

FINDING OF NO SIGNIFICANT IMPACT

Department of Veterans Affairs VA Greater Los Angeles Health Care System West Los Angeles Health Care Center

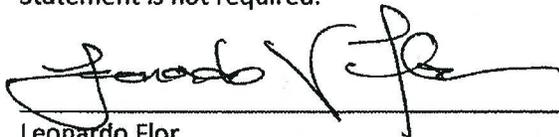
Proposed Seismic Upgrade and Renovation of Building 209 Los Angeles, California

The Department of Veterans Affairs (VA) proposes to perform complete historic rehabilitation of Building 209 on the West Los Angeles VA Medical Center (WLA) campus of the VA Greater Los Angeles Healthcare System (GLA). In accordance with the National Environmental Policy Act (NEPA), VA prepared an Environmental Assessment (EA) to examine the potential for environmental impacts from the proposed action.

GLA mission includes provision of a therapeutic supportive housing program for Veterans who are homeless and for whom previous recovery attempts have not met with success. 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.

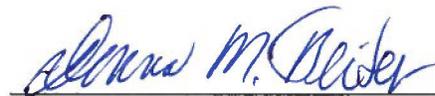
To meet the GLA mission described above, VA proposes to rehabilitate Building 209 located at the WLA campus. Rehabilitation includes seismic corrections, life safety improvements, interior and exterior architectural renovation, and building systems upgrade. Constructed in 1945, Building 209 is identified as a historic property under the National Historic Preservation Act (NHPA). To prevent adverse effects to this historic resource, the proposed rehabilitation will be accomplished in consultation with the California State Historic Preservation Officer.

This Finding of No Significant Impact (FONSI) is based on the results of the evaluation documented in the EA. The analysis performed in the EA concludes that there would be no significant adverse impact, either individually or cumulatively, to the human environment, provided management measures, best management practices, and regulatory compliance measures described in the EA are fully implemented. Therefore, the conclusion of FONSI is appropriate and preparation of an Environmental Impact Statement is not required.



Leonardo Flor
Director, West Region
Office of Construction and Facilities Management

15 May 2012
Date



Donna M. Beiter, R.N., M.S.N.
Director, VA Greater Los Angeles Health Care System

5/17/12
Date

Final Environmental Assessment

For the

Proposed Seismic Upgrade and Renovation of Building 209

**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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May 10, 2012

TABLE OF CONTENTS

	PAGE
EXECUTIVE SUMMARY	<i>i</i>
1.0 INTRODUCTION	1
1.1 Project Background	1
1.2 Purpose and Need	2
2.0 ALTERNATIVES	6
2.1 Development of Alternatives	6
2.2 Alternatives Retained For Detailed Analysis	6
3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES	8
3.1 Aesthetics	8
3.2 Air Quality	9
3.3 Cultural Resources	11
3.4 Geology and Soils	13
3.5 Hydrology and Water Quality	14
3.6 Wildlife and Habitat	15
3.7 Noise	16
3.8 Land Use	17
3.9 Floodplains, Wetlands, and Coastal Zone Management	18
3.10 Socioeconomics	19
3.11 Community Services	19
3.12 Solid and Hazardous Materials	20
3.13 Transportation and Parking	22
3.14 Utilities	23
3.15 Environmental Justice	24
3.16 Cumulative Impacts	25
3.17 Potential for Generating Substantial Controversy	26
4.0 PUBLIC INVOLVEMENT	26
5.0 MITIGATION	26
6.0 CONCLUSIONS	32
7.0 LIST OF PREPARERS	32
8.0 REFERENCES CITED	33
9.0 LIST OF REQUIRED PERMITS	34
10.0 LIST OF ACRONYMS	34

Appendix A – Agency Communications

Appendix B – Notice of Availability

LIST OF FIGURES

Figure 1 – Project Vicinity Map	3
Figure 2 – Building 209 Location Map	4
Figure 3 – Building 209 Photograph	5

Executive Summary

The Department of Veterans Affairs (VA) proposes to perform complete historic rehabilitation of Building 209 on the West Los Angeles Medical Center (WLA) campus of the VA Greater Los Angeles Healthcare System (GLA). In accordance with the National Environmental Policy Act (NEPA), the VA prepared this Environmental Assessment (EA) to analyze the potential environmental effects of the proposed action.

The GLA mission includes provision of 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.

To meet the GLA mission as described above, the VA proposes to rehabilitate Building 209 located at the WLA campus. Rehabilitation includes seismic corrections, life safety improvements, architectural renovation and building system upgrades.

Constructed in 1945, Building 209 is identified as a historic property under Section 106 of the National Historic Preservation Act (NHPA). To prevent adverse effects to this historic resource, the proposed rehabilitation of Building 209 will be accomplished in consultation with the California State Historic Preservation Office (SHPO) as required by Section 106 of the NHPA.

The VA prepared this EA to analyze the potential environmental effects of the proposed action. The analysis performed in this EA 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 regulatory compliance measures described in this EA are fully implemented.

1.0 INTRODUCTION

The Department of Veterans Affairs (VA) proposes to perform historic rehabilitation of Building 209 located at the West Los Angeles VA Medical Center (WLA) campus of the VA Greater Los Angeles Healthcare System (GLA). Rehabilitation will include seismic corrections, life safety improvements, interior and exterior architectural renovations, and building systems upgrades.

1.1 Project Background

The GLA is the largest, most complex healthcare system within the Department of Veterans Affairs. It is one component of the VA Desert Pacific Healthcare Network offering services to Veterans residing in Southern California and Southern Nevada. GLA consists of one tertiary care facility, two ambulatory care centers, and nine community based outpatient clinics. GLA serves Veterans residing throughout five counties: Los Angeles, Ventura, Kern, Santa Barbara, and San Luis Obispo. There are 1.4 million Veterans in the GLA service area – comprising the largest and most diverse demographic in the VA system. GLA is affiliated with both UCLA School of Medicine and USC School of Medicine, as well as more than 45 colleges, universities and vocational schools in 17 different medical, nursing, paramedical and administrative programs.

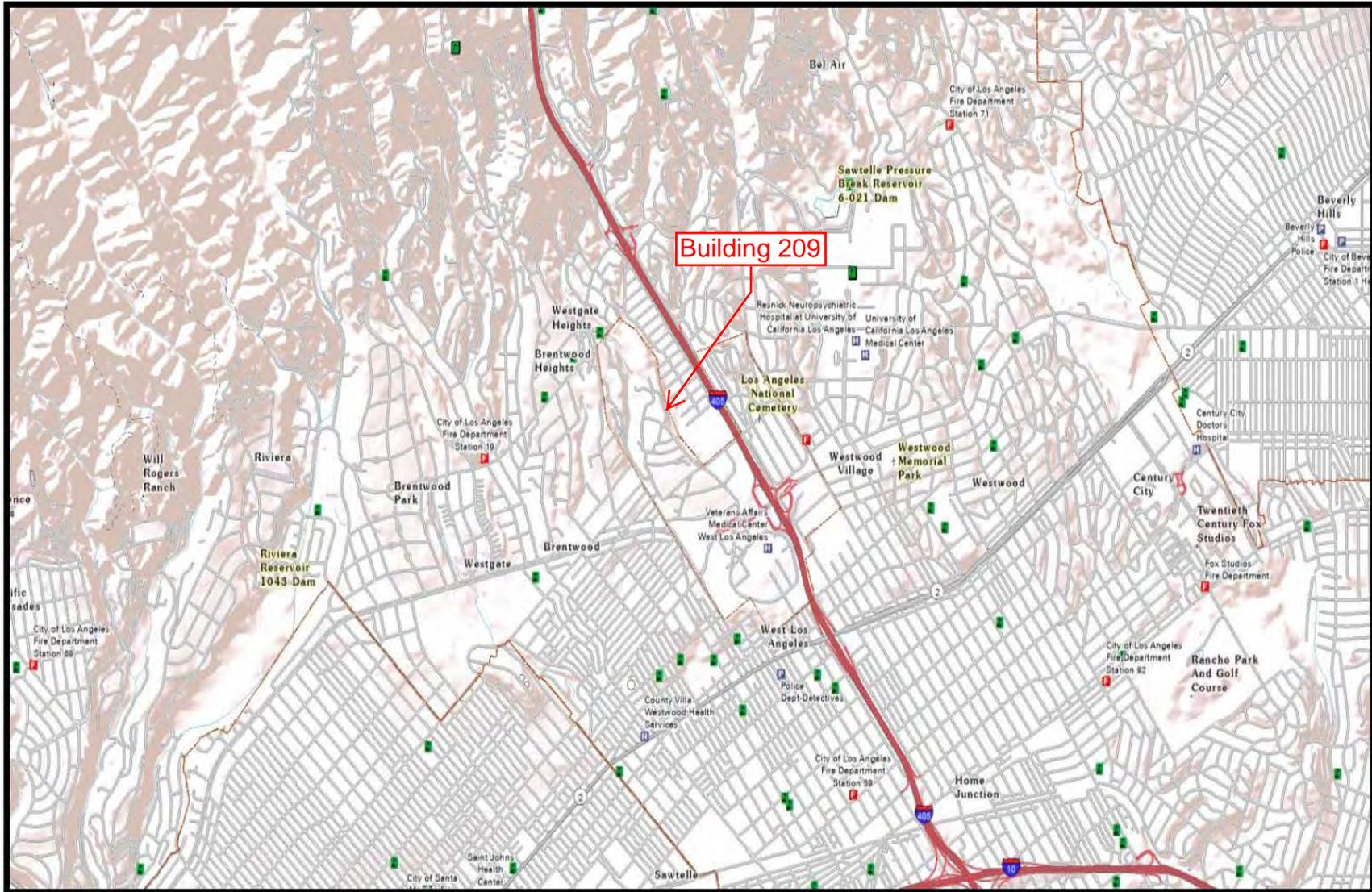
An emerging GLA mission includes provision of a therapeutic supportive housing program for Veterans who are homeless and for whom previous recovery attempts have failed. The program will focus on supportive employment and daily life skills necessary to live effectively among others, care for themselves in a healthy way, and meet the Veterans' reasonable life goals. This program is planned to be housed in Building 209 at the WLA campus.

Building 209 is a three story, 48,200 square foot building. Constructed in 1945, Building 209 is identified as a historic property under Section 106 of the National Historic Preservation Act (NHPA)¹. Building 209 will be rehabilitated in consultation with the California State Historic Preservation Office (SHPO) as required by the NHPA. Figure 1 shows the vicinity map of the WLA, Figure 2 shows the location of Building 209 at the campus and Figure 3 shows a recent photograph of Building 209.

1.2 Purpose and Need

The purpose of the proposed action is to provide a facility to fulfill the GLA need to provide 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.

Figure 1 – Project Vicinity Map



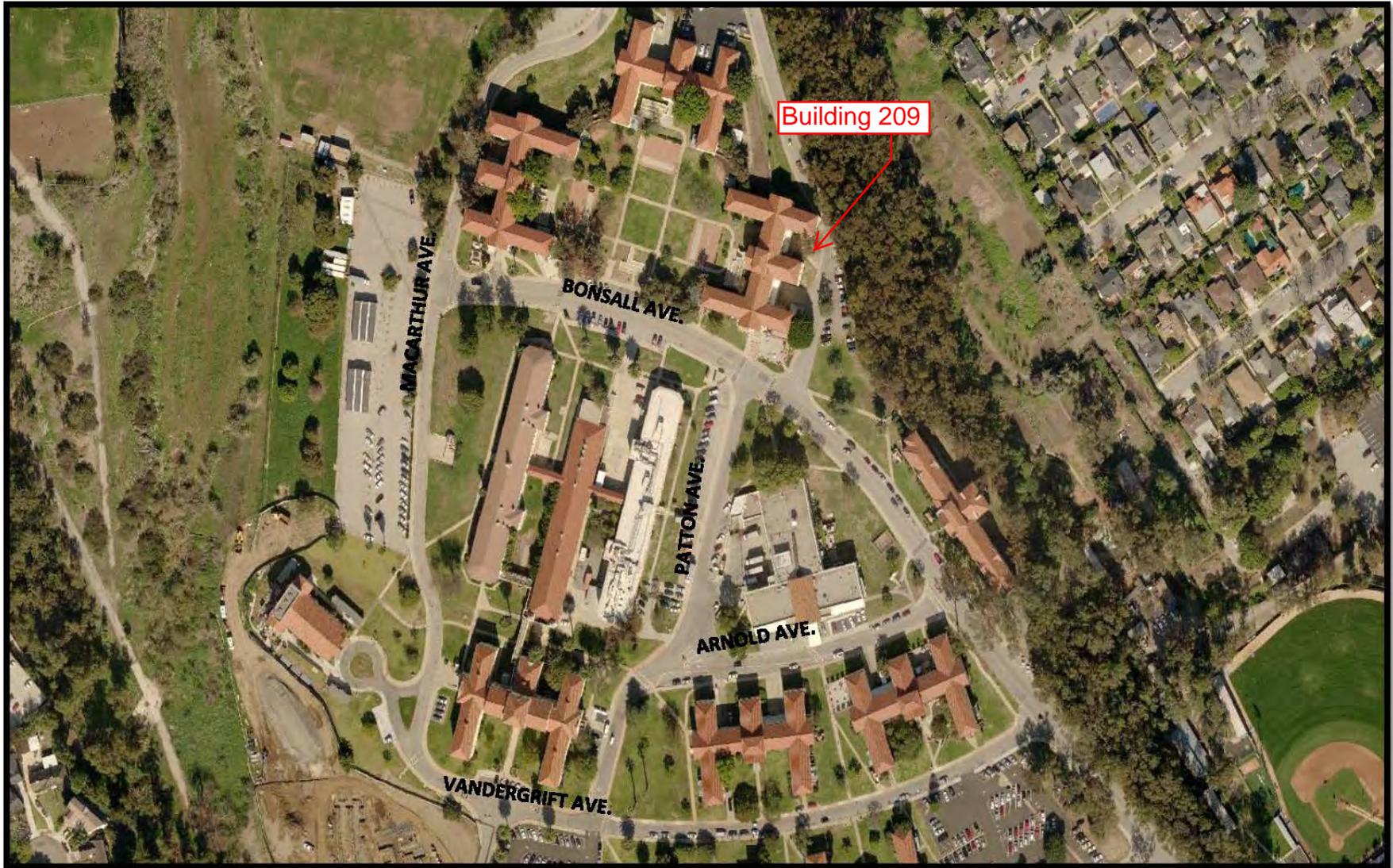
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Proposed Project: Seismic Upgrade and Renovation of Building 209

Location: West Los Angeles Medical Center

Data available from U.S. Geological Survey, National Geospatial Program.

Figure 2 – Building 209 Location Map



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Proposed Project: Seismic Upgrade and Renovation of Building 209

Location: West Los Angeles Medical Center

Data available from U.S. Geological Survey, National Geospatial Program

Figure 3 – Building 209



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Proposed Project: Seismic Upgrade and Renovation of Building 209

Location: West Los Angeles Medical Center

2.0 ALTERNATIVES

2.1 Development of Alternatives

The VA considered multiple alternatives in providing a facility to house the therapeutic supportive housing program for homeless veterans.

Alternatives Considered

1. Rehabilitate Building 209 (Preferred Alternative)
 - Building 209 shares close proximity to clinically supportive programs of the WLA, maximizing potential for successful transition for each veteran. The building will have 55 studio and one bedroom units and will also accommodate supportive services and multipurpose areas.
2. New Construction
 - While this option provides the same advantages as Alternative 1, it is more costly. Therefore, this is the next preferred alternative.
3. Leasing
 - Failure to use an existing campus building or construct a new campus building would lead to dispersal of required services to leased facilities outside the WLA. Therefore, this is the least preferred alternative.
4. No Action
 - The proposed action would not be implemented.

2.2 Alternatives Retained For Detailed Analysis

Proposed Action Alternative

Alternative 1, Rehabilitate Building 209, was selected as the preferred alternative and will be analyzed in this EA as the Proposed Action alternative. Rehabilitation will include seismic and life safety corrections, interior and exterior architectural renovation and building system upgrades.

