

# DRAFT

# Supplemental Environmental Assessment

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For the

Proposed Seismic Upgrade and Renovation of Buildings 205 and 208

VA Greater Los Angeles Healthcare System  
West Los Angeles Medical Center  
Los Angeles, California

Prepared for the Department of Veterans Affairs



Prepared by:

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April 24, 2015

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## 1.0 INTRODUCTION

### 1.1 Project Background

In May 2012, the Department of Veterans Affairs (VA) completed an Environmental Assessment (EA) for the *Proposed Seismic Upgrade and Renovation of Building 209* (2012 EA<sup>1</sup>) located at the West Los Angeles VA Medical Center (WLA) campus of the VA Greater Los Angeles Healthcare System (GLA). The purpose of the 2012 EA was to determine the potential environmental impacts caused by renovating and operating Building 209 for a therapeutic supportive housing program for homeless Veterans. The 2012 EA resulted in a Finding of No Significant Impact, and rehabilitation of historic Building 209 is nearly complete. Since completing the 2012 EA, the VA has expanded the scope of the original project to include two additional historic buildings – Buildings 205 and 208, located adjacent to Building 209. This Supplemental EA (SEA) has been prepared to evaluate the potential environmental impacts caused by increasing the scope of the project.

### 1.2 Purpose and Need

The purpose and need of the proposed action remains the same from the 2012 EA - to provide a facility for a therapeutic supportive housing program for Veterans who are homeless and for whom previous recovery attempts have failed. The program will focus on supportive employment and daily life skills necessary to live effectively among others, care for themselves in a healthy way, and meet the Veterans' reasonable life goals.

### 1.3 Scope of Analysis

This SEA examines the potential environmental and socioeconomic impacts that would result from the proposed increase to the original project scope. The alternatives considered remain the same as in the 2012 EA. This SEA also considers the same No Action Alternative as the 2012 EA – to not perform rehabilitation of Buildings 205 or 208. The alternatives considered and the No Action Alternative are not discussed further in this SEA. The reader is directed to the 2012 EA for a description of the alternatives considered and the No Action Alternative.

## **2.0 Description of Proposed Increase to Original Project Scope**

### **2.1 Rehabilitate Buildings 205 and 208 to provide Homeless Veteran's Housing**

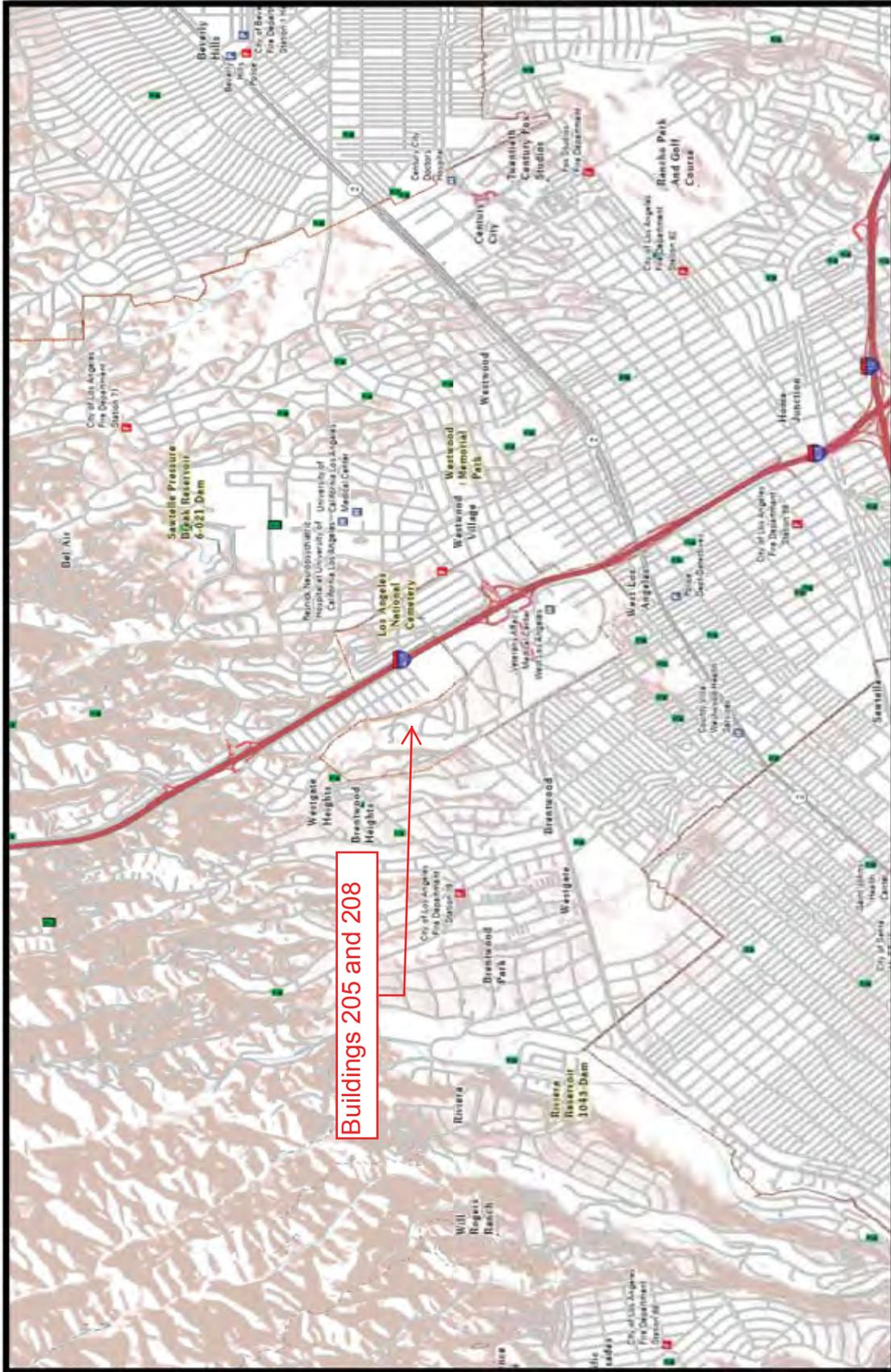
In June 2010, Senator Diane Feinstein (D-Calif.) secured a commitment from then VA Secretary Eric Shinseki to renovate three buildings on the WLA campus to help house and accommodate additional services for the more than 8,000 homeless Veterans in the Greater Los Angeles Area. The first of these three buildings, Building 209, began design planning in November 2010 and received federal capital investment funding in Fiscal Year (FY) 2012; to date, renovation of Building 209 is nearly complete. The other two buildings, Buildings 205 and 208, began design planning activities in September 2013; they are poised to receive federal capital investment funding in FY 2015 and FY 2016, respectively.

Renovation of Buildings 205, 208, and 209 is consistent with the recent settlement agreement reached in January 2015 to help end Veteran homelessness in Greater Los Angeles. As part of the settlement agreement, VA will develop a new Master Plan for the WLA campus by October 2015 of which a key component at the campus will be bridge and permanent supportive housing and services for underserved Veteran populations.

For planning purposes, renovation of Buildings 205, 208, and 209 for homeless programs became part of a larger major project to address seismic, life safety, and facility condition assessment deficiencies of 11 other buildings for a total of 14 buildings. Several of these 11 other buildings are in very early stages of design, and most have not yet started design. As such, request for and receipt of federal capital investment funding for these 11 other buildings is speculative at this time. Likewise, the fate of these 11 other buildings for use other than in the spirit of the settlement agreement is uncertain at this time. Instead of including these 11 other buildings in the analysis of potential environmental impacts in this Supplemental EA, these 11 other buildings will be captured as part of the environmental decision-making process for implementing the upcoming Master Plan.

Figure 1 shows the vicinity map of WLA. Figure 2 shows the location of Buildings 205 and 208 at the campus. Figure 3 shows a recent photograph of Building 205, and Figure 4 shows a recent photograph of Building 208.

Figure 1 – Project Vicinity Map



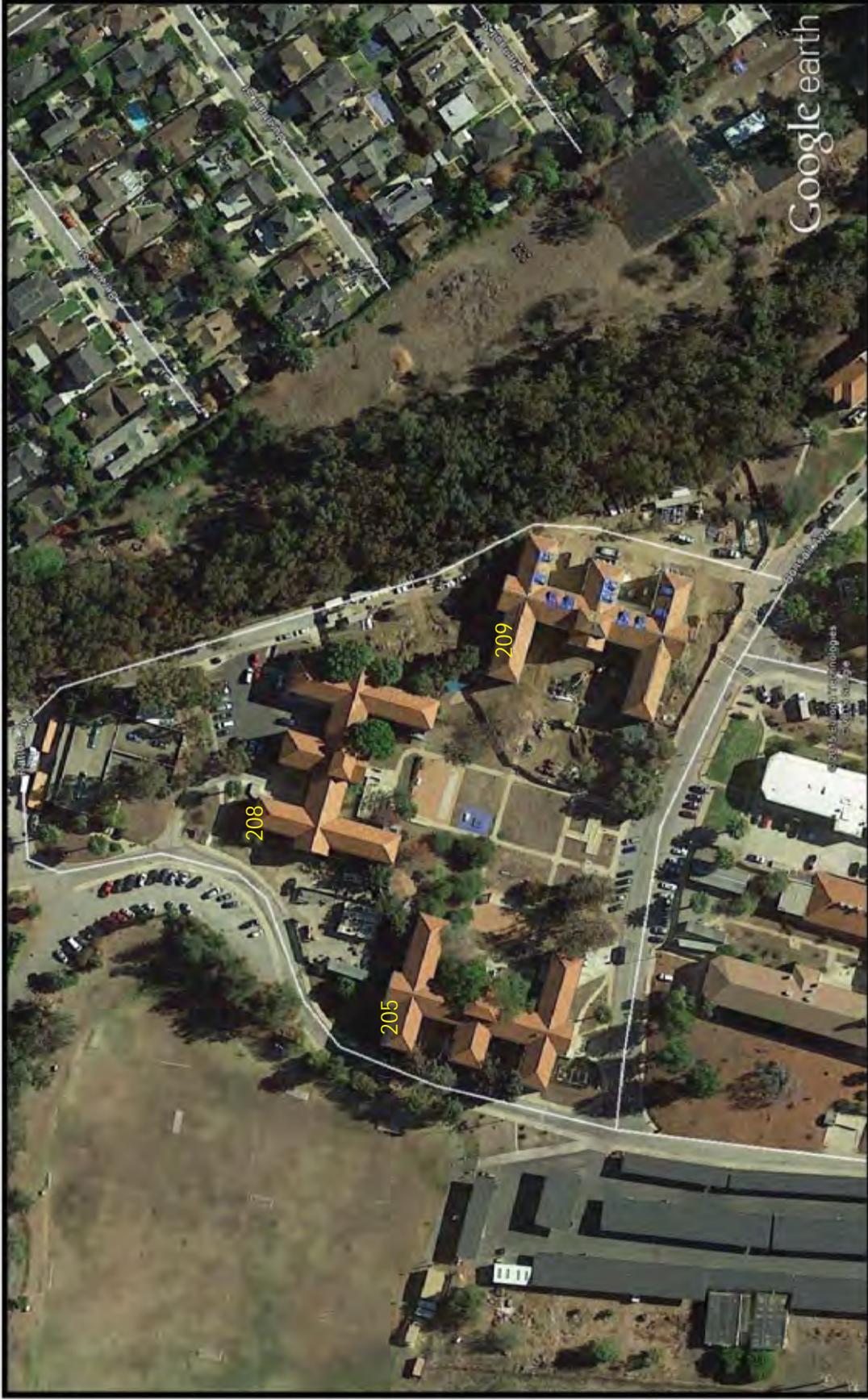
Proposed Project: Seismic Upgrade and Renovation of Buildings 205 and 208

Location: West Los Angeles Medical Center  
Data available from U.S. Geological Survey, National Geospatial Program.

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Figure 2 – Location Map



Proposed Project: Seismic Upgrade and Renovation of Buildings 205 and 208

Location: West Los Angeles Medical Center

Data available from Google Earth

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Figure 3 – Building 205



Proposed Project: Seismic Upgrade and Renovation of Buildings 205 and 208

Location: West Los Angeles Medical Center

Photo by The Leo A Daly, 10/19/2010

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Figure 4 – Building 208



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Proposed Project: Seismic Upgrade and Renovation of Buildings 205 and 208

Location: West Los Angeles Medical Center

## 2.2 Description of Proposed Action

Rehabilitation of Buildings 205 and 208 will include seismic corrections, architectural renovation and interior life safety and building systems upgrades.

### *Seismic Corrections*

The interior structural systems of Buildings 205 and 208 will be modified to have adequate strength to resist the design lateral and moment forces during a major seismic event. This together with non-structural seismic corrections will bring this building to an acceptable level of compliance with current VA, State of California and Federal life safety and structural code requirements. Strengthening will include:

- Diaphragm
  - The building diaphragms (horizontal floors, roof, etc.) will be strengthened as follows:
    - Roof: New plywood sheathing will be added under the existing clay roof tiles (tiles will be removed then reinstalled)
    - Concrete Floor Slabs: The concrete floor slabs will be strengthened by adding reinforced concrete to the areas between the existing ribs located on the underside of the floor slab.
- Concrete Beam / Column Reinforcement
  - Reinforced concrete will be added to the existing columns and pilasters at the exterior walls as required.
  - Beams: Reinforced concrete will be added to each side of the existing concrete beams.
  - Connections between horizontal elements and vertical elements (walls/columns, etc.) will be modified / upgraded
- Non-Structural
  - The building interior will be completely renovated and all new systems will be provided and installed to meet current codes. All non-structural elements provided will be installed and braced as required to meet current VA and seismic code requirements.

### *Architectural Renovation*

Both buildings 205 and 208 will be completely renovated. With the exception of the structural system and exterior building envelope, all systems and interior elements will be replaced.

In summary, the renovations will include the following:

- Building 205
  - New VA accessible ramps (avoid using 'handicap') will be provided at all exterior entrances
  - New accessible toilet facilities will be provided
  - New panic hardware and doors will be provided at all exits
  - New code compliant signage will be provided
  - A new continuous handrail will be provided at the existing stairs
  - Two additional stairways will be added to meet current life-safety code requirements
  - The exterior ground will be regraded, new storm drains and lines installed, and waterproofing added in order to divert storm water away from foundations and basement.
  - The building interior will be entirely reconfigured to support new residential units, staff offices and support facilities per the VA provided program.
  - Repair or Replace all metal sash windows to match the original historical design
  - Add glass Entry Canopy
  - Add New Plaza at South Elevation
  - A new garden will be installed at the area between B205 and B208
  - The building exterior will be repaired, cleaned and painted
  - New central VAV HVAC system will be provided, installed and commissioned
  - New copper plumbing will be installed to meet the current VA legionella directive
  
- Building 208
  - General Exterior
    - Plaster finish will be protected during construction and repaired or patched where damage is evident due to efflorescence, delamination, spalling, etc. Loose and flaking paint will be manually removed and the exterior will be painted. Proposed paint color will closely match the historical, integrally colored stucco and will be consistent with Buildings 205 and 209.
  - New VA accessible ramps (avoid using 'handicap') will be provided at all exterior entrances
  - New accessible toilet facilities will be provided
  - New panic hardware and doors will be provided at all exits
  - New code compliant signage will be provided
  - New central VAV HVAC system will be provided, installed and commissioned
  - A new continuous handrail will be provided at the existing stairs
  - Two additional stairways will be added to meet current life-safety code requirements

- The exterior ground will be regarded, new storm drains and lines installed, and waterproofing added in order to divert storm water away from foundations and basement.
- The building interior will be entirely reconfigured to support new residential units, staff offices and support facilities per the VA provided program.
- Repair or Replace all metal sash windows to match the original historical design
- Add glass Entry Canopy
- Add New Plaza at South Elevation
- A new garden will be installed at the area between B205 and B208
- The building exterior will be repaired, cleaned and painted
- Replace flat built-up roofing at connecting corridors, which has reached end of life.
- Replace roof tiles as needed and re-roof flat roof at enclosed passageway.
- Repair or replace original metal sash windows
- Replace Handicap Accessible Ramp
- Add New Glass Entry Canopy
- Add New Entrance Atrium
- New copper plumbing will be installed to meet the current VA legionella directive

#### *Life Safety and Building Systems Upgrades*

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

- Buildings 205 and 208
  - Add compliant Emergency Exits & signage
  - Installation of New Ductwork system
  - Additional Stair Entrances to Comply with Fire Code
  - New Stairwells to Comply with Fire Code
  - New accessible ramps at entrances

### 3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED ACTION

#### 3.1 Affected Environments and Environmental Consequences

Project Actions are evaluated for construction and operational impacts. The criteria for evaluating potential impacts are the same as the 2012 EA. For the operational phase, there is no significant change in impacts to any of the affected environments as evaluated in the 2012 EA. For the construction phase, two environmental resources with potential impact changes will be evaluated in more detail. Table 2 presents a summary of changes to potential impacts for seventeen Affected Environments:

<b>Environmental Resource</b>	<b>Change</b>
Aesthetics	No Substantial Change
Air Quality	No Substantial Change
Cultural Resources	See Section 3.1.1 For Additional Information
Geology and Soils	No Substantial Change
Hydrology and Water Quality	No Substantial Change
Wildlife and Habitat	No Substantial Change
Noise	No Substantial Change
Land Use	No Substantial Change
Floodplains, Wetlands and Coastal Zone Management	No Substantial Change
Socioeconomics	No Substantial Change
Community Services	No Substantial Change
Solid Waste and Hazardous Materials	No Substantial Change
Transportation and Parking	No Substantial Change
Utilities	No Substantial Change
Environmental Justice	No Substantial Change
Cumulative Impacts	See Section 3.1.2 for Additional Information
Potential for Generating Substantial Controversy	No Substantial Change

### 3.1.1 Cultural Resources

Like Building 209, Buildings 205 and 208 are contributing resources to the WLA Veterans Affairs Historic District. As such, the VA consulted with the California State Historic Preservation Officer (SHPO) as required by Section 106 of the National Historic Preservation Act. The VA and SHPO evaluated the rehabilitation of Buildings 205 and 208 to determine if the project actions would cause “adverse effects” to historic properties due to:

- (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 part 68) and applicable guidelines;
- (3) Neglect of a property which causes its deterioration

SHPO concurred with the VA 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 (Appendix A).

### 3.1.2 Cumulative Impacts

Cumulative impacts are the impacts of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. (CEQ NEPA Regulations 40 C.F.R. § 1508.7).<sup>3</sup>

Future actions considered for cumulative impact analysis include:

- Seismic and facility improvements to Building 500
- Construction of a new acute care center adjacent to Building 500
- Metro Purple Line Subway Extension
- Proposed construction of a new research center on the south campus,
- Proposed construction of a Veterans Benefit Administration Regional Office
- Proposed construction of a new community living center (nursing home)
- Proposed improvements to the Veterans Memorial Park
- Proposed expansion of the Los Angeles National Cemetery

- Proposed rehabilitation of eleven historic buildings on the WLA North Campus

Direct impacts from construction and renovation impacts are typically constrained to the limits of construction and are temporary in nature. If other construction occurs within the same schedule as the proposed action such as construction of a new columbarium or new tower, temporary traffic impacts may need to be considered.

The proposed project would result in similar impacts identified throughout Section 3 of the 2012 EA. These primarily include less-than-significant adverse impacts to aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, wildlife and habitat, noise, solid and hazardous materials, and transportation and parking. All of these impacts are further reduced through careful implementation of best management practices and management measures, and compliance with regulatory requirements as identified throughout Section 3 of the 2012 EA. As such, the proposed project's incremental contribution to any significant cumulative impact will be rendered less than cumulatively considerable and thus not significant.

No adverse effects to land use, floodplains, wetlands, and coastal zones, socioeconomics, community services, utilities, or environmental justice would occur as a result of the proposed action. As such, no cumulative adverse effects to any of these resource areas are anticipated.

#### **4.0 PUBLIC INVOLVEMENT**

The draft version of this SEA will be made available for public review and comment for fifteen (15) days. VA will publish a Notice of Availability (NOA) in a regional newspaper; the NOA and SEA will also be posted on the VA GLA website and be available in three regional libraries (see Appendix B for more details). The VA will consider all comments received in the preparation of the final SEA.

#### **5.0 MITIGATION**

Section 5.0 in the 2012 EA details the required mitigation measures to ensure that no environmental resource is significantly impacted. The proposed action to rehabilitate Buildings 205 and 208 will comply with all of the mitigation measures implemented for Building 209.

## 6.0 CONCLUSION

The analysis performed in this SEA concludes that there would be no significant adverse impact, either individually or cumulatively, to the human environment, provided mitigation measures and commitments consisting of best management practices and all appropriate, required, and applicable regulatory compliance measures described in the 2012 EA are fully implemented. Therefore, this SEA concludes that a Finding of No Significant Impact is appropriate for the Rehabilitation of Buildings 205 and 208 and that an Environmental Impact Statement is not required.

## 7.0 LIST OF PREPARERS

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## 8.0 REFERENCES CITED

1. 2012 EA. Final Environmental Assessment of the Proposed Seismic Upgrade and Renovation of Building 209, Los Angeles, CA.
2. 40 C.F.R. § 1508.7 CEQ NEPA Regulations

## 9.0 LIST OF REQUIRED PERMITS

1. ORDER NO. R4-2009-00068 (CAG674001) Discharges of Low Threat Hydrostatic Test Water to Surface Waters
2. South Coast Air Quality Management District Notification of Demolition or Asbestos Removal

## 10.0 LIST OF ACRONYMS

- CEQ – Center for Environmental Quality
- EA – Environmental Assessment
- GLA – Greater Los Angeles Healthcare System
- NEPA – National Environmental Policy Act
- NOA – Notice of Availability
- SHPO – State Historic Preservation Officer
- VA – Department of Veterans Affairs
- WLA – Veterans Affairs Medical Center West Los Angeles

## **APPENDIX A**

### **Agency Communications**

1. VA Communications with the California State Historic Preservation Officer
  - a. February 18, 2015 – SHPO Concurrence Letter
  - b. February 6, 2015 – VA Response Letter
  - c. January 15, 2015 – SHPO Response Letter
  - d. December 15, 2014 – VA Section 106 Submittal Package
2. VA Letter to L.A. Conservancy, WLA Medical Center
  - a. April 1, 2014

**OFFICE OF HISTORIC PRESERVATION  
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February 18, 2015

Reply in Reference To: VA\_2014\_1219\_001

Daniel Swienton  
Department of Veterans Affairs  
Office of Construction and Facilities Management  
1175 Nimitz Avenue, Suite 200  
Vallejo, CA 94592

Re: Section 106 Consultation for Rehabilitation of Buildings 205 and 208, West Los Angeles Veterans Administration Historic District, West Los Angeles Veterans Affairs Medical Center (DS-Oct152014)

Dear Mr. Swienton:

At my request, the VA has provided additional information and clarification regarding their proposal to rehabilitate buildings 205 and 208 at the West Los Angeles Veterans Affairs Medical Center. After reviewing this information, I offer the following comments:

- 1) &It is my understanding the following CA SHPO recommendations will be incorporated in the undertaking's scope of work:
  - Concealment of a VAV unit in a hallway.
  - Centering of a door in an opening
  - Ceilings are confirmed as remaining held back from windows.
  - Windows at the elevator shaft are confirmed as using transparent glass and a wall will be built behind the windows.
  - & Mechanical systems will be confined to units, allowing corridor ceilings to remain as high as possible. Please note that when character-defining features are intended to be retained, they should be clearly identified and their treatment clearly described. Defining significant spaces is not the same as defining character-defining features within that space.
- 2) &The VA answered most of CA SHPO's questions with parallels made between building 209 and the scope for buildings 205 and 208. As references to Building 209 would have facilitated the original review, I recommended that when applicable, parallels be clearly made in future consultations.
- 3) &Based on the information provided I am able to concur that all work as proposed meets the Secretary of the Interior's Standards and that historic properties will not be adversely affected by the undertaking pursuant to 36 CFR Part 800.5(b). Please be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, you may have future responsibilities for this undertaking under 36 CFR Part 800.

Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact Ed Carroll (916) 445-006/[Ed.Carroll@parks.ca.gov](mailto:Ed.Carroll@parks.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Carol Roland-Nawi, Ph.D.".

Carol Roland-Nawi, PhD  
State Historic Preservation Officer

February 6, 2015

VIA FEDERAL EXPRESS

Carol Roland-Nawi, PhD  
State Historic Preservation Officer  
California Office of Historic Preservation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816  
Attn: Ed Carroll

Re: Department of Veterans Affairs Greater Los Angeles Healthcare System  
West Los Angeles Healthcare Center  
SHPO No.: VA\_2014\_1219\_001  
VA Project No.: 691-406: Buildings 205 208

Dear Ms. Roland-Nawi:

Thank you for your response dated January 15, 2015 regarding consultation on the rehabilitation of Building 205 and 208 on the VA Greater Los Angeles Healthcare System (GLAHS), West Los Angeles Medical Center (WLA) campus. The following responds to your comments and questions.

**Area of Potential Effects**

***OHP Comment 1:*** Pursuant to 36 CFR Part 800.4(a)(1), I recommend that the APE be delineated as the West Los Angeles Veterans Administration Historic District in its entirety.

**Response:** 36 CFR Part 800.4(a)(1) states, "Determine and document the area of potential effects, as defined in §800.16(d). 36 CFR Part 800.16(d) defines the Area of Potential Effects (APE) as:

the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

The definition is clearly written to provide sufficient flexibility required for each unique situation. Neither 36 CFR Part 800.4(a)(1) nor 36 CFR Part 800.16(d) require delineating the APE as the entirety of a historic district. While the undertaking is located at the West Los Angeles VA Historic District, it consists of two contributing buildings to that historic property. Given the size of the historic district (approximately 506 acres with 66 contributing buildings, structures, sites, and landscape features), and nature of the undertaking (rehabilitation of two buildings in conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards)*), the geographic area that may reasonably be directly or indirectly effected is restricted to an approximately 5-foot wide band around Building 205 and Building 208, as well as the

landscaped area directly between the two buildings. This relatively limited APE was selected to ensure that any impacts to the two contributing resources would be detected by the analysis, rather than lost in the context of a district-wide APE. In addition, the consultation package addresses impacts to the district as a whole, stating in a number of locations that as “described in schematic drawings, rehabilitation of Buildings 205 and 208 is consistent with the *Secretary’s Standards* and therefore would not have an adverse effect on the buildings **or the identified historic district** (emphasis added).”

## **Building 205**

### Window Replacement

**OHP Comment 2:** *Replacement window product information was not submitted so it is not possible to review its compatibility with the documentary and physical evidence. Please submit product information for replacement windows and demonstrate its compatibility.*

**Response:** See replacement window product information attached [**Attachment 1**]. As essentially all windows in Building 205 consist of contemporary, aluminum sash windows, replacement with ones that more closely match the original steel sash windows, evidenced in adjacent Buildings 208 and 209, will restore a lost feature.

### Infilled Porches

**OHP Comment 3:** *Replacement window product information was not submitted and so it is not possible to review its compatibility with the documentary and physical evidence. Please submit product information for replacement windows and demonstrate its compatibility.*

**Response:** Windows at east ends of the north and south wings are set within wide insets that are arched on the second floor. Based on historic photographs and drawings, these areas were originally a screen porch with wide openings enclosed with a three part screen. These porches were infilled by 1964 with rectangular windows. The infills have not taken on significance over time and these non-historic windows will be replaced with new steel sash. See replacement window product information attached [**Attachment 2**].

### Emergency Exiting

**OHP Comment 4:** *The east elevation door is shown as centered on the created opening, but the doors placed in created openings on the east side of the center wing are shown as engaging the wall on one side and so not centered on the windows above thereby presenting an unbalanced appearance. OHP recommends infill door/transom that reflects the former window.*

**Response:** No new openings are proposed for the east elevation of Building 205. The main, east, elevation faces a landscaped plateau and is proposed to be retained.

### Mechanical Enclosure

**OHP Comment 5:** *Unless this is the “Existing Central Utility Plant Per Building 205 Contract Documents.” This new mechanical enclosure is not shown on any submittals. Building 205 design documents were not submitted with this review.*

**Response:** See site plan, (drawing AS101 for Building 208) for proposed location of mechanical enclosure. The new, enclosed mechanical enclosure will serve both Buildings 205 and 208 and is proposed to be located at the rear, north elevation of Building 208 in an area that currently functions as surface parking.

### Interior

**OHP Comment 6:** *Character-defining features are stated to be retained, but no character-defining features are listed in the narrative. Existing and original walls, floors and ceilings need to be identified and described.*

**Response:** Significant Spaces Diagrams were included as **Attachment D** in the Consultation Package and are included again for convenience with this letter [**Attachment 3**]. These diagrams identify areas of primary, secondary, and tertiary significance for Building 205 and were generated using guidance provided in the National Park Service publication Preservation Brief 17: *Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character*. The publication focuses on “identifying those visual and tangible aspects of the historic building” that convey its significance.<sup>1</sup>

As noted on page 3 of the Consultation Package, as a contributing building to the historic district, the exterior envelope of the building is the most significant feature and retains the highest degree of integrity; it was therefore identified as having primary significance. Similarly, on the interior, areas of primary significance are the building’s public spaces, which are also its circulation. Aside from terrazzo in the stairwells, surface materials do not contribute to areas of primary significant spaces. Areas of secondary significance include the first floor entrance and lobby, elevator lobbies at all floors, and former wards that retain integrity. No surface materials in secondary significant areas are character-defining. Most interior spaces have been altered over the years to accommodate changing uses and needs; these areas have generally been identified as having tertiary significance. At the exterior, metal fire escapes, concrete stoop, and handicap accessible ramp have also been identified as areas of tertiary significance as these are areas that were previously altered.

### Entrance Atrium

**OHP Comment 7:** *How does the open area of the new entrance atrium incorporate a terrazzo floor with borders that delineate demolished walls? Describe the treatment of the new entrance atrium floor.*

**Response:** As seen in Current Photo 15-16 that accompanied the Consultation Package (also reproduced below), terrazzo floor roughly outlines the main lobby floor. The majority of the main lobby floor consists of contemporary, square floor tile. Multi-colored tiles are located closer to the main entrance (photo 16). As noted above, these small areas of terrazzo floor do not appear to be a character-defining feature of this secondary significant space. Terrazzo floor in the main lobby is not proposed to be retained; rather a new, contemporary terrazzo floor is proposed in the entrance atrium. This work conforms with the *Secretary’s Standards*, specifically standard 9, as new work will be differentiated from the old, but will be compatible with it.

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<sup>1</sup> Lee H. Nelson, FAIA, Preservation Brief 17: Architectural Character Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character, National Park Service, Technical Preservation Services, 1988, <<http://www.nps.gov/history/hps/tps/briefs/brief17.htm>>.



Current Photo 15: Building 205, interior, main lobby, view east (Chattel, 2010)



Current Photo 16: Building 205, interior, main lobby, view west (Chattel, 2010)

#### Installation of New Ductwork

**OHP Comment 8:** *Best practices allows for ductwork-free corridors to maintain original ceiling heights in public areas that were typically free of obstructions. Ductwork usually runs inside of units to maintain ductwork-free corridors.*

**Response:** To clarify, all mechanical systems and ductwork will be installed interior to the units, allowing the ceiling of the corridor to be as high as possible and remain ductwork-free.

#### **Building 208**

##### Infilled Porches

**OHP Comment 9:** *Replacement window product information was not submitted so it is not possible to review its compatibility with the documentary and physical evidence. Please submit product information for replacement windows and demonstrate its compatibility.*

**Response:** See response to comments #2 and #3 above. Replacement window product information is included as **Attachment 2**.

##### Emergency Exiting

**OHP Comment 10:** *The east elevation door is shown as centered on the created opening, but the doors placed in created openings on the east side of the center wing are shown as engaging the wall on one side and so not centered on the windows above thereby presenting an unbalanced appearance. OHP recommends infill door/transom that reflects the former window*

**Response:** Per OHP's recommendation, we will study installing wider emergency doors on the east side of the center wing to better fit the existing window opening, thereby presenting a more balanced appearance. Along with the wider door, we will study installing a glass transom above, matching the light pattern in the windows above. A glass transom would provide additional light into a multipurpose room where these doors are located.

##### Interior

**OHP Comment 11:** *Character-defining features are stated to be retained, but no character-defining features are listed in the narrative. Existing and original walls, floors and ceilings need to be identified and described. Ceilings observed in building sections vary, but range from around 6 inches above the head trim to level with head trim and in some cases below head trim.*

*All ceilings in units must engage the wall above windows at least 6 inches above the head trim a distance of three feet minimum before transitioning lower.*

- *& Ceiling plenums in corridors appear to be very generous and appear to be concealing duct crossings in locations. Ductwork should be shaped as flat and close to the ceiling as possible to provide the highest ceilings possible. Social space 239 appears to contain an exposed VAV, while the dropped ceiling engages windows next to it. Mechanical equipment and ductwork must remain concealed in hallways.*
- *& Random areas of structural ceiling appear to be exposed in both the corridor and in units. Originally the ceilings were most likely finished, and hard plaster ceilings may still be extant. These ceilings should remain and as much ceiling as possible should remain at that original height.*
- *& Hallways are shown as significant spaces but the narrative does not explain why, or describe which elements rendering the corridors significant are retained. It is noted in the photos that several floors and baseboards are terrazzo. Please clarify whether terrazzo floors and baseboards will be retained in corridors. Please confirm that the windows at the elevator are transparent glass.*

**Response:** Significant Spaces Diagrams were included as **Attachment D** in the Consultation Package and are included again for convenience with this letter [**Attachment 3**]. These maps identified areas of primary, secondary, and tertiary significance for Building 208 and were generated using guidance provided in the National Park Service publication Preservation Brief 17: *Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character*.