Seismic Corrections

The interior structural system of Building 209 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 VA, State of California and Federal life safety requirements. Strengthening will include:

- Diaphragm
 - The building diaphragm (horizontal floors, roof, etc.) will be strengthened by adding sheathing beneath the existing clay roof tiles (tiles will be removed then restored) and by strengthening the connections between horizontal elements and vertical elements (walls/columns, etc.)
- Concrete Beam Reinforcement
 - Reinforcing steel is proposed to be added to existing concrete beams to increase tension strength.
- Non-structural
 - Bracing (metal struts or cables) will be added for existing and new utility lines and equipment.

Architectural Renovation

Renovation of the building interior and exterior to accommodate program requirements will include:

- Full renovation of the interior and new layout to accommodate Program requirements
- New entrance atrium
- New corridor door
- New stairwells
- Addition of an exterior canopy at the main entrance
- Windows will be rehabilitated, relocated or replaced as necessary
- New handicap ramp
- New landscaping

Life Safety and Building Systems Upgrades

- Complete update to current building code of building systems and life safety elements such as mechanical, electrical, plumbing, fire sprinkler, emergency egress systems, etc.
- New emergency exit

According to WLA archive information on buildings of this type, Building 209 provided up to 60 units (resident patient) capacity and up to 18 offices for administrative, support and medical staff. Proposed Building 209 residency is 55 units, with eight administrative and support offices and additional multipurpose shared areas.

No Action Alternative

Under this alternative, the Proposed Action would not be implemented. The No Action alternative will be analyzed in this EA to provide a baseline from which to compare the Proposed Action alternative. The impacts of the Proposed Action will be contrasted with the current and future condition in the absence of the project.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES

For each environmental resource evaluated, the criteria for significant impacts are presented for both construction and operational phases of the Proposed Action and the No Action alternative.

3.1 Aesthetics

Threshold for significant impacts:

Impact to aesthetics would be considered significant if the project would alter the building's character-defining physical features that contribute to its historic significance.

Existing Conditions:

Existing areas are historical buildings with intrinsic aesthetic features evaluated under Section 3.3. Non-historic features include landscaping, sidewalks, paved streets, etc.

Proposed Action

Vegetation removal, landscape alteration, and utility or service area modifications will result in minimal or no change to the baseline visual setting and will have no effect on historical features. Potential construction phase impacts will be mitigated prior to operational phase through landscaping, sidewalk/road restoration, etc.

As previously described in more detail in Section 2.2 of this EA, rehabilitation of Building 209 will include seismic corrections, interior and exterior architectural renovation and life safety and building system upgrades. To comply with Section 106 of the NHPA, the VA consulted with the California SHPO on the proposed undertaking. In response, SHPO concurred with the VA's finding of no adverse effect because the undertaking will be consistent with the Secretary of Interior's *Standards for the Treatment of Historic Properties for Rehabilitation*². See Appendix A for more details.

No Action

Over time, taking no action to preserve historical features may cause a severe or moderate impact to Aesthetics by allowing deterioration of those features with intrinsic cultural value (see Section 3.3 for more detail).

3.2 Air Quality

Threshold for significant impacts:

Impacts to air quality would be considered significant if the project released of air pollutants such as asbestos, lead paint, dust or vehicle exhaust in such amounts that would exceed established air quality standards.

Existing conditions:

Building 209 is located within Los Angeles County with EPA listings³ for the following airborne contaminants:

- Los Angeles Co
 - *8-Hr Ozone* * Los Angeles South Coast Air Basin, CA - Extreme
 - *Lead 2008* * Los Angeles County-South Coast Air Basin, CA - Nonattainment
 - *PM-10* * Los Angeles South Coast Air Basin, CA - Serious
 - *PM-2.5 1997* * Los Angeles-South Coast Air Basin, CA - Nonattainment
 - *PM-2.5 2006* * Los Angeles-South Coast Air Basin, CA - Nonattainment

A survey of potential asbestos containing materials and potential lead-based paint indicates that both contaminants are present in building materials anticipated to be disturbed during renovation activities.

Proposed Action

Actions taken by federal agencies in nonattainment and maintenance areas must be evaluated under the General Conformity Rule (Section 176(c)(4) of the Clean Air Act)⁴ to ensure the actions do not interfere with a state's plans to meet national standards for air quality. Per the General Conformity rule, federal actions with air emissions that are *de minimis* rules are exempt from a conformity determination. During construction, the proposed action will meet *de minimis* standards for fugitive dust through implementation of best management practices in accordance with VA Specification 01 57 19 Temporary Environmental Controls⁵ which includes control of particulates (dust; aerosols). Emissions from gaseous and liquid-fueled engines used during construction are considered *de minimis* for engines rated below 50 brake horsepower (bhp). Compliance with South Coast Air Quality Management District RULE 1110.2 EMISSIONS FROM GASEOUS- AND LIQUID-FUELED ENGINES⁶ will ensure *de minimis* emissions from portable engines such as those used for generators and air compressors.

During demolition and construction, asbestos or lead dust may be released into the atmosphere. Implementing requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) and the Occupational Health and Safety Administration (OSHA) will prevent adverse impacts to worker and public health. See Section 5.12 of this EA for specific mitigation measures to be implemented for asbestos and lead-based paint.

During operations, planned building uses will have no direct effect on air quality. No additional parking spaces are planned for the Proposed Action, and no mass transit increases are associated with this project. Therefore, no indirect increase in air emissions is anticipated.

No Action

No impact.

3.3 Cultural Resources

Threshold for Significant Impacts

Impacts to cultural resources would be considered significant if the project 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)² and applicable guidelines;
- (3) Neglect of a property which causes its deterioration

Existing conditions:

Building 209 was constructed in 1945 and is a contributor to the National Register-eligible historic district known as the “Brentwood Division” at the WLA campus⁷. The building retains sufficient integrity and meets the definition of a historic property under Section 106 of the NHPA. See Appendix A for further details.

Proposed Action

As previously described in more detail in Section 2.2 of this EA, rehabilitation of Building 209 will include seismic corrections, interior and exterior architectural renovation and life safety and building system upgrades. To comply with Section 106 of the NHPA, the VA consulted with the California SHPO on the proposed undertaking. In response, SHPO concurred with the VA’s finding of no adverse effect because the undertaking will be consistent with the Secretary of Interior’s *Standards for the Treatment of Historic Properties for Rehabilitation*. See Appendix A for more details.

Although unlikely, in the event of unanticipated historical or archeological effects or previously unidentified resources, the following actions shall be taken:

- a. Buildings, Structures, and/or Objects - In the event that unanticipated effects on buildings, structures, and/or objects are found during the implementation of the work effort, the VA will stop any work that may adversely affect the building, structure, and/or object or that may foreclose opportunities to avoid such adverse effects. VA shall consult with the SHPO and with the other required and concurring parties, as necessary, to determine the appropriate course of action to comply with Section 106.

- b. Archaeological Resources - In the event that a previously unidentified archaeological resource is discovered during the ground disturbing activities, VA will halt all construction work involving subsurface disturbance in the area of the resource and in the surround area where further subsurface deposits may reasonably be expected to occur. The VA shall ensure that an archaeologist meeting the Secretary of Interior's *Professional Qualification Standards* (36 CFR 61)⁸ will immediately inspect the work site and determine the extent and the nature of the affected archaeological property. If the archeological resource is determined to be a unique archeological resource, SHPO shall be notified and options for avoidance or preservation in place shall be evaluated and implemented if feasible. The notification shall describe VA's assessment of the National Register eligibility of the property and proposed actions to resolve the adverse effect (if any). The SHPO shall respond within two (2) working days of notification and construction may resume when the SHPO concurs. In the event that avoidance or preservation in place is infeasible and the archaeologist determines that the potential for significant impacts to such resources exists, a data recovery program shall be expeditiously conducted. The archaeologist may consult the SHPO and other parties as deemed appropriate by the archaeologist in setting the boundaries of the archaeological resource. Construction work may then proceed in the project area outside of the archaeological site boundaries. VA shall take into account the SHPO's recommendations regarding National Register eligibility and proposed actions, and then carry out appropriate actions. VA shall provide the SHPO with a report of these actions once they are complete.

- c. Human Remains - The VA shall ensure that human remains and associated funerary objects encountered during the course of actions taken as a result of this work effort shall be treated in a manner consistent with the provisions. In addition, human remains and associated funerary objects that may be of Native American origin encountered on federal land shall be treated in a manner consistent with the provisions of the *Native American Graves Protection and Repatriation Act* (25 U.S.C. 3001)⁹.

No Action

Building 209 is not currently in use due to facility condition assessment deficiencies. Taking no action to correct deficiencies and restore building 209 to functional use may result in continued deterioration of a historical resources resulting in a long term negative impact. Taking no action may result in an adverse effect.

3.4 Geology and Soils

Threshold for significant impacts:

Impacts to geology and soils would be considered significant if the project results in substantial soil erosion or loss of topsoil.

Existing Conditions:

Soils in the project area consist of fill material near the ground surface. Direct observation indicates existing soil is an appropriate substrate for vegetation.

Proposed Action

Beneficial soil uses that may be impacted during construction include vegetation substrate and stormwater infiltration. Replacement of soil appropriate for drainage and substrate will be required to prevent adverse impacts.

If soil is disturbed, mitigation by best management practices will include appropriate compaction of soil (stormwater infiltration; structural requirements) and installation of top soil

appropriate for vegetation substrate in compliance with VA Specification 01 57 19 Temporary Environmental Controls.

No Action

No impact to baseline plant substrate or stormwater infiltration.

3.5 Hydrology and Water Quality

Threshold for significant impacts:

Impacts to Hydrology or Water Quality would be considered significant if the project results in release of contaminants/sediment to the stormwater conveyance system in excess of regulatory standards and/or increase in the volume of runoff during storm events to exceed system capacity.

Existing Conditions:

Currently, no record exists to indicate that Building 209 and associated stormwater runoff are a source of regulated contaminants or that runoff exceeds system capacity.

Proposed Action

Soil disturbed during construction is a potential sediment source that could adversely impact water quality. During building commissioning and testing of mechanical/plumbing systems, hydrostatic test water and disinfection water (concentrated chlorine solution) may be discharged to the stormwater system. Such discharges will be in accordance with applicable regulations.

Excavation and soil disturbance is not anticipated to be significant based on scale and duration of exposure. Project would not require a Construction Stormwater Pollution Prevention Plan or NPDES permit because soil disturbance would be less than 1 acre¹⁰. Nevertheless, construction stormwater mitigation will be implemented by best management practices in accordance with VA Specification 01 57 19 Temporary Environmental Controls. Soil stabilization methods may include seeding, straw mulch, etc. Stormwater runoff may also be treated using silt fence, catch basin filters, etc.

Discharge of hydrostatic testing water during building commissioning will be in accordance with ORDER NO. R4-2009-0068 (CAG674001) Discharges of Low Threat Hydrostatic Test Water to Surface Waters¹¹. The requirements of this order will be included with the construction contract.

Long term, the proposed action will not increase impervious areas, and therefore will not affect runoff volumes.

No Action

No impact.

3.6 Wildlife and Habitat

Threshold for significant impacts:

Impacts to Wildlife and Habitat would be considered significant if the project causes disruption or removal of an endangered or threatened species, its habitat, migration corridors or breeding areas.

Existing Conditions:

The US Department of Fish and Wildlife (USFWS) and California Department of Fish and Game (CDFG) resources were consulted to determine the presence or absence of protected species in the project area. Critical habitat maps and CDFG BIOS and ACE-II database¹² searches resulted in no indications of listed or threatened species in the project vicinity. The absence of protected species and habitat precludes further analysis.

Under the Migratory Bird Treaty Act of 1918 (MBTA)¹³, as amended, nests containing eggs or young of migratory birds may not be harmed, nor may migratory birds be killed.

Proposed Action

Migratory birds may be directly affected if breeding sites are located prior to or during construction. Therefore, if active migratory bird nests are located, a protection buffer will be delineated and the area avoided until the nests are no longer active.

No Action

No impact.

3.7 Noise

Threshold for significant impacts:

Impacts from noise would be considered significant if the project creates new sources of substantial noise, increases the intensity or duration of noise levels to sensitive receptors, or results in exposure of more people to unacceptable levels of noise. Significant impacts would be noise levels during construction exceeding the following average decibels at 50 feet (VA Master Specification SECTION 01 57 19 TEMPORARY ENVIRONMENTAL CONTROLS):

EARTHMOVING		MATERIALS HANDLING	
FRONT LOADERS	75	CONCRETE MIXERS	75
BACKHOES	75	CONCRETE PUMPS	75
DOZERS	75	CRANES	75
TRACTORS	75	DERRICKS IMPACT	75
SCAPERS	80	PILE DRIVERS	95
GRADERS	75	JACK HAMMERS	75
TRUCKS	75	ROCK DRILLS	80
PAVERS,	80	PNEUMATIC TOOLS	80
STATIONARY			
PUMPS	75	BLASTING	//--//
GENERATORS	75	SAWS	75
COMPRESSORS	75	VIBRATORS	75

Significant impacts from repetitive impact noise are defined as exceeding the following standards (Specification 01 57 19):

Time Duration of Impact Noise	Sound Level in dB
More than 12 minutes in any hour	70
Less than 30 seconds of any hour	85
Less than three minutes of any hour	80
Less than 12 minutes of any hour	75

Existing Conditions:

Building 209 is currently not in use and generates no noise impacts. Buildings in the project vicinity generate low levels of noise from heating and cooling systems.

Proposed Action

During construction, operation of earthmoving and materials handling equipment is expected. Receptors for noise impacts are construction workers, project visitors and pedestrians within the area of affect.

Construction noise will be reduced as necessary in conformance with best management practices specified in VA Specification 01 57 19 Temporary Environment Controls - with the primary emphasis on worker protection in accordance with OSHA regulation. Worker protection at the source of noise will ensure indirect protection to VA staff and clients using the facility.

Operational noise sources including building heating and cooling systems are not expected to increase above baseline conditions.

No Action

No impact.

3.8 Land Use

Threshold for significant impacts:

Impacts to land use would be considered significant if the project results in substantial alteration of present or planned land use.

Existing Conditions:

The GLA is not subject to local land use regulation. The proposed use of Building 209 as a domiciliary and support facility for Veterans is compliant with the existing GLA mission.

Proposed Action

Proposed renovation/retrofit will not alter prescribed facility use and will have no impact on current land use pattern.

No additional parking requirements or traffic is anticipated as a result of this project.

No Action

No impact.

3.9 Floodplains, Wetlands, and Coastal Zone Management

Threshold for significant impacts:

Impacts to floodplains, wetlands or coastal zones would be considered significant if the project would subject people or property to flooding, adversely affect wetland or adversely affect coastal resources.

Existing Conditions:

According to City of Los Angeles County Zone Information and Map Access System (ZIMAS)¹⁴, the WLA lies outside the Coastal Management Zone. No wetlands or floodplain are delineated for this site.

Proposed Action

No impact.

No Action

No impact.

3.10 Socioeconomics

Threshold for significant impacts:

Impacts to socioeconomics would be considered significant if the project adversely affects the local economy or results in substantial increase in the resident population.

Existing Conditions:

Building 209 is currently not in use (no operational employees other than facilities maintenance).

Proposed Action

Temporary positive impacts will occur during construction (construction workforce) and activation through the purchase of materials, supplies. Renovation to allow contemporary use of Building 209 will increase jobs (staff to support operations).

The resident population on the WLA campus will not substantially increase during operations. A population increase would be accompanied by a corresponding decrease in the off campus homeless population which would have a positive socioeconomic impact for the community.

No Action

The No Action alternative will not provide short term economic benefits in the form of additional construction jobs. Long term economic benefits will not be realized as staff needed to support operations will not be retained.

3.11 Community Services

Threshold for significant impacts:

Impacts to community services would be considered significant if the project would increase demand over capacity, requiring expansion or upgrade of community resources such as fire, water, sewage, stormwater, police or schools.

Existing Conditions:

Community resources such as utilities, public safety, etc. are currently established.

Proposed Action

Expansion of utility capacity is not proposed as the building occupancy will not increase over previous levels. WLA archival information indicates that occupancy levels in buildings such as Building 209 were based on at least 60 patient beds and 18 offices for administrative, support and medical staff. Proposed occupancy levels for Building 209 are 52 transitional resident beds, three resident staff beds and eight offices with a net reduction in occupancy levels.

Proposed use of Building 209 for transitional housing and therapeutic support for homeless Veterans is similar to previous uses and therefore will have no significant impact on other community resources such as public safety.

No Action

Failure to convert Building 209 to transitional housing for homeless Veterans will continue to place the burden for supporting this population on surrounding communities and community resources.

3.12 Solid and Hazardous Materials

Threshold for significant impacts:

Impacts from solid and hazardous materials would be considered significant if the project would result in a substantial increase in the generation of hazardous substances, increase in the exposure of persons to hazardous or toxic substances, or increase in the presence of hazardous or toxic materials in the environment.

Existing Conditions:

Generation of waste, including solid waste and medical (hazardous) waste is inherent to a VA Medical Center. The WLA waste management program is currently in place to handle all existing and anticipated waste from restoring Building 209 to an operational condition.

Proposed Action

During demolition, construction and operation, solid and hazardous waste will be generated. Mitigation required by regulation will prevent adverse impacts caused by uncontrolled release of solids and hazardous substances.

Solid Waste

During construction (short term) and operation (long term), bulk solid waste, tree stumps, excess building material, fill, etc., shall be disposed of in a manner consistent with VA Specification 01 74 19¹⁵ and State of California Integrated Waste Management Act of 1989 (AB 939)¹⁶ and shall be removed from the medical center property.

Hazardous & Universal Waste

Management of hazardous and universal waste will be in accordance with the California Health and Safety Code (Health & Saf. Code)¹⁷ and Title 22, California Code of Regulations (Cal. Code Regs.)¹⁸.

Medical Waste

Medical and infectious waste will be managed in accordance with the WLA medical and infectious waste program.

Asbestos

Any building material potentially disturbed during construction or renovation activities will be managed according to VA Specifications 02 82 11 Traditional Asbestos Abatement¹⁹ through 02 82 13.41 Asbestos Abatement for Total Demolition Projects²⁰.

In general, public health and worker protection will be in compliance with the following:

- EPA (U.S. Environmental Protection Agency) established rules under the authority of the Clean Air Act (CAA) to protect the general public from the release of airborne asbestos fibers during the demolition or renovation of buildings. These rules are referred to as the Asbestos NESHAP (National Emissions Standards for Hazardous Air Pollutants)²¹.

They cover work practices to be followed during demolition and renovation and other activities involving the processing, handling, and disposal of asbestos-containing material.

- OSHA (Occupational Safety and Health Agency) and EPA established rules to protect the health of workers that are most likely to contact asbestos. These rules established strict worker exposure limits and set out requirements for employers regarding exposure assessment, medical surveillance, recordkeeping, and hazard communication. The EPA rules cover state and local government employees and the OSHA rules cover private sector workers²².

Lead-based Paint

Painted surfaces scheduled for disturbance during construction or renovation will be tested and abated in accordance with VA Specification 02 83 33.13 Lead-Based Paint Removal and Disposal²³, amended to include new regulations effective January 1, 2011 (California Code of Regulations, Title 17²⁴ for the accreditation, certification, and work practices concerning lead-based paint and Cal OSHA, Title 8 CCR 1532.1, Manual Demolition of Structures²⁵).

Rehabilitation of Building 209 as a transitional housing for Veterans will not significantly increase baseline hazardous waste during operations (will not require an increase WLA medical/infectious program capacity).

No Action

Failure to rehabilitate Building 209 may require eventual demolition of this structure, with potentially significant impact to landfills receiving this waste.

3.13 Transportation and Parking

Threshold for significant impacts:

Impacts would be considered significant if the project would increase demand on transportation infrastructure in excess of the infrastructure capacity.

Existing Conditions:

Roads and parking lots to support current and anticipated uses are currently in place.

Proposed Action

During construction, implementation of VA Specification 01 00 00.1.6.M OPERATIONS AND STORAGE AREAS²⁶ will mitigate interference of construction activities on WLA traffic. Mitigation measures include maintaining weight limits for roads and vehicles and ensuring that at least one traffic lane is open at all times.

Existing public transportation will not be altered to accommodate new residents of Building 209. Existing parking lots will be utilized by new and existing staff. During operations, daily transportation requirements for 52 transitional residents are within the existing mass transit capacities for the WLA and community.

No Action

No impact.

3.14 Utilities

Threshold for significant impacts:

Impacts to utilities would be considered significant if the project would increase demand on utilities in excess of the infrastructure capacity.

Existing Conditions:

Utility capacity is based on building occupancy levels. Building 209 occupancy was originally designed around 128 beds plus medical and support staff. Based on WLA archival information, later renovations (approximately 1970) changed occupancy levels to at least 60 patient beds and 18 offices for administrative, support and medical staff. Proposed occupancy levels for Building 209 are 52 transitional resident beds, three resident staff beds and eight offices with a net reduction in occupancy levels.

Proposed Action

Net demand for all utilities over baseline conditions (recent use as a bed facility) is expected to be reduced with replacement of obsolete electrical and plumbing fixtures with energy efficient or low flow versions; replacement of obsolete HVAC systems with modern energy-efficient components, air flow design and controls; and replacement of single-pane windows with energy efficient versions.

Although carrying capacity of potable water, stormwater and sewage systems is anticipated to increase, the overall impact on infrastructure systems is not expected to be significant based on the number of planned building occupants (52 transitional residents, 3 resident staff and support staff) versus recent occupancy levels of 60 patients plus medical and support staff.

No Action

No impact over baseline conditions.

3.15 Environmental Justice

Threshold for Significant Impacts

Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Significant effects would occur if the project would disproportionately affect minority or low-income populations.

Proposed Action

The proposed action benefits environmental justice by improving conditions for chronically homeless Veterans and ensuring the safety of VA staff and clients.

No Action

The failure to convert building 209 into transitional housing would have a negative impact on homeless Veterans. Failure to implement required safety and building improvements to

current standards and codes would negatively impact VA staff and clients across all demographics.

3.16 Cumulative Impacts

Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. (CEQ NEPA Regulations 40 C.F.R. § 1508.7).²⁷

Related future actions (historical rehabilitation) considered for cumulative impact analysis include seismic and facility improvements to historical buildings 114, 205, 206, 207, 208, 212, 222, 257, 258, and 300. Other recent, current or future actions – construction projects – also considered include construction of a new bed tower, parking garage, energy facilities, columbarium expansion, etc.

Proposed Action

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 (Building 500), temporary traffic impacts may need to be considered. Standard mitigation in compliance with all appropriate, required, and applicable regulations and laws will ensure impacts to air quality, noise, hazardous/solid waste, etc. are not cumulative.

No adverse impacts to cultural resources are anticipated for this project, and therefore this project will not contribute to cumulative impacts in this category.

No long term negative impacts from operation of the facility are anticipated and therefore will not accumulate with other proposed or recently completed actions, such as the new state nursing home.

No Action

No direct cumulative impacts will occur. Long term, failure to rehabilitate the buildings will lead to escalating maintenance costs, reduced efficiency and effectiveness of care provided to Veterans, and increased costs to relocate services.

3.17 Potential for Generating Substantial Controversy

Proposed Action

Beneficial impacts to the community include providing shelter for homeless Veterans, thus reducing impact of homeless Veterans on community resources.

No Action

No impact.

4.0 PUBLIC INVOLVEMENT

As required under Section 106 of the National Historic Preservation Act, the proposed actions includes a public participation component. To this end, regional VA staff consulted with the State Historic Preservation Office (SHPO), Veterans Service Organizations (VSO), the Los Angeles Conservancy and Native American Commission.

The draft version of this EA was made available for public review and comment for thirty days. VA published a Notice of Availability (NOA) in the Los Angeles Times for three consecutive days; the NOA and EA were also posted on the VA GLA website and was available in three regional libraries (see Appendix B for more details). The VA did not receive any comments in regards to the Draft EA.

5.0 MITIGATION

5.1 Aesthetics

Mitigation for this environmental factor is prescribed in 5.3 - Cultural Resources.

5.2 Air Quality

During construction, the proposed action will meet *de minimis* standards for fugitive dust through implementation of best management practices in accordance with VA Specification 01 57 19 Temporary Environmental Controls which includes control of particulates (dust; aerosols). Emissions from gaseous and liquid-fueled engines used during construction are considered *de minimis* for engines rated below 50 brake horsepower (bhp). Compliance with South Coast Air Quality Management District RULE 1110.2 EMISSIONS FROM GASEOUS- AND LIQUID-FUELED ENGINES will ensure *de minimis* emissions from portable engines such as those used for generators and air compressors.

5.3 Cultural Resources

In the event of unanticipated historical or archeological effects or previously unidentified resources, the following actions shall be taken:

- a. Buildings, Structures, and/or Objects - In the event that unanticipated effects on buildings, structures, and/or objects are found during the implementation of the work effort, the VA will stop any work that may adversely affect the building, structure, and/or object or that may foreclose opportunities to avoid such adverse effects. VA shall consult with the SHPO and with the other required and concurring parties, as necessary, to determine the appropriate course of action to comply with Section 106.
- b. Archaeological Resources - In the event that a previously unidentified archaeological resource is discovered during the ground disturbing activities, VA will halt all construction work involving subsurface disturbance in the area of the resource and in the surround area where further subsurface deposits may reasonably be expected to occur. The VA shall ensure that an archaeologist meeting the Secretary of Interior's *Professional Qualification Standards* (36 CFR

61) will immediately inspect the work site and determine the extent and the nature of the affected archaeological property. If the archeological resource is determined to be a unique archeological resource, SHPO shall be notified and options for avoidance or preservation in place shall be evaluated and implemented if feasible. The notification shall describe VA's assessment of the National Register eligibility of the property and proposed actions to resolve the adverse effect (if any). The SHPO shall respond within two (2) working days of notification and construction may resume when the SHPO concurs. In the event that avoidance or preservation in place is infeasible and the archaeologist determines that the potential for significant impacts to such resources exists, a data recovery program shall be expeditiously conducted. The archaeologist may consult the SHPO and other parties as deemed appropriate by the archaeologist in setting the boundaries of the archaeological resource. Construction work may then proceed in the project area outside of the archaeological site boundaries. VA shall take into account the SHPO's recommendations regarding National Register eligibility and proposed actions, and then carry out appropriate actions. VA shall provide the SHPO with a report of these actions once they are complete.

- c. Human Remains - The VA shall ensure that human remains and associated funerary objects encountered during the course of actions taken as a result of this work effort shall be treated in a manner consistent with the provisions. In addition, human remains and associated funerary objects that may be of Native American origin encountered on federal land shall be treated in a manner consistent with the provisions of the *Native American Graves Protection and Repatriation Act* (25 U.S.C. 3001).

5.4 Geology and Soils

If soil is disturbed, mitigation by best management practices will include appropriate compaction of soil (stormwater infiltration; structural requirements) and installation of top soil appropriate for vegetation substrate in compliance with VA Specification 01 57 19 Temporary Environmental Controls.

5.5 Hydrology and Water Quality

Excavation and soil disturbance is not anticipated to be significant based on scale and duration of exposure. Project would not require a Construction Stormwater Pollution Prevention Plan or NPDES permit because soil disturbance would be less than 1 acre. Nevertheless, construction stormwater mitigation will be implemented by best management practices in accordance with VA Specification 01 57 19 Temporary Environmental Controls. Soil stabilization methods may include seeding, straw mulch, etc. Stormwater runoff may also be treated using silt fence, catch basin filters, etc.

Discharge of hydrostatic testing water during building commissioning will be in accordance with ORDER NO. R4-2009-0068 (CAG674001) Discharges of Low Threat Hydrostatic Test Water to Surface Waters. The requirements of this order will be included with the construction contract.

5.6 Wildlife and Habitat

Migratory birds may be directly affected if breeding sites are located prior to or during construction. Therefore, if active migratory bird nests are located, a protection buffer will be delineated and the area avoided until the nests are no longer active.

5.7 Noise

Construction noise will be reduced as necessary in conformance best management practices specified in VA Specification 01 57 19 Temporary Environment - with the primary emphasis on worker protection in accordance with OSHA regulation. Worker protection at the source of noise will ensure indirect protection to VA staff and clients using the facility.

5.8 Land Use

No mitigation required.

5.9 Floodplains, Wetlands, and Coastal Zone Management

No mitigation required.

5.10 Socioeconomics

No mitigation required.

5.11 Community Services

No mitigation required.

5.12 Solid and Hazardous Materials

Solid Waste

During construction (short term) and operation (long term), bulk solid waste, tree stumps, excess building material, fill, etc., shall be disposed of in a manner consistent with VA Specification 01 74 19 and State of California Integrated Waste Management Act of 1989 (AB 939) and shall be removed from the medical center property.

Hazardous & Universal Waste

Management of hazardous and universal waste will be in accordance with the California Health and Safety Code (Health & Saf. Code) and Title 22, California Code of Regulations (Cal. Code Regs.)

Medical Waste

Medical and infectious waste will be managed in accordance with the WLA medical and infectious waste program.

Asbestos

Any building material potentially disturbed during construction or renovation activities will be managed according to VA Specifications 02 82 11 Traditional Asbestos Abatement through 02 82 13.41 Asbestos Abatement for Total Demolition Projects.

In general, public health and worker protection will be in compliance with the following:

- EPA (U.S. Environmental Protection Agency) established rules under the authority of the Clean Air Act (CAA) to protect the general public from the release of airborne asbestos fibers during the demolition or renovation of buildings. These rules are referred to as the Asbestos NESHAP (National Emissions Standards for Hazardous Air Pollutants). They cover work practices to be followed during demolition and renovation and other activities involving the processing, handling, and disposal of asbestos-containing material.
- OSHA (Occupational Safety and Health Agency) and EPA established rules to protect the health of workers that are most likely to contact asbestos. These rules established strict worker exposure limits and set out requirements for employers regarding exposure assessment, medical surveillance, recordkeeping, and hazard communication. The EPA rules cover state and local government employees and the OSHA rules cover private sector workers.

Lead-based Paint

Painted surfaces scheduled for disturbance during construction or renovation will be tested and abated in accordance with VA Specification 02 83 33.13 Lead-Based Paint Removal and Disposal, amended to include new regulations effective January 1, 2011 (California Code of Regulations, Title 17 for the accreditation, certification, and work practices concerning lead-based paint and Cal OSHA, Title 8 CCR 1532.1, Manual Demolition of Structures).

5.13 Transportation and Parking

During construction, implementation of VA Specification 01 00 00.1.6.M OPERATIONS AND STORAGE AREAS will mitigate interference of construction activities on WLA traffic. Mitigation measures include maintaining weight limits for roads and vehicles and ensuring that at least one traffic lane is open at all times.

5.14 Utilities

No mitigation required.

5.15 Environmental Justice

No mitigation required.

5.16 Cumulative Impacts

No mitigation required.

6.0 CONCLUSION

The analysis performed in this EA 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 this EA are fully implemented. Therefore, this EA concludes that a Finding of No Significant Impact is appropriate and that an Environmental Impact Statement is not required.

7.0 LIST OF PREPARERS

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Castle-Rose, Inc.