As noted on page 4 of the Consultation Package, as a contributing building to the historic district, the exterior envelope of the building is the most significant feature and retains the highest degree of integrity; it was therefore identified as having primary significance. Similarly, on the interior, areas of primary significance are the building's public spaces, which are also its circulation. Aside from terrazzo in the stairwells, surface materials do not contribute to areas of primary significant spaces. Areas of secondary significance include the first floor entry and lobby, elevator lobby at all floors, and former wards that retain integrity. No surface materials in secondary significant areas are character-defining. Most interior spaces have been altered over the years to accommodate changing uses and needs and these areas have generally been identified as having tertiary significance. At the exterior, metal fire escapes, concrete stoop, and handicap accessible ramp have also been identified as areas of tertiary significance as these are areas that were previously altered.

While corridor ceilings may have been originally finished in hard plaster, these materials are no longer evident. Corridor currently have suspended ceilings or tiles (see Current Photos 34 and 39, also reproduced below).



Current Photo 34: Building 208, interior, typical first floor corridor (Chattel, 2010)



Current Photo 39: Building 208, interior, typical third floor corridor (Chattel, 2010)

Corridor ceilings will follow the pattern set in the rehabilitation of Building 209, which is located adjacent to Building 208 and was the subject of consultation completed in 2012. Recent photographs of completed corridors are provided below. Corridor ceiling heights will be kept as high as possible and finished with a hard lid. While there are some areas of the corridors with terrazzo baseboard, as noted above, these small areas of terrazzo floor do not appear to be a character-defining feature and will not be retained. Throughout the building, as well as in Social Space 239, no dropped ceiling will engage windows. Dropped ceiling will be cut around all windows so that windows are completely visible on interior of building and not visible from exterior. All windows will be a minimum of 18-inches and, where possible, attempt to accommodate a distance of three feet.



Building 209, typical completed corridor (Chattel, 2015)



Building 209, detail of typical completed corridor (Chattel, 2015)

The exposed VAV shown in drawings in Social Space 239 was a mistake in the drawings that has been corrected in subsequent sets.

The window at the elevator will have transparent glass. A solid wall will be constructed on the interior, set back from the window.

### Entrance Atrium

**OHP Comment 12:** *How does the open area of the new entrance atrium incorporate a terrazzo floor with borders that delineate demolished walls? Describe the treatment of the new entrance atrium floor.*

**Response:** As seen in Current Photo 31-32 that accompanied the Consultation Package (also reproduced below), terrazzo floor roughly outlines the main lobby floor. The majority of the main lobby floor consists of contemporary, square floor tile. As noted above, these small areas of terrazzo floor do not appear to be a character-defining feature of this secondary significant space. Terrazzo floor in the main lobby is not proposed to be retained; rather a new, contemporary terrazzo floor is proposed in the entrance atrium. This work conforms with the *Secretary's Standards*, specifically standard 9, as new work will be differentiated from the old, but will be compatible with it.



Current Photo 31: Building 208, interior, main entrance, view south (Chattel, 2010)



Current Photo 32: Building 208, interior from main entrance, view north (Chattel, 2010)

### Installation of New Ductwork

**OHP Comment 13:** *Best practices allows for ductwork-free corridors to maintain original ceiling heights in public areas that were typically free of obstructions. Ductwork usually runs inside of units to maintain ductwork-free corridors.*

**Response:** To clarify, all mechanical systems and ductwork will be installed interior to the units, allowing the ceiling of the corridor to be as high as possible and remain ductwork-free.

**OHP Comment #14:** *Due to discrepancies regarding the treatment ceilings and windows, questions regarding whether the corridors will retain their existing integrity of materials at the ceiling, floor and baseboard and lack of demonstration as to whether the replacement windows will be compatible with documentary and physical evidence, I am unable to concur the undertaking meets the Standards.*

**Response:** See response to comments #1-13. As described above, the proposed project continues to fully conform with the *Secretary's Standards for Rehabilitation*.

### Conclusion

As described in the consultation package and clarified in this letter, the rehabilitation of Buildings 205 and 208 is consistent with the *Secretary's Standards* and therefore would not have an adverse

effect on the buildings, APE or the identified historic district. We respectfully request your concurrence in a finding of no adverse effect.

Sincerely yours,



Daniel Swinton  
Project Manager  
US Department of Veterans Affairs  
Office of Construction and Facilities Management (OO3C1D-ds)

Attachments

cc: & Kathleen Schamel  
& Federal Preservation Officer  
Historic Preservation Office (OOCFM)  
& Office of Construction Facilities Management  
Department of Veterans Affairs  
811 Vermont Avenue, NW  
Washington, DC 20420

**OFFICE OF HISTORIC PRESERVATION  
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January 15, 2015

Reply in Reference To: VA\_2014\_1219\_001

Daniel Swienton  
Department of Veterans Affairs  
Office of Construction and Facilities Management  
1175 Nimitz Avenue, Suite 200  
Vallejo, CA 94592

Re: Section 106 Consultation for Rehabilitation of Buildings 205 and 208, West Los Angeles Veterans Administration Historic District, West Los Angeles Veterans Affairs Medical Center (DS-Oct152014)

Dear Mr. Swienton:

Thank you for initiating consultation regarding the Department of Veteran's Affairs (VA) efforts to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 300101), as amended, and its implementing regulation found at 36 CFR Part 800.

The VA has identified the undertaking as the rehabilitation of Buildings 205 and 208 at the West Los Angeles Veterans Affairs Medical Center. Buildings 205 and 208, constructed in 1937 and 1944 respectively, are contributing elements to the West Los Angeles Veterans Administration Historic District. The VA is requesting my concurrence that all proposed work will conform to the Secretary of the Interior's Standards (Standards) and historic properties will not be adversely affected by the undertaking. After reviewing the provided documentation, including schematic drawings, maps, and photographs, I have the following comments regarding the section 106 process:

- 1) Pursuant to 36 CFR Part 800.4(a)(1), I recommend that the APE be delineated as the West Los Angeles Veterans Administration Historic District in its entirety.
- 2) For the reasons provided in this letter, I am presently unable to concur that the proposed undertaking will not adversely affect historic properties.

Below are comments addressing the undertaking's scope of work (as described in detail in the VA's December 2014 letter and attachments) and their consistency with the Standards.

**Building 205**

Exterior plaster finish will be protected during construction and repaired or patched where damage is evident due to efflorescence, delamination, spalling, etc. Loose and flaking paint will be manually removed and the exterior will be painted and the proposed paint color will closely match the historical, integrally colored stucco and will be consistent with Buildings 208 and 209

### *Handicap accessible ramp*

The existing handicap accessible ramp is proposed to be replaced with a new ramp, following the design of the new ramp at Building 209 across the landscaped plateau. While the proposed ramp and stairs will project further from the building than the existing ramp, they will not project beyond the north and south wings. The ramp and stairs will be constructed of concrete to match the building, with limited areas of metal railing.

Given the grade change, a secondary ramping system is proposed to be constructed along the west elevation to allow for emergency exiting. The proposed ramping system will incorporate most of the area between the wings along the west elevation and will be combined with terraced gardens. At the west elevation, the proposed ramp will be located immediately adjacent to the building, and will have only minimal connections to it, so as to not damage historic materials.

It is my understanding the proposed ramps and stairs will be differentiated from the building and will be compatible in materials, size, scale and proportion, and massing to protect the integrity of the building. The proposed ramps and stairs will be constructed of concrete to match the building and a simple metal railing will be compatible with the character of the building.

### *Window Replacement*

As essentially all windows in Building 205 consist of contemporary, aluminum sash windows, they are proposed to be replaced with new, aluminum windows in existing openings to match the original steel sash windows, evidenced in adjacent Buildings 208 and 209, as closely as possible. To address energy efficiency concerns, all glass is proposed to consist of higher performance laminated glass, which is being installed in Building 209.

In the few instances where original steel sash windows are extant, they will be retained and rehabilitated. Window sash will be removed from frames. Light rust, flaking and excessive paint will be removed from both sash and frames using a combination of manual and mechanical abrasion or by chemical means. Exposed metal surfaces will be immediately primed with a rust-inhibiting primer. Counter balances will be rehabilitated or replaced, based on their level of deterioration. All steel sections will be repainted with two coats of finish paint compatible with the primer. Finally masonry surrounds will be caulked with a high quality elastomeric.

**OHP Comment:** Replacement window product information was not submitted so it is not possible to review its compatibility with the documentary and physical evidence. Please submit product information for replacement windows and demonstrate its compatibility.

### *Infilled Porches*

Building 205 also originally had wide openings enclosed with a three part screen at ends of the short wings. All of the porches have been infilled with small rectangular windows that fill the openings. These window infills have not taken on significance over time and will be replaced with new aluminum sash. Original drawings show screens with wood frames and were generally double hung sash however these screens are no longer extant. New window screens are proposed to be installed on all windows to restore a lost feature. Screen frames will be made out of aluminum extrusions to match the dimensions of the original wood screen frames and will match

the original design (double hung screens at double hung windows and fixed screens elsewhere). Screens will be factory painted to match window frames and will have a black powder coated stainless steel screen to maximize visibility.

The National Park Service provides considerable guidance on window sash replacement and generally recommends that windows are "a significant part of the exterior envelope of most buildings and are important in defining the historic character of a building" and advises retaining historic windows whenever possible." As almost all windows have been previously replaced, the proposed replacement would restore a lost feature as new window sash are proposed to be compatible with historic window sash in "configuration, color, operability, number and size of panes, profile and proportion of metal sections, and reflective quality of the original glass." Furthermore, the proposed replacement of contemporary windows is consistent with the *Secretary's Standards*, specifically standard 6 as the replacement of missing features is based on documentary and physical evidence.

**OHP Comment:** Replacement window product information was not submitted and so it is not possible to review its compatibility with the documentary and physical evidence. Please submit product information for replacement windows and demonstrate its compatibility.

### *Emergency Exiting*

Metal fire escapes were installed after 1984 on the north elevation of the south wing and the north elevation of the north wing. Emergency exit doors were opened in the former porches to allow access to the fire escapes. In addition, a metal fire escape was also installed along at the north elevation of the central wings along the rear, west elevation. All three contemporary fire escapes are proposed to be removed, along with the metal doors leading out to the fire escapes. Door openings will be returned to window openings, patching surrounding concrete to match. The metal fire escapes have not taken on significance since they were installed and thus their removal is consistent with the *Secretary's Standards* as they retain and preserve distinctive materials and features of the building (*Standards 4 and 5*).

Three new emergency exits are proposed:

- One will replace an existing window at the rear, west elevation at the basement level. A second emergency exit will be created by converting a single metal door to a double metal door at the center of the south elevation, also at the basement level.
- Finally, a third emergency exit will replace an existing window toward the east side of the south elevation.

**OHP Comment:** The east elevation door is shown as centered on the created opening, but the doors placed in created openings on the east side of the center wing are shown as engaging the wall on one side and so not centered on the windows above thereby presenting an unbalanced appearance. OHP recommends infill door/transom that reflects the former window.

### *Entry Canopy*

New glass canopies supported by steel beams are proposed at the main, east entrance, as well as an existing secondary exit along the north elevation and the proposed emergency exit along the

south elevation. No part of the new steel and glass canopies are proposed to attach to the historic building.

#### *Plaza at South Elevation*

A new plaza is proposed to be located along the south elevation. The plaza will mirror the one located along the south elevation of Building 209. Access to the plaza will be via an existing door. In addition to a contemporary loading dock, landscape at the south elevation where the new plaza is proposed consists of grass, small shrubs, and a single palm tree, none of which are contributing landscape features to the National Register historic district.

#### *Mechanical Enclosure*

A new, enclosed mechanical enclosure that will serve both Buildings 205 and 208 is proposed at the rear, north elevation of Building 208. The enclosed mechanical enclosure will be adjacent to a loading and surface parking at the rear, north elevation of Building 208. This area currently serves as surface parking and the proposed mechanical enclosure is consistent with *Secretary's Standards 2, 5, 9* as the historic character will be retained and preserved, distinctive materials and features will be preserved, and new additions will not destroy spatial relationships.

**OHP Comment:** Unless this is the “Existing Central Utility Plant Per Building 205 Contract Documents” This new mechanical enclosure is not shown on any submittals. Building 205 design documents were not submitted with this review.

#### *Interior*

Proposed work on the interior will retain the double-loaded, north-south corridor and the two stairs on each floor. New interior demising walls will be constructed and will avoid existing window openings.

Ceilings in the retained north-south corridors will be finished and pan joists will not be visible. To the greatest extent feasible, new mechanical systems will be installed in interior units, thereby retaining as high a ceiling as possible in the corridor. Fire closet doors, to the maximum extent feasible, will be salvaged and reused where appropriate throughout the building. Ceilings in interior units may expose pan joists in some areas.

**OHP Comment:** Character-defining features are stated to be retained, but no character-defining features are listed in the narrative. Existing and original walls, floors and ceilings need to be identified and described.

#### *Seismic Retrofit*

Three options that achieve necessary seismic strengthening were studied. The selected option will strengthen concrete beams with concrete, as well as strengthen floor framing and strengthen the roof diaphragm with plywood sheathing and blocking between joists. As part of this work, roof tiles will be salvaged and reinstalled.

### *Entrance Atrium*

An entrance atrium is proposed to be created by opening up the first floor ceiling to create a double height entrance lobby between the first and second floors. A stair in the new entrance lobby will link first and second floors and the second floor balcony will be delineated in wood and have a glass railing. As the space affected has been identified as an area of lesser significance, it can accommodate greater alteration. The existing first floor entrance lobby is generally undistinguished and there are no distinctive materials or features. Creating an entrance atrium will enhance the entry sequence for the building.

A new atrium is consistent with the *Secretary's Standards* if it is minimally damaging to historic materials, small in size, covered so that it remains an interior space, clearly evident as a new feature carved out of the existing building, and finished in a manner compatible with the historic character of the building.

**OHP Comment:** How does the open area of the new entrance atrium incorporate a terrazzo floor with borders that delineate demolished walls? Describe the treatment of the new entrance atrium floor.

### *Installation of New Ductwork*

The proposed plan generally places new unit bathrooms along the corridor, thereby allowing ductwork to be collected from each unit to minimize the number of roof penetrations. All mechanical systems will be installed along the interior of the corridor, allowing the ceiling of the corridor to be as high as possible.

**OHP Comment:** Best practices allows for ductwork-free corridors to maintain original ceiling heights in public areas that were typically free of obstructions. Ductwork usually runs inside of units to maintain ductwork-free corridors.

### *Additional Stairwell Entrance*

To comply with current fire code requirements, new entrances to the existing stairwells will be added, along with a short spur of the stairs.

### *New Stairwells*

To comply with current fire code requirements, two new stairwells will be constructed at the east end of north and south wings. These new stairs will exit directly out at the basement along the south elevation and the first floor along the north elevation.

### **Building 208**

Plaster finish will be protected during construction and repaired or patched where damage is evident due to efflorescence, delamination, spalling, etc. Loose and flaking paint will be manually removed and the exterior will be painted. Proposed paint color will closely match the historical, integrally colored stucco and will be consistent with Buildings 205 and 209.

### *Handicap Accessible Ramp*

The existing handicap accessible ramp is proposed to be replaced with a new ramp, following the design of the new ramp at Building 209. While the proposed ramp and stairs will project further from the building than the existing ramp, they will not project beyond the north and south wings. The ramp and stairs will be constructed of concrete to match the building, with limited areas of metal railing.

The proposed ramps and stairs will be differentiated from the building and will be compatible in materials, size, scale and proportion, and massing to protect the integrity of the building. The proposed ramp and stairs will be constructed of concrete to match the building and a simple metal railing will be compatible with the character of the building.

### *Window Rehabilitation*

As Building 208 retains most of its original steel sash windows, they are proposed to be retained and rehabilitated. Window sash will be removed from frames. Light rust, flaking and excessive paint will be removed from both sash and frames using a combination of manual and mechanical abrasion or by chemical means. Exposed metal surfaces will be immediately primed with a rust-inhibiting primer. To address energy efficiency concerns, all existing glass will be replaced with higher performance laminated glass, following the model established by Building 209. Counter balances will be rehabilitated or replaced, based on their level of deterioration. All steel sections will be repainted with two coats of finish paint compatible with the primer. Finally masonry surrounds will be caulked with a high quality elastomeric caulk. For previously replaced or no longer extant windows, new aluminum windows will be installed in those openings to match the existing as closely as possible. Similarly, existing steel sash windows that are severely deteriorated beyond the ability to be rehabilitated will be replaced with a new aluminum window. Severe deterioration will be photographically documented prior to removal.

### *Infilled Porches*

Building 208 also originally had wide openings enclosed with a three part screen at ends of the short wings. All of the porches have been infilled with smaller rectangular windows that fill the opening. These window infills have not taken on significance over time and will be replaced with new aluminum sash. Original drawings show screens with wood frames and were generally double hung sash however these screens are no longer extant. New window screens are proposed to be installed on all windows to restore a lost feature. Screen frames will be made out of aluminum extrusions to match the dimensions of the original wood screen frames and will match the original design (double hung screens at double hung windows and fixed screens elsewhere). Screens will be factory painted to match window frames and will have a black powder coated stainless steel screen to maximize visibility.

**OHP Comment:** Replacement window product information was not submitted so it is not possible to review its compatibility with the documentary and physical evidence. Please submit product information for replacement windows and demonstrate its compatibility.

### *Emergency Exiting*

Metal fire escapes were installed after 1984 on the east elevation of the west wing and the west elevation of the east wing. Emergency exit doors were opened in the former porches to allow access to the fire escapes. Both fire escapes are proposed to be removed, along with the metal doors leading out to them. Door openings will be returned to window openings, patching surrounding concrete to match. The metal fire escapes have not taken on significance since they were installed. Four, new, emergency exits are proposed.

- One will replace an existing window on the south end of the west elevation, in the basement.
- A second will replace an existing window at the south end of the east elevation at the first floor.
- Two more will be located at the north elevation, along the central wing facing east at the first floor.

**OHP Comment:** The east elevation door is shown as centered on the created opening, but the doors placed in created openings on the east side of the center wing are shown as engaging the wall on one side and so not centered on the windows above thereby presenting an unbalanced appearance. OHP recommends infill door/transom that reflects the former window

### *Entry Canopy*

New glass canopies supported by steel beams are proposed at the main, south entrance, as well as the proposed emergency exits along the east and west elevations. No part of the new steel and glass canopies are proposed to attach to the historic building.

### *Interior*

Proposed work on the interior will retain the double-loaded, east-west corridor and the two stairs on each floor. New interior demising walls will be constructed and will avoid existing window openings.

Ceilings in the retained east-west corridors will be finished and pan joists will not be visible. To the greatest extent feasible, new mechanical systems will be installed in interior units, thereby retaining as high a ceiling as possible in the corridor. Fire closet doors, to the maximum extent feasible, will be salvaged and reused where appropriate throughout the building. Ceilings in interior units may expose pan joists in some areas.

**OHP Comment:** Character-defining features are stated to be retained, but no character-defining features are listed in the narrative. Existing and original walls, floors and ceilings need to be identified and described. Ceilings observed in building sections vary, but range from around 6 inches above the head trim to level with head trim and in some cases below head trim. All ceilings in units must engage the wall above windows at least 6 inches above the head trim a distance of three feet minimum before transitioning lower.

- & Ceiling plenums in corridors appear to be very generous and appear to be concealing duct crossings in locations. Ductwork should be shaped as flat and close to the ceiling as

possible to provide the highest ceilings possible. Social space 239 appears to contain an exposed VAV, while the dropped ceiling engages windows next to it. Mechanical equipment and ductwork must remain concealed in hallways.

- & Random areas of structural ceiling appear to be exposed in both the corridor and in units. Originally the ceilings were most likely finished, and hard plaster ceilings may still be extant. These ceilings should remain and as much ceiling as possible should remain at that original height.
- & Hallways are shown as significant spaces but the narrative does not explain why, or describe which elements rendering the corridors significant are retained. It is noted in the photos that several floors and baseboards are terrazzo. Please clarify whether terrazzo floors and baseboards will be retained in corridors. Please confirm that the windows at the elevator are transparent glass.

### *Seismic Retrofit*

Three options that achieve necessary seismic strengthening were studied. The selected option will strengthen concrete beams with concrete, as well as strengthen floor framing and strengthen the roof diaphragm with plywood sheathing and blocking between joists. As part of this work, roof tiles will be salvaged and reinstalled.

### *Entrance Atrium*

An entrance atrium is proposed to be created by opening up the first floor ceiling to create a double height entrance lobby between the first and second floors. A stair in the new entrance lobby will link first and second floors and the second floor balcony will be delineated in wood and have a glass railing. As the space affected has been identified as an area of lesser significance, it can accommodate greater alteration. The existing first floor entrance lobby is generally undistinguished and there are no distinctive materials or features. Creating an entrance atrium will enhance the entry sequence for the building.

A new atrium is consistent with the *Secretary's Standards* if it is minimally damaging to historic materials, small in size, covered so that it remains an interior space, clearly evident as a new feature carved out of the existing building, and finished in a manner compatible with the historic character of the building.

**OHP Comment:** How does the open area of the new entrance atrium incorporate a terrazzo floor with borders that delineate demolished walls? Describe the treatment of the new entrance atrium floor.

### *Installation of New Ductwork*

The proposed plan generally places new unit bathrooms along the corridor, thereby allowing ductwork to be collected from each unit to minimize the number of roof penetrations. All mechanical systems will be installed along the interior of the corridor, allowing the ceiling of the corridor to be as high as possible.

**OHP Comment:** Best practices allows for ductwork-free corridors to maintain original ceiling heights in public areas that were typically free of obstructions. Ductwork usually runs inside of units to maintain ductwork-free corridors.

*Additional Stairwell Entrance*

- & To comply with fire code, new entrances to the existing stairwells will be added, along with a short spur of the stairs.

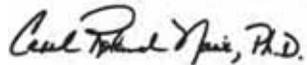
*New Stairwells*

- & Also to comply with fire code, two new stairwells will be constructed at the south end of east and west wings. These new stairs will exit directly out at the first floor.

**OHP Comment:** Due to discrepancies regarding the treatment ceilings and windows, questions regarding whether the corridors will retain their existing integrity of materials at the ceiling, floor and baseboard, and a lack of demonstration as to whether the replacement windows will be compatible with documentary and physical evidence, I am unable to concur the undertaking meets the Standards.

Thank you for seeking my comments and considering historic properties as part of your project planning. I look forward to continuing this consultation with the VA. If you have any questions or concerns, please contact Mark Huck at (916) 445-7011/Mark.Huck@parks.ca.gov or Ed Carroll (916) 445-7006/Ed.Carroll@parks.ca.gov.

Sincerely,



Carol Roland-Nawi, PhD  
State Historic Preservation Officer



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: DS-Oct152014

December 15, 2014

VIA FEDERAL EXPRESS

Carol Roland-Nawi, Ph.D  
State Historic Preservation Officer  
Department of Parks and Recreation  
Office of Historic Preservation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816  
Attn: Ed Carroll, State Historian I

Re: Department of Veterans Affairs Greater Los Angeles Healthcare System  
West Los Angeles Healthcare Center  
VA Project No. 691-406: Buildings 205 & 208  
National Historic Preservation Act Section 106 Consultation Package

Dear Ms. Roland-Nawi:

In compliance with Section 106 of the National Historic Preservation Act, please find enclosed a consultation package focusing on rehabilitation of two historic buildings, Building 205 and Building 208 at VA's West Los Angeles Healthcare Center. The consultation package, completed by our historic preservation consultant, summarizes consulting parties contributions, establishes an Area of Potential Effects (APE), identifies historic properties within the APE, assesses the undertaking for adverse effects to historic properties, and recommends that the rehabilitation of Buildings 205 and 208 conforms with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, specifically the *Secretary of the Interior's Standards for Rehabilitation*, there will be no adverse effect.

We appreciate your prompt attention in reviewing the report and respectfully request your consideration and concurrence with VA's finding of no adverse effect. If you have any questions regarding the report, please contact Daniel Swienton at 707-562-8418 or Daniel.Swienton@va.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Daniel Swienton".

enclosures

cc: Kathleen Schamel, Federal Preservation Officer, U.S. Department of Veterans Affairs  
Jenna Snow, Principal Associate, Chattel Architecture  
Nicos A. Katsellis, Leo A. Daly

**DEPARTMENT OF VETERANS AFFAIRS GREATER LOS ANGELES HEALTHCARE SYSTEM  
WEST LOS ANGELES HEALTHCARE CENTER  
VA PROJECT No. 691-406: BUILDINGS 205 & 208  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106 CONSULTATION PACKAGE**

*Prepared for:*

Department of Veterans Affairs  
Greater Los Angeles Healthcare System

*Prepared by:*

Chattel, Inc.  
13417 Ventura Boulevard  
Sherman Oaks, CA 91423

December 2014



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## I. UNDERTAKING

This consultation report was prepared for the United States Department of Veterans Affairs (VA) for a portion of Project No. 691-406. This VA project initially consisted of work on 11 buildings located on the VA Greater Los Angeles Healthcare System (GLAHS), West Los Angeles Medical Center (WLA) campus. In 2012, one of the 11 buildings, Building 209 (SHPO Project No. VA110720A), was considered on an expedited schedule from the other 10 buildings. Consultation for the Building 209 undertaking was completed in 2012 and that project is currently under construction. VA Project No. 691-406 now involves a total of 15 buildings (see Attachment G), all of which have been identified as contributing resources to a National Register of Historic Places (National Register) listed historic district. As noted in Attachment G, work on the remaining buildings may include seismic retrofit, rehabilitation, deactivation, and possible demolition.

This consultation package has been prepared to support consultation as required under Section 106 of the National Historic Preservation Act of 1966, as amended (Section 106), for seismic retrofit and rehabilitation of Buildings 205 and 208 (the undertaking), which are also proceeding on an expedited schedule. Buildings 205 and 208 are located at the north end of the campus on a plateau with Building 209. Like Building 209, the two buildings are proposed to be rehabilitated to accommodate long term therapeutic supportive housing program for veterans. Building 205 will have 47 studio and one bedroom units and will also accommodate spaces for supportive services and multipurpose areas, including, possibly, a café. Building 208 will have 54 studio and one bedroom units and will also accommodate spaces for supportive services and multipurpose areas.

The following report summarizes consulting parties; establishes an Area of Potential Effects (APE); identifies historic properties in the APE that may be affected by the proposed undertaking; and describes the undertaking in detail, evaluating it for consistency with the *Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards)*. As described in this consultation package, both Buildings 205 and 208 contribute to a historic district at the WLA campus. Based on an analysis of the undertaking, this consultation package includes a recommended finding that the proposed seismic retrofit and rehabilitation is consistent with the *Secretary's Standards* and thus will have no adverse effect on any historic property.

## II. CONTRACTOR QUALIFICATIONS

This consultation package was prepared by Chattel, Inc. (Chattel) to assist the VA in its obligations under Section 106. Chattel, a full-service historic preservation consulting firm with statewide practice, has been contracted by Leo A. Daly. Comprised of professionals meeting the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61, Appendix A) in architectural history and historic architecture, the firm offers professional services including historic property evaluation and project effects analysis, and consultation on federal, state and local historic preservation statutes and regulations.

## III. CONSULTING PARTIES

The California State Historic Preservation Office and Los Angeles Conservancy have been identified as consulting parties. Public comments will be accepted concurrently with the National Environmental Policy Act (NEPA) process. Consultation with Native American Tribes has begun; no Federally-recognized tribes were identified, but ten state-recognized tribes were invited to consult and four responded to the invitation (see Attachment E).

#### IV. IDENTIFICATION OF HISTORIC PROPERTIES

##### Area of Potential Effects

The APE is limited to the footprint and an approximately 5-foot wide band around Building 205 and Building 208 (Attachment A, Maps 1 and 2), as well as the landscaped area directly between the two buildings.

##### West Los Angeles Veterans Administration Historic District

Implementing regulations of Section 106 in 36 CFR §800.4(c)1 defines a “historic property” as any district, site, structure, building, or object that is included in or eligible for inclusion in the National Register. One historic property was identified within the APE: the National Register listed West Los Angeles Veterans Administration Historic District (WLA VA Historic District), to which Buildings 205 and 208 are contributing resources.

Originally constructed as the Pacific Branch of the National Home for Disabled Volunteer Soldiers (NHDVS) for Civil War veterans, the campus opened May 1, 1888. The site transferred in 1930 to the newly formed Veterans Administration, now Department of Veterans Affairs.

A 2014 National Register nomination form WLA VA Historic District National Register reconsidered the whole campus and incorporates information from several previous National Register identification efforts (Attachment A, map 1). The WLA VA Historic District is significant as an excellent, intact example of a Second Generation Veterans Hospital that was built on the campus of the first NHDVS branch on the West Coast. The WLA VA Historic District is significant under criterion A at the statewide level for its contribution to the “development of a national policy for veteran health care.”<sup>1</sup> The WLA VA Historic District is a “tangible manifestation of the federal government’s commitment to the health care of veterans of World War I, which resulted in the nation’s largest network of hospitals.”<sup>2</sup> The WLA VA Historic District is also significant under criterion C, “exhibiting nationally popular Colonial Revival architectural styles.”<sup>3</sup> The Veterans Administration Construction Services established the propriety of Mission Revival style to reflect the colonial past of southern California.

Buildings 205 and 208 were constructed in 1937 and 1944, respectively, along with five other neuropsychiatric hospital buildings that were constructed at the north end of the campus in an H-shape plan (Attachment B, Historic Photos 1-2). The seven buildings are all designed in a simplified Mission revival style, which had been adopted as the common architectural style for the campus as early as 1928. Expression of Mission revival style was restrained, identifiable by smooth stucco wall surfaces, *terra cotta* roof tiles, and ornamental grills over the lower half of the steel sash double-hung windows that substituted for the more typical window bar restraints. Other common features included porches at each end of the perpendicular wings. Like most other VA neuropsychiatric hospital buildings,<sup>4</sup> porches at WLA were infilled by 1964.

Buildings 205 and 208 are contributing resources to the WLA VA Historic District both as a Second Generation Veterans Hospital as well as for their Mission Revival style architecture. As noted above, the two buildings contribute to the historic district for their historic use as neuropsychiatric hospital buildings as well as for their design in a Mission Revival style. While the relationship

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<sup>1</sup> Suzanne Julin, “National Home for Disabled Volunteer Soldiers: Assessment of Significance and National Historic Landmark Recommendations” (prepared for the United States Department of Veterans Affairs, 2007).

<sup>2</sup> Trent Spurlock, Craig A. Potts, Karen E. Hudson, Cultural Resources Analysts, Inc., “United States Second Generation Veterans Hospitals,” *National Register of Historic Places Multiple Property Documentation Form* (prepared for the United States Department of Veteran Affairs, September 3, 2010), E1.

<sup>3</sup> Spurlock, Potts, and Hudson, E1.

<sup>4</sup> Spurlock, Potts, and Hudson, E55.

between buildings on the landscaped plateau contributes to the National Register historic district, the specific landscape features, including mature trees and walkways, was installed in 1964 and has not taken on significance over time are not contributing features.

## **Building 205**

### Physical Description

Building 205, a contributing building to the WLA VA Historic District, was constructed in 1937 as the first neuropsychiatric hospital building in the group of seven buildings at the north end of the campus. It is located on a landscaped plateau, with Buildings 208 and 209 (Attachment B, Historic Photos 1-9, Attachment C, Current Photos 1-22).

Building 205 is generally H-shaped and designed with elements of Mission Revival style. It is three stories high with its lowest (basement) level partially below grade at two elevations. An enclosed passageway leads from the basement to adjacent Building 208. Constructed of reinforced concrete, the building is clad in smooth stucco with a cross gable roof capped in *terra cotta* tiles. Windows are regularly spaced on each elevation and generally consist of contemporary, single hung, aluminum sash, although a handful of original, multi-light, metal, double-hung sash remain. The main entrance is centrally located in the east elevation, accessed by a flight of stairs and a handicap accessible ramp. A secondary entrance is located at the south elevation. Exterior metal fire escapes are located at the north elevation of the south wing, as well as the north elevation of the north wing.

On the interior, primary circulation is provided by H-shaped, double-loaded corridors at each floor. Stairwells are located at the north and south ends of the main north-south corridor and have internal cages extending their full height. Some corridors generally retain coved terrazzo bases. Aside from stairwells, most spaces have suspended ceilings, often obscuring window heads. Some former wards at the end of the north and south wings retain their original plan and consist of two large spaces.

### Alterations

The most significant alteration to Building 205 includes replacement of almost all windows and infill of large openings at the former open-air porches at the north and south wings. The main entry stair has been replaced with an extended concrete stoop and a handicap accessible ramp. Metal fire escape stairs have been added to the north and south wings, infilling a window in each location. The interior has been altered over time to accommodate changing requirements and technological advances. Most interior finishes are contemporary, including walls, corridor flooring, and suspended ceilings. A therapeutic swimming pool in the basement was infilled (date unknown).

### Significant Spaces

As identified in significant spaces diagrams (Attachment D), areas of primary significance include the exterior building envelope, which is the main feature that contributes to the historic district. Additional areas of primary significance include interior primary circulation of the main corridor and two stairwells on each floor. Areas of secondary significance include the first floor entrance and lobby, elevator lobbies at all floors, and former wards that retain integrity. Areas of tertiary significance include all other interior spaces. At the exterior, metal fire escapes, concrete stoop, and handicap accessible ramp have also been identified as areas of tertiary significance.

## **Building 208**

### Physical Description

Building 208, also a contributing building to the WLA VA Historic District, was constructed in 1944 as a neuropsychiatric hospital building. It is located toward the north end of the campus on a landscaped plateau, grouped between buildings 205 and 209 (Attachment B, Historic Photos 1-11; Attachment C, Current Photos 23-41).

Building 208 is generally H-shaped and designed with elements of Mission Revival style. It is three stories high with its lowest (basement) level partially below grade. Enclosed passageways lead from the basement to adjacent Buildings 205 and 209. Constructed of reinforced concrete, the building is clad in smooth stucco with a cross gable roof capped in *terra cotta* tile. Windows are regularly spaced on each elevation and generally consist of multi-light, metal, double-hung sash. The main entrance is centrally located in the south elevation, accessed by a flight of stairs and handicap accessible ramp. A secondary entrance is located at the north elevation. Exterior, metal fire escapes are located at the east elevation of the west wing and the west elevation of the east wing, facing the main, south elevation.

On the interior, primary circulation is provided on each floor by H-shaped, double-loaded corridors. Stairwells are located at the east and west ends of the main east-west corridor and have internal cages extending their full height. Stairs are clad in terrazzo and corridors generally retain a coved terrazzo base. The basement and second floors have suspended ceilings, often obscuring window heads. Former wards at the ends of the east and west wings retain their original plan and consist of two large spaces.

#### *Alterations*

In addition to replacement of a few original steel sash windows, large openings for open-air porches at east and west wings have been infilled. The entry stair has been replaced with an extended concrete stoop and a handicap accessible ramp has been added. Metal fire escape stairs have been added to the east and west wings. The interior has been altered over time to accommodate changing requirements and technological advances. While the interior retains its primary circulation patterns, including the main east-west corridor and two stairwells on each floor, most interior spaces have been altered with new partition walls and suspended ceilings.

#### Significant Spaces

As identified in significant spaces diagrams (Attachment D), areas of primary significance include the exterior building envelope, which is the main feature that contributes to the historic district. Additional areas of primary significance include interior primary circulation of the main corridor and two stairwells on each floor. Areas of secondary significance include the first floor entry and lobby, elevator lobby at all floors, and former wards that retain integrity. Areas of tertiary significance include all other interior spaces. At the exterior, metal fire escapes, concrete stoop, and handicap accessible ramp have also been identified as areas of tertiary significance.

#### **Archaeology**

No archaeologically sensitive sites are located within the APE. Therefore, there is very little potential for National Register-eligible archaeological resources. A completed archaeological report is included as Attachment E.

#### **ASSESSMENT OF ADVERSE EFFECTS**

The proposed work is described in schematic drawings prepared by Leo A Daly and engineering drawings prepared by Nabih Youssef Associates and involves seismic retrofit and reuse of Buildings 205 and Building 208 (Attachment F, Schematic Drawings). With slight variation to accommodate differences between buildings, rehabilitation follows that of Building 209. While some secondary spaces on the interior will not be retained, the proposed work appears consistent with the *Secretary's Standards* and thus will have no adverse effect on either building and therefore will have no adverse effect on the historic district.

## **Building 205**

The following describes proposed work and evaluates it for conformance with the *Secretary's Standards*.

### Exterior

Limited work is proposed on the exterior. Plaster finish will be protected during construction and repaired or patched where damage is evident due to efflorescence, delamination, spalling, etc. Loose and flaking paint will be manually removed and the exterior will be painted. Proposed paint color will closely match the historical, integrally colored stucco and will be consistent with Buildings 208 and 209.

### *Handicap accessible ramp*

The existing handicap accessible ramp is proposed to be replaced with a new ramp, following the design of the new ramp at Building 209 across the landscaped plateau. While the proposed ramp and stairs will project further from the building than the existing ramp, they will not project beyond the north and south wings. The ramp and stairs will be constructed of concrete to match the building, with limited areas of metal railing.

Given the grade change, a secondary ramping system is proposed to be constructed along the west elevation to allow for emergency exiting. The proposed ramping system will incorporate most of the area between the wings along the west elevation and will be combined with terraced gardens.

This work is consistent with the *Secretary's Standards*, specifically standards 5, 9, and 10. Consistent with standard 5 distinctive features that characterize the property will be preserved, as the existing ramp is not a character-defining feature. Consistent with standard 9, the proposed ramp and stairs at the main, east elevation will not destroy historic materials, features, and spatial relationships that characterize the building. At the west elevation, the proposed ramp will be located immediately adjacent to the building, and will have only minimal connections to it, so as to not damage historic materials. The proposed ramps and stairs will be differentiated from the building and will be compatible in materials, size, scale and proportion, and massing to protect the integrity of the building. The proposed ramps and stairs will be constructed of concrete to match the building and a simple metal railing will be compatible with the character of the building. Finally, the proposed ramps and stairs will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the building would be unimpaired, consistent with standard 10.

### *Window replacement*

As essentially all windows in Building 205 consist of contemporary, aluminum sash windows, they are proposed to be replaced with new, aluminum windows in existing openings to match the original steel sash windows, evidenced in adjacent Buildings 208 and 209, as closely as possible. To address energy efficiency concerns, all glass is proposed to consist of higher performance laminated glass, which is being installed in Building 209.

In the few instances where original steel sash windows are extant, they will be retained and rehabilitated. Window sash will be removed from frames. Light rust, flaking and excessive paint will be removed from both sash and frames using a combination of manual and mechanical abrasion or by chemical means. Exposed metal surfaces will be immediately primed with a rust-inhibiting primer. Counter balances will be rehabilitated or replaced, based on their level of deterioration. All steel sections will be repainted with two coats of finish paint compatible with the primer. Finally masonry surrounds will be caulked with a high quality elastomeric.

Building 205 also originally had wide openings enclosed with a three part screen at ends of the short wings. All of the porches have been infilled with small rectangular windows that fill the openings.

These window infills have not taken on significance over time and will be replaced with new aluminum sash.

Original drawings show screens with wood frames and were generally double hung sash. Screens are no longer extant. New window screens are proposed to be installed on all windows to restore a lost feature. Screen frames will be made out of aluminum extrusions to match the dimensions of the original wood screen frames and will match the original design (double hung screens at double hung windows and fixed screens elsewhere). Screens will be factory painted to match window frames and will have a black powder coated stainless steel screen to maximize visibility.

The National Park Service provides considerable guidance on window sash replacement and generally recommends that windows are “a significant part of the exterior envelope of most buildings and are important in defining the historic character of a building” and advises retaining historic windows whenever possible.”<sup>5</sup> As almost all windows have been previously replaced, the proposed replacement would restore a lost feature as new window sash are proposed to be compatible with historic window sash in “configuration, color, operability, number and size of panes, profile and proportion of metal sections, and reflective quality of the original glass.”<sup>6</sup> Furthermore, the proposed replacement of contemporary windows is consistent with the *Secretary’s Standards*, specifically standard 6 as the replacement of missing features is based on documentary and physical evidence.

#### *Emergency exiting*

Metal fire escapes were installed after 1984 on the north elevation of the south wing and the north elevation of the north wing. Emergency exit doors were opened in the former porches to allow access to the fire escapes. In addition, a metal fire escape was also installed along at the north elevation of the central wings along the rear, west elevation. All three contemporary fire escapes are proposed to be removed, along with the metal doors leading out to the fire escapes. Door openings will be returned to window openings, patching surrounding concrete to match. The metal fire escapes have not taken on significance since they were installed and thus their removal is consistent with the *Secretary’s Standards* as they retain and preserve distinctive materials and features of the building (standards 4 and 5).

Three new emergency exits are proposed. One will replace an existing window at the rear, west elevation at the basement level. A second emergency exit will be created by converting a single metal door to a double metal door at the center of the south elevation, also at the basement level. Finally, a third emergency exit will replace an existing window toward the east side of the south elevation. This work is consistent with the *Secretary’s Standards*, specifically standards 1, 2, and 5. Consistent with standard 1, the proposed emergency exits will allow the building to be given a new use that requires minimal change to its distinctive materials, spaces, and spatial relationships. Consistent with standard 2, the historic character of the building will be retained and preserved. The proposed emergency doors will not be visible from the east façade. Consistent with standard 5, distinctive materials, features, and finishes will be preserved.

#### *Entry canopy*

New glass canopies supported by steel beams are proposed at the main, east entrance, as well as an existing secondary exit along the north elevation and the proposed emergency exit along the south elevation. No part of the new steel and glass canopies are proposed to attach to the historic building. This work is consistent with the *Secretary’s Standards*. Consistent with standard 2,

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<sup>5</sup> National Park Service, “INCENTIVES! A Guide to the Federal Historic Preservation Tax Incentives Program for Income-Producing Properties: Avoiding Incompatible Work: Historic Building Exterior – Windows,” <[http://www.nps.gov/history/hps/tps/tax/incentives/avoiding\\_5.htm](http://www.nps.gov/history/hps/tps/tax/incentives/avoiding_5.htm)>, site accessed May 5, 2011.

<sup>6</sup> Sharon C. Park, “Preservation Brief 13: The Repair and Thermal Upgrade of Historic Steel Windows,” National Park Service, <<http://www.nps.gov/history/hps/tps/briefs/brief13.htm>>, site accessed May 5, 2011.

distinctive materials will not be removed. Consistent with standard 9, the proposed canopy is differentiated from the old and clearly appears to be contemporary. Finally, consistent with standard 10, the proposed canopy can be removed in the future without impairing the essential form and integrity of the building.

#### *Plaza at south elevation*

A new plaza is proposed to be located along the south elevation. The plaza will mirror the one located along the south elevation of Building 209. Access to the plaza will be via an existing door. In addition to a contemporary loading dock, landscape at the south elevation where the new plaza is proposed consists of grass, small shrubs, and a single palm tree, none of which are contributing landscape features to the National Register historic district. As the new plaza will not destroy historic materials, features, or spatial relationships and it could be removed in the future without destroying the essential form of the building, is consistent with *Secretary's Standards* 9 and 10.

#### *Mechanical Enclosure*

A new, enclosed mechanical enclosure that will serve both Buildings 205 and 208 is proposed at the rear, north elevation of Building 208. The enclosed mechanical enclosure will be adjacent to a loading and surface parking at the rear, north elevation of Building 208. This area currently serves as surface parking and the proposed mechanical enclosure is consistent with *Secretary's Standards* 2, 5, 9 as the historic character will be retained and preserved, distinctive materials and features will be preserved, and new additions will not destroy spatial relationships.

#### Interior

Proposed work on the interior will retain the double-loaded, north-south corridor and the two stairs on each floor. New interior demising walls will be constructed and will avoid existing window openings. Ceilings in the retained north-south corridors will be finished and pan joists will not be visible. To the greatest extent feasible, new mechanical systems will be installed in interior units, thereby retaining as high a ceiling as possible in the corridor. Fire closet doors, to the maximum extent feasible, will be salvaged and reused where appropriate throughout the building. Ceilings in interior units may expose pan joists in some areas. As interior, character-defining features are proposed to be retained and minimal change is proposed to the building's distinctive materials, features, spaces and spatial relationships, this work is consistent with the *Secretary's Standards* 1 and 2.

#### *Seismic Retrofit*

Three options that achieve necessary seismic strengthening were studied. The selected option will strengthen concrete beams with concrete, as well as strengthen floor framing and strengthen the roof diaphragm with plywood sheathing and blocking between joists. As part of this work, roof tiles will be salvaged and reinstalled. As the seismic work will allow for continued use of the building while avoiding impacts to significant spaces, this work is consistent with the *Secretary's Standards*.

#### *Entrance atrium*

An entrance atrium is proposed to be created by opening up the first floor ceiling to create a double height entrance lobby between the first and second floors. A stair in the new entrance lobby will link first and second floors and the second floor balcony will be delineated in wood and have a glass railing. As the space affected has been identified as an area of lesser significance, it can accommodate greater alteration. The existing first floor entrance lobby is generally undistinguished and there are no distinctive materials or features. Creating an entrance atrium will enhance the entry sequence for the building. A new atrium is consistent with the *Secretary's Standards* if it is minimally damaging to historic materials, small in size, covered so that it remains an interior space, clearly evident as a new feature carved out of the existing building, and finished in a manner

compatible with the historic character of the building.<sup>7</sup> The proposed entrance atrium meets these conditions and is therefore consistent with the *Secretary's Standards*.

#### *Installation of new ductwork*

The proposed plan generally places new unit bathrooms along the corridor, thereby allowing ductwork to be collected from each unit to minimize the number of roof penetrations. All mechanical systems will be installed along the interior of the corridor, allowing the ceiling of the corridor to be as high as possible. This work is consistent with the *Secretary's Standards*.

#### *Additional stairwell entrance*

To comply with fire code, a new entrance to the stairwells will be added, along with a short spur of the stairs. While the stairwells have been identified as a primary character-defining feature of the interior, this work is consistent with the *Secretary's Standards*, specifically standards 1, 2, and 10. Consistent with standard 1, the new doors and stair spurs will allow the building to have a new use that requires minimal change. Consistent with standard 2, the historic character of the building will be retained and preserved. Consistent with standard 10, new doors and stair spurs will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the stairs will be unimpaired.

#### *New stairwells*

Also to comply with fire code, two new stairwells will be constructed at the east end of north and south wings. These new stairs will exit directly out at the basement along the south elevation and the first floor along the north elevation. This work is consistent with the *Secretary's Standards* 1, 2, and 9. Consistent with standard 1, the proposed stairwells will allow the building be given a new use that requires minimal change to its distinctive materials, spaces, and spatial relationships and consistent with standard 2, the historic character of the building will be retained and preserved. In addition, the new stairwells will not destroy historic materials or spatial relationships, consistent with standard 9.

### **Building 208**

The following describes proposed work and evaluates it for conformance with the *Secretary's Standards*.

#### Exterior

Limited work is proposed on the exterior. Plaster finish will be protected during construction and repaired or patched where damage is evident due to efflorescence, delamination, spalling, etc. Loose and flaking paint will be manually removed and the exterior will be painted. Proposed paint color will closely match the historical, integrally colored stucco and will be consistent with Buildings 205 and 209.

#### *Handicap accessible ramp*

The existing handicap accessible ramp is proposed to be replaced with a new ramp, following the design of the new ramp at Building 209. While the proposed ramp and stairs will project further from the building than the existing ramp, they will not project beyond the north and south wings. The ramp and stairs will be constructed of concrete to match the building, with limited areas of metal railing.

This work is consistent with the *Secretary's Standards*, specifically standards 5, 9, and 10. Consistent with standard 5 distinctive features that characterize the property will be preserved, as

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<sup>7</sup> National Park Service, "INCENTIVES! A Guide to the Federal Historic Preservation Tax Incentives Program for Income-Producing Properties: Avoiding Incompatible Work: New Interior Features – Atriums," <[http://www.nps.gov/history/hps/tps/tax/incentives/avoiding\\_21.htm](http://www.nps.gov/history/hps/tps/tax/incentives/avoiding_21.htm)>, site accessed January 6, 2011.

the existing ramp is not a character-defining feature. Consistent with standard 9, the proposed ramp and stairs at the main, east elevation will not destroy historic materials, features, and spatial relationships that characterize the building. The proposed ramp and stairs will be differentiated from the building and will be compatible in materials, size, scale and proportion, and massing to protect the integrity of the building. The proposed ramp and stairs will be constructed of concrete to match the building and a simple metal railing will be compatible with the character of the building. Finally, the proposed ramps and stairs will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the building would be unimpaired, consistent with standard 10.

#### *Window rehabilitation*

As Building 208 retains most of its original steel sash windows, they are proposed to be retained and rehabilitated. Window sash will be removed from frames. Light rust, flaking and excessive paint will be removed from both sash and frames using a combination of manual and mechanical abrasion or by chemical means. Exposed metal surfaces will be immediately primed with a rust-inhibiting primer. To address energy efficiency concerns, all existing glass will be replaced with higher performance laminated glass, following the model established by Building 209. Counter balances will be rehabilitated or replaced, based on their level of deterioration. All steel sections will be repainted with two coats of finish paint compatible with the primer. Finally masonry surrounds will be caulked with a high quality elastomeric caulk. For previously replaced or no longer extant windows, new aluminum windows will be installed in those openings to match the existing as closely as possible. Similarly, existing steel sash windows that are severely deteriorated beyond the ability to be rehabilitated will be replaced with a new aluminum window. Severe deterioration will be photographically documented prior to removal.

Building 208 also originally had wide openings enclosed with a three part screen at ends of the short wings. All of the porches have been infilled with smaller rectangular windows that fill the opening. These window infills have not taken on significance over time and will be replaced with new aluminum sash.

Original drawings show screens with wood frames and were generally double hung sash. Screens are no longer extant. New window screens are proposed to be installed on all windows to restore a lost feature. Screen frames will be made out of aluminum extrusions to match the dimensions of the original wood screen frames and will match the original design (double hung screens at double hung windows and fixed screens elsewhere). Screens will be factory painted to match window frames and will have a black powder coated stainless steel screen to maximize visibility.

Rehabilitation of existing steel sash window assemblies and replacement where existing window assemblies are severely deteriorated or no longer extant is consistent with the *Secretary's Standards*. Consistent with standard 5, distinctive materials will be preserved and consistent with standard 6, deteriorated historic features will be repaired rather than replaced. Also consistent with standard 6, replacement of missing features will be substantiated by documentary and physical evidence.

#### *Emergency exiting*

Metal fire escapes were installed after 1984 on the east elevation of the west wing and the west elevation of the east wing. Emergency exit doors were opened in the former porches to allow access to the fire escapes. Both fire escapes are proposed to be removed, along with the metal doors leading out to them. Door openings will be returned to window openings, patching surrounding concrete to match. The metal fire escapes have not taken on significance since they were installed and thus their removal is consistent with the *Secretary's Standards* as it retains and preserves distinctive materials and features of the building (standards 4 and 5).

Four, new, emergency exits are proposed. One will replace an existing window on the south end of the west elevation. A second will replace an existing window at the south end of the east elevation. Two more will be located at the north elevation, along the central wing facing east. This work is consistent with the *Secretary's Standards*, specifically standards 1, 2, and 5. Consistent with standard 1, the proposed emergency exits will allow the building be given a new use that requires minimal change to its distinctive materials, spaces, and spatial relationships. Consistent with standard 2, the historic character of the building will be retained and preserved. The proposed emergency doors will not be visible from the south façade. Consistent with standard 5, distinctive materials, features, and finishes will be preserved.

#### *Entry canopy*

New glass canopies supported by steel beams are proposed at the main, south entrance, as well as the proposed emergency exits along the east and west elevations. No part of the new steel and glass canopies are proposed to attach to the historic building. This work is consistent with the *Secretary's Standards*. Consistent with standard 2, distinctive materials will not be removed. Consistent with standard 9, the proposed canopy is differentiated from the old and clearly appears to be contemporary. Finally, consistent with standard 10, the proposed canopy can be removed in the future without impairing the essential form and integrity of the building.

#### Interior

Proposed work on the interior will retain the double-loaded, east-west corridor and the two stairs on each floor. New interior demising walls will be constructed and will avoid existing window openings. Ceilings in the retained east-west corridors will be finished and pan joists will not be visible. To the greatest extent feasible, new mechanical systems will be installed in interior units, thereby retaining as high a ceiling as possible in the corridor. Fire closet doors, to the maximum extent feasible, will be salvaged and reused where appropriate throughout the building. Ceilings in interior units may expose pan joists in some areas. As interior character-defining features are proposed to be retained and minimal change is proposed to the building's distinctive materials, features, spaces and spatial relationships, this work is consistent with the *Secretary's Standards* 1 and 2.

#### *Seismic Retrofit*

Three options that achieve necessary seismic strengthening were studied. The selected option will strengthen concrete beams with concrete, as well as strengthen floor framing and strengthen the roof diaphragm with plywood sheathing and blocking between joists. As part of this work, roof tiles will be salvaged and reinstalled. As the seismic work will allow for continued use of the building while avoiding impacts to significant spaces, this work is consistent with the *Secretary's Standards*.

#### *Entrance atrium*

An entrance atrium is proposed to be created by opening up the first floor ceiling to create a double height entrance lobby between the first and second floors. A stair in the new entrance lobby will link first and second floors and the second floor balcony will be delineated in wood and have a glass railing. As the space affected has been identified as an area of lesser significance, it can accommodate greater alteration. The existing first floor entrance lobby is generally undistinguished and there are no distinctive materials or features. Creating an entrance atrium will enhance the entry sequence for the building. A new atrium is consistent with the *Secretary's Standards* if it is minimally damaging to historic materials, small in size, covered so that it remains an interior space, clearly evident as a new feature carved out of the existing building, and finished in a manner compatible with the historic character of the building.<sup>8</sup> The proposed entrance atrium meets these conditions and is therefore consistent with the *Secretary's Standards*.

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<sup>8</sup> National Park Service, "INCENTIVES! A Guide to the Federal Historic Preservation Tax Incentives Program for Income-Producing Properties: Avoiding Incompatible Work: New Interior Features – Atriums," <[http://www.nps.gov/history/hps/tps/tax/incentives/avoiding\\_21.htm](http://www.nps.gov/history/hps/tps/tax/incentives/avoiding_21.htm)>, site accessed January 6, 2011.

*Installation of new ductwork*

The proposed plan generally places new unit bathrooms along the corridor, thereby allowing ductwork to be collected from each unit to minimize the number of roof penetrations. All mechanical systems will be installed along the interior of the corridor, allowing the ceiling of the corridor to be as high as possible. This work is consistent with the *Secretary's Standards*.

*Additional stairwell entrance*

To comply with fire code, a new entrance to the stairwells will be added, along with a short spur of the stairs. While the stairwells have been identified as a primary character-defining feature of the interior, this work is consistent with the *Secretary's Standards*, specifically standards 1, 2, and 10. Consistent with standard 1, the new doors and stair spurs will allow the building to have a new use that requires minimal change. Consistent with standard 2, the historic character of the building may be retained and preserved. Consistent with standard 10, new doors and stair spurs will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the stairs will be unimpaired

*New stairwells*

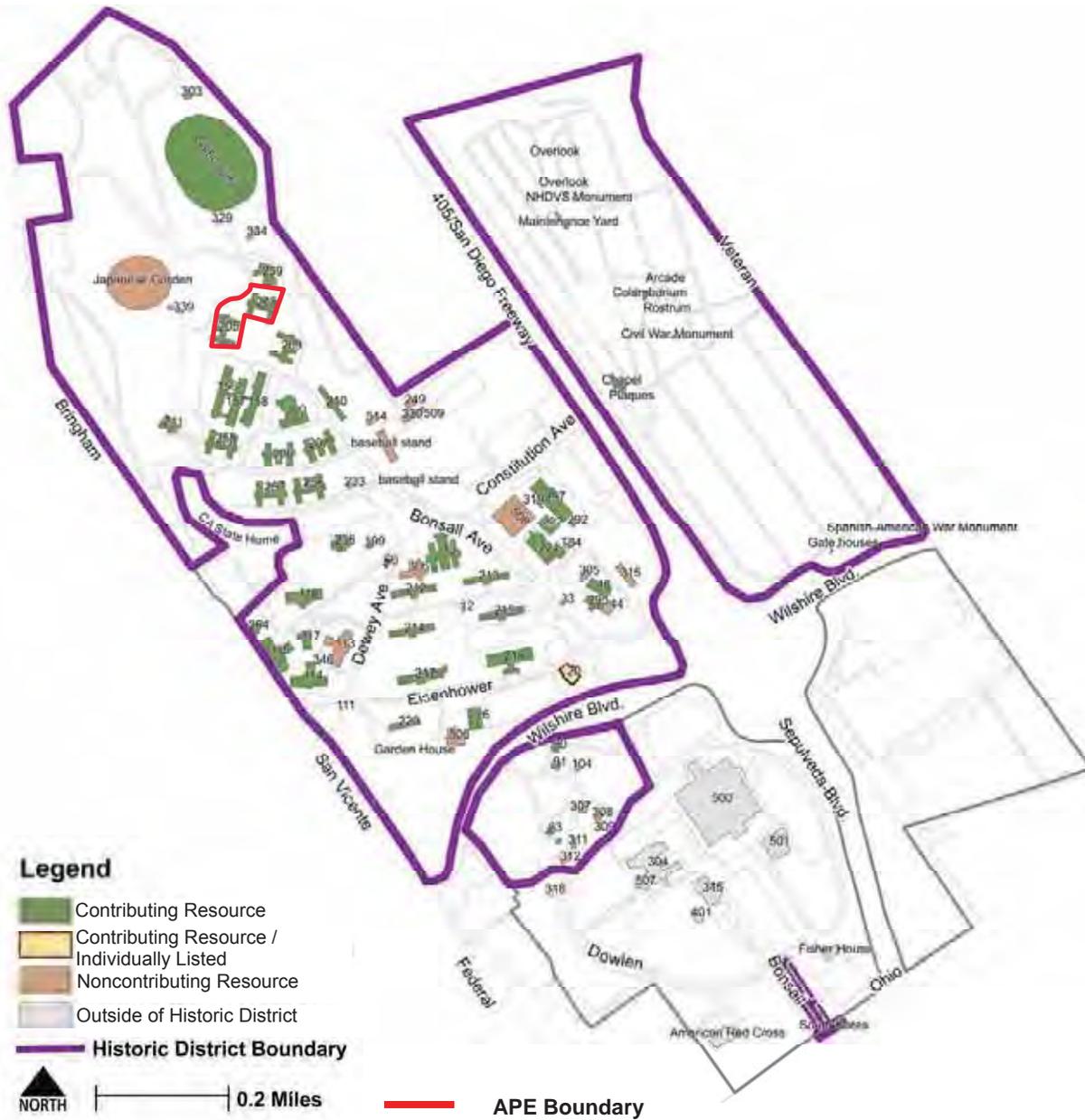
Also to comply with fire code, two new stairwells will be constructed at the south end of east and west wings. These new stairs will exit directly out at the first floor. This work is consistent with the *Secretary's Standards* 1, 2, and 9. Consistent with standard 1, the proposed stairwells will allow the building be given a new use that requires minimal change to its distinctive materials, spaces, and spatial relationships and consistent with standard 2, the historic character of the building will be retained and preserved. In addition, the new stairwells will not destroy historic materials or spatial relationships, consistent with standard 9.

**VI. RECOMMENDED FINDING OF EFFECT**

Building 205 and Building 208 are contributing resources to the National Register listed WLA VA Historic District. Based on our analysis of the proposed undertaking as described in the attached schematic drawings, we recommend that the seismic retrofit and rehabilitation of Buildings 205 and 208 is consistent with the *Secretary's Standards* and therefore will have no adverse effect on any historic property.

## **ATTACHMENT A: MAPS**

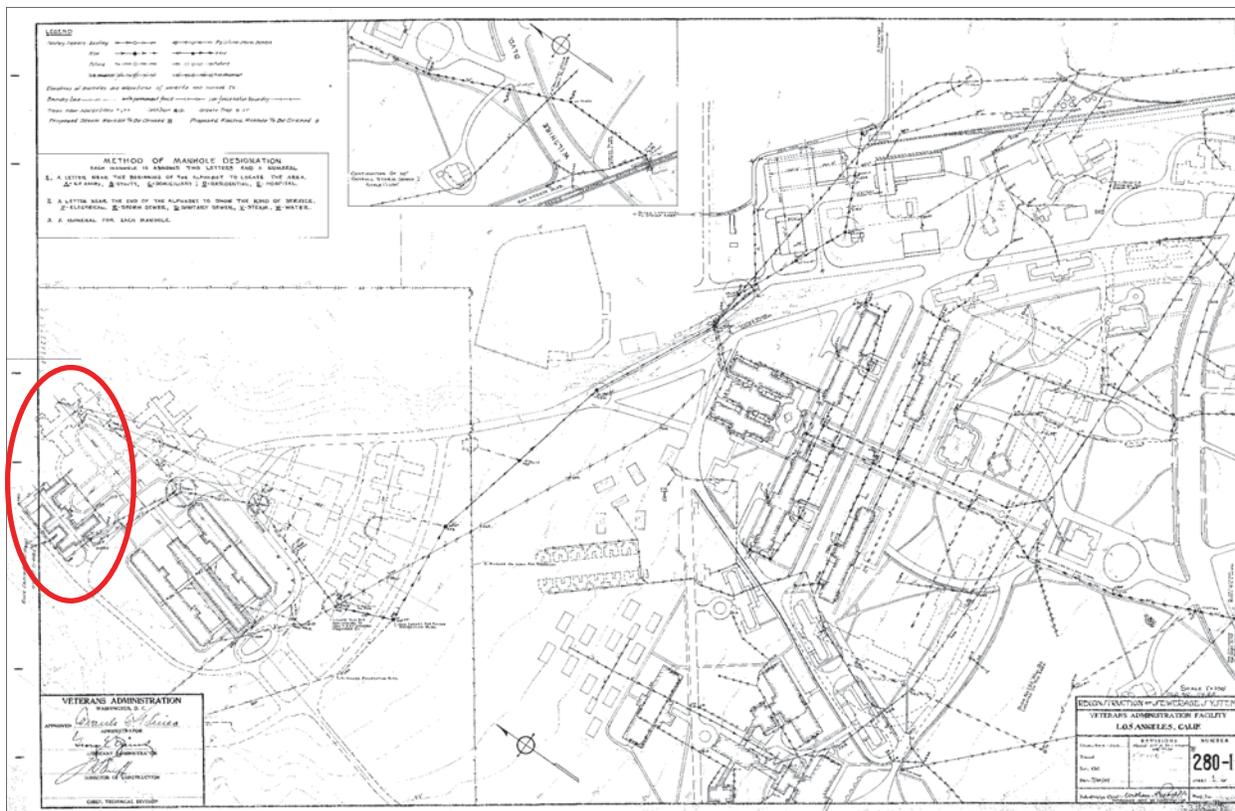
ATTACHMENT A—MAPS  
 NHPA SECTION 106 CONSULTATION PACKAGE  
 U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
 WEST LOS ANGELES HEALTHCARE CENTER



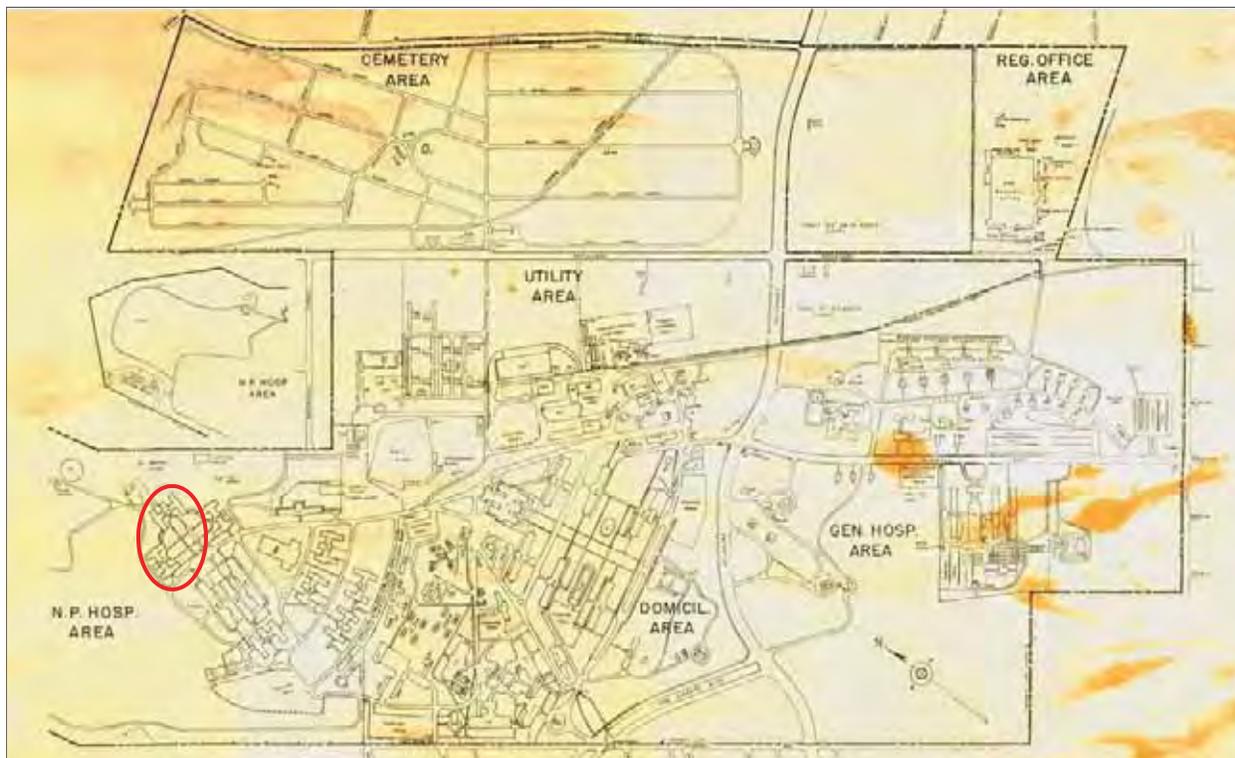
Map 1: West Los Angeles Veterans Affairs campus showing boundaries of historic district and APE