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Kelso, WA 98626

8.0 REFERENCES CITED

1. 36 CFR § 800.5 (a) National Historic Preservation Act Section 106
2. 36 CFR Part 68 *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Secretary's Standards)
3. US Environmental Protection Agency – Currently Designated Nonattainment Areas for All Criteria Pollutants (<http://www.epa.gov/oaqps001/greenbk/ancl.html>) As of August 30, 2011.
4. 42 U.S.C. 7596(c) Section 176(c)(4) General Conformity Rule
5. VA Master Specifications 01 57 19 Temporary Environmental Controls
6. South Coast Air Quality Management District RULE 1110.2 EMISSIONS FROM GASEOUS- AND LIQUID-FUELED ENGINES
7. Building 209 Section 106 Determination of Effect. 2011. Chattel Architecture, Planning & Preservation, Inc.
8. 36 CFR 61 *Secretary of Interior's Professional Qualification Standards*
9. 25 U.S.C. 3001 *Native American Graves Protection and Repatriation Act*
10. Environmental Protection Agency, National Pollutant Discharge Elimination System (NPDES) Stormwater Program, Stormwater Discharges From Construction Activities <http://cfpub1.epa.gov/npdes/stormwater/const.cfm>
11. ORDER NO. R4-2004-0109 (CAG674001) Discharges of Low Threat Hydrostatic Test Water to Surface Waters
12. California Department of Fish and Game BIOS and ACE-II online databases
 - a. ACE-II: Areas of Conservation Emphasis (<http://www.dfg.ca.gov/biogeodata/ace/>)
 - b. BIOS: Biogeographic Information and Observation System online mapping tool (<http://bios.dfg.ca.gov/>)
13. Migratory Bird Treaty Act of 1918.
<http://www.fws.gov/migratorybirds/RegulationsPolicies/treatlaw.html#mbta>
14. City of Los Angeles Automated Zone Information and Map Access System (ZIMAS): <http://zimas.lacity.org/>
15. VA Master Specification 01 74 19 Construction Waste Management
16. California Integrated Waste Management Act of 1989 (AB 939)
17. California Health and Safety Code Chapter 6.11, Sections 25404.3(b) and 25404(c)(6)

18. Title 22, California Code of Regulations - Community Care
19. VA Master Specification 02 82 11 Traditional Asbestos Abatement
20. VA Master Specification 02 82 13.41 Asbestos Abatement for Total Demolition Projects
21. 40 CFR Part 61. National Emission Standard for Hazardous Air Pollutants (NESHAPS). Subpart M—National Emission Standard for Asbestos.
22. Construction Industry Compliance Assistance Center. Asbestos.
<http://www.cicacenter.org/asbestos.html>
23. VA Master Specification 02 83 33.13 Lead-Based Paint Removal and Disposal
24. Title 17 California Code of Regulations - Public Health
25. Title 8 California Code of Regulations - Division of Occupational Safety and Health 1532.1, Manual Demolition of Structures
26. 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

- ACE-II - Areas of Conservation Emphasis
- BIOS - Biogeographic Information and Observation System online mapping tool
- CEQ - Center for Environmental Quality
- EA - Environmental Assessment
- GLA - Greater Los Angeles Healthcare System
- MBTA - Migratory Bird Treaty Act
- NEPA - National Environmental Policy Act
- NHPA - National Historic Preservation Act
- SHPO - State Historic Preservation Officer
- VA - Department of Veterans Affairs
- WLA - Veterans Affairs Medical Center West Los Angeles
- VSO - Veterans Service Organization

APPENDIX A

Agency Communications

1. VA Communications with California State Historic Preservation Office
 - a. March 5, 2012 SHPO Letter
 - b. January 25, 2012 VA Letter
 - c. December 06, 2011 SHPO Letter
 - d. October 30, 2011 VA Letter
 - e. August 23, 2011 SHPO Letter
 - f. July 15, 2011 VA Letter
2. VA Letter to Native American Heritage Commission
3. VA Letter to Veteran Service Organizations

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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March 05, 2012

Reply in Reference To: VA110720A

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

Re: Section 106 Consultation for Building 209 Seismic Retrofit and Rehabilitation Activities,
Veterans Affairs West Los Angeles Healthcare Center

Dear Mr. Swienton:

Thank you for continuing consultation on behalf of the Department of Veterans Affairs (VA) regarding their efforts to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800.

I received your response to my 06 December 2011 comments regarding your proposed Building 209 seismic retrofit and window replacement. It is my understanding that the VA is addressing the retention, repair and replacement of the existing steel sash windows in Building 209 in the following manner:

- Replacement of existing glass with laminated glass to address energy performance;
- Replacement of missing, previously replaced or severely damaged windows with aluminum sash windows to match original windows on secondary elevations;
- Relocation of original windows on secondary elevations at missing or deteriorated primary elevation facades;
- Removal of four windows from secondary elevations to create emergency exits;
- Removal and replacement of non-historic windows at the in-filled porches with new window sash and keeping the porches enclosed;
- Replacement of missing wood screens with new aluminum screens.

The VA has provided the following information in support of this undertaking:

- Cover letter responding to consultation dated 7/20/11
- Attachment 1 Building elevations with window treatment
- Attachment 2 Existing vs. proposed glazing comparison
- Attachment 3 Sections, Elevations, Photos of proposed aluminum replacement windows
- Attachment 4 Screen porch historic photos

- Attachment 5 Existing and proposed window screens for porches
- Attachment E identifying primary, secondary and tertiary spaces
- Sample of laminated glass

After reviewing this information, I have the following comments:

- 1) I concur with the proposed repair and reuse of the existing steel sash windows. The replacement of damaged primary window sash on primary elevations with original sash from secondary elevations is considered to be good practice and in accordance with the Secretary of the Interior's Standards.
- 2) I concur that the removal of select windows at secondary elevations to provide code-required access and the installation of new aluminum screens to replicate original wood screens and factory painted to match original wood windows meets the Standards.
- 3) I concur with the replacement of existing windows at the porches.
- 4) The film in the laminated glazing you have provided has a distinctive tint that appears half-mirrored in character. OHP strongly suggests a clear film. As a result, I *cannot* concur that the use of this product as currently configured meets the Standards.
- 5) OHP supports the use of the clear film identified as Solarban 60 that you have selected for this undertaking. I am therefore able to concur that this undertaking as described and proposed will have no adverse effect on historic properties pursuant to 36 CFR Part 800.5(b).
- 6) 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 of my staff at (916) 445-7006 or at email at ecarroll@parks.ca.gov.

Sincerely,



Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

05 March 2012

Page 3 of 3

CC:

VA110720A

Brian Lusher

Advisory Council on Historic Preservation

Old Post Office Building

1100 Pennsylvania Avenue, NW, Suite 803

Washington, DC 20004

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



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management

January 25, 2012

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816
Attn: Ed Carroll

Re: Section 106 Consultation for Building 209 Seismic Retrofit and Rehabilitation Activities,
Veterans Affairs West Los Angeles Healthcare Center
SHPO No. VA110720A
Project No. 046-10026-004

Dear Mr. Donaldson,

Thank you for your response dated December 6, 2011 regarding continuing consultation on the rehabilitation of Building 209 on the Veterans Affairs West Los Angeles Healthcare Center (VA West LA campus). Based on your comments, we reconsidered our window replacement approach and decided to retain and rehabilitate the existing steel sash windows. The project now fully conforms with the Secretary of the Interior's Standards for the Treatment of Historic Properties for rehabilitation. We look forward to receiving your concurrence on this project of a finding of no adverse effect.

Windows

The West Elevation is the Primary Elevation and will showcase all original windows with the exception of the west wings ends (formerly porch areas) which include non-historic window infills. 221 of the building's 270 windows will be rehabilitated. The remaining 49 windows are missing, damaged, or non-historic, and two windows will be removed altogether to accommodate functional requirements. We explain our revised window treatment methodology graphically in Attachment 1. Our methodology for window treatment is articulated below:

1. We plan to retain and rehabilitate the existing steel sash windows. To address energy efficiency concerns we will replace the existing glass with higher performance laminated glass. Attachment 2 provides information on the new glass; we also include a sample with this submittal. The restoration process requires the removal of the original window sash, restoration or replacement of counter balances based on their level of deterioration, repainting of sash and frames based on the results of color analysis, and re-installation of window sash.
2. For previously replaced or no longer extant windows rehabilitation is not possible. On the Primary Elevations original windows will be relocated and installed where possible, Secondary

Elevations receive a new aluminum window to match the existing as closely as possible. A mock-up of the new window has been installed in an opening where the original steel sash window had been removed (**Attachment 3**). You are invited to review this mock-up in person.

3. For any existing steel window sash that is severely deteriorated and cannot be rehabilitated, we will provide thorough photographic documentation prior to removal. To maintain steel sash windows on primary elevations, specifically the west and south elevations, severely deteriorated window sash will be replaced with salvaged original sash from secondary elevations. New aluminum sash will be installed only on secondary elevations.
4. As discussed in our Determination of Effect report, four existing windows from secondary elevations will be removed to accommodate two emergency exits (as required by the fire code) and two access doors at the loading dock area (one serving a new elevator room and one serving a new recycling room). Two of these windows will be relocated on the primary, west elevation. The remaining two windows cannot be relocated elsewhere in the building because one is missing the top sash and the other does not dimensionally fit any other window openings; where possible components of these two windows will be used to repair other existing windows.
5. Windows at west 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 multi-part screen (**Attachment 4**). These porches were infilled by 1964 with rectangular windows. The infills have not taken on significance over time and these non-historic windows (which are dimensionally different from other historic windows) will be replaced with new aluminum sash.

Removing the window infills and opening the screen porches back to their original configuration was considered. We decided to retain the existing openings considering required occupant privacy within the residential units and energy consumption.

6. Original drawings show screens with wood frames. Screens were generally double hung sash. These screens are no longer extant, having been replaced with new, aluminum sash screens (date unknown). Aluminum sash screens have not taken on historic significance over time. New window screens are proposed to be installed on all windows (rehabilitated or new) 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 (**Attachment 5**).

This approach to restoring existing windows with limited replacement in areas where historic windows no longer exist conforms with the *Secretary's Standards* for rehabilitation.

Approach in Identification of Significant Spaces

Significant Spaces Maps were included as **Attachment E** in the Determination of Effect report and are included for convenience with this letter. These maps identified areas of primary, secondary, and tertiary significance for Building 209 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.¹ 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. These areas include the north-south corridor on each floor and the two stairs. 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. The exceptions are former wards at the west ends of the north and south arms that retain integrity and have been identified as secondary significant spaces.

Suspended ceilings

The building section provided in our previous submittal was incomplete and showed suspended ceilings hanging below window heads and touching the windows: this condition is not proposed. A more accurate ceiling detail and reflected ceiling plan is included as Attachment 6. As seen in these drawings, typical condition pulls the suspended ceiling away from the windows by at least one foot.

Entry canopy

While included in earlier drawings, the new entry canopy was not clearly addressed in the Determination of Effect report. The proposed entry canopy is included in this letter (Attachment 7). The clear glass canopy is supported by steel beams and columns and none of its parts attach to the historic building. This work conforms with the Secretary’s Standards as follows:

- conformance with standard 2: distinctive materials will not be removed;
- conformance with standard 9: the proposed canopy is differentiated from the old and clearly appears to be contemporary;
- conformance with standard 10: the proposed canopy could be removed in the future without impairing the essential form and integrity of the building.

Public outreach

- Per Section 106 regulations (36 CFR Part 800) and the VA Handbook for Cultural Resource Management Procedures, the VA submitted a letter to the Native American Heritage Commission on October 30, 2011; to date, there has been no response.
- The Advisory Council on Historic Preservation was invited to participate in the consultation process by letter on December 21, 2011. Due to the revised approach window treatment approach and the proposed finding of no adverse effect the ACHP has elected not to participate.
- The VA Greater Los Angeles will be formally requesting comments from Veteran Services Organizations by the end of January 2012. The Building #209 project and renderings will be available on the GLA Internet Website and communicated through social media outlets to other employees and staff as well.

¹ 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>>.

- We engaged the Los Angeles Conservancy, who, following their review stated they do not have any comments. Their engagement in the project was concluded with a site visit on January 24, 2012.

Cumulative impacts to the historic district

In your letter dated December 6, 2011 you indicated possible cumulative impacts to the district posed by the undertaking of projects including photovoltaic carport structures, modifications to building 1001, and demolition of Buildings 278 and 298. These undertakings will be addressed by the US Department of Veterans Affairs in separate communication with SHPO and independently from this project.

Because rehabilitation of Building 209 conforms with the *Secretary Standards*, the Undertaking will not contribute to a cumulative impact to the historic district. Additionally, our consultant, Chattel Architecture, is currently preparing an updated National Register nomination for the three districts, proposing to combine them into one district. We expect to have a draft by the end of March 2012 to submit for your input. Also, Chattel Architecture is under contract to prepare a campus-wide Preservation Plan, which will also be submitted for your input.

Conclusion

The proposed project has been revised to meet the SHPO recommendations and fully conforms with the Secretary's Standards for Rehabilitation. We respectfully request your concurrence in a finding of no adverse effect. In addition, we diligently continue to consult with interested parties and implement documents to address cumulative impacts to the historic district.

Sincerely yours,



Daniel Swienton
Project Manager
US Department of Veterans Affairs
Office of Construction and Facilities Management (003C1B)

Attachments

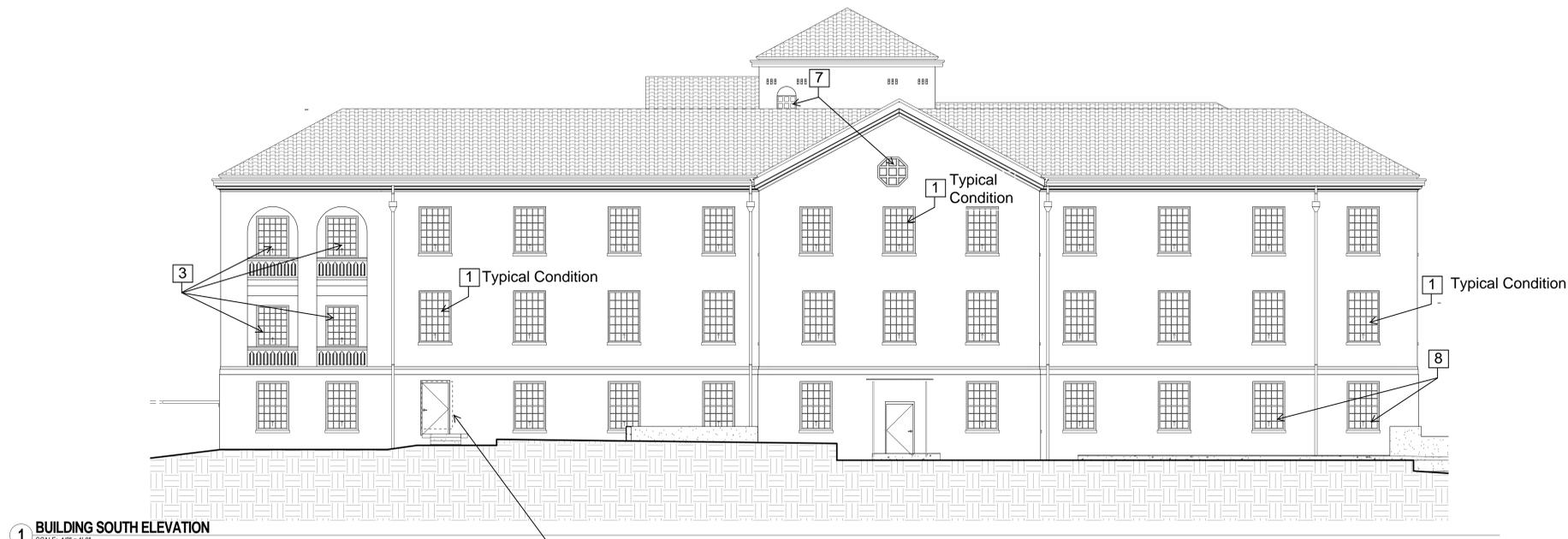
cc: Brian Lusher
Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 803
Washington, DC 20004

Kathleen Schamel
Federal Preservation Officer
Historic Preservation Office (00CFM)
Office of Construction & Facilities Management
Department of Veterans Affairs
811 Vermont Avenue, NW
Washington, DC 20420

Attachment 1

Building Elevations and Window Treatment Explanation

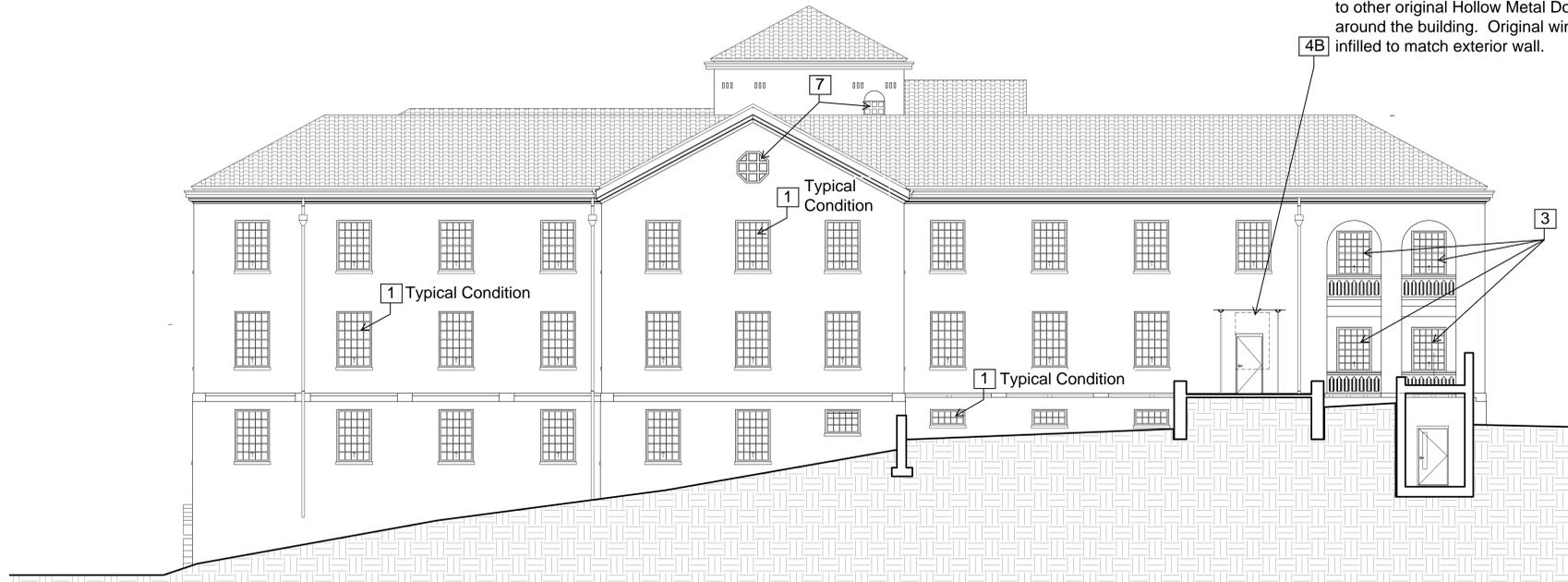
ATTACHMENT 1A



1 BUILDING SOUTH ELEVATION
SCALE: 1/8" = 1'-0"

4A New Access Door is similar (in material and color) to other original Hollow Metal Doors found around the building. Original window opening is infilled to match exterior wall.