ATTACHMENT A—MAPS  
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 WEST LOS ANGELES HEALTHCARE CENTER



**Map 3:** Northern portion of West Los Angeles Veterans Affairs campus, Buildings 205 and 208 circled, note buildings yet to be constructed in dotted lines including Building 208, 1937 (VA Archives)



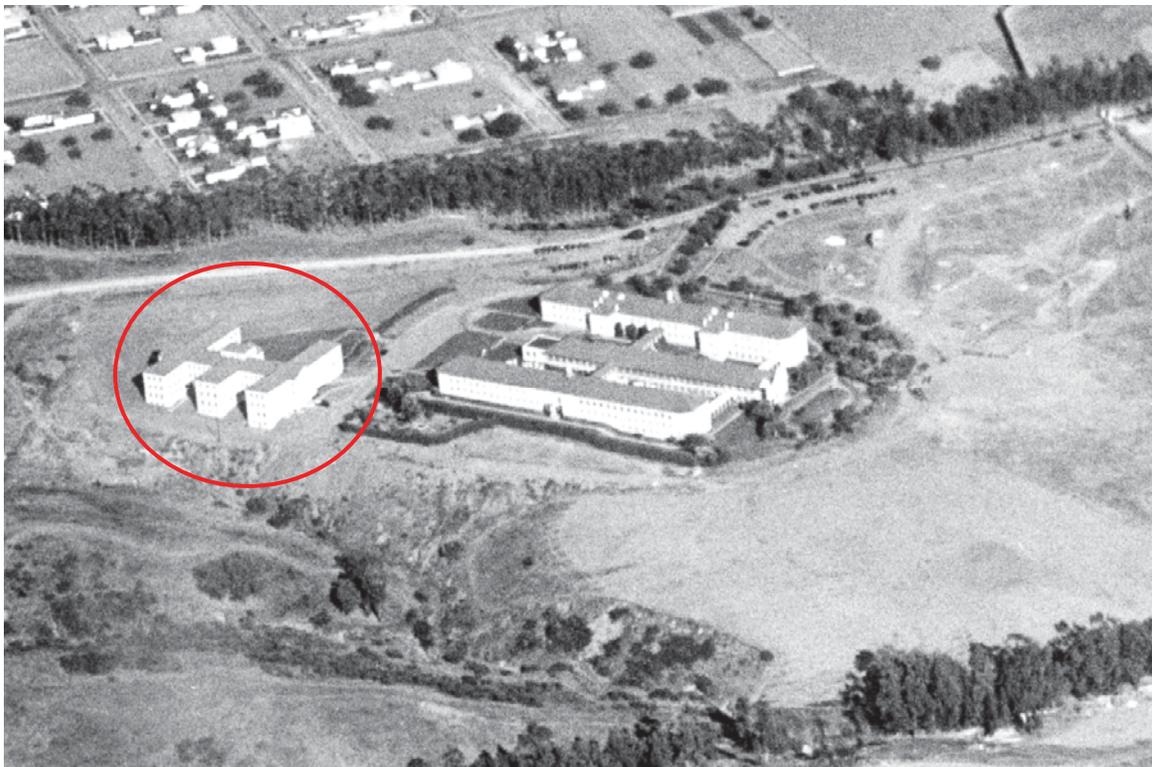
**Map 4:** West Los Angeles Veterans Affairs campus, Buildings 205 and 208 circled, 1952 (VA Archives)

## **ATTACHMENT B: HISTORIC PHOTOS**

ATTACHMENT B—HISTORIC PHOTOS  
NHPA SECTION 106 CONSULTATION PACKAGE  
U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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**Historic Photo 1:** Aerial view southeast, Building 205 circled (University of California Los Angeles Air Photo Archives, Spence Collection, 1938)



**Historic Photo 2:** Detail of aerial photograph above, view southeast, Building 205 circled (University of California Los Angeles Air Photo Archives, Spence Collection, 1938)

ATTACHMENT B—HISTORIC PHOTOS  
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U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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**Historic Photo 3:** Aerial view east, Buildings 205 and 298 circled (VA Archives, circa 1980)



**Historic Photo 4:** Aerial view south, Buildings 205 and 208 circled (VA Archives, circa 1984)

ATTACHMENT B—HISTORIC PHOTOS  
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**Historic Photo 5:** Aerial view northwest, Buildings 205 and 208 circled (VA Archives, circa 1984)



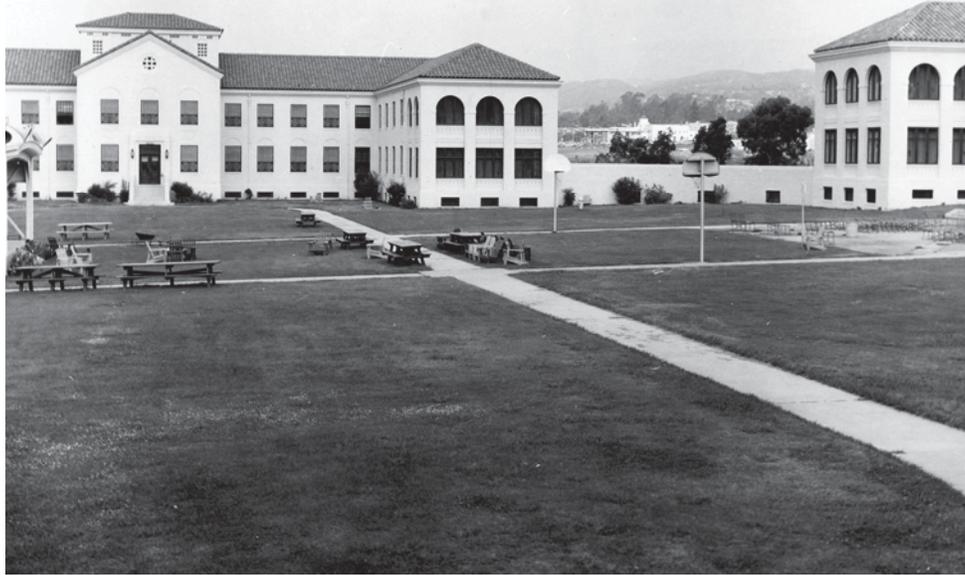
**Historic Photo 6:** Detail of aerial photograph above, view northwest, Buildings 205 at top left and Building 208 at right (VA Archives, circa 1984)

ATTACHMENT B—HISTORIC PHOTOS  
NHPA SECTION 106 CONSULTATION PACKAGE  
U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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**Historic Photo 7:** Aerial view northwest, Buildings 205 and 208 circled (VA Archives, circa 1984)

ATTACHMENT B—HISTORIC PHOTOS  
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**Historic Photo 8:** Building 205, view northwest, photo taken prior to landscape improvements (VA Archives, circa 1964)



**Historic Photo 9:** Building 205, view west, photo taken after landscape improvements (VA Archives, circa 1965)

ATTACHMENT B—HISTORIC PHOTOS  
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**Historic Photo 10:** Building 208, view north, photo taken during landscape improvements (VA Archives, circa 1965)



**Historic Photo 11:** Building 208, view north, photo taken after landscape improvements (VA Archives, circa 1965)

**ATTACHMENT C: CURRENT PHOTOS**

ATTACHMENT C—CURRENT PHOTOS  
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WEST LOS ANGELES HEALTHCARE CENTER



**Current Photo 1:** Building 205, east elevation, view west (Chattel, 2010)



**Current Photo 2:** Building 205, east elevation, detail of main entrance, view west (Chattel, 2010)

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**Current Photo 3:** Building 205, east elevation, detail of main entrance, view west (Chattel, 2010)



**Current Photo 4:** Building 205, east elevation, detail of handicap accessible ramp and fire escape along south wing, view southeast (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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**Current Photo 5:** Building 205, east elevation, north elevation of south wing, view southwest (Chattel, 2010)



**Current Photo 6:** Building 205, east elevation, south wing, view west (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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**Current Photo 7:** Building 205, south elevation, view south northeast (Chattel, 2010)



**Current Photo 8:** Building 205, south elevation, view north (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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**Current Photo 9:** Building 205, west elevation, view east (Chattel, 2010)



**Current Photo 10:** Building 205, west elevation (right) and north elevation (left), view southeast (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
WEST LOS ANGELES HEALTHCARE CENTER



**Current Photo 11:** Building 205, north elevation, view southeast (Chattel, 2010)



**Current Photo 12:** Building 205, north elevation, view south (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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**Current Photo 13:** Building 205, south elevation of north wing, view north (Chattel, 2010)



**Current Photo 14:** Building 205, east elevation of north wing, view northwest (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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WEST LOS ANGELES HEALTHCARE CENTER



**Current Photo 15:** Building 205, interior, main lobby, view east (Chattel, 2010)



**Current Photo 16:** Building 205, interior, main lobby, view west (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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**Current Photo 17:** Building 205, interior, typical first floor corridor, (Chattel, 2010)



**Current Photo 18:** Building 205, interior, typical second floor corridor, (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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**Current Photo 19:** Building 205, interior, typical stair well (Chattel, 2010)



**Current Photo 20:** Building 205, interior, typical stair well, note interior cage (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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**Current Photo 21:** Building 205, interior, typical infilled porch (Chattel, 2010)



**Current Photo 22:** Building 205, interior, typical infilled porch (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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**Current Photo 23:** Building 208, south elevation, view north (Chattel, 2010)



**Current Photo 24:** Building 208, main entrance at south elevation, view north (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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**Current Photo 25:** Building 208, south elevation of east wing, view northeast



**Current Photo 26:** Building 208, east elevation, view west (Chattel, 2010)

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**Current Photo 27:** Building 208, north elevation, view southwest (Chattel, 2010)



**Current Photo 28:** Building 208, north elevation, view southeast (Chattel, 2010)

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**Current Photo 29:** Building 208, west elevation, view east (Chattel, 2010)



**Current Photo 30:** Building 208, west wing of south elevation, view northwest (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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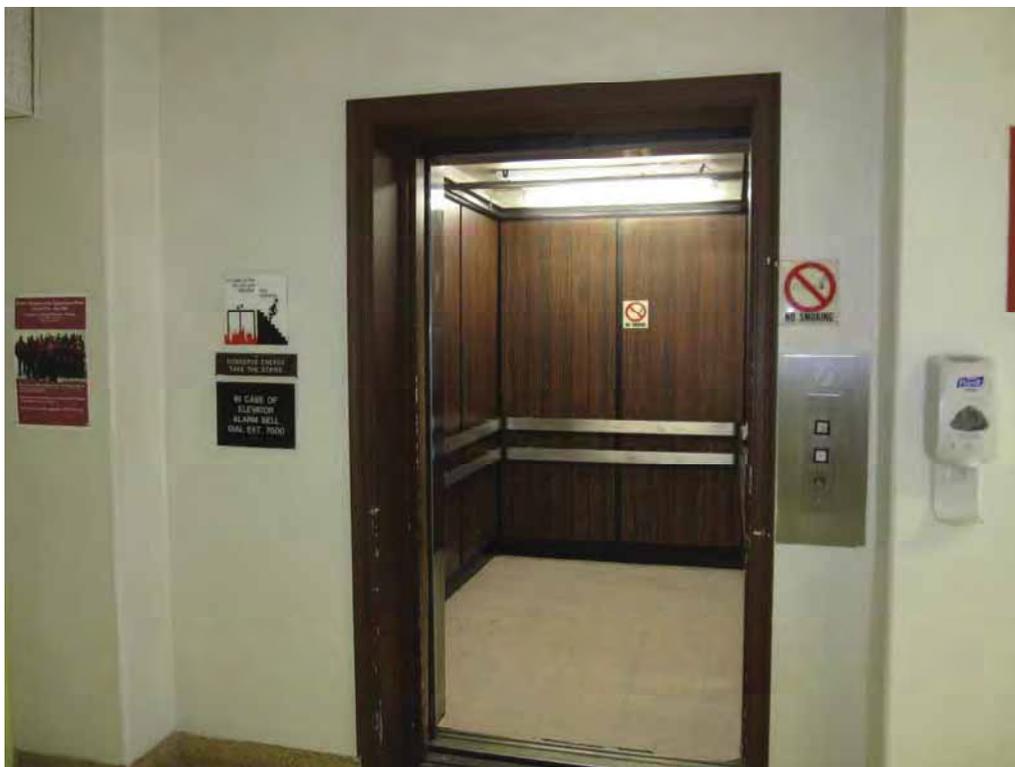


**Current Photo 31:** Building 208, interior, main entrance, view south (Chattel, 2010)



**Current Photo 32:** Building 208, interior from main entrance, view north (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
NHPA SECTION 106 CONSULTATION PACKAGE  
U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
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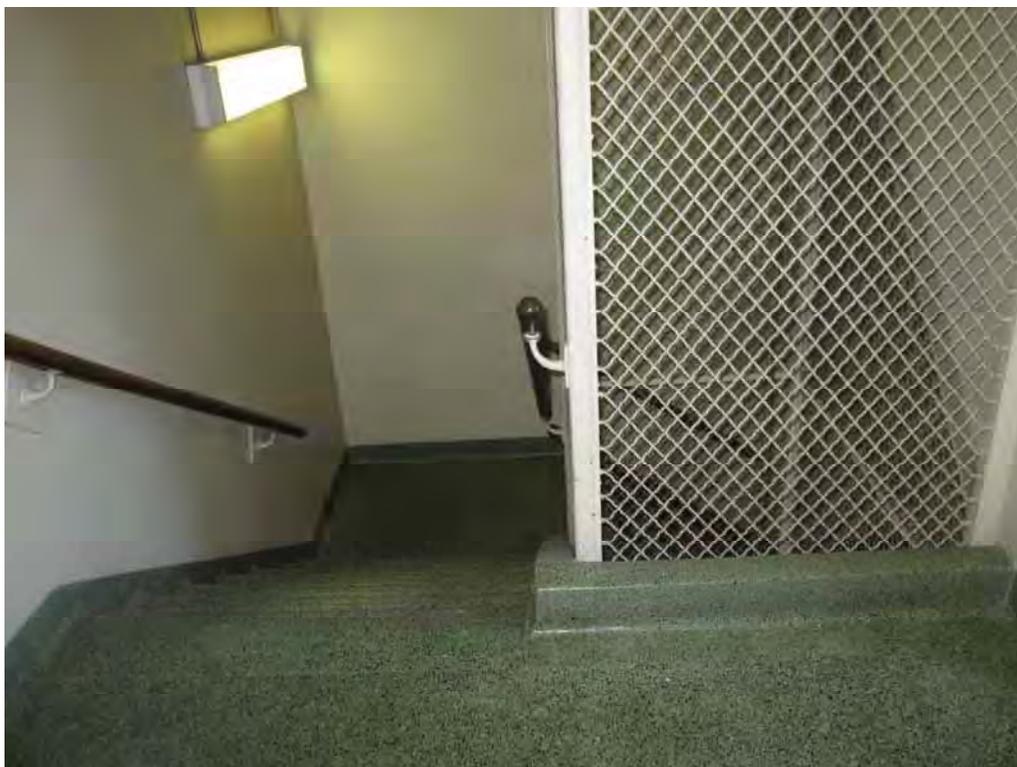
**Current Photo 33:** Building 208, interior, elevator cab (Chattel, 2010)



**Current Photo 34:** Building 208, interior, typical first floor corridor (Chattel, 2010)



**Current Photo 35:** Building 208, interior, typical stairwell, note terrazzo floor (Chattel, 2010)



**Current Photo 36:** Building 208, interior, typical stairwell, note cage (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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**Current Photo 37:** Building 208, interior, typical plan at end of east and west wing (Chattel, 2010)



**Current Photo 38:** Building 208, interior, typical infilled porch (Chattel, 2010)

ATTACHMENT C—CURRENT PHOTOS  
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**Current Photo 39:** Building 208, interior, typical third floor corridor (Chattel, 2010)



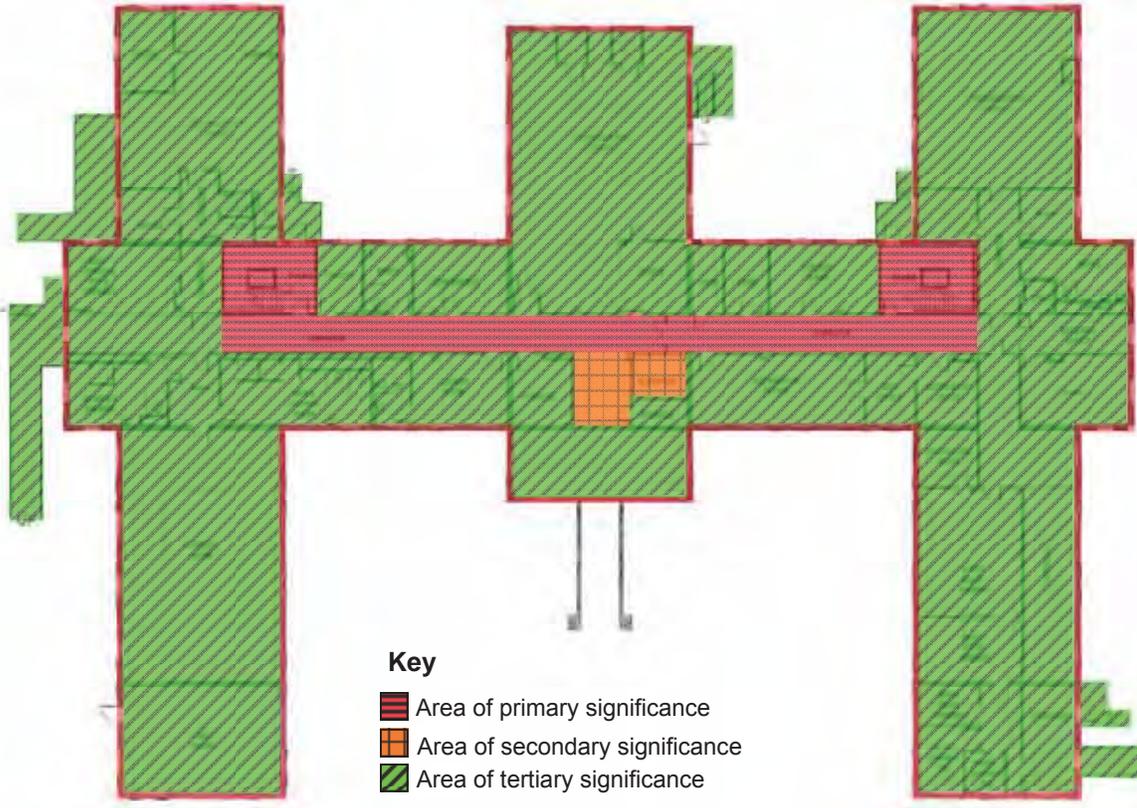
**Current Photo 40:** Building 208, interior, enclosed passageway to Building 205 (Chattel, 2010)



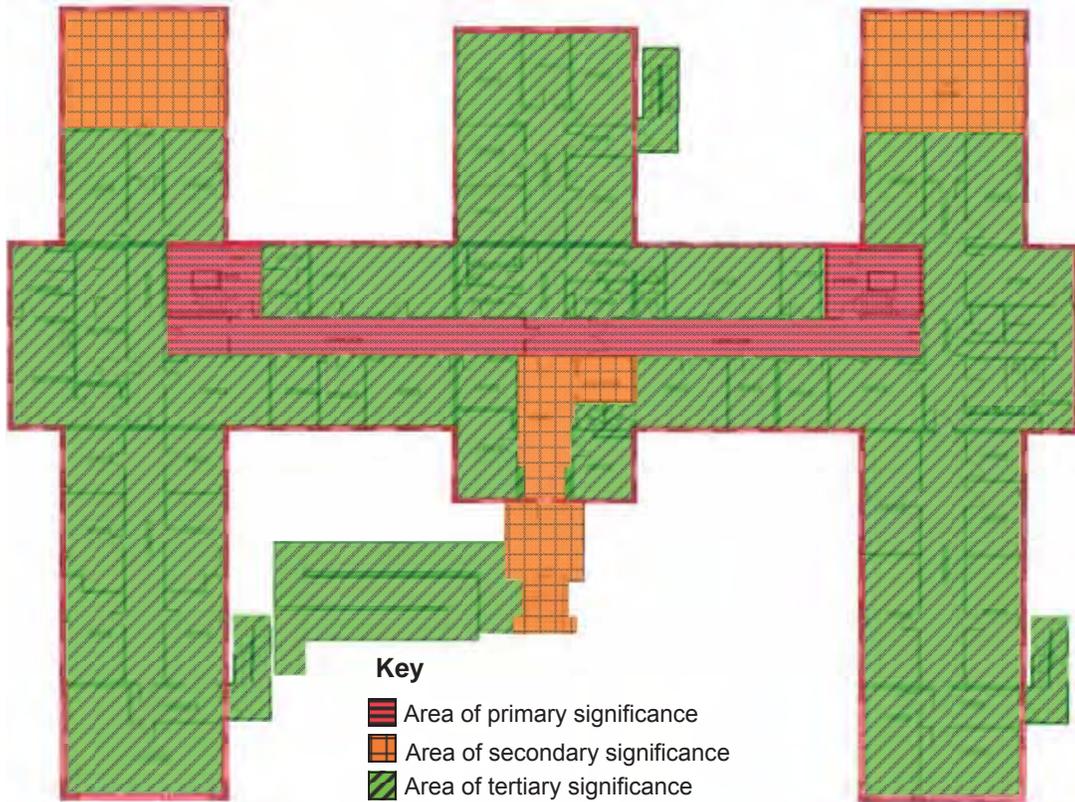
**Current Photo 41:** Building 208, interior, enclosed passageway to Building 209  
(Chattel, 2010)

**ATTACHMENT D: SIGNIFICANT SPACES DIAGRAMS**

ATTACHMENT D—SIGNIFICANT SPACES DIAGRAMS  
NHPA SECTION 106 CONSULTATION PACKAGE  
U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
WEST LOS ANGELES HEALTHCARE CENTER

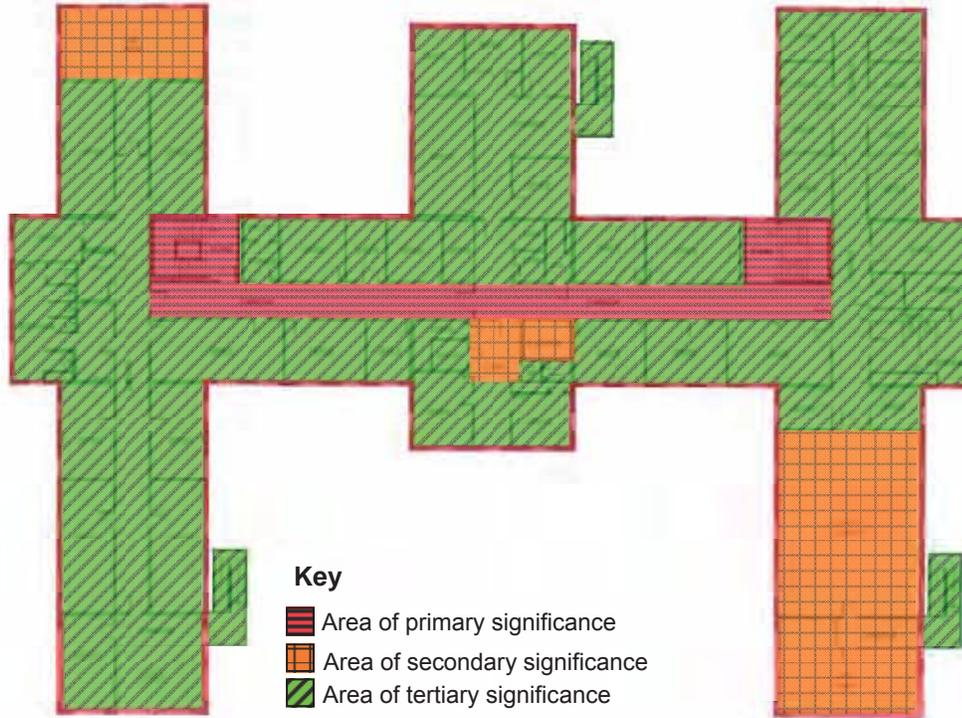


Building 205, significant space diagram, basement



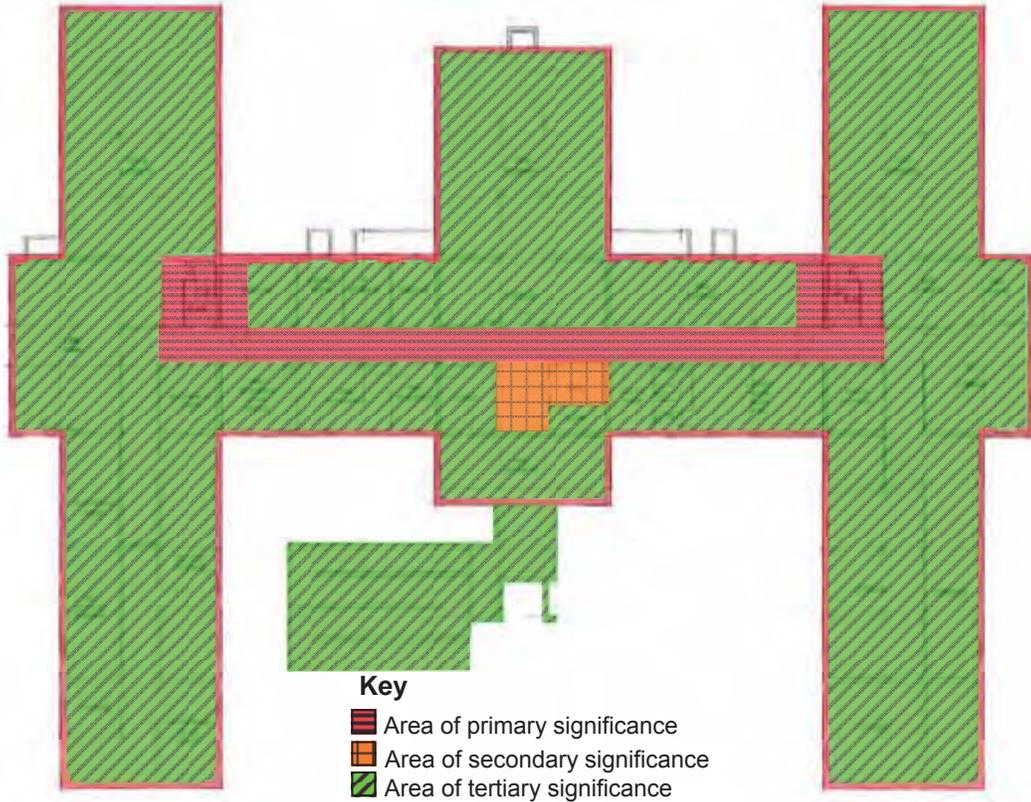
Building 205, significant space diagram, first floor

ATTACHMENT D—SIGNIFICANT SPACES DIAGRAMS  
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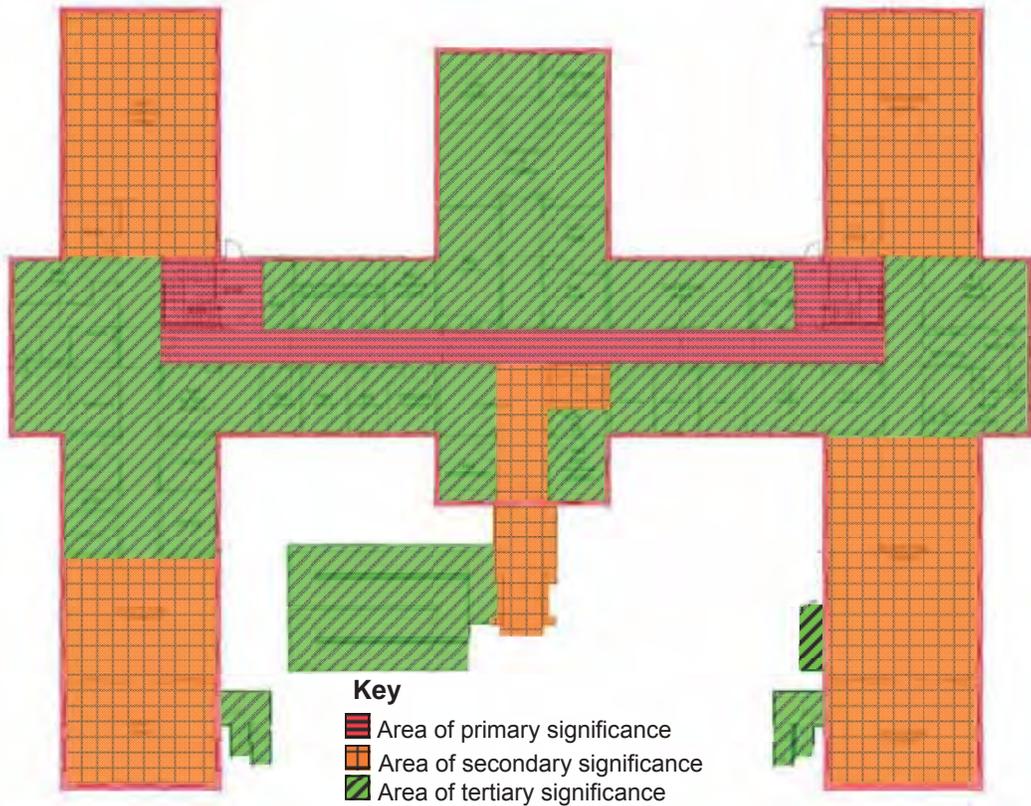


Building 205, significant space diagram, second floor

ATTACHMENT D—SIGNIFICANT SPACES DIAGRAMS  
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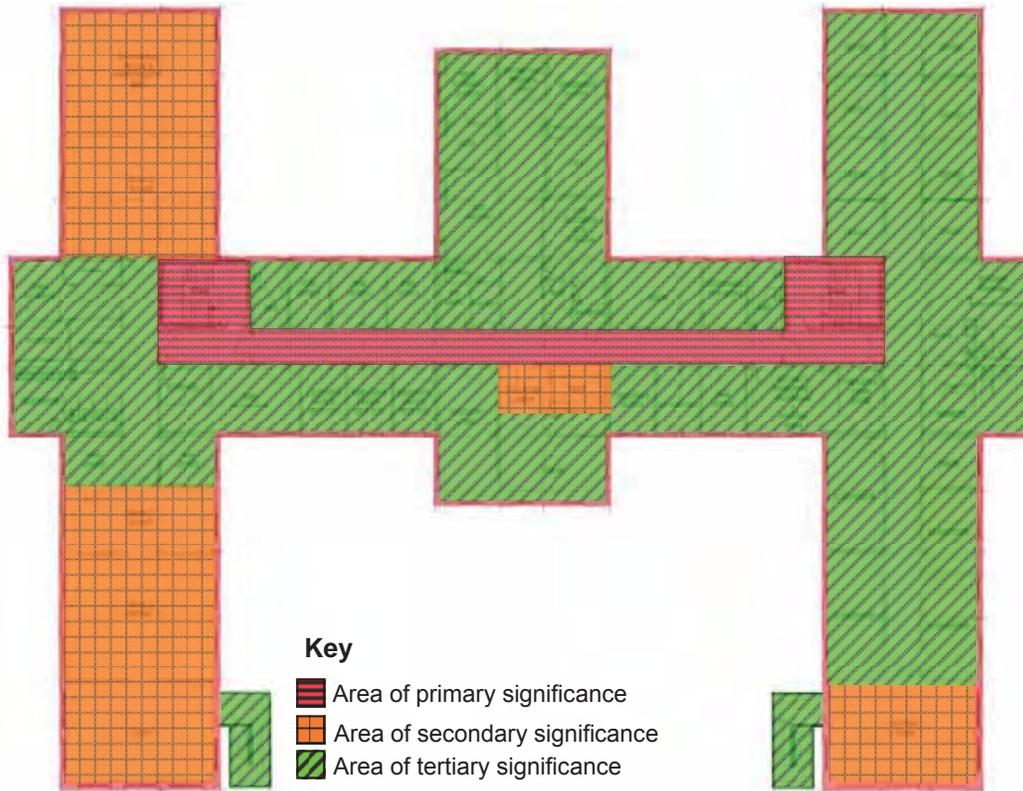


Building 208, significant space diagram, basement



Building 208, significant space diagram, first floor

ATTACHMENT D—SIGNIFICANT SPACES DIAGRAMS  
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U.S. VETERANS AFFAIRS PROJECT NO. 619-406: BUILDINGS 205 AND 208  
WEST LOS ANGELES HEALTHCARE CENTER



Building 208, significant space diagram, second floor

**ATTACHMENT E: ARCHAEOLOGICAL REPORT**

# **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:**

**Department of Veterans Affairs  
Greater Los Angeles Healthcare System**

11301 Wilshire Blvd  
Los Angeles, CA 90073

and

**Leo A. Daly Company**

550 South Hope Street, 27th Floor  
Los Angeles, CA 90071

**Prepared by:**

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Duke CRM Project Number: C-0134



**December 16, 2014**



## MANAGEMENT SUMMARY

DUKE Cultural Resources Management, LLC (DUKE CRM) is under contract to Leo A. Daly Company (Leo Daly) to conduct an archaeological assessment of the seismic corrections and miscellaneous renovations on the West Los Angeles Healthcare Center (WLAHC Campus or Property) for the Department of Veterans Affairs (VA). Specifically seismic corrections/renovations/repurposing are proposed at the following 15 buildings: 114, 115, 156, 157, 158, 205, 206, 207, 208, 209, 212, 222, 257, 258, and 300. Minor ground disturbance will be required at each building. In addition, the scope of this study includes an archaeological reconnaissance survey of the portion of the Campus that is west of the I-405. The Campus is located in the City and County of Los Angeles. More specifically it is located west of the I-405 Freeway straddling Wilshire Boulevard. The WLAHC Property is 387 acres and is under the Veterans Health Administration (VHA).