New Exit Door is similar (in material and color) to other original Hollow Metal Doors found around the building. Original window opening is infilled to match exterior wall.



2 BUILDING NORTH ELEVATION
SCALE: 1/8" = 1'-0"

WINDOW LEGEND

1 Rehabilitate Existing Steel Window. All windows on all elevations fall under this category unless noted otherwise. A total of 221 windows fall under this category.

2 New Aluminum Window to replace missing original window. A total of 13 windows fall under this category.

3 New Aluminum Window to replace non-historic window. A total of 28 windows fall under this category.

4A Existing Steel Window to be removed in order to accommodate access doors. These Windows cannot be reused because they are damaged or because dimensionally they do not fit other window openings. A total of two windows fall under this category.

4B Existing Steel Window to be removed and relocated on Primary West Elevation (see keynote 6 below) in order to accommodate exit door. A total of two windows fall under this category.

5 New Aluminum Window to replace Existing Damaged Historic Steel Window (missing sashes). A total of four windows fall under this category.

6 Existing Steel Window is relocated to this location from a secondary elevation (see keynote 4B above). A total of two windows fall under this category.

7 Existing Ventilation Openings to remain.

8 The conditions of these Window Openings is unknown due to obstructions. An evaluation will be performed once construction begins and priority will be given in rehabilitating the Existing Windows if they are the original ones. If the original Windows are missing or are damaged beyond repair they will be replaced with similar New Aluminum Windows. A total of two windows fall under this category.

* The new Aluminum Windows referenced above will be similar to the original as demonstrated with the new window mock-up.

** The total Window counts referenced above include all Building Elevations. The Building will have a total of 270 windows after rehabilitated.

**WORK IN PROGRESS - NOT FOR CONSTRUCTION
FULLY SPRINKLERED**

CONSULTANTS:

ARCHITECT/ENGINEERS:

LEO A DALY

27th Floor, 550 South Hope Street
Los Angeles, CA 90071 USA
Tel 213-629-0100 Fax 213-629-0070

Drawing Title
EXTERIOR ELEVATIONS NORTH AND SOUTH

Approved: Project Director

Project Title
**VA GLA HEALTHCARE SYSTEM
WEST LA MEDICAL CENTER
SEISMIC CORRECTIONS**

Location
LOS ANGELES, CA 90073

Date
01/20/12

Project Number
691-406

Building Number
209

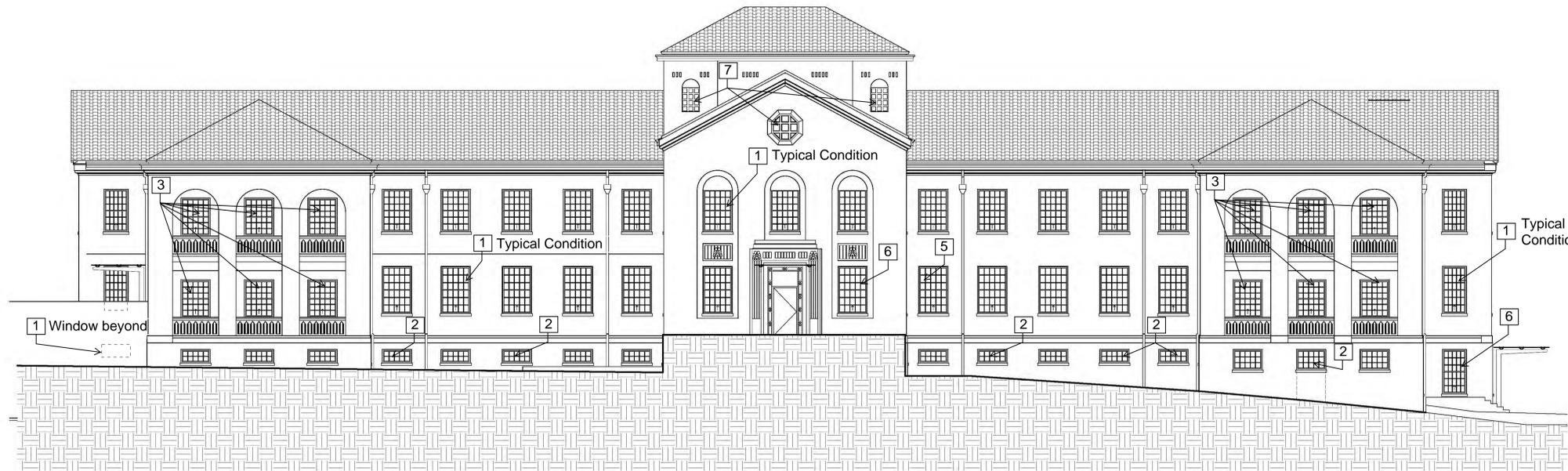
Drawing Number
AE201

Office of
Construction
and Facilities
Management



CONSTRUCTION DOCUMENTS SUBMITTAL	01/20/12
DESIGN DEVELOPMENT SUBMITTAL	03/17/11
SCHEMATIC DESIGN SUBMITTAL	01/12/11
Revisions:	Date

ATTACHMENT 1B



PRIMARY ELEVATION (West Elevation)

WINDOW LEGEND

1 Rehabilitate Existing Steel Window. All windows on all elevations fall under this category unless noted otherwise. A total of 221 windows fall under this category.

2 New Aluminum Window to replace missing original window. A total of 13 windows fall under this category.

3 New Aluminum Window to replace non-historic window. A total of 28 windows fall under this category.

4A Existing Steel Window to be removed in order to accommodate access doors. These Windows cannot be reused because they are damaged or because dimensionally they do not fit other window openings. A total of two windows fall under this category.

4B Existing Steel Window to be removed and relocated on Primary West Elevation (see keynote 6 below) in order to accommodate exit door. A total of two windows fall under this category.

5 New Aluminum Window to replace Existing Damaged Historic Steel Window (missing sashes). A total of four windows fall under this category.

6 Existing Steel Window is relocated to this location from a secondary elevation (see keynote 4B above). A total of two windows fall under this category.

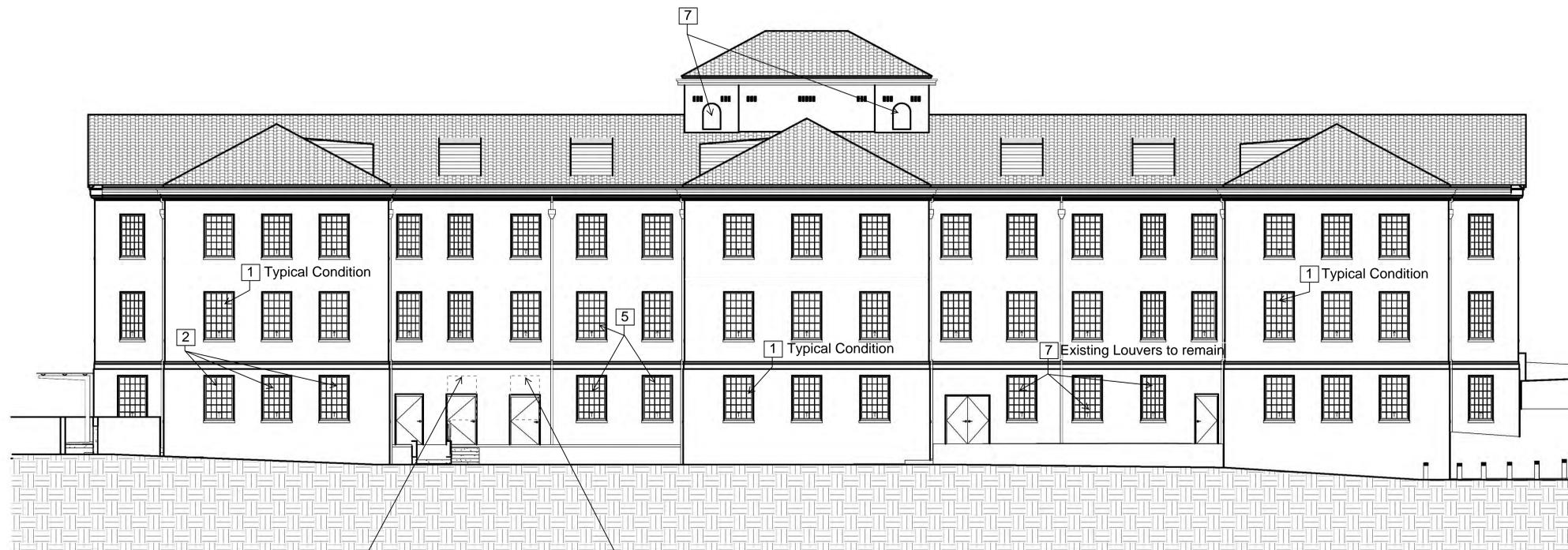
7 Existing Ventilation Openings to remain.

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2 BUILDING WEST ELEVATION
SCALE: 1/8" = 1'-0"



New Exit Door is similar (in material and color) to other original Hollow Metal Doors found around the building. Original window opening is infilled to match exterior wall.

New Access Door is similar (in material and color) to other original Hollow Metal Doors found around the building. Original window opening is infilled to match exterior wall.

1 BUILDING EAST ELEVATION
SCALE: 1/8" = 1'-0"

**WORK IN PROGRESS - NOT FOR CONSTRUCTION
FULLY SPRINKLERED**

CONSULTANTS:

ARCHITECT/ENGINEERS:

LEO A DALY

27th Floor, 550 South Hope Street
Los Angeles, CA 90071 USA
Tel 213-629-0100 Fax 213-629-0070

Drawing Title
EXTERIOR ELEVATIONS EAST AND WEST

Approved: Project Director

Project Title
**VA GLA HEALTHCARE SYSTEM
WEST LA MEDICAL CENTER
SEISMIC CORRECTIONS**

Location
LOS ANGELES, CA 90073

Date
01/20/12

Project Number
691-406

Building Number
209

Drawing Number
AE202

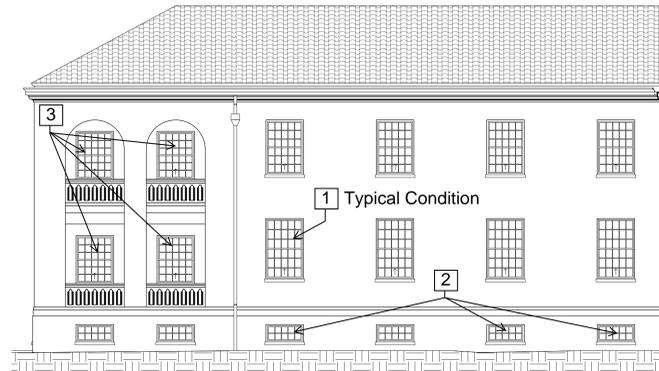
Dwg. of

Office of
Construction
and Facilities
Management

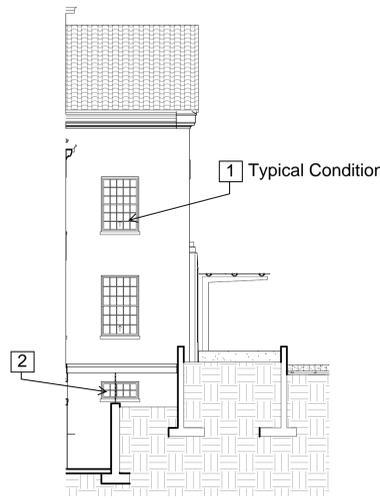
Department of
Veterans Affairs

CONSTRUCTION DOCUMENTS SUBMITTAL	01/20/12
DESIGN DEVELOPMENT SUBMITTAL	03/17/11
SCHEMATIC DESIGN SUBMITTAL	01/12/11
Revisions:	Date

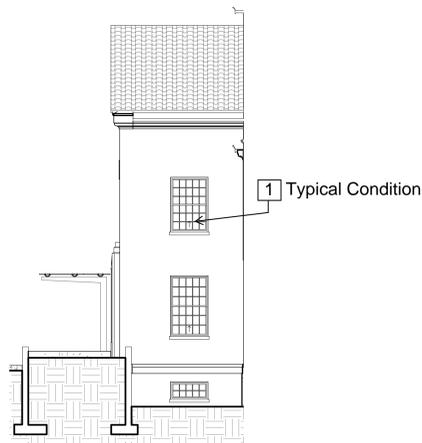
ATTACHMENT 1C



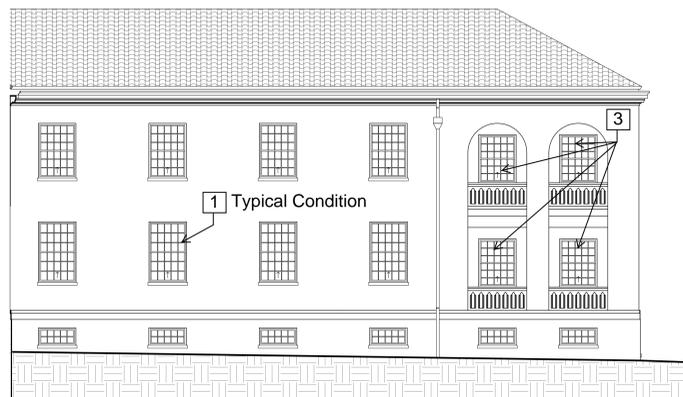
1 NORTH-WEST COURTYARD ELEVATION 1
SCALE: 1/8" = 1'-0"



2 NORTH-WEST COURTYARD ELEVATION 2
SCALE: 1/8" = 1'-0"



3 SOUTH-WEST ELEVATION COURTYARD ELEVATION
SCALE: 1/8" = 1'-0"



4 SOUTH-WEST ELEVATION 2
SCALE: 1/8" = 1'-0"

WINDOW LEGEND

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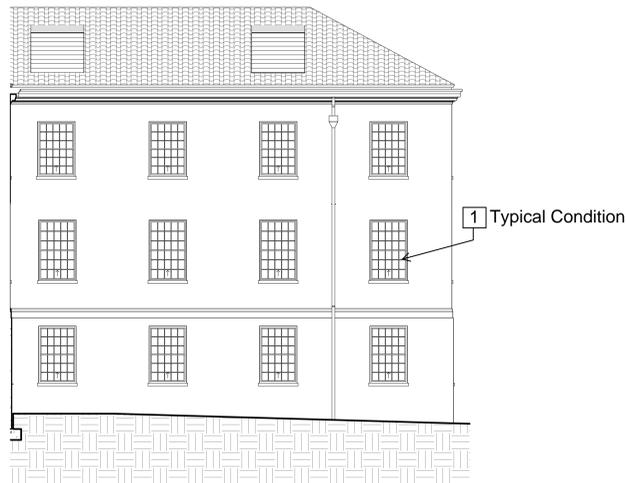
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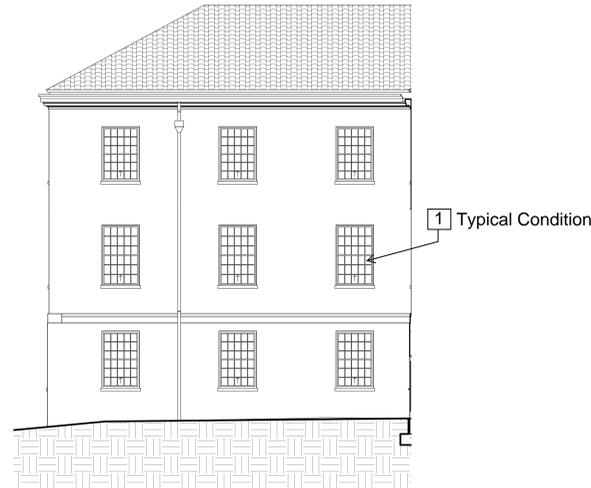
**WORK IN PROGRESS - NOT FOR CONSTRUCTION
FULLY SPRINKLERED**