The purpose of this report is to identify archaeological resources within the West Los Angeles Healthcare Campus that may be encountered during development of the seismic corrections project and future projects. Historic-period built environment resources are being treated in a separate report by Chattel, Inc. This effort was completed in support of the VA's compliance with 36 CFR Part 800, the regulations implementing the National Historic Preservation Act (NHPA).

A records search was completed at the South Central Coastal Information Center and a field survey was conducted of the Property. The VA Project Manager contacted Native American groups as part of the identification process. The records search did not identify any recorded archaeological resources within the Campus. The WLAHC was constructed in 1888 as the Pacific Branch of the National Home for Disabled Volunteer Soldiers (NHDVS). Over the years the campus grew in overall size and the services offered to Veterans. In 1930 the NHDVS was subsumed by the Veterans Administration and is now part of the VA. There are three historic districts on the Campus: the Los Angeles Architectural Set or Brentwood Historic District (14 buildings constructed from 1921 through 1952), the Pacific Branch or Wadsworth Historic District (39 buildings constructed from 1890 through 1959), and the Los Angeles National Cemetery (east of the I-405). All three have been formally determined eligible for listing in the National Register of Historic Places. The archaeological field survey identified two historic refuse scatters (VA Site 1 and VA Site 2). Each of these sites contains fragmented historic material: VA Site 1 contains primarily building materials (n=45, including tiles, brick and glass fragments, a toilet fragment, and a piece of marble); VA Site 2 contains domestic materials (n=9, including fragments of ceramic, glass, plaster, and steel). Additionally, two prehistoric archaeological resources were recently discovered on the Campus in association with the Solar Photovoltaic project. Excavation at one of these sites determined it to be a prehistoric shell midden in a secondary deposit with fire cracked rock, burned animal bone, and flaked stone. The other site was not excavated, but contains prehistoric shell fragments scattered on the surface.

Consultation with Native American groups was undertaken by the VA Project Manager. Preliminary results indicate the Campus contains a high sensitivity for Native American cultural resources. This is primarily due to the presence of burials at the nearby Kuruuvanga Springs site and the recent discovery of shell midden on the campus associated with the Solar Photovoltaic project. The Native American groups contacted requested Native American monitoring during ground disturbing activities associated with the project.

The majority of the Campus is obscured by buildings, asphalt/concrete, and landscaping. Significant changes to the Campus have been made over the last 126 years which have changed the landscape and in the process altered the natural and historic setting significantly. Due to the age of the original NHDVS facility (built in 1888 with additions over the years) there is a high sensitivity for historical archaeological resources associated with the early use of the property, especially in the Los Angeles Home Branch or Wadsworth Historic District. Other areas of the campus have a medium or moderate potential for historical archaeological resources. The presence of prehistoric site CA-LAN-382 (Serra or Kuruuvanga Springs) within ¼ mile of the Campus and known shell midden (although disturbed) discovered on the Campus indicates a medium-to-high sensitivity for prehistoric archaeological resources. The sensitivity of prehistoric and historic archaeological

resources is offset by the extensive prior ground disturbance that has occurred over the more than 100 year history of the Campus. However, the degree of disturbance is not known in each specific location and likely varies from building to building on the campus. See Table 4 on page 14 for a list of buildings and their associated sensitivity ranking.

This study revealed four known archaeological resources (2 historical and 2 prehistoric) within the Campus. The mapped location of these resources is not within the area of potential effects (APE) for the current seismic correction project; therefore, DUKE CRM recommends that no known archaeological resources will be impacted by the project. While no known archaeological resources will be impacted, their presence on the campus indicates an overall high sensitivity for discovering additional archaeological features within the Campus during future development. Additional archaeological resources, if present, may be important to Native American groups and have the potential to answer questions about the previous inhabitants of the area and their use of the Property in the prehistoric and protohistoric period, and the early history of the NHDVS. Any findings could be used for educational and interpretive purposes on the Campus or at local museums and institutions.

Based on our field observations showing a high level of prior ground disturbance in the APE combined with the limited nature of ground disturbance associated with this undertaking, it is not likely that any archaeological resources will be impacted by the current undertaking. However, given the overall high sensitivity of the campus for cultural resources it is recommended that an archaeological monitor be present during initial ground disturbing activities near buildings with a sensitivity ranking of high (114, 115, 156, 157, 158, 205, 206, 212, 222, 257, and 258, see Table 4, page 14). Monitoring will enable the WLAHC and SHPO to rapidly address any post-review discoveries pursuant to 36 CFR 800.13(b). The archaeological monitoring should occur as follows:

**Archaeological Monitoring-** In areas of high sensitivity for archaeological resources, it is recommended that an archaeological monitor be present during the initial ground disturbance associated with seismic corrections/renovations. This will be followed by spot checking for the duration of ground disturbance associated with seismic corrections/renovations. In areas of low-to-moderate sensitivity (buildings 207, 208, 209, and 300) no monitoring is recommended.

The monitor shall work under the direct supervision of a qualified archaeologist (Secretary of Interior Professional Qualification Standards- M.A./M.S. in anthropology, or related discipline with an emphasis in archaeology and demonstrated experience and competence in archaeological research, fieldwork, reporting, and curation).

1. The qualified archaeologist shall be on-site at the pre-construction meeting to discuss monitoring protocols.
2. In the event of an archaeological discovery, the monitor shall flag the area and notify the VA Resident Engineer immediately. The contractor shall follow the construction contract protocols. No further disturbance in the flagged area shall occur until the VA Resident Engineer has cleared the area.
3. In consultation with the qualified archaeologist, the monitor shall quickly assess the nature and significance of the find. If the discovery is not significant it shall be quickly mapped, documented, removed and the area cleared.
4. If the discovery potentially is significant, the qualified archaeologist shall notify the VA Resident Engineer immediately. The WLAHC shall consult with the California State Historic Preservation Officer (SHPO), Native American Tribes, and the Advisory Council on Historic Preservation (ACHP) within 48 hours, notifying them of the National Register eligibility of the discovery and the proposed plan to resolve adverse effects. The plan may include avoidance, minimization, and/or mitigation, or a combination of treatment options.
5. The SHPO, Native American Tribes, and the ACHP have 48 hours to respond.

6. The WLAHC shall take into account the comments of the SHPO, Native American Tribes, and ACHP, and carry out the plan. After the plan has been executed a report will be submitted to the SHPO, Native American Tribes, and ACHP.
7. An archaeological report will be prepared upon completion of all mitigation efforts. The report will be submitted to South Central Coastal Information Center, located at CSU, Fullerton.

**Native American Monitoring-** Based on the high sensitivity of the Campus for prehistoric resources and the requests by Native American groups, the WLAHC should allow for a Native American monitor to be present during the initial ground disturbance associated with seismic corrections/renovations at buildings with a prehistoric sensitivity ranking of High (buildings 156, 157, 158, 205, 206, 212, 222, 257, and 258). This will be followed by spot checking for the duration of ground disturbance associated with seismic corrections/renovations. In areas of low-to-moderate sensitivity for prehistoric archaeological resources, no monitoring is recommended. The Native American monitoring should occur as follows:

1. A designated Native American monitor shall be invited to the pre-construction meeting to discuss monitoring protocols.
2. The Native American monitor shall notify the qualified archaeologist and resident engineer if prehistoric archaeological resources are discovered.
3. In the event of an archaeological discovery, the monitor shall flag the area and notify the VA Resident Engineer immediately. The contractor shall follow the construction contract protocols. No further disturbance in the flagged area shall occur until the VA Resident Engineer has cleared the area.

If human remains are encountered, no further disturbance shall occur until the County Coroner has been notified and made a determination of origin and disposition. If the remains are determined to be prehistoric, the VA shall comply with the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) and develop a plan of action in consultation with Native American groups (43 CFR 10).



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## **INTRODUCTION**

DUKE Cultural Resources Management, LLC (DUKE CRM) is under contract to Leo A. Daly Company (Leo A Daly) to conduct an archaeological assessment of the seismic corrections and miscellaneous renovations on the West Los Angeles Healthcare Campus (Campus or Property) for the Department of Veterans Affairs (VA). In addition, the scope of this study includes an archaeological reconnaissance survey of the portion of West Los Angeles Healthcare Campus that is west of the I-405. The Project is located in the City and County of Los Angeles.

The purpose of this report is to identify archaeological resources within the West Los Angeles Healthcare Campus that may be encountered during development of the seismic corrections project and future projects. Historic period built environment resources are being treated in a separate report by Chattel, Inc. This effort was completed in compliance with 36 CFR Part 800, the regulations implementing the National Historic Preservation Act (NHPA).

## **Project Description**

Specifically seismic corrections/renovations are proposed at the following 15 buildings:

<b>Building</b>	<b>Proposed Scope</b>
114	Demolish - Services Relocated to buildings 156, 157, 258
115	Demolish - Services Relocated to buildings 156, 157, 258
156	Full renovation of Vacant Space to Research Labs/Admin
157	Full renovation of Vacant Space to Research Labs/Admin
158	Partial renovation to accommodate building 208 program
205	Transitional Homeless Housing Buildings (Impact space for current housing buildings 207, 212, 257)
206	Retrofit / Facility Condition Assessment /Renovation to accommodate Substance Abuse
207	Retrofit / Facility Condition Assessment only
208	Transitional Homeless Housing Buildings (Impact space for current housing buildings 207, 212, 257)
209	Full Renovation - Homeless Housing
212	Retrofit/Facility Condition Assessment /Renovation. Research relocated to buildings 156, 157, 258
222	Retrofit / Facility Condition Assessment only
257	Half- Retrofit / Facility Condition Assessment & Half - Renovation
258	Mental Health to building 257 upon its completion. Research Admin relocated from buildings 114, 115, 212
300	Retrofit / Facility Condition Assessment only

The majority of construction will take place within the interior of each building. The project description here discusses components that have potential to impact archaeological resources, namely those portions of the project that occur outside the building. This may include the area immediately surrounding the building:

- Excavation for utilities, depth 2'-6'
- New terraced gardens and ramps, depth 2'-6'
- New retaining walls, ramps, and re-grading, depth 2'-10'
- Excavation for waterproofing and excavation for Sewer and Storm Drain connections: 5' wide band around building perimeter, depth 8'
- Road work, exit paths, and parking, depth 0'-10'

## **Project Location**

The VA West Los Angeles Healthcare Campus is located in West Los Angeles, west of the I-405 freeway straddling Wilshire Boulevard. The address is 11301 Wilshire Blvd., Los Angeles, CA 90073. The Campus is 387 acres, generally bound by the I-405 freeway on the east, Ohio Avenue on the south, Bringham/Federal Avenues to the west, and the Brentwood School to the north. Surrounding the project are primarily residential land uses with some commercial land-uses. East of the of the I-405 freeway are the National

Cemetery and GSA Federal Building. The project is located in an unsectioned portion (portions of projected Sections 20, 21, 28, and 29) of Township 1 South, Range 15 West, San Bernardino Baseline and Meridian. The project is depicted on the USGS *Beverly Hills, Calif. 7.5 Minute Quadrangle* (See Appendix A).

## SETTING

### Natural

The natural landscape of the WLAHC has been dramatically altered by human activity over the last 126 years. What was once a region of grass-covered rolling hills interspersed with tree-lined arroyos is now an almost fully developed urban landscape.

The WLAHC lies on the Sawtelle Plain which is part of the coastal plain of Los Angeles County. The Sawtelle Plain is an alluvial apron that was formed by streams draining the Santa Monica Mountains which eroded and backfilled the area. This alluvial apron is general 30 to 40 feet deep. Two major fault systems, the San Andreas Fault System and Newport-Inglewood Structure Zone, affect the Los Angeles region, including the study area (URS Greiner Woodward Clyde 2000, 3-1). There is generally a humic brown soil with fragments of angular gray shale.

Elevations on the study area range from approximately 260 feet in the southern tip to 480 feet in the northern end. Two fairly large drainages previously existed on the property but have now mostly been filled in. One ran north to south in the western area of the northwest quadrant. The other ran northeast to southwest at the southern end of the southwest quadrant. Two natural springs are depicted on the USGS 1901 topographic map in the southwest corner of the WLAHC. A grouping of three springs is located approximately ¼ mile southwest of the Campus (Serra or Kuruuvanga Springs).

A 1995 study of the drainage in the northwest quadrant identified the following species as the most dominant of the native plants: laurel sumac (*Malosma laurina*), California sagebrush (*Artemisia californica*), mule fat (*Baccharis salicifolia*), California encelia (*Encelia californica*), coast goldenbush (*Isocoma menziesii*), black walnut (*Juglans californica*), arroyo willow (*Salix lasiolepis*), and broad-leaved cattail (*Typha la ifolia*) (Bryant Engineers 1995, 37-42). Dominant non-native plants included: field mustard (*Brassica rapa*), castor bean (*Ricinus communes*), filaree (*Erodium cicutarium*), gun trees (*Eucalyptus* sp.), Bermuda buttercup (*Oxalis pes-capr-ae*), tree tobacco (*Nicotiana glauca*), giant reed (*Arundo dony*), wild oat (*Avena Fatua*), rigput grass (*Bromus diandrus*), and foxtail chess (*Bromus madritensis*) (ibid.). Of the 56 plants identified, the non-natives outnumbered the indigenous 29 (51.8%) to 27 (48.2%).

The Bryant Engineers study (1995, 43-45) identified the following animal species in the area: red-tailed hawk (*Bueto jamaicensis*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), Say's phoebe (*Sayornis saya*), scrub jay (*Aphelocoma coerulescens*), common bushtit (*Psaltriparus minimus*), northern mockingbird (*Mimus polyglottos*), European starling (*Stumus vulgaris*), house sparrow (*Passer domesticus*), western meadowlark (*Stumelia neglecta*), house finch (*Carpodacus mexicanus*), common towhee (*Pipilo fuscus*), white-crowned sparrow (*Zonotrichia leucophrys*), song sparrow (*Melospiza melodia*), Audubon cottontail (*Syvilgus audoboni*), California ground squirrel (*Spermophilus beecheyi*), and Botta pocket gopher (*Thomomys bottae*).

### Cultural

#### Prehistory

The archaeology of the Los Angeles area is not particularly well understood. The following sequence is provided as a general framework that will be subject to major revisions as regional research increases. Many archaeologists reject the use of static chronologies as unreflective of the processes of cultural evolution that were actually occurring in prehistory.

When people first arrived in California, or the Americas, is still a matter of speculation. Up until the early 1980s a few archaeologists and non-professionals argued that human occupation went back as far as 50,000 years ago based on evidence from the California deserts (e.g. Schulling 1979). Studies in the mid-1980s suggested that human occupation in California did not exceed 11,000 years in age (Bada et al. 1984; Taylor et al. 1985). The generally accepted view today is that "The case for an occupation of California between 15,000 and 11,000 years ago has been established beyond any reasonable doubt, but the date of first settlement remains very much in question" (Erlandson et al. 2007:62).

The prehistoric occupation of the area generally is divided into four periods using the definitive chronology originally developed by Wallace in 1955 and later modified by him in 1978 (Wallace 1955). A 1961 chronology by Warren, which is environmentally oriented, also is frequently cited (Warren 1961). The first period is known as the Early Horizon. This lasted from the initial appearance of people in California up until about 5,000 BC. Little is known about these early people. Probably the best evidence comes from San Diego County where the latter part of this horizon is termed the San Dieguito phase (see Rogers 1966). It is believed that Early Horizon peoples subsisted primarily by semi-nomadic hunting of larger game animals using articulated spear throwers termed atlatls.

By around 5,000 BC the Millingstone Horizon began. This horizon is characterized by the presence of seed grinding implements termed manos and metates. These grinding devices are thought to indicate a fundamental shift in the subsistence base over the preceding period, with hard seed plant resources becoming a dominant food source. Along the coast, shellfish collecting formed an important aspect of the diet. Atlatl hunting still occurred. The diversification of the subsistence pattern during the Millingstone Horizon contributed to a somewhat more sedentary way-of-life with seasonal villages appearing for the first time.

The Millingstone Horizon terminates with the onset of the Intermediate Horizon at around 1,500 to 1,000 BC. This period is characterized by a further change in the subsistence pattern with larger, fleshier foodstuffs, particularly acorns, being eaten. Stone mortars and pestles appearing on sites of this period are thought to represent acorn processing. Atlatl hunting still was practiced, with large, crude projectile points representing this technology in the archaeological record.

By about 1,200 years ago the Late Horizon was under way. The Late Horizon society was fairly complex with a diversified hunting and gathering economy, extensive trade networks, and sophisticated social, political, and religious institutions. The economy was even more variegated than the preceding periods with the bow and arrow, having smaller, finer points, coming into widespread use.

### *Ethnography*

The project is located within the boundaries of Gabrielino or Tongva Indians lands. The name Gabrielino was given to them by the Spanish to note they were within the territory of the Mission San Gabriel. Generally their territory included all of the Los Angeles Basin, parts of the Santa Ana and Santa Monica Mountains, along the coast from Aliso Creek in the south to Topanga Canyon in the north, and San Clemente, San Nicolas, and Santa Catalina Islands.

The Gabrielino spoke a dialect of the Cupan group of the Takic language family. This language was part of the larger Uto-Aztecan language stock which migrated west from the Great Basin. The Gabrielino shared this language with their neighboring groups to the south and east (Bean and Smith 1978, Shipley 1978).

Groups of Gabrielino lived in villages that were autonomous from other villages. Each village had access to hunting, collecting, and fishing areas (Bean and Smith 1978). Villages were typically located in protected coves or canyons near water. The village known as *Kuruuvanga* (meaning we are in warmth or sun) was located approximately ¼ mile southwest of the WLAHC. *Kuruuvanga* is the site of a series of natural springs that provided a year-round supply of water. The village was visited by the expedition of Gaspar de Portola in 1769 where the group camped. Friar Juan Crespi noted that the village residents were friendly offering bowls of

seeds, sage, and shell bead necklaces. Villages were used as a homebase. It would be common for groups of hunters and foragers to move about the landscape in search of resources for food, clothing, structures, etc. Natural waterways would be a common place to search for these resources.

Acorns were the most important food for the Gabrielino, although the types and quantity of different foods varied by season and locale. Other important sources of food were grass and many other seed types, deer, rabbit, jackrabbit, woodrat, mice, ground squirrels, quail, doves, ducks and other fowl, fish, shellfish, and marine mammals.

Typically women gathered and men hunted, although work tasks often overlapped. Each village had a chief who controlled religious, economic, and warfare authorities. The chief had an assistant and an advisory council who assisted in important decisions and rituals. Each of these positions was hereditary being passed down from generation to generation (Bean and Smith 1978).

### *History*

The study area is a large property that has been intensively utilized over the years and has a long and varied history. This context section views the history of the WLAHC in terms of material culture. Specifically, what events have occurred in the past that may have left evidence behind in the form of archaeological resources?

#### **Mission/Rancho Period**

The first Europeans to pass through the area comprised the Portolá expedition in August of 1769. They were destined for Monterey and camped at the Indian village now known as Serra Springs (or San Vicente), which is near the study area (Robinson 1939:144-145). Upon the establishment of Mission San Gabriel, the west Los Angeles area was uninhabited by the Spanish who simply considered it a region for neophyte acquisition and cattle grazing by the mission.

The WLAHC comprises portions of two former ranchos: Rancho San Vicente y Santa Monica and Rancho San Jose de Buenos Ayres. The dividing line is Sepulveda Boulevard.

In 1828 Francisco Sepulveda, an army officer, was given possession of, and provisional title to "the place called San Vicente" (Robinson 1939:145). This included all of what was to become the original Santa Monica town site and it stretched almost as far east as what would become Westwood. Over the years there was a dispute with the Reyes and Marquez families over the ownership of the Santa Monica area. In 1839 Sepulveda was granted the 31,000-acre Rancho San Vicente y Santa Monica by Governor Juan B. Alvarado (Connor 1941:29). However, it was not until 1881 that United States patents were issued, officially recognizing the Mexican grants (Robinson 1939:149).

The smaller--4,438 acre--Rancho San Jose de Buenos Ayres was granted by Governor Manuel Micheltoarena on February 24, 1843 to Maximo Alanis (Conner 1941:35).

The diseños for the two ranchos, available online from Calisphere (UC Libraries, California Digital Library), apparently show no buildings on either rancho that would fall within the present study area.

#### **The Soldiers Home**

The history of the WLAHC is well documented (e.g. Kelly 1997, Cetina 1977, Julin 2007, and U.S. Department of Veterans Affairs 1995) and is only briefly summarized here.

The VA can trace its origins back to the founding of the National Asylum for Disabled Volunteer Soldiers. This was created by Congress and signed into law by President Lincoln on March 3, 1865 (Cetina 1977:84). One of the primary intentions was to provide facilities for volunteer soldiers and sailors who, because they were not regulars, were denied access to the U.S. Military Asylum and U.S. Naval Asylum (Cetina 1977:92). The first facility opened in 1866 in Togus, Maine (Eastern Branch). On January 23, 1873, Congress passed a

resolution changing the name of the institution to the National Home for Disabled Volunteer Soldiers (NHDVS).

The Board of Governors of the NHDVS formally agreed in December of 1884 that it was necessary to establish a branch home on the Pacific coast (Cetina 1977:184). In March of 1887 The U.S. Congress authorized the establishment of the Pacific Branch of the National Home for Disabled Soldiers (Cetina 1977:186). The Pacific branch opened in 1888 and within the year held a hospital, barracks, mess hall and a cemetery (Julin 2007:23).

The proposal accepted by the Board was offered by Colonel Robert S. Baker, Senator John P. Jones of Nevada, and John Wolfskill. Baker and Jones owned Rancho San Vicente y Santa Monica and were instrumental in the founding of Santa Monica (Robinson 1939:150-152). Wolfskill had purchased Rancho San Jose de Buenos Ayres in 1884 for \$40,000 and sold it two years later for more than 10 times that price to the Los Angeles Santa Manta Monica Land and Water Company (Connor 1941:35). The offer made by the group consisted of 300 acres of land, a water supply of 120,000 gallons a day, and \$100,000 cash (Ingersoll 1908:338).

On May 12, 1888 the *Los Angeles Times* provided a fairly detailed description of the Soldiers Home undertaking. The following information is summarized from that article (Los Angeles Times 1888:2): The project was to include a branch of the Los Angeles County railroad running to a central point at the Home, which contained about 300 acres. The now barren landscape was to be planted with trees and have artificial lakes creating a park-like setting. Instead of one mammoth building there would be 25 "barracks," which would not be like barracks at all, but much more comfortable, with smoking rooms, lavatories, and bathrooms. Also to be built was a headquarters building, a memorial hall, a dining hall, a boiler house, a laundry, a large hospital, and a church. The Soldier's Home was not to be just a building, but a settlement of some 40 buildings.

The facility was designed by architect Stanford White, a partner in the architectural firm of McKim, Mead, and White (Rasmussen 1994:B3). Construction was supervised by the architects Peters and Burns (Los Angeles Times 1888:7). Veterans started arriving before the facility was habitable, living in tents on the grounds. The first to arrive was Private George Davis of New York on May 2, 1888, unwilling to put up with another New York winter (Rasmussen 1994:B3). By December of 1888 the facility was available for initial occupation (Ingersoll 1908:339). The veterans drifted in, grateful for the free lodging, including 100 elderly men from northern California who marched 500 miles to take up residence (Rasmussen 1994:B3).

A *Los Angeles Times* article from 1892 mentions construction of a reservoir for the facility and noted the need for additional construction only four years after the facility had opened:

"Five barracks, a headquarters, mess hall, Governors quarters, laundry, surgeons quarters, hospital, farmers house and barn are completed or under construction. There is a need for five extra barracks, a boiler and engine house, treasurer's quarters, an additional hospital wing, a permanent kitchen, and additional barn and corral, and a pavilion and bathhouses on the beach. When the building[s] now under construction are finished a thousand men can be accommodated [Los Angeles Times 1892:5]."

The Soldiers Home functioned in many ways like an urban farmstead, trying to maintain a degree of self-sufficiency. In pursuit of this, they kept livestock, had orchards, and grew crops. This not only fed the pensioners but allowed for the sale of some products (Rasmussen 1994:B3). The facility even had its own cannery (Fitzgerrell 1920:np). Treated sewage was used for irrigation (ibid.).

Developments over the years included installation of a telephone system in 1895 (Los Angeles Times 1895:9), completion of a new hospital in 1904, and the extension of the Los Angeles Pacific Railroad to the Home in 1905 (Los Angeles Times 1905:17).

Expansion continued and by 1908 there were 11 barracks accommodating over 2000 veteran residents at the Home (Ingersoll 1908:342). By 1920 the Soldiers Home had a power plant with a 1200 horsepower steam and engine capacity (Fitzgerrell 1920:np). This provided hot water and steam to the building and powered pumps for 13 bored wells on the property. Southern California Edison supplied a lighting system while the facility generated DC power to supply various motors throughout the Veterans Home property (ibid.).

By the 1920s it became apparent that the early wood frame buildings were a fire hazard. Nine arson-suspected fires had occurred in the early part of 1927 and some \$200,000 worth of property had been destroyed (Los Angeles Times 1927a:A1). The government decided that the early buildings needed to be replaced by modern, fire-proof structures. A gradual replacement program was initiated that was not completed until the 1960s (Los Angeles Times 1960:W2).

A significant event of the 1920s was the construction of the \$1,500,000 James W. Wadsworth Hospital. This was a state-of-the-art steel and concrete structure with 562 beds that opened on May 12, 1927 (Los Angeles Times 1927b:10). The facility was growing rapidly and in 1929 a new building phase was started which included a new mess hall, 12 barracks, and the widening of Wilshire Boulevard (Los Angeles Times 1928:E1).

Congress enacted legislation in July 1930 (46 Stat. L., 1016) authorizing the president to merge the Veterans Bureau, the NHDVS, and the Bureau of Pensions into a single entity, the Veterans Administration, which then became the Department of Veterans Affairs (Cetina 1977:382-383). World War I and then World War II provided great impetus for the continued expansion of the former NHDVS facilities.

## **METHODS**

### **Research**

On October 27, 2010 a records search was conducted by ArchaeoGroup at the South Central Coastal Information Center (SCCIC). A follow-up records search was conducted on January 9, 2014 by Eleni Ziogas of DUKE C R M . The SCCIC is part of the California Historical Resources Information System (CHRIS) and is located at California State University, Fullerton. The records search focused on archaeological resources. It included a review of all recorded historic and prehistoric archaeological sites within a one-mile radius of the project area, as well as a review of known cultural resource survey and excavation reports. The California State Historic Property Data File (HPD) was examined, which includes the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI). Cultural resource reports prepared for the West Los Angeles Healthcare Campus were also provided by the VA and their consultants working on other projects. DUKE C R M inspected relevant background information, including historic maps and photos.

### **Native American Consultation**

Section 106 requires federal agencies to consult with federally-recognized Indian Tribes and other stakeholders to consider their comments in the planning process. The Native American Heritage Commission (NAHC) was contacted to search the Sacred Lands File (SLF) and provide a list of Native Americans to contact for the project. WLAHC contacted each group on the list provided by the NAHC (See Appendix C).

### **Field Survey**

A field survey was conducted over several days in 2010/2011 and in 2014. Because the landscape of the study area is so variable—ranging from large buildings to parking lots to roads to grassy lawns to drainages to playing fields to exposed dirt areas—it was important to keep track of the survey coverage for the study. This was further complicated by issues of access, levels of rodent disturbance, and vegetation density. All told, the ground visibility was only fair to poor. As will be seen below, there is little doubt that there are archaeological

resources present on the WLAHC in areas covered by playing fields, parking lots, lawns, etc., that were not identified during the current study.

Given the history of the property it was anticipated that a scatter of historic to modern isolated finds (termed “isolates”) would be present, particularly in areas of ground exposure (e.g. rodent disturbance). While locations of all debris were noted, it was decided to only record finds that could be definitively dated to over 50 years old and possibly eligible for the National Register.

Dates of fieldwork and personnel participating are as follows:

October 21, 2010: James Brock with Jenna Snow (Chattel Inc.)  
November 22, 2010: James Brock and Mary Anne Eason (Intensive)  
November 23, 2010: James Brock and Mary Anne Eason (Intensive)  
December 16, 2010: James Brock and Mary Anne Eason (Intensive)  
December 17, 2010: James Brock and Mary Anne Eason (Intensive)  
January 20, 2011: James Brock with Chattel Inc. and Leo Daly staff  
May 25, 2011: James Brock (Intensive)  
May 26, 2011: James Brock (Intensive)  
February 11, 2014: Curt Duke and Eleni Ziogas (reconnaissance)  
March 6, 2014: Curt Duke (reconnaissance)

### **Personnel**

James Brock, archaeologist with ArchaeoGroup, conducted a records search and the field survey, recording VA Site 1 and 2. Mr. Brock prepared a draft of this report. Before the report was finished, on December 11, 2011 Mr. Brock died. Following his death DUKE C R M was contracted to complete the work started by Mr. Brock. On January 9, 2014 Eleni Ziogas conducted a partial records search. This report was prepared by Curt Duke using much of the research and data provided by Mr. Brock. Mr. Duke is the Principal Archaeologist of DUKE C R M. Mr. Duke meets the professional qualifications of the Secretary of the Interior for prehistoric and historical archaeology; he is also a Registered Professional Archaeologist (RPA) who has worked in all phases of archaeology (archival research, field survey, testing and data recovery excavation, laboratory analysis, construction monitoring) since 1994. Mr. Duke holds a Master of Arts degree in Anthropology with an emphasis in archaeology from California State University, Fullerton and a Bachelor of Arts degree in Anthropology from the University of California, Santa Cruz. Mr. Duke has worked throughout southern and Northern California and parts of Arizona and Nevada. Please see Appendix C for Mr. Duke’s resume.

## **RESULTS**

### **Records search**

At least 60 archaeological studies have been conducted for the area within one mile of the WLAHC property boundaries. The majority of these studies have been small surveys of residential or commercial lots with negative results. Notable exceptions include those studies at CA-LAN-382 and CA-LAN-1063. Most of the area surrounding the Campus is built and developed with little or no ground visibility. Map data from the SCCIC indicates that there are no archaeological resources recorded within the Project boundaries. However, two archaeological sites have been recorded within one mile of the study area: CA-LAN-382 falls within ¼ mile of the Campus while another site, CA-LAN-1063, falls in the one-half to one mile distance from the Campus.

CA-LAN-382, also identified as Serra or *Kuruuvanga* Springs, is a well-known site located to the southwest of the WLAHC on the University High School property. It is registered as California Historical Landmark Number 522. This is the site of a former Gabrielino Tongva village that was visited by the Portolá

Expedition in 1769. Fr. Serra is reported to have said mass there in 1770. It appears that the site has been largely destroyed but is noted as having produced human burials, projectile points, grinding implements, bone tools, faunal remains (bone and shell), and midden areas.

CA-LAN-1063 rests about one mile to the southwest of the Campus. Singer reported the site to be heavily disturbed (Singer 1980). He noted the presence of “Manos, abrading hammers, core hammers and scrapers, flakes and flake scraper and flake knife” (ibid.). Singer believed the site to be old, possibly dating back to the Early Horizon.

The records search identified five prior archaeological studies that included the Campus (Dillon 1980, Bryant 1995, Warren 2005, Switalski and Cooper 2010, Baker 2011). Additional reports were provided to DUKE CRM by the WLAHC and various consultants (Mirro et al. 2012, Hamilton 2012, Hamilton 2013, and Beiter 2013). These reports were reviewed. It is possible that other studies have taken place within the Campus that have not been reported to the Archaeological Information Center.