CONSULTANTS: 		ARCHITECT/ENGINEERS: LEO A DALY 27th Floor, 550 South Hope Street Los Angeles, CA 90071 USA Tel 213-629-0100 Fax 213-629-0070		Drawing Title BUILDING ELEVATIONS - WEST COURTYARDS		Project Title VA GLA HEALTHCARE SYSTEM WEST LA MEDICAL CENTER SEISMIC CORRECTIONS		Project Number 691-406		Office of Construction and Facilities Management
CONSTRUCTION DOCUMENTS SUBMITTAL 01/20/12 DESIGN DEVELOPMENT SUBMITTAL 03/17/11 SCHEMATIC DESIGN SUBMITTAL 01/12/11 Revisions: _____ Date _____				Approved: Project Director		Location LOS ANGELES, CA 90073		Building Number 209		
						Date 01/20/12		Drawing Number AE203		
						Checked Author		Dwg. of		

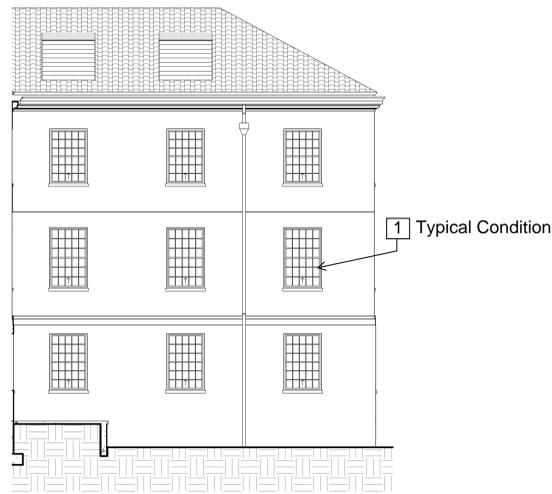
ATTACHMENT 1D



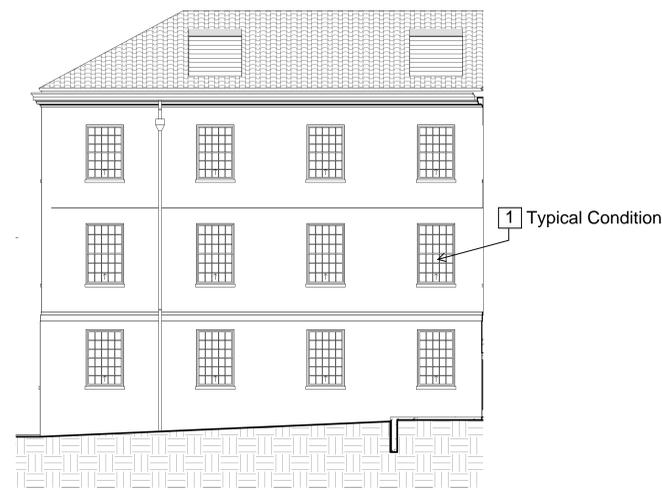
1 NORTH-EAST COURTYARD ELEVATION 1
SCALE: 1/8" = 1'-0"



2 NORTH-EAST COURTYARD ELEVATION 2
SCALE: 1/8" = 1'-0"



3 SOUTH-EAST COURTYARD ELEVATION 1
SCALE: 1/8" = 1'-0"



4 SOUTH-EAST COURTYARD ELEVATION 2
SCALE: 1/8" = 1'-0"

WINDOW LEGEND

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**WORK IN PROGRESS - NOT FOR CONSTRUCTION
FULLY SPRINKLERED**

CONSULTANTS:

ARCHITECT/ENGINEERS:

LEO A DALY

27th Floor, 550 South Hope Street
Los Angeles, CA 90071 USA
Tel 213-629-0100 Fax 213-629-0070

Drawing Title
**BUILDING ELEVATIONS - EAST
COURTYARD ELEVATIONS**

Approved: Project Director

Project Title
**VA GLA HEALTHCARE SYSTEM
WEST LA MEDICAL CENTER
SEISMIC CORRECTIONS**

Location
LOS ANGELES, CA 90073

Date
01/20/12

Checked
Checker

Drawn
Author

Project Number
691-406

Building Number
209

Drawing Number
AE204

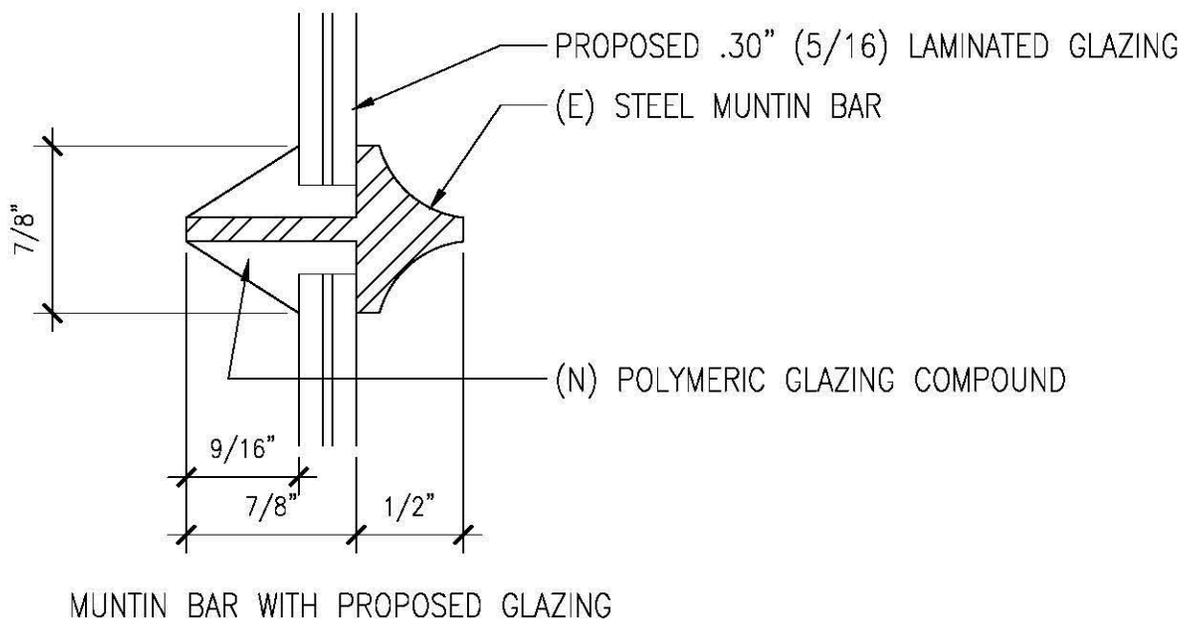
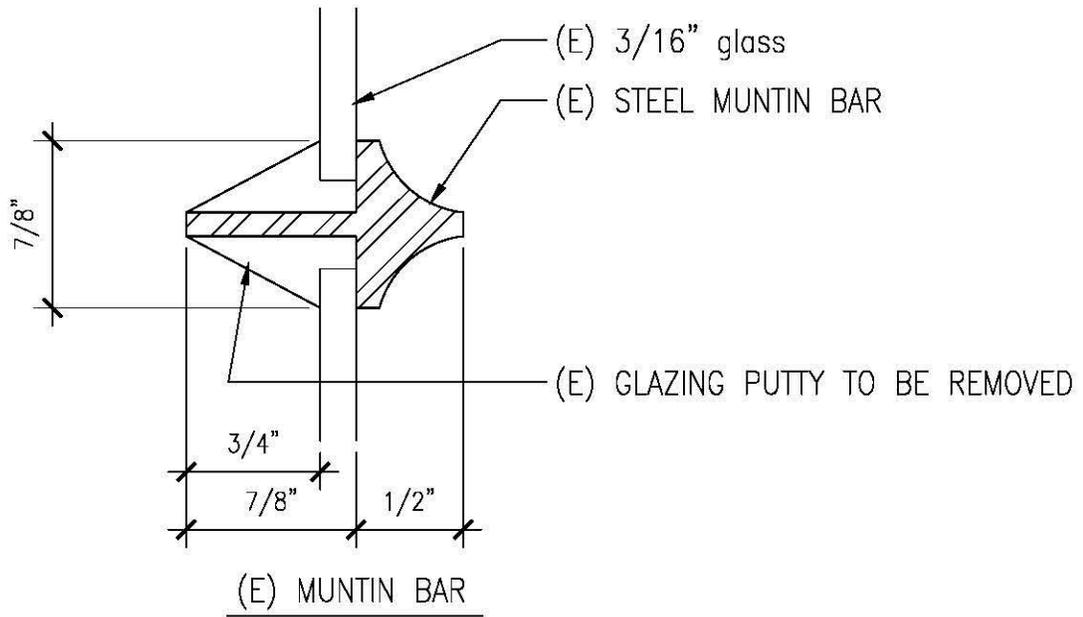
Dwg. of

Office of
Construction
and Facilities
Management

Department of
Veterans Affairs

Attachment 2

Comparison between existing and proposed replacement window glazing



Product Comparison Chart

Customer: VA

Project: B209 glass replacement

Color	Product Description - Performance Characteristics	Thickness (inches)	Visible Trans. (%)	Visible Refl. Out (%)	Visible Refl. In (%)	UV Trans. (%)	Solar Trans. (%)	Solar Refl. Out (%)	Winter U-factor	Summer U-factor	Shading Coeff.	Solar Heat Gain Coeff.	Relative Heat Gain	Light to Solar Gain
	1/4" Laminate - 1/8" PPG Solarban® 70XL Low-E #2 - 0.030" Clear PVB - 1/8" Clear	0.304	60	13	15	<1	23	43	0.99	0.90	0.39	0.33	90	1.82
	1/4" Clear	0.223	89	9	9	66	77	7	1.02	0.93	0.94	0.82	201	1.09

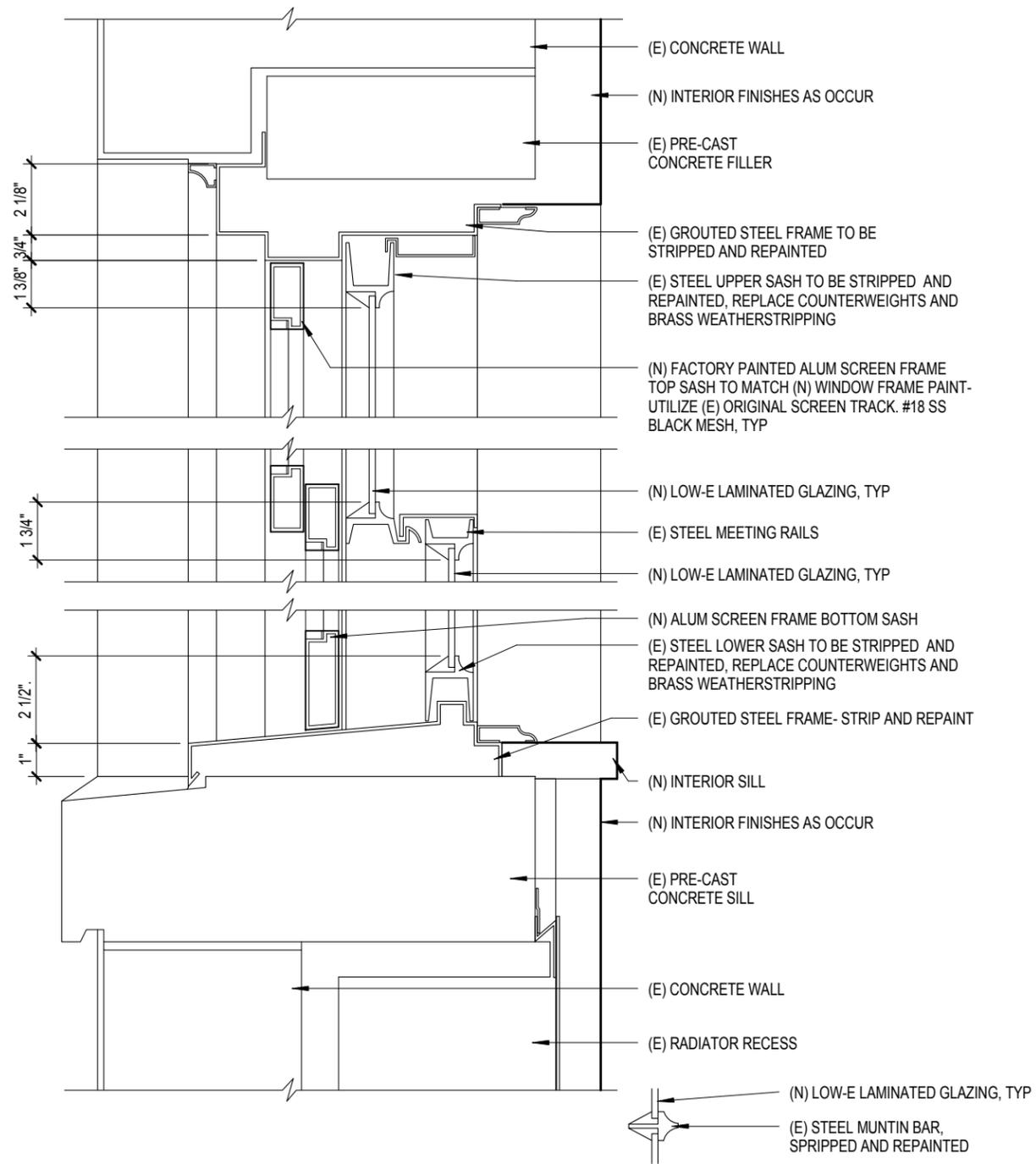
NOTES:

GlasSelect® calculates center of glass performance data using the Lawrence Berkeley National Laboratory (LBNL) Window 5.2 program (version 5.2.17) with Environmental Conditions set at NFRC 100-2001. Gas Library ID#1 (Air) is used for Insulating Glass units with air. Gas Library ID#9 (10% Air/90% Argon) is used for Insulating Glass units with argon. Monolithic glass data is from the following sources: 1. LBNL International Glazing Database (IGDB) version 18.1; 2. Vendor supplied spectral data files. Laminated glass data is from the following sources: 1. LBNL International Glazing Database (IGDB) version 18.1; 2. LBNL Optics 5 (version 5.1 Maintenance Pack 2); 3. Vendor supplied spectral data files; 4. Vendor supplied data.