### *The Dillon Study*

The Dillon (1980) survey was conducted in advance of the construction of playing fields in the northwest area of the WLAHC. The acreage is not given in the report but is estimated at about 15 acres. Dillon's survey was negative for prehistoric resources. Dillon noted that refuse dumping had occurred adjacent to, and in, the large drainage along the eastern border of this study area. He noted “...modern glass, chinaware, and plastic fragments...” along with larger pieces of reinforced concrete, metal pipe, etc. (Dillon 1980:5). He concluded that the refuse had been imported onto his study area, that it appeared to be less than 40 years old, and that “... no important historic or archaeological resources are present on the subject property” (ibid.).

### *The Bryant Study*

In 1995, 15 years after the Dillon study, a study was undertaken of the large drainage that was along the eastern border of the Dillon study in the northwestern portion of the WLAHC. This was conducted in advance of a channelization project for the drainage by Jack K. Bryant Engineers (Bryant 1995). Three loci of historic and modern debris were located during the survey of the 2.5-acre study area. Locus A, the densest and largest of the loci contained over 250 fragments of glass and 100 fragments of “ceramic china” in an area about 300 by 75 feet (Bryant 1995:21). Included with the glass were numerous fragments of amethyst colored glass which generally dates to 1880-1914, along with cobalt blue and aqua glass fragments thought to date to the 1920s to 1940s. It is also stated that ceramics with willow ware patterns are present which were “...popular during the 1920s to the 1940s” (Bryant 1995:22). Willow ware has been in use from the 1790s to the present (Gaston 2003) and cobalt blue and aqua glass were in use before the 1920s and remain in use today.

The Bryant study identified two smaller loci of “historic debris” (Loci B and C). Locus B was a 60 by 60 feet area with about 25 artifacts and Locus C was a 60 by 90 feet area with less than 20 specimens. The Bryant study concluded:

“The historic debris observed in all three locations is consistent with glass and ceramic refuse from the 1920s through the 1940s, possibly from an institutional source. The artifacts were dominated by patent medicine bottle fragments and inexpensive china sherds. Some of the glass was melted, indicative of periodic burning, a practice that was typical for trash dumps during this time period (Bryant 1995:22).”

The amethyst colored glass dates prior to 1914, therefore the deposit could pre-date 1920 and possibly be from the late 1800s. It is likely that the deeply buried historic debris is older and could date to the early period of the NHDVS. Such deposits have not been previously identified and could provide information pertaining to dietary patterns, medical treatments, government expenditure on NHDVS operations, etc.

### *The Warren Study*

The 2005 Warren study examined two areas of the WLAHC totaling approximately 70 acres. One property is termed the "Veterans Home" parcel and the other the "Kitchen" parcel. The field reconnaissance of the two properties was negative. It was concluded that the Veterans Home property had a low sensitivity for archaeological resources while the Kitchen property had a moderate to high potential for prehistoric resources based on its proximity to site CA-LAN-382 (Warren 2005:32). The archaeological site is still over one-half mile from the Kitchen parcel. Because the Kitchen parcel was paved over, it was recommended that an archaeological test program be undertaken on the property to identify and evaluate any resources that might be present. There is no evidence that a test program was ever undertaken.

### *The Solar Photovoltaic Studies*

In 2012 and 2013 Applied Earthworks, Inc. (AE) conducted a buried site testing program (BST). The first report included trenching in Parking Lot 38 and 299 (Mirro et al. 2012). AE excavated two trenches in Lot 38 identifying modern and historic fill material. In Trench 2 below 2.1 meters (m) AE observed native (natural or undisturbed by human activity) sediments consisting of sandy silty clays and clayey silts. Trenches 3 and 4 were excavated in Parking Lot 299. Sediments in Trench 3 included sands with gravel interbedding, indicating a high energy depositional environment. Trench 4 contained homogenous sediment throughout consisting of clayey or silty loam. No recommendations were made for future archaeological studies in these areas.

The second report was completed later in 2012 and consists of two trenches in Parking Lot 20 (Hamilton 2012). The results of these trenches indicate that the top one meter consists of disturbed and compacted sediments. These sediments are underlain by alluvial sediments that likely date to the Pleistocene. The Pleistocene alluvium indicates the presence of wetlands following its original deposition. It also indicates a low potential for prehistoric archaeological resources. No recommendations were made for future archaeological studies in these areas.

In the third BST report six trenches were excavated: Lot 18-2 trenches; Lot 49-2 trenches; Helipad-2 trenches (Hamilton 2013). The trenches at the Helipad were placed in a former drainage that has been filled in over the years. Beneath this fill historic artifacts were discovered that were likely dumped in the ravine during the historic period; however AE interpreted these items as having been dumped upstream and washed to their current location. The four trenches in Lots 18 and 49 were similar to the trenches excavated in Lot 20 consisting of alluvial sediments of Pleistocene age beneath the top, disturbed layer. AE recommended archaeological monitoring due to the potential to discover historic period archaeological deposits. At Lots 18 and 49 these would be shallow, within the top one meter; at the Helipad these deposits would be deeper beneath 3 meters as the top 3 meters is fill.

The studies by Switalski and Cooper (2010) and Baker (2011) were archaeological surveys. Both were negative for archaeological resources.

The following maps were reviewed:

- Santa Monica 15' USGS Topographic Map, 1902 (surveyed in 1893)
- Santa Monica 15' USGS Topographic Map, 1922 (revisions in 1920)
- Sawtelle 7.5' USGS Topographic Map, 1925 (surveyed in 1923)
- Sawtelle 7.5' USGS Topographic Map, 1934 (revised in 1931)
- Beverly Hills 7.5' USGS Topographic Map, 1950 (revised in 1947)

Review of the historic maps reveals that the layout of the NHDVS in 1893 consisted of 17 buildings, a railroad loop, and a few roads. This is consistent with the 1892 *Los Angeles Times* article which states there are "Five barracks, a headquarters, mess hall, Governors quarters, laundry, surgeons quarters, hospital, farmers house and barn are completed or under construction." These early buildings were in the location of the Los

Angeles Home Branch historic district and south of Wilshire Boulevard within the grouping of buildings in the Dowlen Drive loop. The railroad loop is located east of the Pacific Branch District on the lower terrace closer to and under the location of the 405 freeway.

By 1920 many new buildings were added, primarily in the core area of the Home Branch historic district with some new construction to the north, namely buildings 157 and 158 and several new buildings to the east and south of Wilshire Boulevard. In 1931 several additional buildings were added, these buildings filled out the Campus to the north, west, east, and south. By 1947, the configuration of buildings on the Campus was very similar to the Campus today. The biggest difference in appearance after 1920 is the Medical Center building constructed south of Wilshire Boulevard.

### **Field Survey**

The northern portion of the Campus (north of Wilshire Boulevard) was the most complex area to survey. It is characterized by buildings, parking lots, lawn areas, and playing fields. There are very few good soil exposures. The playing fields and golf course generally lacked rodent disturbance so there was essentially zero percent ground surface visibility. Only the perimeters of these areas were examined. The best soil exposures came in lawn areas with apparent gopher infestations. Numerous cultural items (100s of glass fragments, 50+ brick fragments, 5 whiteware sherds) were observed however they were almost entirely undiagnostic and were therefore not formally recorded. Associated artifacts with diagnostic specimens present were recorded as the two sites described below.

The southern portion of the campus is dominated by the modern WLAHC hospital and large encircling parking areas so most of the area is not surveyable. The areas between the perimeter road and the southwest border have comparatively good ground exposure. The isolated cup/bowl sherd noted below was found in this area. The ground surface contours would argue for previous heavy grading of this area. This area is also closest to the Serra (*Kuruuvanga*) Springs site. No evidence of Native American activity was observed. The area that once contained the Wadsworth Hospital, torn down after the 1971 San Fernando Earthquake, is now covered by parking lots and chipped wood/mulch ground cover. The wood/mulch ground cover has been used extensively in this quadrant. Finally, because of the sensitive nature of the residences, we were only allowed a short term limited access to the area at the northwest tip of the area that comprises part of the Wadsworth National Register District.

### ***Archaeological Resources Identified***

Two small historical archaeology sites and one isolated historic item were found during the ArchaeoGroup field survey. These are the first archaeological sites to be recorded on the WLAHC. These were given the simple field designations of VA Site 1, VA Site 2, and VA Isolate 1. During the 2014 DUKE C R M field survey VA Site 1 and VA Site 2 were relocated and recorded on California Department of Parks and Recreation (DPR) 523 Series Forms (See Appendix B). VA Isolate 1 was not relocated by the DUKE C R M crew in 2014; therefore its location is unknown and no DPR 523 Form was prepared.

#### **VA Site 1**

This site comprises a historic artifact scatter consisting primarily of complete or fragmentary ceramic tile. It is in a lawn area near building 213 with a fairly substantial amount of rodent (gopher) disturbance. The rodent disturbance has been “kicking up” artifacts to the surface—indicating that the site may have some depth. This site was first discovered on November 22, 2010 and was recorded in detail on May 26, 2011 by ArchaeoGroup. The surface artifact inventories differed substantially between the two days. This can best be accounted for by rodent activity and lawn watering. On February 11, 2014, DUKE C R M archaeologists visited the site making additional observations. The inventory below is cumulative from May 26, 2011 and February 11, 2014.

<b>Table 2:</b> Surface artifact inventory from VA Site 1.	
<b>Item</b>	<b>Quantity</b>
Tile, 1" square creamy white, complete or fragmentary	16
Tile, misc. white fragments	12
Tile, misc. gray fragments	3
Tile, unglazed red fragment (with mark)	1
Tile, pale green fragment	1
Tile, white fragment (with mark)	1
Vitreous ceramic fragments (e.g. toilet fragment)	2
Marble, white architectural fragment	1
Brick fragments	5
Glass, colorless fragments	3
<b>Total</b>	<b>45</b>

Of particular interest is the unglazed red tile fragment. This is a diagnostic artifact. The tile fragment has a partial manufacturer's mark (see Figure 1) indicating it was made by the U.S. Encaustic Tile Company of Indianapolis, Indiana between 1877 and 1932 (Kovel and Kovel 1986:216, Lehner 1988:480). Given that the site falls within an area of 1938 buildings, this artifact, and perhaps the entire site, represents material from the initial 1890s NHDVS. The site possibly was formed during demolition activity in the 1930s when material was left on the ground. However, at least one other artifact is either intrusive or indicates deposition at a later date. This is a tile fragment manufactured by Interpace in 1963 or later (Figure 2; Lehner 1988:221). It is probably a waste fragment from tile being installed.



**Figure 1.** Tile fragment from VA Site 1 made by the U.S. Encaustic Tile Company of Indianapolis, Indiana between 1877 and 1932 (Kovel and Kovel 1986:216, Lehner 1988:480). The bottoms of the "U" and "S" are visible at the top of the specimen.



**Figure 2.** Tile fragment from Site VA 1 manufactured by Interpace Corporation in 1963 or later (Lehner 1988:221). The “FRANC...” designation at the top probably refers to a pattern rather than country of origin.

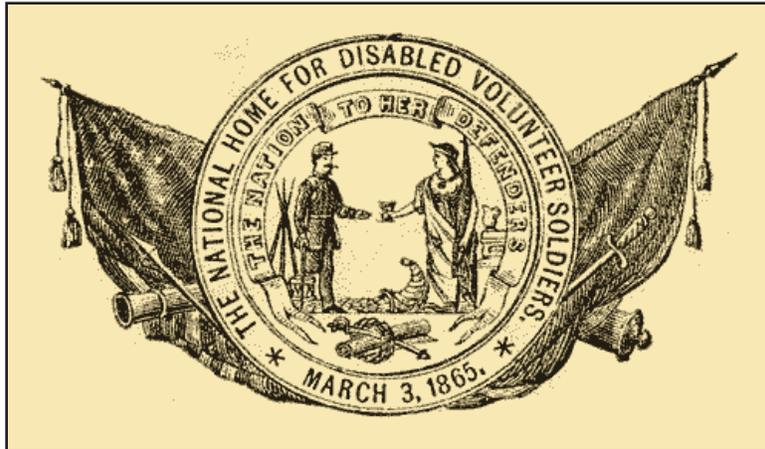
**VA Site 2**

This is a small site in an open patch of exposed dirt near building 117. In contrast to VA Site 1, this site contains evidence of historic domestic activity primarily in the form of ceramics. The surface inventory is shown in Table 3. It would appear that there are at least three different ceramic vessels represented: a shallow bowl, a plate, and a possible mug. One sherd exhibits a poorly-defined institutional mark (Figure 3).

<b>Table 3:</b> Surface artifact inventory from VA Site 2.	
<b>Item</b>	<b>Quantity</b>
Vitreous ceramic base sherd with makers mark	1
Vitreous ceramic shallow bowl sherd	1
Vitreous ceramic foot sherd (from mug?)	1
Vitreous ceramic rim sherd, plate	1
Plaster fragment, blue	1
Glass fragment, milk	1
Glass fragment, colorless	1
Glass fragment, aqua	1
Galvanized steel fragment	1
<b>Total</b>	<b>9</b>



**Figure 3.** Ceramic sherd from VA Site 2 with the seal of NHDVS (full seal shown below).



**Figure 4.** The seal of The National Home for Disabled Volunteer Soldiers (source: <http://www.dayton.va.gov/graphics/museum/bigpix/homeseal.gif>).

### VA Isolate 1

This isolated mug/small bowl fragment (Figure 5) was located in a disturbed context in the southwestern area of the southwest quadrant. This specimen was manufactured by Shenango China Company of New Castle, Pennsylvania. Shenango claimed to have used this design—the seated Indian—as early as 1912 (Lehner 1988:421). Shenango was a major supplier of institutional wares and the Veterans Administration was an important customer.



**Figure 5.** Base sherd from a mug or small bowl manufactured by Shenango China Company. Shenango claimed to have used this design—the seated Indian—as early as 1912 (Lehner 1988:421). Shenango was a major supplier of institutional wares and the Veterans Administration was an important customer.

### *Recent Discoveries on the Campus*

In August 2013 during archaeological monitoring of the Solar Photovoltaic project near Bonsall Avenue and Constitution Avenue, west of Parking Lot 15 a disturbed prehistoric archaeological site was discovered (See letter from Donna Beiter, WLAHC Director, to SHPO dated August 22, 2013). The site is located at the base of the slope that separates the higher terrace where the majority of the campus is located and the lower Campus to the east. The site consists of remnants of a prehistoric shell midden. The midden consists of a surface scatter of abalone and Venus clam. After excavating seven shovel test pits (STP) it was determined that there was burned bone and shell in a buried context. The deposit appears to be in a secondary or disturbed context. The location of the original prehistoric archaeological site is unknown although it is likely nearby. No report or site record is available at this time and very little information is known about these findings.

Through our consultation with Native American groups we learned that a second find was made by the Solar Photovoltaic archaeological field crew in transition from their parking location to the job site on campus. The find consists of a light scatter of shell found in the area immediately surrounding Building 211, the Brentwood Theater. No additional information is known about this discovery. No report or site record is available at this time and very little information is known about these findings.

### **Native American Consultation**

On December 19, 2013 DUKE CRM contacted the NAHC to obtain the results of a review of the Sacred Lands File (SLF) and a list of local Native American groups to contact. On December 24, 2013 the NAHC responded indicating that there were no files in the SLF for the project location. The VA Project Manager contacted the following ten groups:

- Gabrielino Tongva Nation, Sam Dunlap
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame
- Gabrieleno Band of Mission Indians, Andrew Salas
- LA City/County Native American Indian Commission, Ron Andrade
- Gabrielino/Tongva Nation, Sandonne Goad
- Tongva Ancestral Territorial Tribal Nation, John Tommy Rosas
- Gabrielino-Tongva Tribe, Bernie Acuna
- Gabrieleno/Tongva San Gabriel Band of Mission Indians, Anthony Morales
- Gabrielino-Tongva Tribe, Conrad Acuna
- Gabrielino-Tongva Tribe, Linda Candelaria

Each group was contacted by certified U.S. Mail on March 3, 2014. No address was available for the Tongva Ancestral Territorial Tribal Nation; they were contacted by email on March 13, 2014. Mr. Rosas of the Tongva Ancestral Territorial Tribal Nation responded on March 13 indicating that the area is culturally sensitive and that he will work with the WLAHC to resolve any impacts. On April 2, 2014, follow-up phone calls were made to the groups who had not responded. Three additional contacts were made with the Gabrielino Tongva Indians of California Tribal Council (Robert Dorame), Gabrieleno Band of Mission Indians (Andrew Salas), and the Gabrielino Tongva Nation (Sam Dunlap). Each of these groups has indicated that the WLAHC is highly sensitive for Native American cultural resources. Each has cited the presence of the nearby *Kuruuvanga* Springs site and the presence of burials there. Mr. Dorame and Mr. Salas both recommended a Native American monitor be present during ground disturbing activities associated with construction. The NAHC letter, a sample letter to the Native American groups, all correspondence, and a Native American consultation summary matrix are attached to this report in Appendix B.

### Cultural and Archaeological Sensitivity

The majority of the Campus is obscured by buildings, asphalt/concrete, and landscaping. Significant changes to the Campus have been made over the last 126 years which have changed the landscape and in the process altered the natural and historic setting significantly. Due to the age of the original NHDVS facility (built in 1888 with additions over the years) there is a high sensitivity for historical archaeological resources associated with the early use of the property, especially in the Pacific Branch or Wadsworth Historic District. Other areas of the campus have a medium or moderate potential for historical archaeological resources. The presence of Serra or *Kuruuvanga* Springs, the unnamed springs located in the southwest area of the WLAHC Campus, and the two streams that once ran across the Campus (now filled-in) combined with the known presence of native inhabitants at the *Kuruuvanga* Village (and Springs), as well as known shell midden (although disturbed) discovered on the Campus indicate a high sensitivity for prehistoric archaeological resources. The sensitivity of prehistoric and historic archaeological resources is offset by the extensive prior ground disturbance that has occurred over the more than 100 year history of the Campus. However, the degree of previous disturbance at each location on the campus is not known and likely varies from building to building on the campus. A rank of high sensitivity was given to all buildings within 600 feet of either of the shell midden discoveries. Medium sensitivity was assigned to all other buildings. Due to the presence of a known village site (LAN-382) and additional natural springs there is no rank of low sensitivity for prehistoric resources. The sensitivity rankings are shown in the table below.

<b>Building</b>	<b>Ground Disturbance</b>	<b>Historic Sensitivity</b>	<b>Prehistoric Sensitivity</b>
114	Yes	High	Medium
115	Yes	High	Medium
156	Yes	Medium	High
157	Yes	Medium	High
158	Yes	Medium	High
205	Yes	Medium	High
206	Yes	Medium	High
207	Yes	Medium	Medium
208	Yes	Medium	Medium
209	Yes	Medium	Medium
212	Yes	High	High
222	Yes	Medium	High
257	Yes	Medium	High
258	Yes	Medium	High
300	Yes	Medium	Medium

### STUDY FINDINGS AND CONCLUSIONS

This study revealed four known archaeological resources (2 historical and 2 prehistoric) within the Campus. The mapped location of these resources is not within the area of potential effects (APE) for the current seismic correction project; therefore, DUKE CRM recommends that no known archaeological resources will be impacted by the project. While no known archaeological resources will be impacted, their presence on the campus indicates an overall high sensitivity for discovering additional archaeological features within the Campus during future development. Additional archaeological resources, if present, may be important to Native American groups and have the potential to answer questions about the previous inhabitants of the area and their use of the Property in the prehistoric and protohistoric period, and the early history of the NHDVS. Any findings could be used for educational and interpretive purposes on the Campus or at local museums and institutions.

Based on our field observations showing a high level of prior ground disturbance in the APE combined with the limited nature of ground disturbance associated with this undertaking, it is not likely that any

archaeological resources will be impacted by the current undertaking. However, given the overall high sensitivity of the campus for cultural resources it is recommended that an archaeological monitor be present during initial ground disturbing activities near buildings with a sensitivity ranking of high (114, 115, 156, 157, 158, 205, 206, 212, 222, 257, and 258, see Table 4, page 14). Monitoring will enable the WLAHC and SHPO to rapidly address any post-review discoveries pursuant to 36 CFR 800.13(b). The archaeological monitoring should occur as follows:

**Archaeological Monitoring-** In areas of high sensitivity for archaeological resources, it is recommended that an archaeological monitor be present during the initial ground disturbance associated with seismic corrections/renovations. This will be followed by spot checking for the duration of ground disturbance associated with seismic corrections/renovations. In areas of low-to-moderate sensitivity (buildings 207, 208, 209, and 300) no monitoring is recommended.

The monitor shall work under the direct supervision of a qualified archaeologist (Secretary of Interior Professional Qualification Standards- M.A./M.S. in anthropology, or related discipline with an emphasis in archaeology and demonstrated experience and competence in archaeological research, fieldwork, reporting, and curation).

1. The qualified archaeologist shall be on-site at the pre-construction meeting to discuss monitoring protocols.
2. In the event of an archaeological discovery, the monitor shall flag the area and notify the VA Resident Engineer immediately. The contractor shall follow the construction contract protocols. No further disturbance in the flagged area shall occur until the VA Resident Engineer has cleared the area.
3. In consultation with the qualified archaeologist, the monitor shall quickly assess the nature and significance of the find. If the discovery is not significant it shall be quickly mapped, documented, removed and the area cleared.
4. If the discovery potentially is significant, the qualified archaeologist shall notify the VA Resident Engineer immediately. The WLAHC shall consult with the California State Historic Preservation Officer (SHPO), Native American Tribes, and the Advisory Council on Historic Preservation (ACHP) within 48 hours, notifying them of the National Register eligibility of the discovery and the proposed plan to resolve adverse effects. The plan may include avoidance, minimization, and/or mitigation, or a combination of treatment options.
5. The SHPO, Native American Tribes, and the ACHP have 48 hours to respond.
6. The WLAHC shall take into account the comments of the SHPO, Native American Tribes, and ACHP, and carry out the plan. After the plan has been executed a report will be submitted to the SHPO, Native American Tribes, and ACHP.
7. An archaeological report will be prepared upon completion of all mitigation efforts. The report will be submitted to South Central Coastal Information Center, located at CSU, Fullerton.

**Native American Monitoring-** Based on the high sensitivity of the Campus for prehistoric resources and the requests by Native American groups, the WLAHC should allow for a Native American monitor to be present during the initial ground disturbance associated with seismic corrections/renovations at buildings with a prehistoric sensitivity ranking of High (buildings 156, 157, 158, 205, 206, 212, 222, 257, and 258). This will be followed by spot checking for the duration of ground disturbance associated with seismic corrections/renovations. In areas of low-to-moderate sensitivity for prehistoric archaeological resources, no monitoring is recommended. The Native American monitoring shall occur as follows:

1. A designated Native American monitor shall be invited to the pre-construction meeting to discuss monitoring protocols.
2. The Native American monitor shall notify the qualified archaeologist and resident engineer if prehistoric archaeological resources are discovered.

3. In the event of an archaeological discovery, the monitor shall flag the area and notify the VA Resident Engineer immediately. The contractor shall follow the construction contract protocols. No further disturbance in the flagged area shall occur until the VA Resident Engineer has cleared the area.

If human remains are encountered, no further disturbance shall occur until the County Coroner has been notified and made a determination of origin and disposition. If the remains are determined to be prehistoric, the VA shall comply with the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) and develop a plan of action in consultation with Native American groups (43 CFR 10).

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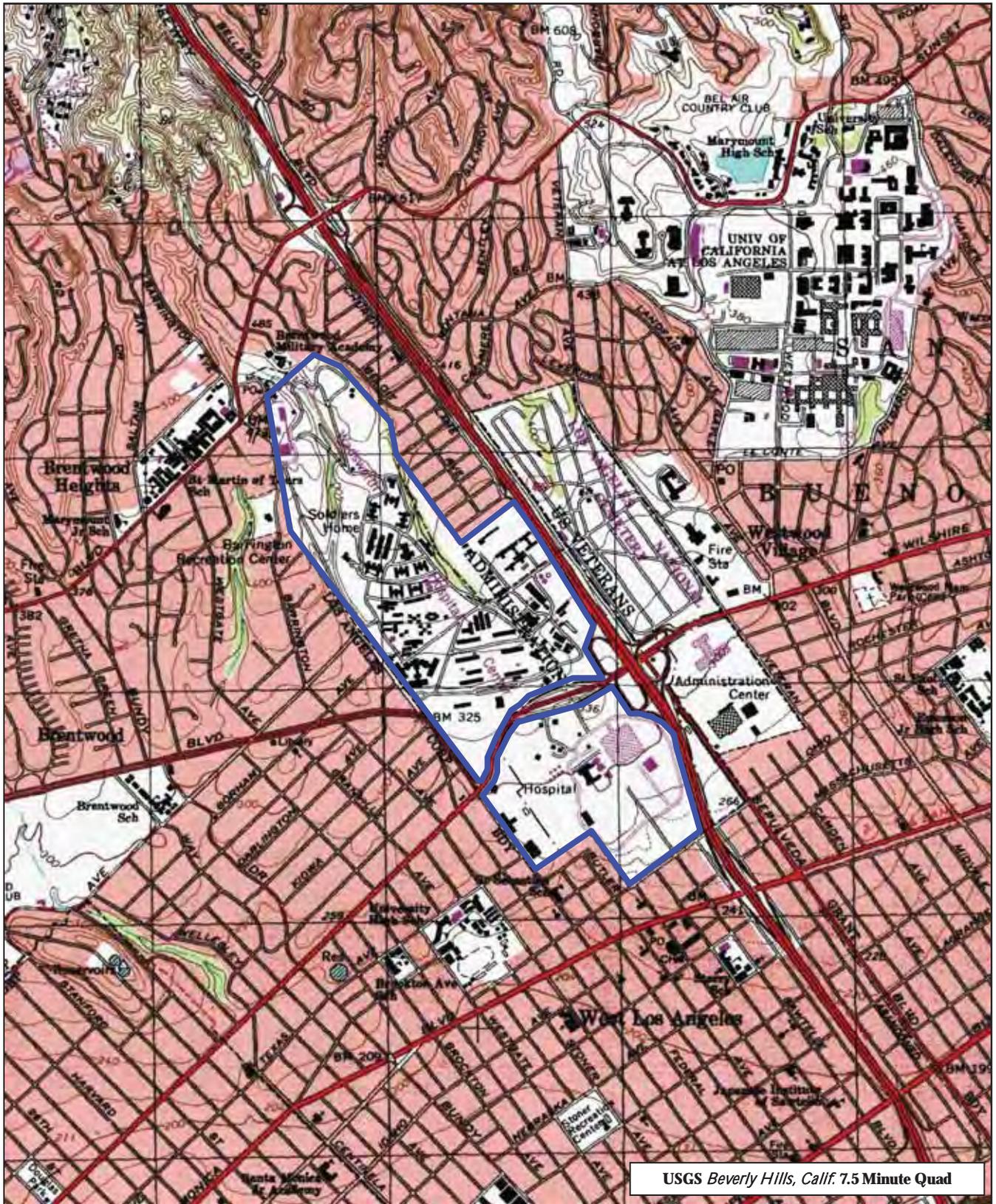
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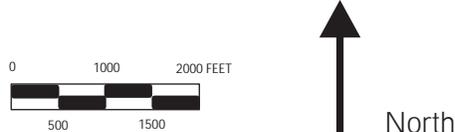
# **Appendix A**

## **Project Maps**

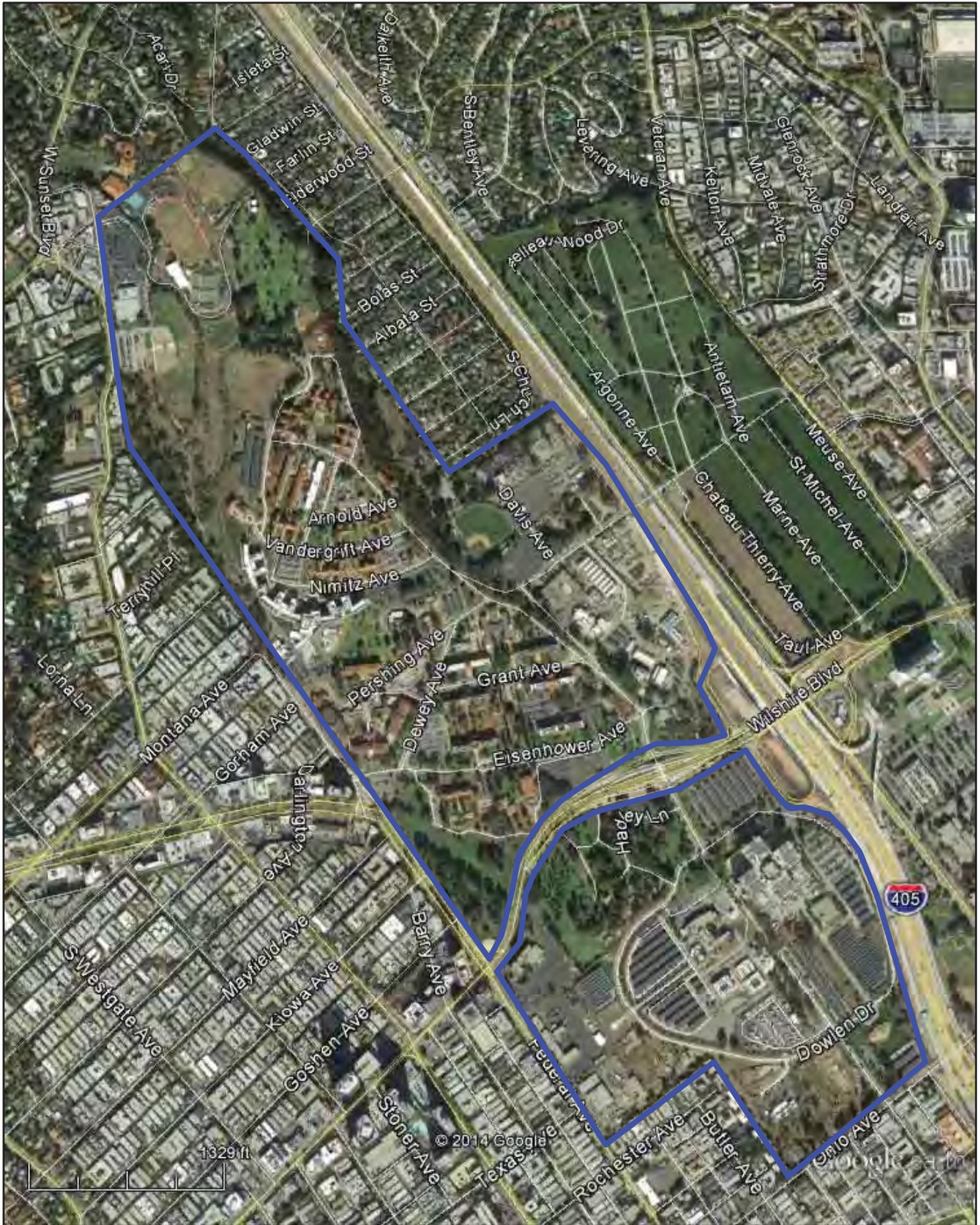




**Map 1**  
**USGS Location Map**  
**VA West LA Medical Center**







**Figure 2**  
**Aerial Photograph**  
**VA West LA Medical Center**





**Appendix B**  
**Site Records for VA Site 1 and VA Site 2**



State of California — The Resources Agency  
 DEPARTMENT OF PARKS AND RECREATION  
**PRIMARY RECORD**

Primary #  
 HRI #  
 Trinomial  
 NRHP Status Code

Other Listings  
 Review Code

Reviewer

Date

Page 1 of 5

\*Resource Name or #: VA Site 1

**P1. Other Identifier:**

\*P2. Location:  Not for Publication  Unrestricted

\*a. County: Los Angeles

and (P2b and P2c or P2d. Attach a Location Map as necessary.)

\*b. USGS 7.5' Quad: Beverly Hills, CA; Date: 1966/PR 1995; T 1S; R 15 W; SE ¼ of NW ¼ of Sec. 28 (Projected); S.B. B.M.

c. Address: 11301 Wilshire Blvd.

City: Los Angeles

Zip: 90073

d. UTM: Zone: 11S; 365,544 mE; 3,769,216 mN (G.P.S.)

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate) Elevation:

VA Site 1 is located on the south side of the east wing of building number 213 on the Department of Veterans Affairs West Los Angeles Healthcare Campus. The site is located east of the driveway and west of the walkway leading into the building's east wing. There is a small garden wall around the north, east, and west sides of the site.

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

VA Site 1 is a small historic debris scatter located on the lawn in front of the Building 213 on the Department of Veterans Affairs West Los Angeles Healthcare Campus, within West Los Angeles Veterans Administration Historic District (formerly a portion of the Home Branch Historic District). The scatter consists of tiles (white, offwhite, and green), ceramic fragments, milk glass fragments, cement fragments, and one white ceramic insulator. This scatter was likely created during the demolition activity of the 1930's, and could possibly represent material from the 1890's era Soliders Home.

\*P3b. Resource Attributes: (List attributes and codes) AH4 trash scatter

\*P4. Resources Present:  Building  Structure  Object  Site  District  Element of District  Other (Isolates, etc.)

**P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)**



**P5b. Description of Photo:**

(View, date, accession #)

Overview of VA Site 1, building 213 in background, view to north. 2/11/14.

\*P6. Date Constructed/Age and Sources:  Historic

Prehistoric  Both

\*P7. Owner and Address:

West Los Angeles Veterans Affairs Center; 11301 Wilshire Blvd., Los Angeles, CA, 90073

\*P8. Recorded by: (Name, affiliation, and address)

Eleni Zogas and Curt Duke  
 DUKE CRM  
 22 Socorro  
 Rancho Santa Margarita  
 CA, 92688

\*P9. Date Recorded: 2/11/14

\*P10. Survey Type: (Describe)  
 intensive pedestrian survey

\*P11. Report Citation: (Cite survey report and other sources, or enter "none."): *Archaeological Resources Assessment, Seismic Corrections Project, Department of Veterans Affairs, West Los Angeles Healthcare Campus, Los Angeles, California*. 2014. By Curt Duke, DUKE C R M .

\*Attachments:  NONE  Location Map  Sketch Map  Continuation Sheet  Building, Structure, and Object Record  Archaeological Record  District Record  Linear Feature Record  Milling Station Record  Rock Art Record  Artifact Record  Photograph Record  Other (List):

\*A1. Dimensions: a. Length: 12 m (36 ft) × b. Width: 17 m (51 ft)

Method of Measurement:  Paced  Taped  Visual estimate  Other:

Method of Determination (Check any that apply.):  Artifacts  Features  Soil  Vegetation  Topography  
 Cut bank  Animal burrow  Excavation  Property boundary  Other (Explain):

Reliability of Determination:  High  Medium  Low Explain: Due to the disturbed and developed nature of the site it is difficult to know the actual boundaries.

Limitations (Check any that apply):  Restricted access  Paved/built over  Site limits incompletely defined  
 Disturbances  Vegetation  Other (Explain):

A2. Depth:  None  Unknown Method of Determination: N/A

\*A3. Human Remains:  Present  Absent  Possible  Unknown (Explain):

\*A4. Features (Number, briefly describe, indicate size, list associated cultural constituents, and show location of each feature on sketch map.):

None present

\*A5. Cultural Constituents (Describe and quantify artifacts, ecofacts, cultural residues, etc., not associated with features.):

1 metal rectangular plate; 4 tile, gray, fragment; 7 tile, pale green, fragment; 5 ceramic fragment; 5 red brick fragments; 12 glass, colorless fragments; 5 tile 1", off white, complete; 4 tile, off white, fragment; 1 concrete rectangular plate; 1 ceramic fragment, green; 1 tile 1", square, white, complete; 2 tile 2", gray, complete; 5 tile 1", white, complete; 1 ceramic, white, insulator, BRUNT 1800's-1925.

\*A6. Were Specimens Collected?  No  Yes (If yes, attach Artifact Record or catalog and identify where specimens are curated.)

\*A7. Site Condition:  Good  Fair  Poor (Describe disturbances.): Site disturbances include the construction of building 213. In recent years rodents, landscaping, hardscaping and the utilities in the site boundaries and a manhole directly outside the site.

\*A8. Nearest Water (Type, distance, and direction.): intermittent creeks are map on historic maps within ½ mile to the north and south. In addition freshwater springs are located in the immediate vicinity.

\*A9. Elevation: 370 feet, interpreted from map.

A10. Environmental Setting (Describe culturally relevant variables such as vegetation, fauna, soils, geology, landform, slope, aspect, exposure, etc.): All the vegetation is landscaped grass and trees such as palm trees.

A11. Historical Information: In 1888 the Pacific Branch of the National Home for Disabled Volunteer Soldiers (NHDVS) was established. Approximately 40 buildings were founded on the property. Here 25 barracks (with smoking rooms, lavatories, and bathrooms), along with a church, hospital, laundry, boiler house, dining hall, memorial hall, and headquarters were built along with trees, landscaping, and lakes. Over the years with the increase in the number veterans and change in administration and purpose most of the original buildings were replaced with newer buildings. Building 213 was constructed in 1938.

\*A12. Age:  Prehistoric  Protohistoric  1542-1769  1769-1848  1848-1880  1880-1914  1914-1945  
 Post 1945  Undetermined Describe position in regional prehistoric chronology or factual historic dates if known: Most of the material is not diagnostic to time period. The previous buildings were demolished prior to 1938 when building 213 was constructed. The BRUNT insulator found at the site dates from the 1880s to the 1920s.

A13. Interpretations (Discuss data potential, function[s], ethnic affiliation, and other interpretations): All remnants of the site observed are fragmented. While these items are not significant they are indicators for what could be buried. The potential exists for intact historical archaeological features that could shed light on the history of the early period of the NHDVS.

A14. Remarks:

A15. References (Documents, informants, maps, and other references): *Historical Resources Evaluation Report and Finding of Effect, Section 106 Review, Solar Photovoltaic System Installation, West Los Angeles Va Medical Center, 11301 Wilshire. ARG, 2012*

A16. Photographs (List subjects, direction of view, and accession numbers or attach a Photograph Record.):  
Original Media/Negatives Kept at: DUKE C R M, 22 Socorro, RSM, CA.

\*A17. Form Prepared by: Eleni Ziogas and Curt Duke

Date: 8/22/14

Affiliation and Address: DUKE CRM 22 Socorro, Rancho Santa Margarita, CA, 92688

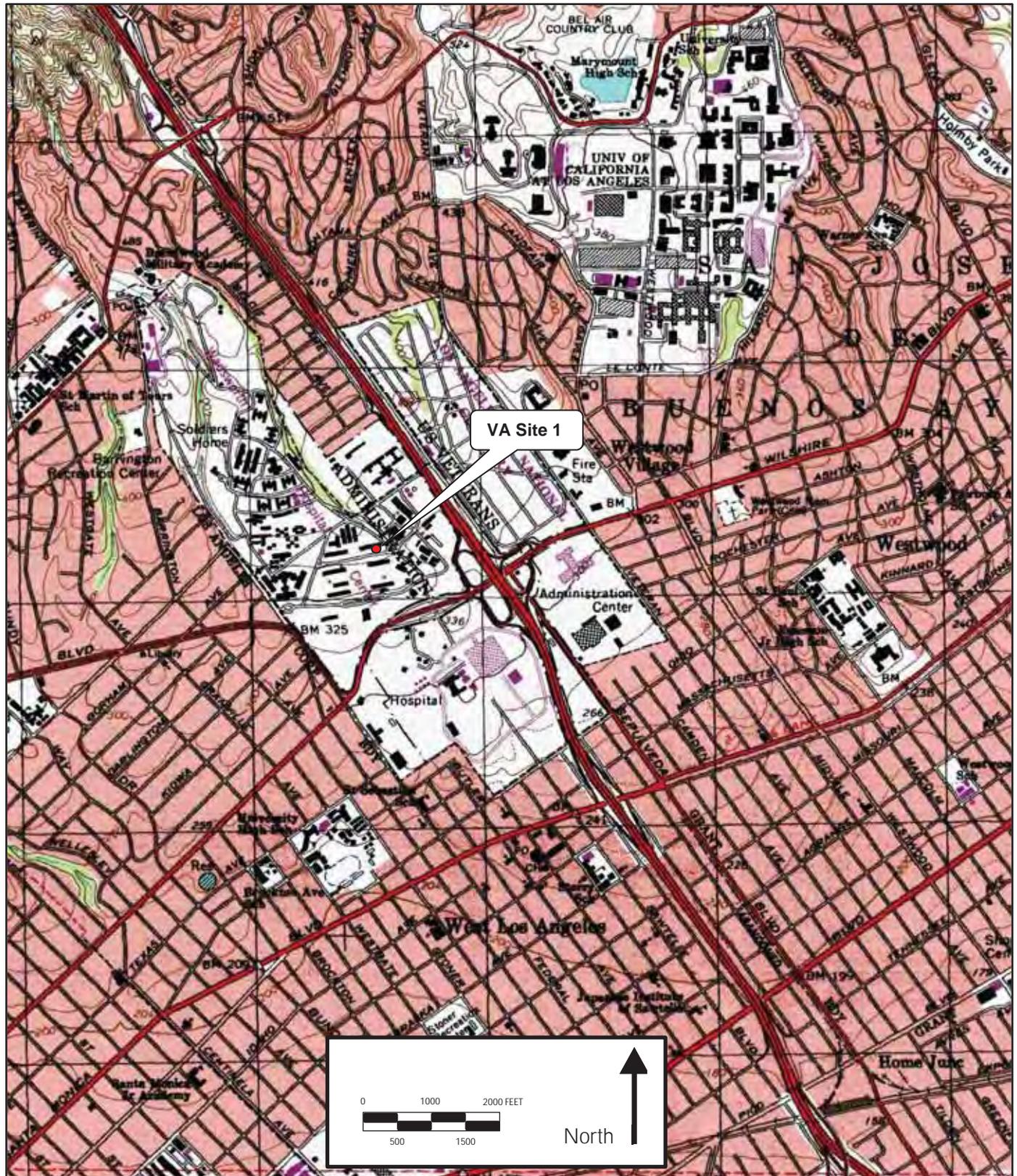
Camera Format: Samsung Droid

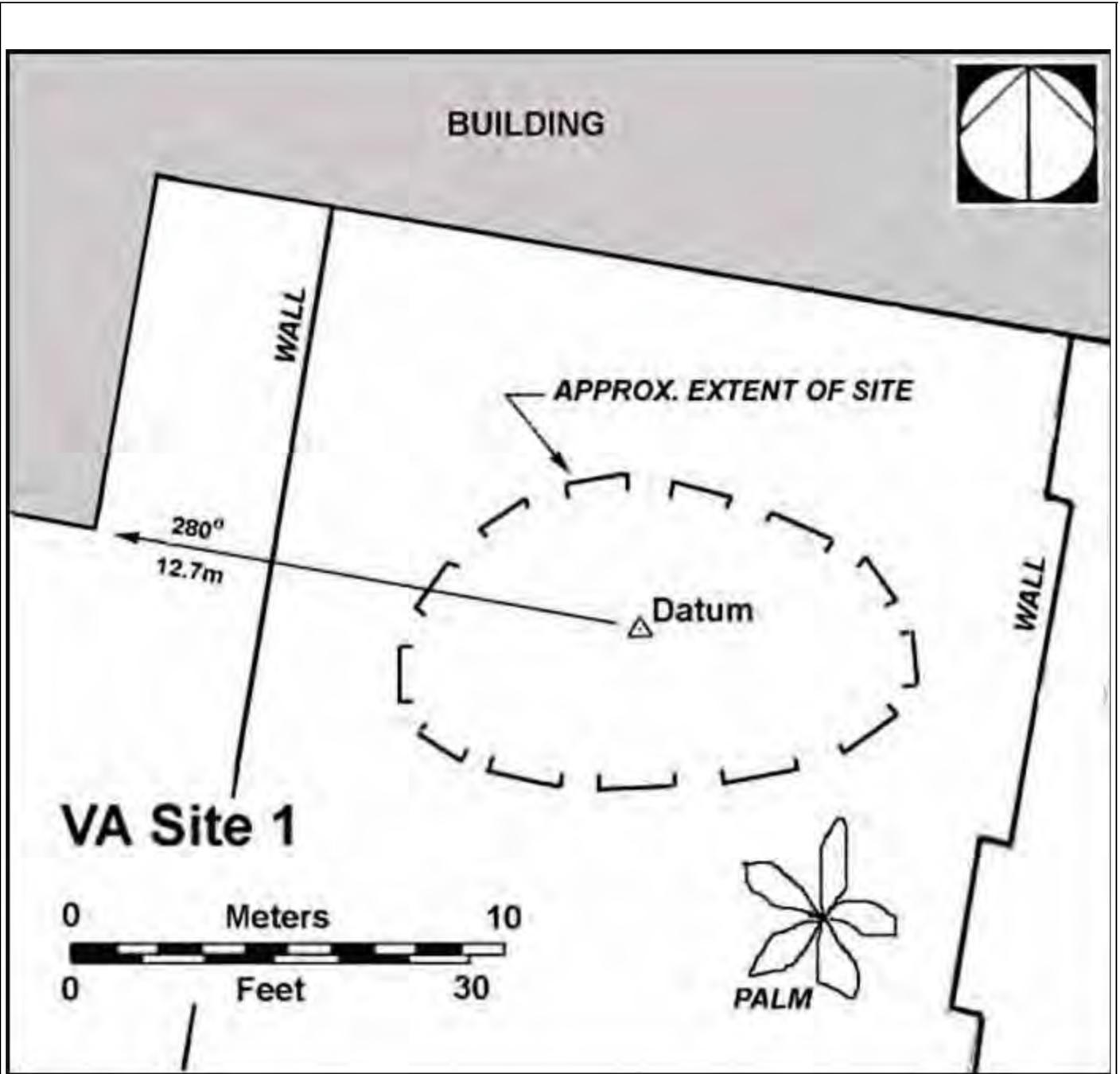
Lens Size:

Film Type and Speed: Digital

Negatives Kept at: DUKE CRM

Mo.	Day	Time	Exp./Frame	Subject/Description	View Toward	Accession #
2	11	4:45	1	Site Overview	NW	
2	11	4:45	2	Site Overview	NE	
2	11	4:45	3	Site Overview	NE	
2	11	4:45	4	Site Overview	NE	
2	11	4:45	5	Manhole	N	
2	11	4:45	6	Overview	NW	
2	11	4:45	7	Overview	N	
2	11	4:45	8	Overview	W	
2	11	4:45	9	Insulator "BRUNT"	-	
2	11	4:45	10	Insulator "BRUNT"	-	
2	11	4:45	11	Insulator "BRUNT"	-	
2	11	4:45	12	Insulator "BRUNT" profile	-	
2	11	4:45	13	Insulator "BRUNT" profile	-	
2	11	4:45	14	Water Outlet Covering	W	







State of California — The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**PRIMARY RECORD**

Primary #  
HRI #  
Trinomial  
NRHP Status Code

Other Listings  
Review Code

Reviewer

Date

Page 1 of 6

\*Resource Name or #: VA Site 2

**P1. Other Identifier:**

\*P2. Location:  Not for Publication  Unrestricted

\*a. County: Los Angeles

and (P2b and P2c or P2d. Attach a Location Map as necessary.)

\*b. USGS 7.5' Quad: Beverly Hills, CA; Date: 1966/PR 1995; T 1S; R 15 W; SW ¼ of NW ¼ of Sec. 28 (Projected); S.B. B.M.

c. Address: 11301 Wilshire Blvd. City: Los Angeles Zip: 90073

d. UTM: Zone: 11S; 365,127 mN; 3,769,123 mN (G.P.S.)

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate) Elevation:

VA Site 2 is located on the north side of building 117, immediately to the west of the Department of Veterans Affairs West Los Angeles Healthcare Campus. The site is located in an open patch of dirt southwest of the intersection of Perishing Ave. and Grant Ave. It is located between a driveway and a small parking area.

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries) VA Site 2 is a small historic debris scatter located north of building 117 on the Department of Veterans Affairs West Los Angeles Healthcare Campus, within West Los Angeles Veterans Administration Historic District (formerly a portion of the Home Branch Historic District). The small trash scatter consists of milk glass fragments, ceramic fragments (including rim and base sherds), colorless, amethyst, and amber glass sherds, and one ceramic base fragment with the National Home for Disabled Volunteer soldiers makers mark.

\*P3b. Resource Attributes: (List attributes and codes) AH4 trash scatter

\*P4. Resources Present:  Building  Structure  Object  Site  District  Element of District  Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo: (View, date, accession #)  
Overview of VA Site 2, building 117 in background, view to southwest. 2/11/14.

\*P6. Date Constructed/Age and Sources:  Historic  Prehistoric  Both

\*P7. Owner and Address:  
West Los Angeles Veterans Affairs  
11301 Wilshire Blvd., Los Angeles,  
CA, 90073

\*P8. Recorded by: (Name, affiliation, and address)  
Eleni Ziogas and Curt Duke  
DUKE C R M  
22 Socorro  
Rancho Santa Margarita  
CA, 92688

\*P9. Date Recorded: 2/11/14

\*P10. Survey Type: (Describe)  
intensive pedestrian survey

\*P11. Report Citation: (Cite survey report and other sources, or enter "none."): *Archaeological Resources Assessment, Seismic Corrections Project, Department of Veterans Affairs, West Los Angeles Healthcare Campus, Los Angeles, California.* 2014. By Curt Duke, DUKE C R M .

\*Attachments:  NONE  Location Map  Sketch Map  Continuation Sheet  Building, Structure, and Object Record  Archaeological Record  District Record  Linear Feature Record  Milling Station Record  Rock Art Record  Artifact Record  Photograph Record  Other (List):

\*A1. Dimensions: a. Length: 12 m (36 ft) × b. Width: 12 m (36 ft)

Method of Measurement:  Paced  Taped  Visual estimate  Other:

Method of Determination (Check any that apply.):  Artifacts  Features  Soil  Vegetation  Topography  
 Cut bank  Animal burrow  Excavation  Property boundary  Other (Explain):

Reliability of Determination:  High  Medium  Low Explain: Due to the disturbed and developed nature of the site it is difficult to know the actual boundaries.

Limitations (Check any that apply):  Restricted access  Paved/built over  Site limits incompletely defined  
 Disturbances  Vegetation  Other (Explain):

A2. Depth:  None  Unknown Method of Determination:

\*A3. Human Remains:  Present  Absent  Possible  Unknown (Explain):

\*A4. Features (Number, briefly describe, indicate size, list associated cultural constituents, and show location of each feature on sketch map.):  
None present

\*A5. Cultural Constituents (Describe and quantify artifacts, ecofacts, cultural residues, etc., not associated with features.):

1 fragment, white, ceramic, rim sherd; 1 fragment, colorless, base, embossing "A"; 2 fragments, white, ceramic, same piece as National Home for Disabled Volunteer soldiers makers mark; 2 fragments, milk glass, brown designs, same vessel; 2 fragments, milk glass, base and body, same vessel; 1 fragment, glass, green; 1 fragment, blue, ceramic mug handle; 1 fragment, glass, amber, embossing; 1 fragment, white, ceramic rim sherd; 2 fragments, milk glass; 2 fragments, glass, colorless; 1 fragment, glass, amethyst; 2 fragments, white, ceramic, shallow bowl sherds, base and rim; 1 fragment, ceramic, white with green paint, rim sherd

\*A6. Were Specimens Collected?  No  Yes (If yes, attach Artifact Record or catalog and identify where specimens are curated.)

\*A7. Site Condition:  Good  Fair  Poor (Describe disturbances.): Site disturbances include the construction of building 117. In recent years rodents, landscaping, and hardscaping would have impact the site.

\*A8. Nearest Water (Type, distance, and direction.): intermittent creeks are map on historic maps within ½ mile to the north and south. In addition freshwater springs are located in the immediate vicinity.

\*A9. Elevation: between 360, interpreted from map

A10. Environmental Setting (Describe culturally relevant variables such as vegetation, fauna, soils, geology, landform, slope, aspect, exposure, etc.): No natural vegetation, site itself is an exposed dirt lot, to the north of the site are landscaped trees and grass.

A11. Historical Information: In 1888 the Pacific Branch of the National Home for Disabled Volunteer Soldiers (NHDVS) was established. Approximately 40 buildings were founded on the property. Here 25 barracks (with smoking rooms, lavatories, and bathrooms), along with a church, hospital, laundry, boiler house, dining hall, memorial hall, and headquarters were built along with trees, landscaping, and lakes. Over the years with the increase in the number veterans and change in administration and purpose most of the original buildings were replaced with newer buildings. Building 117 was constructed in 1930.

\*A12. Age:  Prehistoric  Protohistoric  1542-1769  1769-1848  1848-1880  1880-1914  1914-1945  
 Post 1945  Undetermined Describe position in regional prehistoric chronology or factual historic dates if known: Most of the material is not diagnostic to time period. The previous buildings were demolished prior to 1930 when building 117 was constructed. The NHDVS ceramic fragments were made between 1899-1906.

A13. Interpretations (Discuss data potential, function[s], ethnic affiliation, and other interpretations): All remnants of the site observed are fragmented. While these items are not significant they are indicators for what could be buried. The potential exists for intact historical archaeological features that could shed light on the history of the early period of the NHDVS.

A14. Remarks:

A15. References (Documents, informants, maps, and other references): *Historical Resources Evaluation Report and Finding of Effect, Section 106 Review, Solar Photovoltaic System Installation, West Los Angeles Va Medical Center, 11301 Wilshire. ARG, 2012.*

*Kovels.com* (<http://www.kovels.com/collectors-concerns/national-home-platter.html>): Posted August 17, 2011. Accessed May 2014.

A16. Photographs (List subjects, direction of view, and accession numbers or attach a Photograph Record.):  
Original Media/Negatives Kept at: DUKE C R M , 22 Socorro, Rancho Santa Margarita, CA.

\*A17. Form Prepared by: Eleni Ziogas and Curt Duke

Date: 8/22/14

Affiliation and Address: DUKE C R M 22 Socorro, Rancho Santa Margarita, CA, 92688

\*Recorded by: Eleni Ziogas and Curt Duke

\*Date: Feb. 11, 2014     Continuation     Update



Photograph of NHDVS ceramic plate fragments.



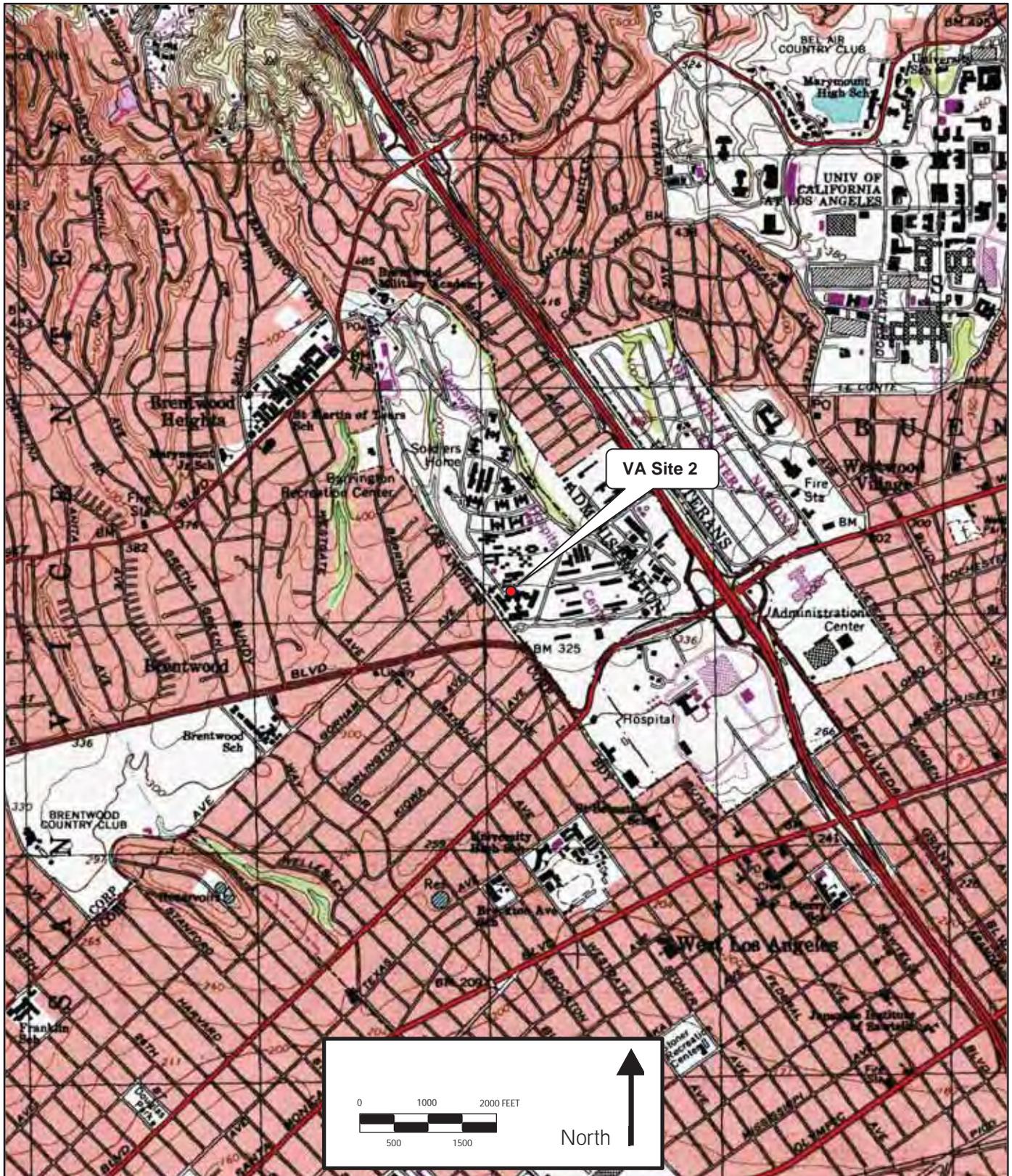
Seal of the NHDVS which was placed on the bottom of pottery manufactured for the NHDVS from 1899-1906.

Camera Format: Samsung Droid  
 Film Type and Speed: Digital

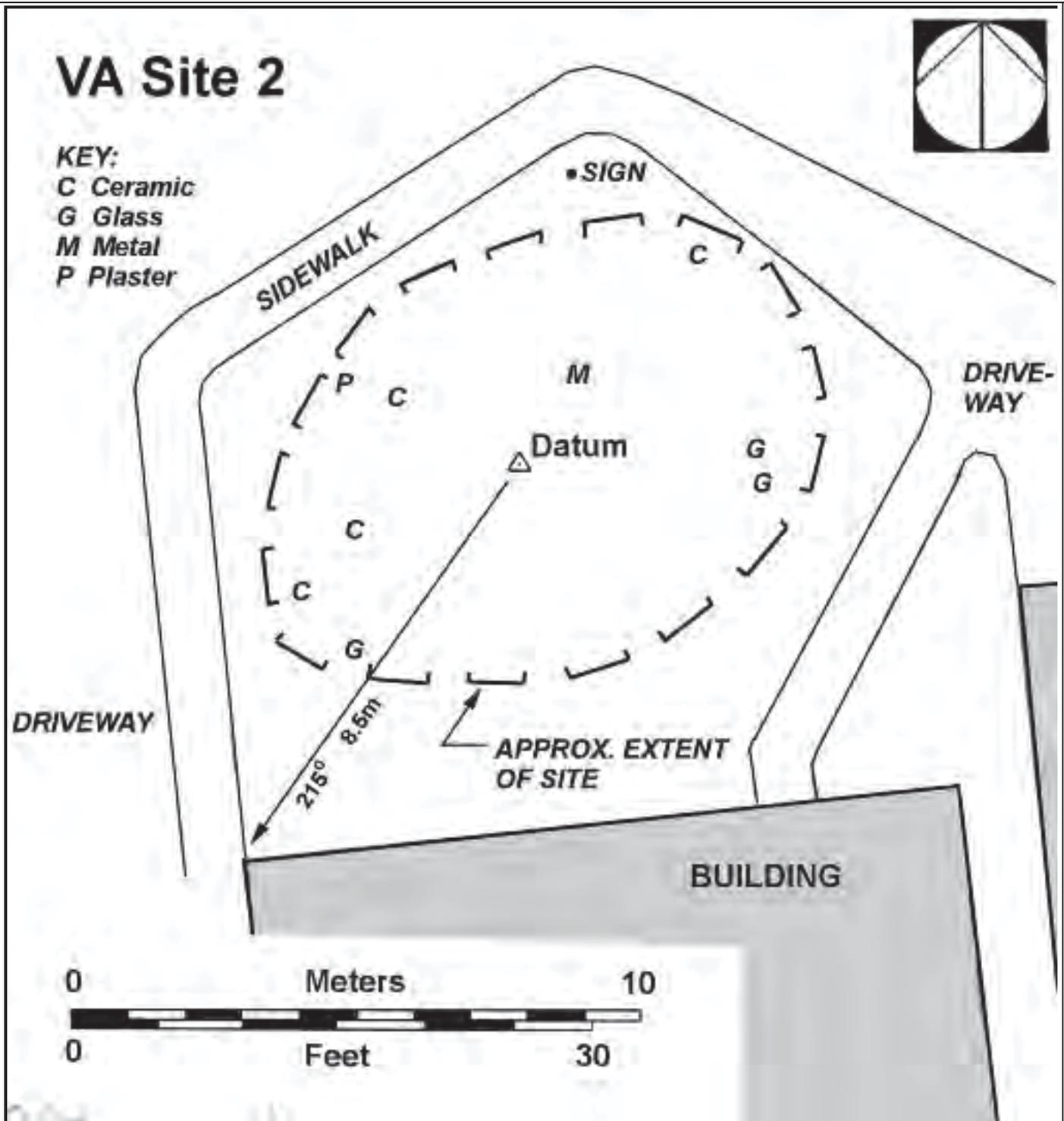
Negatives Kept at: DUKE CRM

Lens Size:

Mo.	Day	Time	Exp./Frame	Subject/Description	View Toward	Accession #
2	11	3:45	1	Site Overview	SE	
2	11	3:45	2	Site Overview	S	
2	11	3:45	3	Site Overview	SW	
2	11	3:45	4	Site Overview	NE	
2	11	3:45	5	Close up of plate base with makers mark	-	
2	11	3:45	6	Close up of plate base with makers mark	-	
2	11	3:45	7	Close up of plate base with makers mark	-	
2	11	3:45	8	Close up of plate base with makers mark	-	
2	11	3:45	9	Close up of plate base with makers mark	-	
2	11	3:45	10	Close up of plate base with makers mark	-	
2	11	3:45	11	Close up of ceramic plate rim fragment	-	
2	11	3:45	12	Close up of ceramic plate rim fragment	-	
2	11	3:45	13	3 ceramic rim sherds	-	
2	11	3:45	14	3 ceramic rim sherds	-	
2	11	3:45	15	2 glass fragments with embossing	-	
2	11	3:45	16	2 glass fragments with embossing	-	
2	11	3:45	17	2 glass fragments with embossing	-	
2	11	3:45	18	2 glass fragments with embossing	-	



**SKETCH MAP**



# **Appendix C**

## **Native American Correspondence**



# Native American Consultation Record

Project Name: Seismic Corrections and Renovations Project, for the West Los Angeles Veterans Adm  
 Project Number: C-0134  
 NAHC Contact Initiated: 12/19/2013  
 NAHC Letter Received: 12/24/2013

Results: The NAHC did not identify any Native American cultural resources in the Sacred Lands File recommended that we contact 10 Native American groups/individuals.

Matrix prepared by Elenia Ziogas and Curt Duke

Name/Group	Date contact was initiated	Method of contact	Response
Gabrielino Tongva Nation, Sam Dunlap	3/4/2014	U.S. Certified Mail	No response to letter as of 4/2/14. Follow-up phone was left. 4/11/14 follow-up phone call was made. made in person. On 4/30/14 in a personal convers
Gabrielino Tongva Indians of California Tribal Council, Robert Dorame	3/4/2014	U.S. Certified Mail	No response to letter as of 4/2/14. Follow-up phone was left. 4/3/14 spoke on the phone with Ms. Ziogas area is extremely sensitive, monitoring required. He will em 4/9/14. Please see emailed correspondence on 4/11/14. On Ziogas spoke on the phone with Mr. Dorame and he Applied Earthworks for additional information. Th Mr. Dorame recommends that a Native Monitor s disturbance. Mr. Duke spoke with Colleen Hamilt about the 2nd discovery of shell fragments on the

Name/Group	Date contact was initiated	Method of contact	Response
Gabrieleno Band of Mission Indians, Andrew Salas	3/4/2014	U.S. Certified Mail	No response to letter as of 4/2/14. Follow-up phone has concerns about site. Native American monitor is recommen an email regarding documentation. In email dated "Like I mentioned during our conversation, we wo during all ground disturbance . The area is known as Follow up phone call and email made 4/14/14. Fo 4/15/14.
LA City/County Native American Indian Commission, Ron Andrade	3/4/2014	U.S. Certified Mail	No response to letter as of 4/2/14. Follow-up pho message. No response as of the date of this report.
Gabrielino/Tongva Nation, Sandonne Goad	3/4/2014	U.S. Certified Mail	No response to letter as of 4/2/14. Follow-up pho message. No response as of the date of this report.
Tongva Ancestral Territorial Tribal Nation, John Tommy Rosas	3/13/2014	email	On 3/13/14 Mr. Rosas emailed Dan Swienton of the to deal directly with the VA, not their consultant. He sensitive for cultural resources and that there are Rosas will be in touch regarding these concerns. Mr. Swien up email to Mr. Rosas on 4/29/14. No response re report.
Gabrielino-Tongva Tribe, Bernie Acuna	3/4/2014	U.S. Certified Mail	No response to letter as of 4/2/14. Follow-up phone 4/2/14 but the phone number was incorrect. No re this report.
Gabrieleno/Tonova San Gabriel Band of Mission Indians, Anthony Morales	3/4/2014	U.S. Certified Mail	No response to letter as of 4/2/14. Follow-up pho message. No response as of the date of this report.
Gabrielino-Tongva Tribe, Conrad Acuna	3/4/2014	U.S. Certified Mail	No response to letter as of 4/2/14. Unable to make email due to lack of contact information. No resp report.
Gabrielino-Tongva Tribe, Linda Candeleria	3/4/2014	U.S. Certified Mail	No response to letter as of 4/2/14. Follow-up phone message was left. No response as of the date of th

**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Boulevard, Suite 100  
West Sacramento, CA 95691  
(916) 373-3715  
Fax (916) 373-5471  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
Ds\_nahc@pacbell.net



December 24, 2013

Mr. Curt Duke, M.A., RPA

**DUKE Cultural Resources Management**

22 Socorro  
Rancho Santa Margarita, California 92688

Sent by U.S. Mail

No. of Pages: 4

RE: Sacred Lands File Search and Native American Contacts list for the **"Veterans Administration Medical Services Area, West Los Angeles;"** located in in West Los Angeles near Wilshire Boulevard and Interstate 405; Los Angeles County, California

Dear Mr. Duke:

A record search of the NAHC Sacred Lands File **failed to indicate** the presence of Native American traditional cultural places in the project site(s) submitted as defined by the USGS coordinates configuring the 'Area of Potential Effect' or APE. However, there are Native American cultural resources in close proximity to the APE. Furthermore, please note that the absence of archaeological or cultural resources does not preclude their existence at the subsurface level. Other data sources should be contacted. A Native American may be the only source of information about a sacred site.