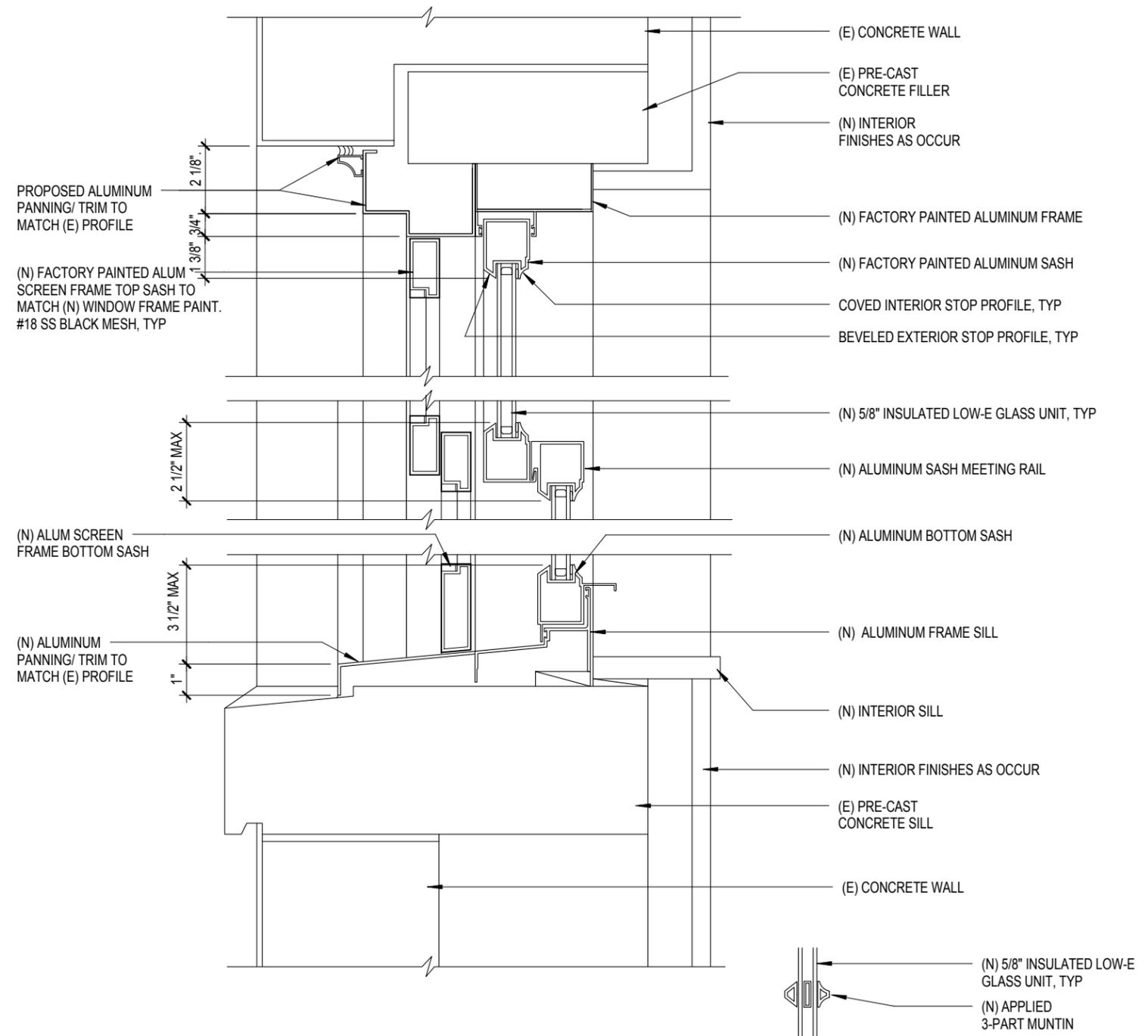
Glass colors represented herein are included only for the general purpose of glass selection. Accurate representation of optical properties, including color and reflectivity, can only be achieved by viewing glass mock-ups in conditions that are similar to the actual job. User assumes all responsibility and liability for glass color selection. Thermal values are in Imperial units.

Attachment 3

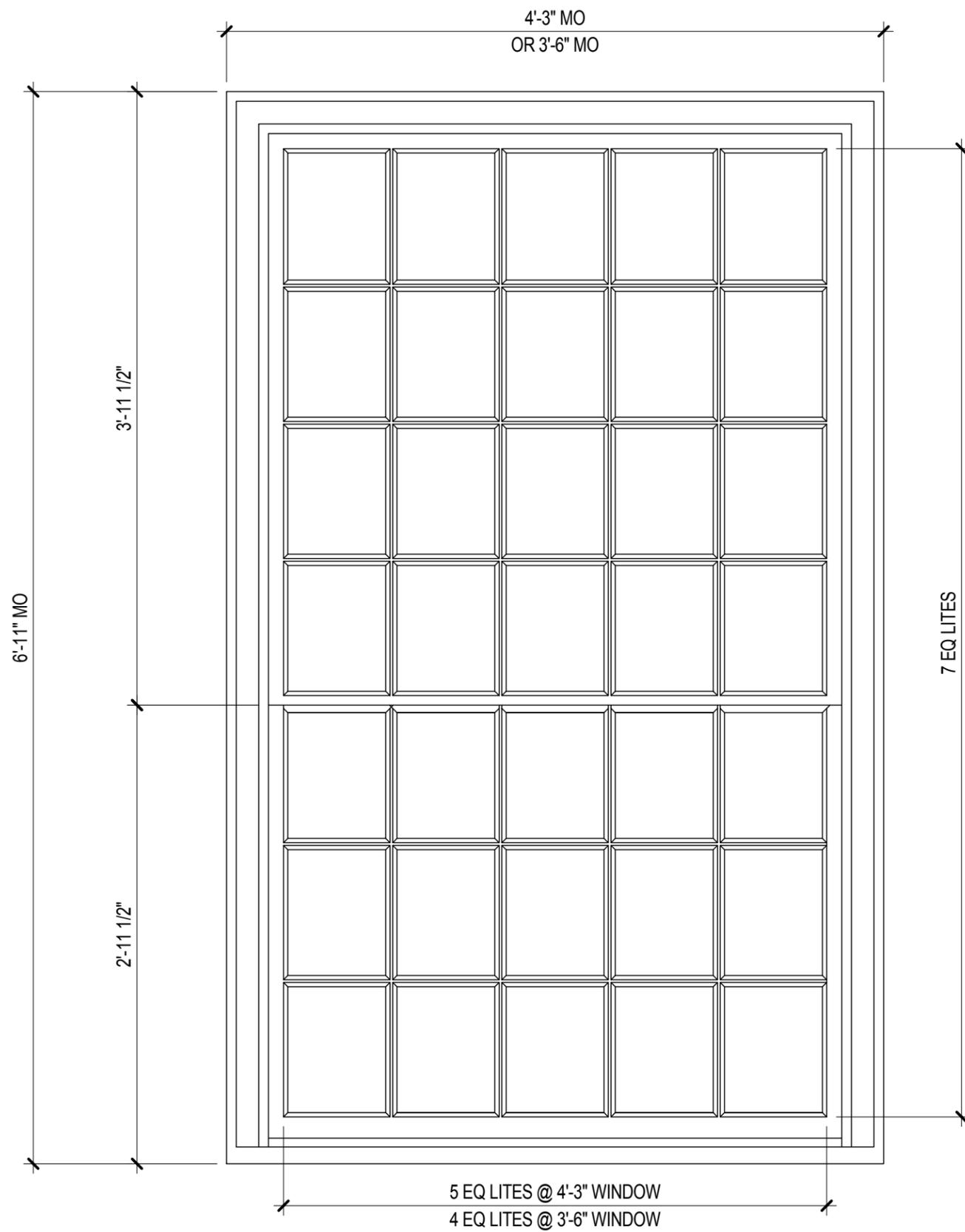
Original Window and Proposed New: Sections, Elevations, & Photographs



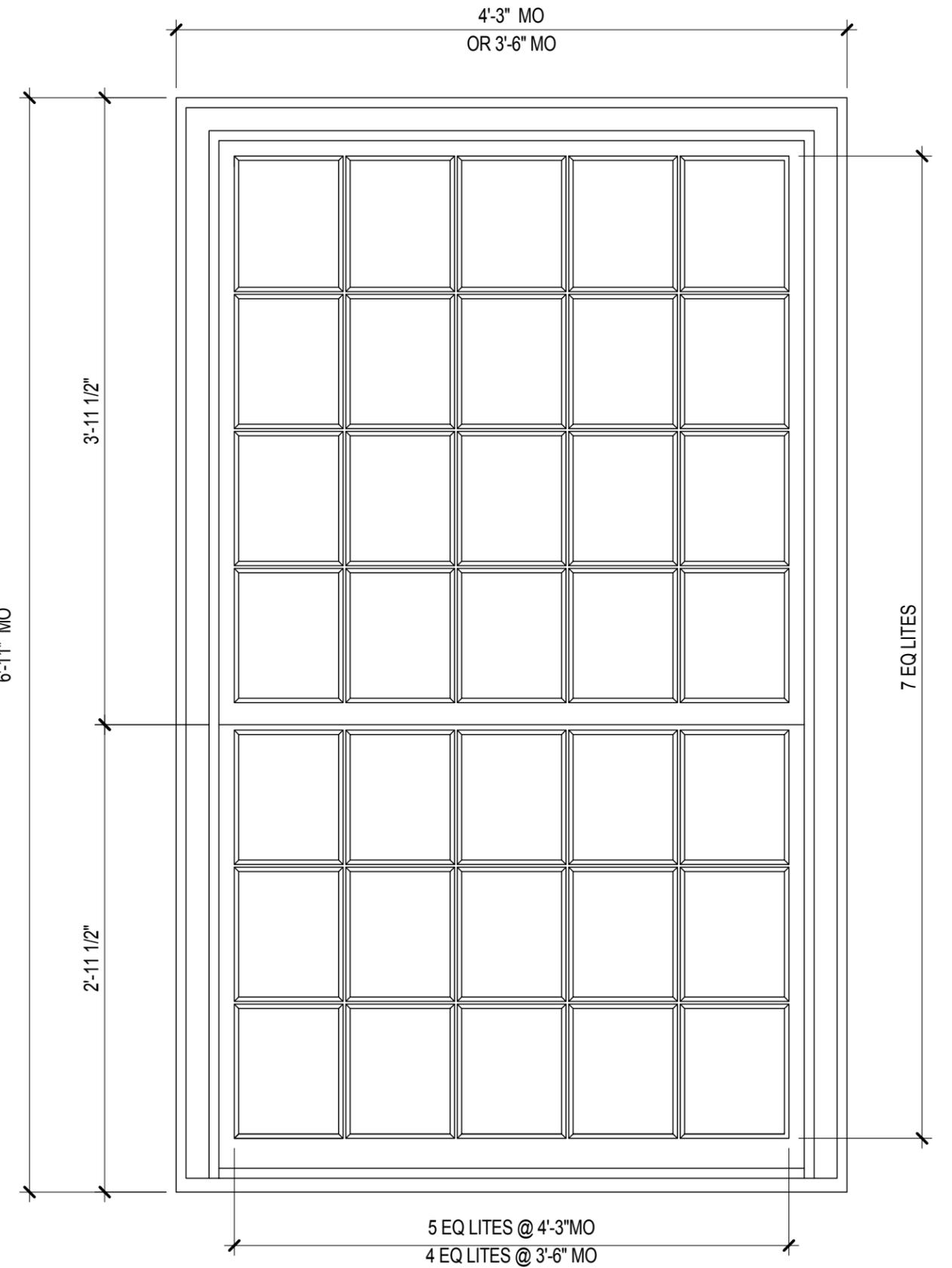
3 EXISTING WINDOW- DOUBLE HUNG



5 REPLACEMENT WINDOW



1 EXISTING WINDOW ELEVATION-1ST FLR TYP



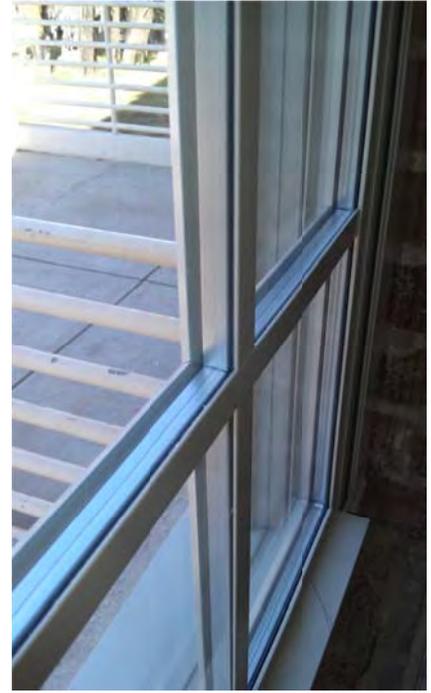
2 REPLACEMENT WINDOW ELEVATION- 1ST FLR TYP



MOCK-UP OF NEW ALUMINUM WINDOW (EXTERIOR ELEVATIONS)



EXTERIOR ELEVATION OF ORIGINAL HISTORIC WINDOW



MOCK-UP OF NEW ALUMINUM WINDOW (INTERIOR ELEVATIONS)



INTERIOR ELEVATIONS OF ORIGINAL HISTORIC WINDOW

Attachment 4

Screen Porches on Building 209: Historic Photographs



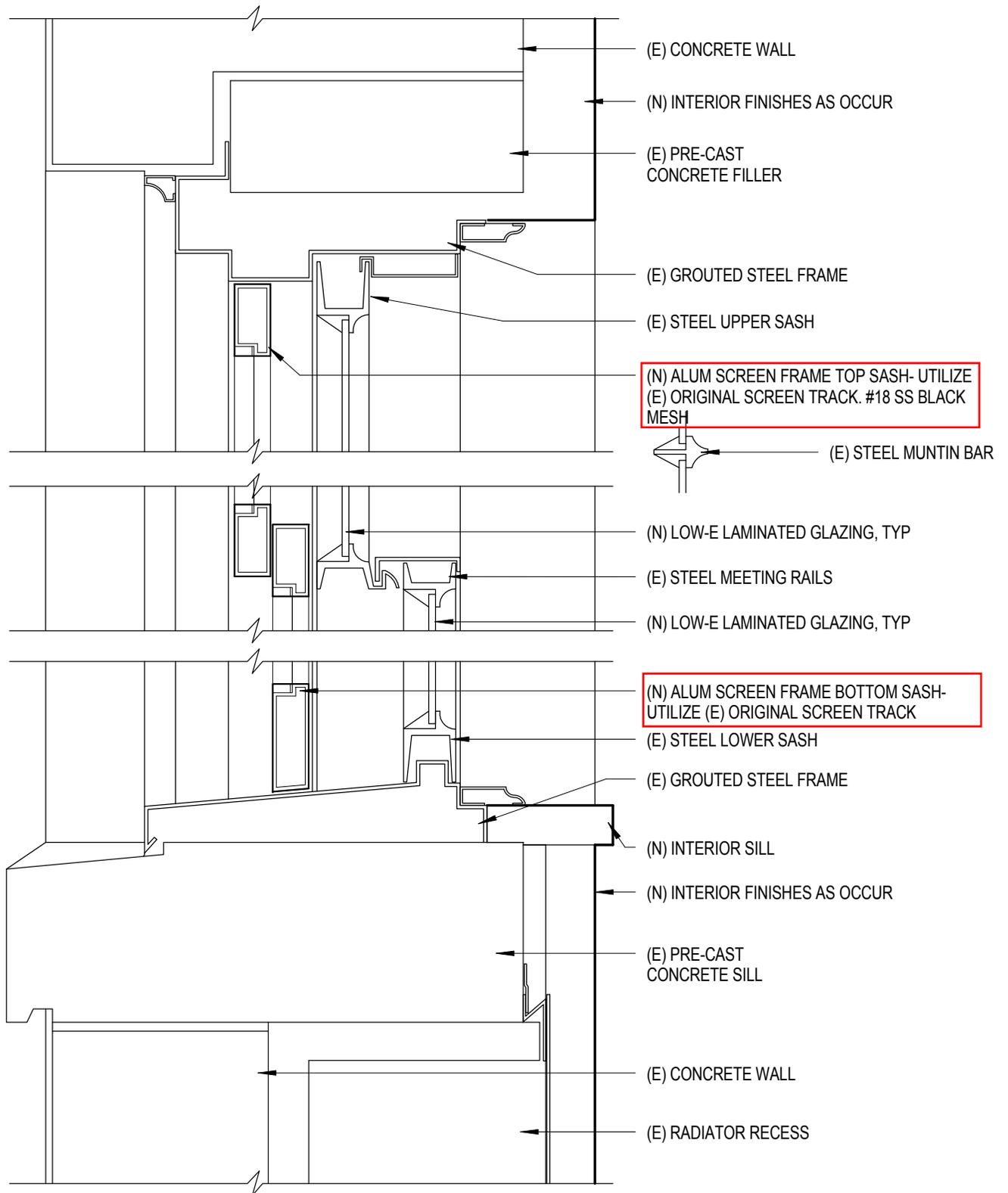
Figure 1: Aerial photo showing Building 209, view northeast, note three part screens at west end of north and south wings (VA Archives, c.1940)



Figure 2: Building 209, view east, note infilled areas at west end of north and south wings (VA Archives, 1964)