In the 1985 Appellate Court decision (170 Cal App 3<sup>rd</sup> 604), the Court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

Attached is a list of Native American tribes, Native American individuals or organizations that may have knowledge of cultural resources in or near the project area (APE). As part of the consultation process the NAHC recommends that local government and project developers contact the tribal governments and individuals in order to determine the proposed action on any cultural places/sacred sites. If a response from those listed is not received in two weeks of notification, the NAHC requests that a follow-up telephone call be made to ensure the project information has been received.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People...with respect to the development, adoption,

Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

If you have any questions or need additional information, please contact me at (916) 373-3715.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dave Singleton', written over a printed name and title.

Dave Singleton  
Program Analyst

**Happy Holidays!**

Attachments

**Native American Contacts  
Los Angeles County California  
December 24, 2013**

LA City/County Native American Indian Comm  
Ron Andrade, Director  
3175 West 6th St, Rm. 403  
Los Angeles , CA 90020  
randrade@css.lacounty.gov  
(213) 351-5324  
(213) 386-3995 FAX

Tongva Ancestral Territorial Tribal Nation  
John Tommy Rosas, Tribal Admin.  
Private Address                      Gabrielino Tongva  
  
tattnlaw@gmail.com  
310-570-6567

Gabrieleno/Tongva San Gabriel Band of Mission  
Anthony Morales, Chairperson  
PO Box 693                      Gabrielino Tongva  
San Gabriel , CA 91778  
GTtribalcouncil@aol.com  
(626) 286-1632  
(626) 286-1758 - Home  
(626) 286-1262 -FAX

Gabrielino /Tongva Nation  
Sandonne Goad, Chairperson  
P.O. Box 86908                      Gabrielino Tongva  
Los Angeles , CA 90086  
sgoad@gabrielino-tongva.com  
951-845-0443

Gabrielino Tongva Indians of California Tribal Council  
Robert F. Dorame, Tribal Chair/Cultural Resources  
P.O. Box 490                      Gabrielino Tongva  
Bellflower , CA 90707  
**gtongva@verizon.net**  
562-761-6417 - voice  
562-761-6417- fax

Gabrielino-Tongva Tribe  
Bernie Acuna, Co-Chairperson  
P.O. Box 180                      Gabrielino  
Bonsall , CA 92003  
(619) 294-6660-work  
(310) 428-5690 - cell  
(760) 636-0854- FAX  
bacuna1@gabrielinotribe.org

Gabrielino-Tongva Tribe  
Linda Candelaria, Co-Chairperson  
P.O. Box 180                      Gabrielino  
Bonsall , CA 92003  
palmsprings9@yahoo.com  
626-676-1184- cell  
(760) 636-0854 - FAX

Gabrieleno Band of Mission Indians  
Andrew Salas, Chairperson  
P.O. Box 393                      Gabrielino  
Covina , CA 91723  
gabrielenoindians@yahoo.  
(626) 926-4131

**This list is current only as of the date of this document.**

**Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed VA West Hollywood Project; Los Angeles County, California for which a Sacred Lands File search and Native American Contacts list were requested.

**Native American Contacts  
Los Angeles County California  
December 24, 2013**

Gabrielino-Tongva Tribe  
Conrad Acuna,  
P.O. Box 180  
Bonsall , CA 92003  
Gabrielino

760-636-0854 - FAX

Gabrielino /Tongva Nation  
Sam Dunlap, Cultural Resorces Director  
P.O. Box 86908  
Los Angeles , CA 90086  
samdunlap@earthlink.net  
909-262-9351  
Gabrielino Tongva

**This list is current only as of the date of this document.**

**Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

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**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: January 28, 2014 – ds

January 28, 2014

Andrew Salas, Chairperson  
P. O. Box 393  
Covina, CA 91723  
626-926-4131  
gabrielenoindians@yahoo.com

Subject: Native American Consultation for the Seismic Corrections and Renovations Project, Located at the West Los Angeles Veterans Administration Campus, Los Angeles, California,

Dear Mr. Salas:

The Department of Veterans Affairs (VA) is in the process of making seismic corrections and renovations to many buildings on its West Los Angeles Campus. This process involves some ground disturbance during the renovation to comply with VA and building code requirements. Additionally, the VA is also updating its Preservation Plan for Historic Properties. The West Los Angeles Campus is approximately 570 acres; however, the seismic corrections and renovations proposed are in the western portion of the campus (west of the I-405 Freeway).

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires that federal agencies consider the effect that their projects may have on historic properties. These include properties of traditional, religious, and cultural significance to Indian Tribes. Government-to-Government consultation with Indian Tribes is also a requirement of the NHPA. If you are not the designated representative, please forward this information to the person who is responsible.

A search of the South Central Coastal Information Center (SCCIC) did not identify any prehistoric resources within the West Los Angeles Campus. However, we are aware of a Native American village (Serra Springs) southwest of the campus. The Native American Heritage Commission (NAHC), Sacred Lands File did not identify any Native American cultural resources within the project boundaries, but they did note that there are resources in close proximity.

If you know of any religious and/or culturally significant resources that may be impacted by this project, or if you would like more information, please do not hesitate to contact me at the below telephone or email address. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads "Daniel Swinton".

Daniel Swinton  
Project Manager  
Phone Number: 707-562-8418  
Email: [Daniel.Swinton@va.gov](mailto:Daniel.Swinton@va.gov)

Attachment: USGS *Beverly Hills* 7.5 Minute Quadrangle



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: January 28, 2014 – ds

January 28, 2014

John Tommy Rosas, Tribal Admin.  
310-570-6567  
tattnlaw@gmail.com

Subject: Native American Consultation for the Seismic Corrections and Renovations Project,  
Located at the West Los Angeles Veterans Administration Campus, Los Angeles,  
California,

Dear Mr. Rosas:

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Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Swienton", is positioned above the typed name.

Daniel Swienton  
Project Manager  
Phone Number: 707-562-8418  
Email: [Daniel.Swienton@va.gov](mailto:Daniel.Swienton@va.gov)

Attachment: USGS *Beverly Hills* 7.5 Minute Quadrangle



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: January 28, 2014 – ds

January 28, 2014

Anthony Morales, Chairperson  
P.O. Box 693  
San Gabriel, CA 91778  
626-286-1632  
gttribalcouncil@aol.com

Subject: Native American Consultation for the Seismic Corrections and Renovations Project,  
Located at the West Los Angeles Veterans Administration Campus, Los Angeles,  
California,

Dear Anthony Morales:

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Daniel Swinton  
Project Manager  
Phone Number: 707-562-8418  
Email: [Daniel.Swinton@va.gov](mailto:Daniel.Swinton@va.gov)

Attachment: USGS *Beverly Hills* 7.5 Minute Quadrangle



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: January 28, 2014 – ds

January 28, 2014

Sandonne Goad, Chairperson  
P.O. Box 86908  
Los Angeles, CA 90086  
951-845-0443  
sgoad@gabrielino-tongva.com

Subject: Native American Consultation for the Seismic Corrections and Renovations Project,  
Located at the West Los Angeles Veterans Administration Campus, Los Angeles,  
California,

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Project Manager  
Phone Number: 707-562-8418  
Email: [Daniel.Swinton@va.gov](mailto:Daniel.Swinton@va.gov)

Attachment: USGS *Beverly Hills* 7.5 Minute Quadrangle



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: January 28, 2014 – ds

January 28, 2014

Sam Dunlap, Cultural Resources Director  
P. O. Box 86908  
Los Angeles, CA 90086  
909-262-9351  
samdunlap@earthlink.net

Subject: Native American Consultation for the Seismic Corrections and Renovations Project,  
Located at the West Los Angeles Veterans Administration Campus, Los Angeles,  
California,

Dear Sam Dunlap:

The Department of Veterans Affairs (VA) is in the process of making seismic corrections and renovations to many buildings on its West Los Angeles Campus. This process involves some ground disturbance during the renovation to comply with VA and building code requirements. Additionally, the VA is also updating its Preservation Plan for Historic Properties. The West Los Angeles Campus is approximately 570 acres; however, the seismic corrections and renovations proposed are in the western portion of the campus (west of the I-405 Freeway).

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires that federal agencies consider the effect that their projects may have on historic properties. These include properties of traditional, religious, and cultural significance to Indian Tribes. Government-to-Government consultation with Indian Tribes is also a requirement of the NHPA. If you are not the designated representative, please forward this information to the person who is responsible.

A search of the South Central Coastal Information Center (SCCIC) did not identify any prehistoric resources within the West Los Angeles Campus. However, we are aware of a Native American village (Serra Springs) southwest of the campus. The Native American Heritage Commission (NAHC), Sacred Lands File did not identify any Native American cultural resources within the project boundaries, but they did note that there are resources in close proximity.

If you know of any religious and/or culturally significant resources that may be impacted by this project, or if you would like more information, please do not hesitate to contact me at the below telephone or email address. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads "Daniel Swinton".

Daniel Swinton  
Project Manager  
Phone Number: 707-562-8418  
Email: [Daniel.Swinton@va.gov](mailto:Daniel.Swinton@va.gov)

Attachment: USGS *Beverly Hills* 7.5 Minute Quadrangle



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: January 28, 2014 – ds

January 28, 2014

Robert F. Dorame, Tribal Chair / Cultural Resources  
P.O. Box 490  
Bellflower, CA 90707  
562-761-6417  
gtongva@verion.net

Subject: Native American Consultation for the Seismic Corrections and Renovations Project,  
Located at the West Los Angeles Veterans Administration Campus, Los Angeles,  
California,

Dear Mr. Dorame:

The Department of Veterans Affairs (VA) is in the process of making seismic corrections and renovations to many buildings on its West Los Angeles Campus. This process involves some ground disturbance during the renovation to comply with VA and building code requirements. Additionally, the VA is also updating its Preservation Plan for Historic Properties. The West Los Angeles Campus is approximately 570 acres; however, the seismic corrections and renovations proposed are in the western portion of the campus (west of the I-405 Freeway).

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires that federal agencies consider the effect that their projects may have on historic properties. These include properties of traditional, religious, and cultural significance to Indian Tribes. Government-to-Government consultation with Indian Tribes is also a requirement of the NHPA. If you are not the designated representative, please forward this information to the person who is responsible.

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If you know of any religious and/or culturally significant resources that may be impacted by this project, or if you would like more information, please do not hesitate to contact me at the below telephone or email address. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads "Daniel Swinton".

Daniel Swinton  
Project Manager  
Phone Number: 707-562-8418  
Email: [Daniel.Swinton@va.gov](mailto:Daniel.Swinton@va.gov)

Attachment: USGS *Beverly Hills* 7.5 Minute Quadrangle



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: January 28, 2014 – ds

January 28, 2014

Conrad Acuna  
P. O. Box 180  
Bonsall, CA 92003  
Fax Number: (760) 636-0854

Subject: Native American Consultation for the Seismic Corrections and Renovations Project, Located at the West Los Angeles Veterans Administration Campus, Los Angeles, California,

Dear Mr. Acuna:

The Department of Veterans Affairs (VA) is in the process of making seismic corrections and renovations to many buildings on its West Los Angeles Campus. This process involves some ground disturbance during the renovation to comply with VA and building code requirements. Additionally, the VA is also updating its Preservation Plan for Historic Properties. The West Los Angeles Campus is approximately 570 acres; however, the seismic corrections and renovations proposed are in the western portion of the campus (west of the I-405 Freeway).

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires that federal agencies consider the effect that their projects may have on historic properties. These include properties of traditional, religious, and cultural significance to Indian Tribes. Government-to-Government consultation with Indian Tribes is also a requirement of the NHPA. If you are not the designated representative, please forward this information to the person who is responsible.

A search of the South Central Coastal Information Center (SCCIC) did not identify any prehistoric resources within the West Los Angeles Campus. However, we are aware of a Native American village (Serra Springs) southwest of the campus. The Native American Heritage Commission (NAHC), Sacred Lands File did not identify any Native American cultural resources within the project boundaries, but they did note that there are resources in close proximity.

If you know of any religious and/or culturally significant resources that may be impacted by this project, or if you would like more information, please do not hesitate to contact me at the below telephone or email address. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads "Daniel Swinton".

Daniel Swinton  
Project Manager  
Phone Number: 707-562-8418  
Email: [Daniel.Swinton@va.gov](mailto:Daniel.Swinton@va.gov)

Attachment: USGS *Beverly Hills* 7.5 Minute Quadrangle



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: January 28, 2014 – ds

January 28, 2014

Linda Candelaria, Co-Chairperson  
P.O. Box 180  
Bonsall, CA 92003  
626-676-1184  
palmsprings9@yahoo.com

Subject: Native American Consultation for the Seismic Corrections and Renovations Project,  
Located at the West Los Angeles Veterans Administration Campus, Los Angeles,  
California,

Dear Ms. Candelaria:

The Department of Veterans Affairs (VA) is in the process of making seismic corrections and renovations to many buildings on its West Los Angeles Campus. This process involves some ground disturbance during the renovation to comply with VA and building code requirements. Additionally, the VA is also updating its Preservation Plan for Historic Properties. The West Los Angeles Campus is approximately 570 acres; however, the seismic corrections and renovations proposed are in the western portion of the campus (west of the I-405 Freeway).

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires that federal agencies consider the effect that their projects may have on historic properties. These include properties of traditional, religious, and cultural significance to Indian Tribes. Government-to-Government consultation with Indian Tribes is also a requirement of the NHPA. If you are not the designated representative, please forward this information to the person who is responsible.

A search of the South Central Coastal Information Center (SCCIC) did not identify any prehistoric resources within the West Los Angeles Campus. However, we are aware of a Native American village (Serra Springs) southwest of the campus. The Native American Heritage Commission (NAHC), Sacred Lands File did not identify any Native American cultural resources within the project boundaries, but they did note that there are resources in close proximity.

If you know of any religious and/or culturally significant resources that may be impacted by this project, or if you would like more information, please do not hesitate to contact me at the below telephone or email address. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Swinton", is positioned above the typed name.

Daniel Swinton  
Project Manager  
Phone Number: 707-562-8418  
Email: [Daniel.Swinton@va.gov](mailto:Daniel.Swinton@va.gov)

Attachment: USGS *Beverly Hills* 7.5 Minute Quadrangle



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: January 28, 2014 – ds

January 28, 2014

Bernie Acuna, Co-Chairperson  
P.O. Box 180  
Bonsall, CA 92003  
619-294-6660  
bacuna1@gabrielinotribe.org

Subject: Native American Consultation for the Seismic Corrections and Renovations Project,  
Located at the West Los Angeles Veterans Administration Campus, Los Angeles,  
California,

Dear Bernie Acuna:

The Department of Veterans Affairs (VA) is in the process of making seismic corrections and renovations to many buildings on its West Los Angeles Campus. This process involves some ground disturbance during the renovation to comply with VA and building code requirements. Additionally, the VA is also updating its Preservation Plan for Historic Properties. The West Los Angeles Campus is approximately 570 acres; however, the seismic corrections and renovations proposed are in the western portion of the campus (west of the I-405 Freeway).

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires that federal agencies consider the effect that their projects may have on historic properties. These include properties of traditional, religious, and cultural significance to Indian Tribes. Government-to-Government consultation with Indian Tribes is also a requirement of the NHPA. If you are not the designated representative, please forward this information to the person who is responsible.

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If you know of any religious and/or culturally significant resources that may be impacted by this project, or if you would like more information, please do not hesitate to contact me at the below telephone or email address. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads "Daniel Swinton".

Daniel Swinton  
Project Manager  
Phone Number: 707-562-8418  
Email: [Daniel.Swinton@va.gov](mailto:Daniel.Swinton@va.gov)

Attachment: USGS *Beverly Hills* 7.5 Minute Quadrangle



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

In Reply Refer To: January 28, 2014 – ds

January 28, 2014

Ron Andrade, Director  
3175 West 6<sup>th</sup> St, Room 403  
Los Angeles, CA 90020  
213-351-5324  
randrade@css.lacounty.gov

Subject: Native American Consultation for the Seismic Corrections and Renovations Project,  
Located at the West Los Angeles Veterans Administration Campus, Los Angeles,  
California,

Dear Mr. Andrade:

The Department of Veterans Affairs (VA) is in the process of making seismic corrections and renovations to many buildings on its West Los Angeles Campus. This process involves some ground disturbance during the renovation to comply with VA and building code requirements. Additionally, the VA is also updating its Preservation Plan for Historic Properties. The West Los Angeles Campus is approximately 570 acres; however, the seismic corrections and renovations proposed are in the western portion of the campus (west of the I-405 Freeway).

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires that federal agencies consider the effect that their projects may have on historic properties. These include properties of traditional, religious, and cultural significance to Indian Tribes. Government-to-Government consultation with Indian Tribes is also a requirement of the NHPA. If you are not the designated representative, please forward this information to the person who is responsible.

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If you know of any religious and/or culturally significant resources that may be impacted by this project, or if you would like more information, please do not hesitate to contact me at the below telephone or email address. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads "Daniel Swinton".

Daniel Swinton  
Project Manager  
Phone Number: 707-562-8418  
Email: [Daniel.Swinton@va.gov](mailto:Daniel.Swinton@va.gov)

Attachment: USGS *Beverly Hills* 7.5 Minute Quadrangle

**From:** [Eleni Ziogas](#)  
**To:** [curt@dukecrm.com](mailto:curt@dukecrm.com)  
**Subject:** Fwd:  
**Date:** Saturday, April 19, 2014 5:35:27 PM

---

Here is additional documentation for the West LA VA project. This is what Andrew salas sent me. I was waiting for this the other day but he finally sent it to me yesterday. I already sent you over the native America matrix. But if you need me too I can add this new information to it and resend it to you. Just let me know.  
Eleni

Sent from my iPhone

Begin forwarded message:

**From:** Andy Salas <[andysalas07@yahoo.com](mailto:andysalas07@yahoo.com)>  
**Date:** April 18, 2014, 6:34:40 PM PDT  
**To:** Eleni Ziogas <[eziog001@gmail.com](mailto:eziog001@gmail.com)>, Christina Swildall <[christinaswindall@yahoo.com](mailto:christinaswindall@yahoo.com)>  
**Subject:** Fwd:

Eleni  
Let me know if this works

[http://media.metro.net/projects\\_studies/wilshire/images/deir/4.3\\_Cultural\\_Resources.pdf](http://media.metro.net/projects_studies/wilshire/images/deir/4.3_Cultural_Resources.pdf)

From: [Eleni Ziogas](mailto:Eleni.Ziogas)  
To: [curt@dukecrm.com](mailto:curt@dukecrm.com)  
Subject: Fwd: Seismic Corrections and Renovation Project at the West LA Veterans Affairs documentation  
Date: Monday, April 14, 2014 1:18:02 PM

---

Sent from my iPhone

Begin forwarded message:

**From:** Andy <[gabrielenoindians@yahoo.com](mailto:gabrielenoindians@yahoo.com)>  
**Date:** April 3, 2014, 7:59:41 PM PDT  
**To:** Eleni Ziogas <[eziog001@gmail.com](mailto:eziog001@gmail.com)>  
**Cc:** Christina Swildall <[christinaswindall@yahoo.com](mailto:christinaswindall@yahoo.com)>, "Matt Teutimez.Kizh Gabrieleno" <[Matt.Teutimez@gmail.com](mailto:Matt.Teutimez@gmail.com)>  
**Subject:** Re: Seismic Corrections and Renovation Project at the West LA Veterans Affairs documentation

Dear Eleni

Like I mentioned during our conversation, we would like a monitor present during all ground disturbance . The area is known as being highly sensitive .

Thank you Andrew Salas  
Sent from my iPhone

On Apr 2, 2014, at 3:46 PM, Eleni Ziogas <[eziog001@gmail.com](mailto:eziog001@gmail.com)> wrote:

Hi Andrew,

This is Eleni Ziogas. We just spoke on the phone. I am sending you the consultation letter for the Seismic Corrections and Renovation Project at the West LA Veterans Administration Campus so you can send me the documentation you have about the project area. If you can please send this to me by April 9th that would be awesome.

Thanks so much

Eleni

<USGS Location Map.pdf>

<691-406\_Native American Consultation\_Salas\_012814-1.pdf>

**From:** [Eleni Ziogas](mailto:Eleni.Ziogas)  
**To:** [curt@dukecrm.com](mailto:curt@dukecrm.com)  
**Subject:** Fwd: Seismic Corrections and Renovations Project at VA West LA  
**Date:** Friday, April 11, 2014 12:40:46 PM

---

Sent from my iPhone

Begin forwarded message:

**From:** "Robert F. Dorame" <[gtongva@verizon.net](mailto:gtongva@verizon.net)>  
**Date:** April 11, 2014, 10:22:14 AM PDT  
**To:** "Eleni Ziogas" <[eziog001@gmail.com](mailto:eziog001@gmail.com)>  
**Subject:** Re: Seismic Corrections and Renovations Project at VA West LA

Hi Eleni:

I just realized I may be standing in line at the post office so felt it best I jot down my points.

1. There is a high level of cultural sensitivity at the Veteran's Administration, WLA campus, that includes, but is not limited to shell midden and cemetery features that my brother and I observed in the late 50s and early 60s, both on the east and west sides of the property.
2. I recently discovered two previously unknown Native American sites during excavation activities in the past year.
3. The site also has/had major fossil deposits uncovered, along with midden during excavation for a road in the mid-90s in the north/west portion of the campus.
4. Last year, Native American remains were uncovered during excavation at the Kuravungna Springs, which are located approximately a mile south/west of the VA and is in fact, an extension of the same riparian corridor as the VA and are connected.

All of these factors add up to requiring native monitoring during all soil disturbances in the area and particularly on the VA campus.

You are welcome to call me after you get this if you have any additional questions but at least I will not have to discuss sensitive issues with you in the middle of the post office. I'm afraid I may be there quite awhile.

Thanks for being so patient...it's been quite a week.

My cell number is 562-761-6417

Enjoy your weekend  
Robert Dorame

**From:** [Eleni Ziogas](#)

**Sent:** Thursday, April 03, 2014 11:49 AM

**To:** [gtongva@verizon.net](mailto:gtongva@verizon.net)

**Subject:** Seismic Corrections and Renovations Project at VA West LA

Hi Robert,

This is Eleni Ziogas with DUKE CRM. We spoke on the phone this morning. Here is the consultation letter and map of the project area. If you could please get back to me by April 9th. Also I spoke with my boss and we do not need a formal letter, unless you want to write one. You can email me back your documentation or if you like get back in touch with me via phone. My number is 949 500 6054.

Thank you so much

Eleni

# **Appendix D**

## **Resume**



## **Curt Duke**

### **President/Archaeologist**



### **Expertise**

Cultural Resources Management  
California Prehistory  
Section 106 Compliance  
CEQA Compliance  
Native American Consultation

### **Education**

CSU, Fullerton, M.A., Anth, 2006  
SDSU, Grad Studies, Anth, 1996/97  
UC Santa Cruz, B.A., Anth, 1994

### **Professional Registrations**

RPA, No. 15969  
County of Riverside ( No. 151)  
County of Orange

### **Professional Memberships**

Society for California Archaeology  
Society for American Archaeology  
Pacific Coast Archaeological Society  
Assoc. of Environmental Professionals  
Building Industry Association

### **Professional Experience**

President/Archaeologist, DUKE CRM, March 2011 to present.  
Archaeologist/Principal, LSA Associates, 1997-2011.  
Archaeological Technician, SRI, 1997.  
Archaeological Technician, Petra Resources, 1997.  
Archaeological Technician, KEA Environmental, 1997.  
Archaeological Technician, Keith Companies, 1997.  
Archaeological Technician, KEA Environmental, 1997.  
Archaeological/Paleontological Technician, LSA Associates, 1996.  
Archaeological/Paleontological Technician, Petra Resources, 1996.  
Archaeological Technician, Affinis Environmental Services, 1996.  
Archaeological Technician, KEA Environmental, 1996.  
Archaeological Technician, Macko Archaeological Consulting, 1995 to 1996.  
Archaeological Technician, Heritage Resource Consultants, 1995.  
Archaeological Technician, Chambers Group, 1995.  
Archaeological Technician/Teachers Assistant, Cabrillo College, 1994  
Anthropological Laboratory Technician, UC Santa Cruz, 1994.

### **Selected Project Experience**

Vila Borba, Chino Hills, 2013-Present  
Skyridge Residential, Mission Viejo, 2011-Present  
Bryn Mawr Road Extension, Loma Linda, 2014-Present  
VA Clinic, Loma Linda, 2014-Present  
California Street/Highway 101, Ventura, 2014-Present  
6<sup>th</sup> Street Bridge Replacement, Los Angeles, 2013-Present  
Colton Bridges, 2013-14  
San Fernando Road Widening, Los Angeles, 2011-12  
California Avenue Improvements, Long Beach, 2011  
AT&T Mobility On-Call, 2011-12  
Palomar Mountain Fuels Modification, 2011  
Colton Crossing Grade Separation, 2009-11  
Devore Interchange Improvements, 2008-11  
Mid County Parkway, western Riverside County, 2005-11  
24<sup>th</sup> Street Widening, Bakersfield, 2008-10  
California Valley Solar Ranch, San Luis Obispo 2009-10  
Mammoth Lakes Parks and Recreation and Trails System Master Plan 2009  
I-15/SR-79 Interchange, Temecula, 2006-10  
Superstition Solar I, Imperial Valley, 2008-09  
McSweeney Farms, Hemet, 2005-08  
Magnolia Avenue Widening, Los Angeles, 2008  
Hacienda at Fairview Valley, Mojave Desert, 2007-08  
Majestic Hills Specific Plan, Hesperia, 2007  
Needles Highway Improvements, 2005-08  
Mesquite Regional Landfill, Glamis, 2005-06  
Los Coches Creek Elementary School, Alpine, 2003  
Stadium Arco Station, San Diego, 2003-04  
AT&T Wireless, Cingular/PBMS, ~3,000 Facilities, CA, NV, and AZ, 1997-2001  
Muddy Canyon Archaeological Project, Newport Coast, 2000-02  
Bonita Canyon Sports Park, Newport Beach, 1997  
Hicks Canyon Retention Basin, Irvine, CA, 1996  
Testing of Phase III, Las Trancas Canyon, Newport Coast, 1995  
Data Recovery of Site CA-ORA-64, Newport Beach, 1995

## **ATTACHMENT F: SCHEMATIC DRAWINGS**

**ATTACHMENT G: BUILDINGS INCLUDED IN VA PROJECT No. 691-406**

Attachment G-Spreadsheet of buildings included in VA Project No. 691-406  
 NHPA Section 106 Consultation Package  
 U.S. Veterans Affairs Project No. 619-406: Buildings 205 and 208  
 West Los Angeles Healthcare Center

Bldg	Proposed Scope	New Function	NHPA Section 106 Consultation Status
114	Demolish - Services Relocated to B156/B157/B258	N/A	Not yet initiated
115	Demolish - Services Relocated to B156/B157/B258	N/A	Not yet initiated
156	Full renovation of Vacant Space to Research Labs/Admin	Research (Wet Lab)	Not yet initiated
157	Full renovation of Vacant Space to Research Labs/Admin	Research (Wet Lab)	Not yet initiated
158	Partial renovation to accommodate B208 program		Not yet initiated
205	Transitional Homeless Housing Buildings (Impact space for current housing buildings B257, B207, B212)	Homeless Housing	In process
206	Retrofit / Facility Condition Assessment / Renovation to accommodate Substance Abuse	Mental Health / Substance Abuse	Not yet initiated
207	Retrofit / Facility Condition Assessment only	Same	Not yet initiated
208	Transitional Homeless Housing Buildings (Impact space for current housing buildings B257, B207, B212)	Homeless Housing	In process
209	Full Renovation - Homeless Housing	Homeless Housing	Completed
212	Retrofit/Facility Condition Assessment / Renovation. Research relocated to B156/B157/B258	Transitional Housing	Not yet initiated
222	Retrofit / Facility Condition Assessment only	Emergency Op Center / Safety	Not yet initiated
257	Half- Retrofit / Facility Condition Assessment & Half - Renovation	Mental Health / MH Admin	Not yet initiated
258	B258 Mental Health to B257 upon completion of B257. Research Admin relocated from B114/B115/B212	Mental Health & Research Administration	Not yet initiated
300	Retrofit / Facility Condition Assessment only	Dietetics / OI&T	Not yet initiated

Note: All buildings are contributing resources to the West Los Angeles Veterans Administration Historic District

**Submitted electronically**

Nicos A. Katsellis  
Leo A Daly  
550 South Hope Street, 27<sup>th</sup> Floor  
Los Angeles, CA 90071  
Email: [NAKatsellis@leoadaly.com](mailto:NAKatsellis@leoadaly.com)



**RE: Buildings 205, 208 and 209, U.S. Department of Veterans Affairs,  
West Los Angeles Medical Center Campus**

April 1, 2014

Dear Nicos,

Thank you for meeting last week. It is exciting to see the work happening at the West Los Angeles Medical Center Campus and the current seismic upgrade and renovation to Building 209. The Los Angeles Conservancy greatly appreciates the opportunity to be consulted with on this project and to see how well it is progressing.

The renovation of Building 209 appears to be very well thought out in terms of its programming and needs, as well as sensitivity to preservation aspects. Important character-defining elements are being retained and overall this will be a good example of an adaptive reuse project. I was especially pleased to see how well the refurbishment of the original windows has turned out, as their retention is critical to the success of this project.

I understand a similar treatment and protocols for preservation will be put in place for Buildings 205 and 208 as funding becomes available in the near future. The Conservancy concurs with this approach as all three buildings are of nearly identical construction, design and existing conditions. Once all three are completed, along with the landscape, this will be a great project and model for the West Los Angeles Medical Center Campus and other Veterans Affairs' sites nationally.

Again, thank you for reaching out to the Conservancy on this important project. I look forward to working together soon.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine".

Adrian Scott Fine  
Director of Advocacy



## **APPENDIX B**

### **Notice of Availability**

# NOTICE OF AVAILABILITY

## DRAFT ENVIRONMENTAL ASSESSMENT

### U. S. DEPARTMENT OF VETERANS AFFAIRS

#### **Proposed Seismic Upgrade and Renovation of Buildings 205 and 208 VA Greater Los Angeles Health Care System West Los Angeles Medical Center**

The Department of Veterans Affairs (VA) announces the preparation and availability of a "Draft Supplemental Environmental Assessment" (DSEA) for the proposed rehabilitation of Buildings 205 and 208 located at the VA West Los Angeles Campus, 11301 Wilshire Blvd, Los Angeles, CA 90073. In May 2012, the VA completed an Environmental Assessment (EA) for the Proposed Seismic Upgrade and Renovation of Building 209 located at the WLA campus.

The purpose of the 2012 EA was to determine the potential environmental impacts caused by renovating and operating Building 209 for a therapeutic supportive housing program for homeless Veterans. The 2012 EA resulted in a Finding of No Significant Impact (FONSI), and rehabilitation of historic Building 209 is nearly complete.

Since completing the 2012 EA, the VA has expanded the scope of the original project to include two additional historic buildings – Buildings 205 and 208, located adjacent to Building 209. This DRAFT Supplemental EA (DSEA) has been prepared to evaluate the potential environmental impacts to affected environments caused by increasing the scope of the project. VA intends to issue a FONSI following a fifteen day comment period in accordance with the Council on Environmental Quality Regulations for Implementing NEPA, Section 1508.13 providing there are no substantive comments which warrant further evaluation.

Copies of the DSEA and 2012 EA are available for review at the following public libraries and online at <http://www.losangeles.va.gov>. In addition, copies of the DSEA and 2012 EA will be available in the medical library located on the 6<sup>th</sup> Floor of the main hospital Building 500, Monday thru 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 Blvd  
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

All comments on the DSEA are requested by May 23, 2015. Comments or questions may be directed to:

Charles Green  
Office of Communications & External Affairs (691/00PA)  
VA Greater Los Angeles Healthcare System  
11301 Wilshire Blvd  
Los Angeles, CA 90073  
Facsimile: 310-268-4941  
Email: [Charles.Green5@va.gov](mailto:Charles.Green5@va.gov)

For further information, please contact Mr. Green at 310-478-3711, x43420