Attachment 5

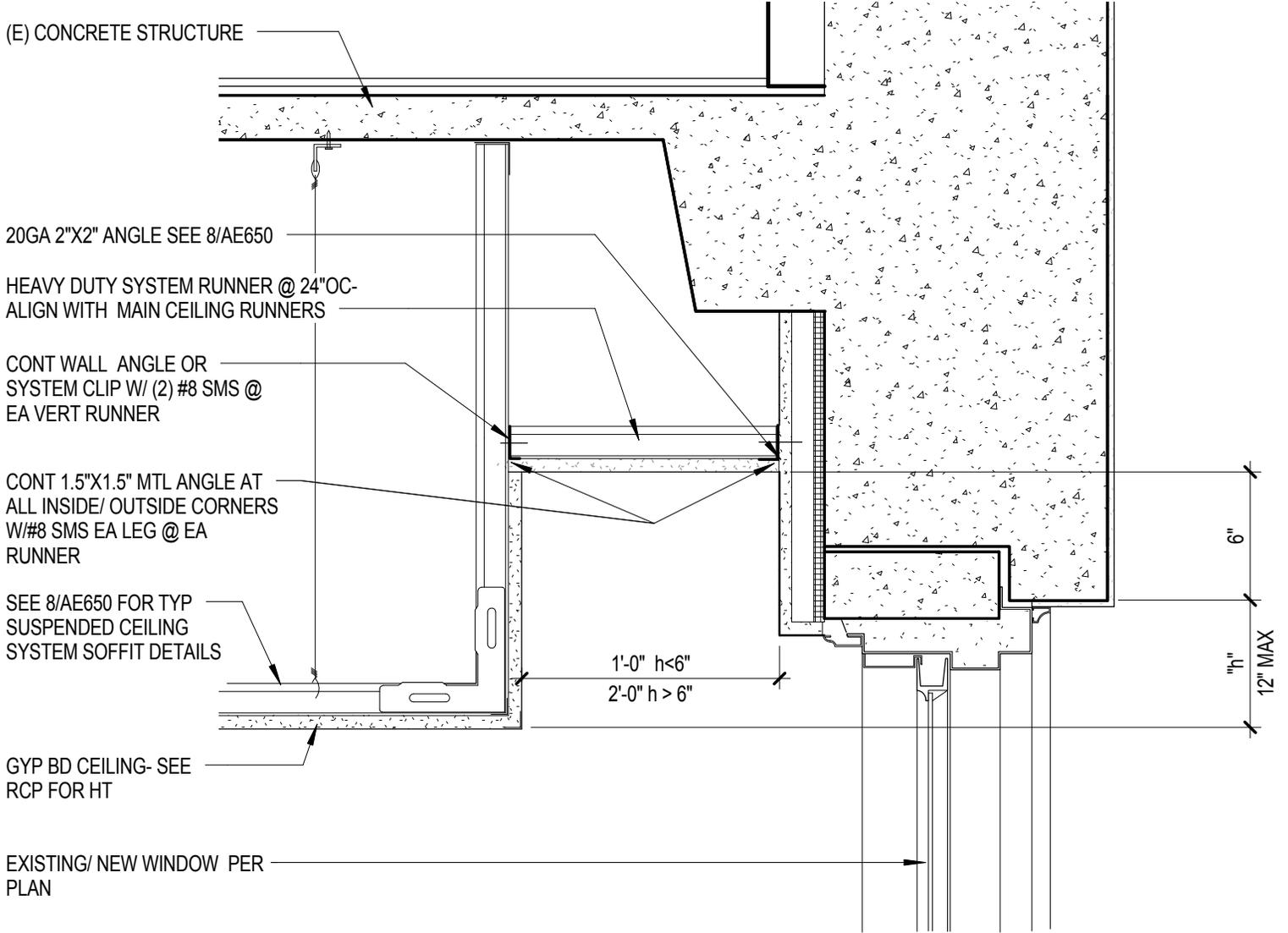
Window Screens: Original non- extant and proposed new



3 EXISTING WINDOW CONDITION

Attachment 6

Typical Ceiling Detail



7

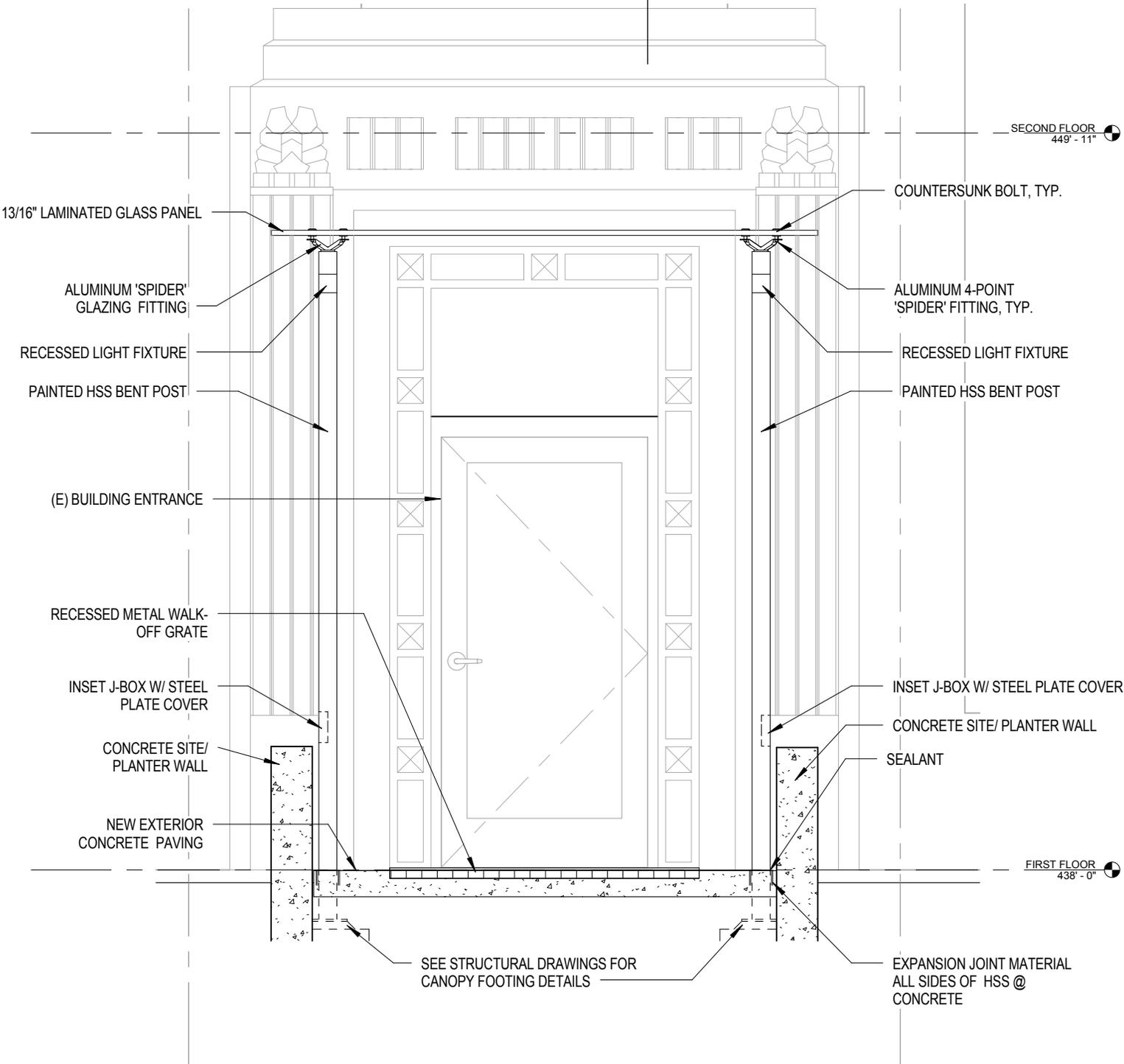
TYP SOFFIT @ WINDOW

Attachment 7

Entry Canopy

8.9

10.1



13/16" LAMINATED GLASS PANEL

ALUMINUM 'SPIDER' GLAZING FITTING

RECESSED LIGHT FIXTURE

PAINTED HSS BENT POST

(E) BUILDING ENTRANCE

RECESSED METAL WALK-OFF GRATE

INSET J-BOX W/ STEEL PLATE COVER

CONCRETE SITE/PLANTER WALL

NEW EXTERIOR CONCRETE PAVING

SEE STRUCTURAL DRAWINGS FOR CANOPY FOOTING DETAILS

SECOND FLOOR
449' - 11"

COUNTERSUNK BOLT, TYP.

ALUMINUM 4-POINT 'SPIDER' FITTING, TYP.

RECESSED LIGHT FIXTURE

PAINTED HSS BENT POST

INSET J-BOX W/ STEEL PLATE COVER

CONCRETE SITE/PLANTER WALL

SEALANT

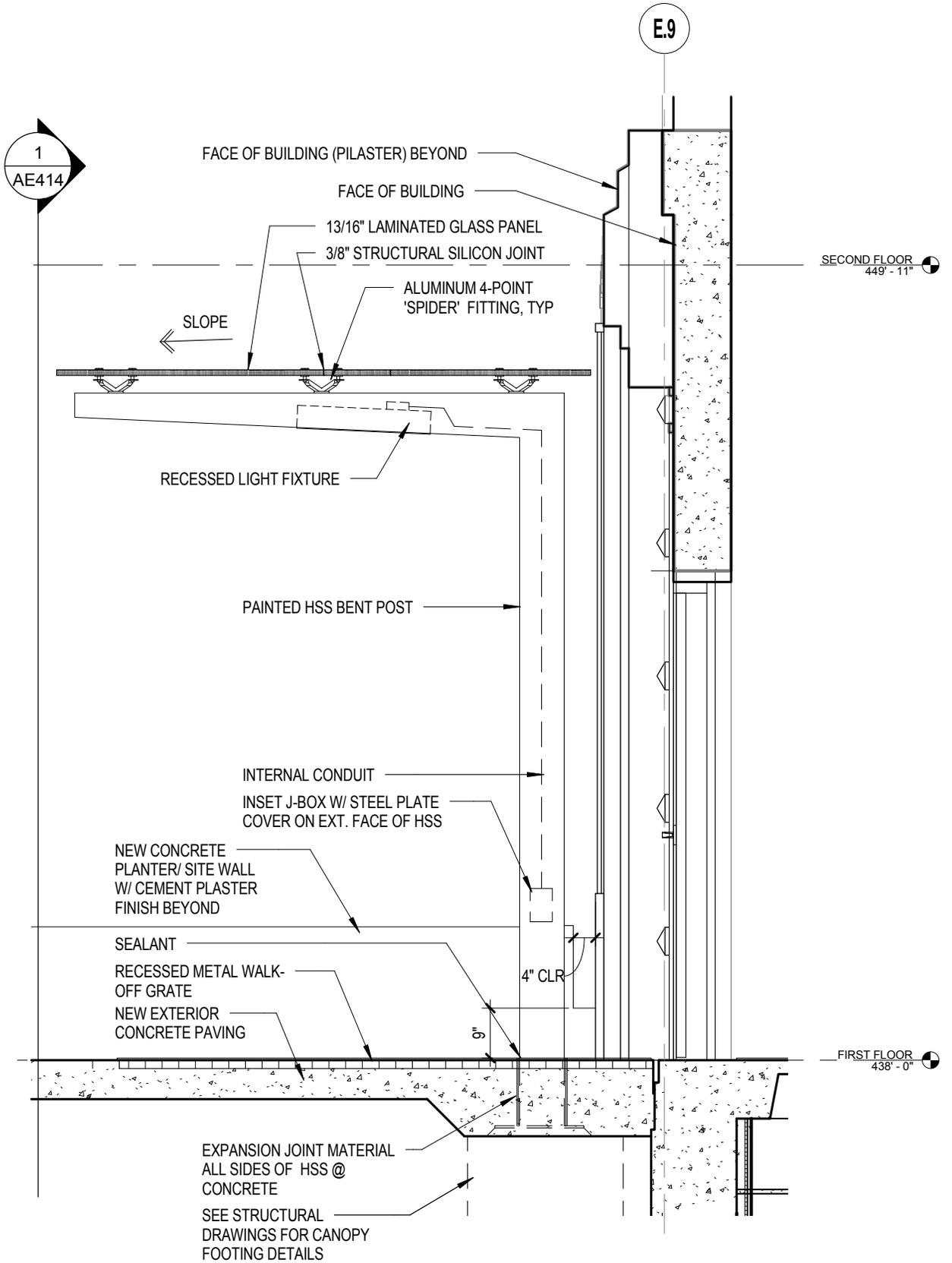
FIRST FLOOR
438' - 0"

EXPANSION JOINT MATERIAL ALL SIDES OF HSS @ CONCRETE

3

ENTRANCE CANOPY WEST ELEVATION

SCALE: 1/2" = 1'-0"

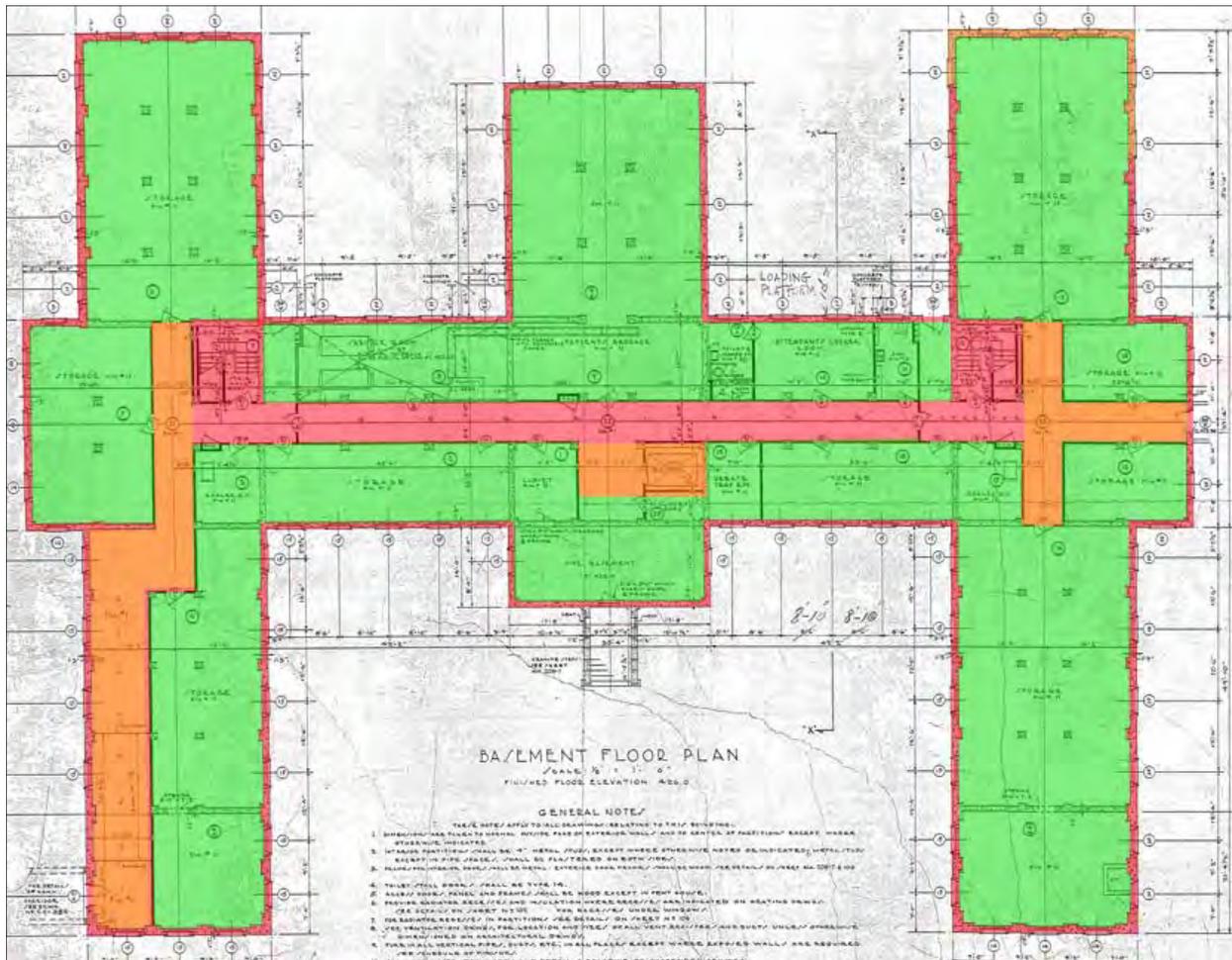


1 ENTRANCE CANOPY SECTION LOOKING NORTH

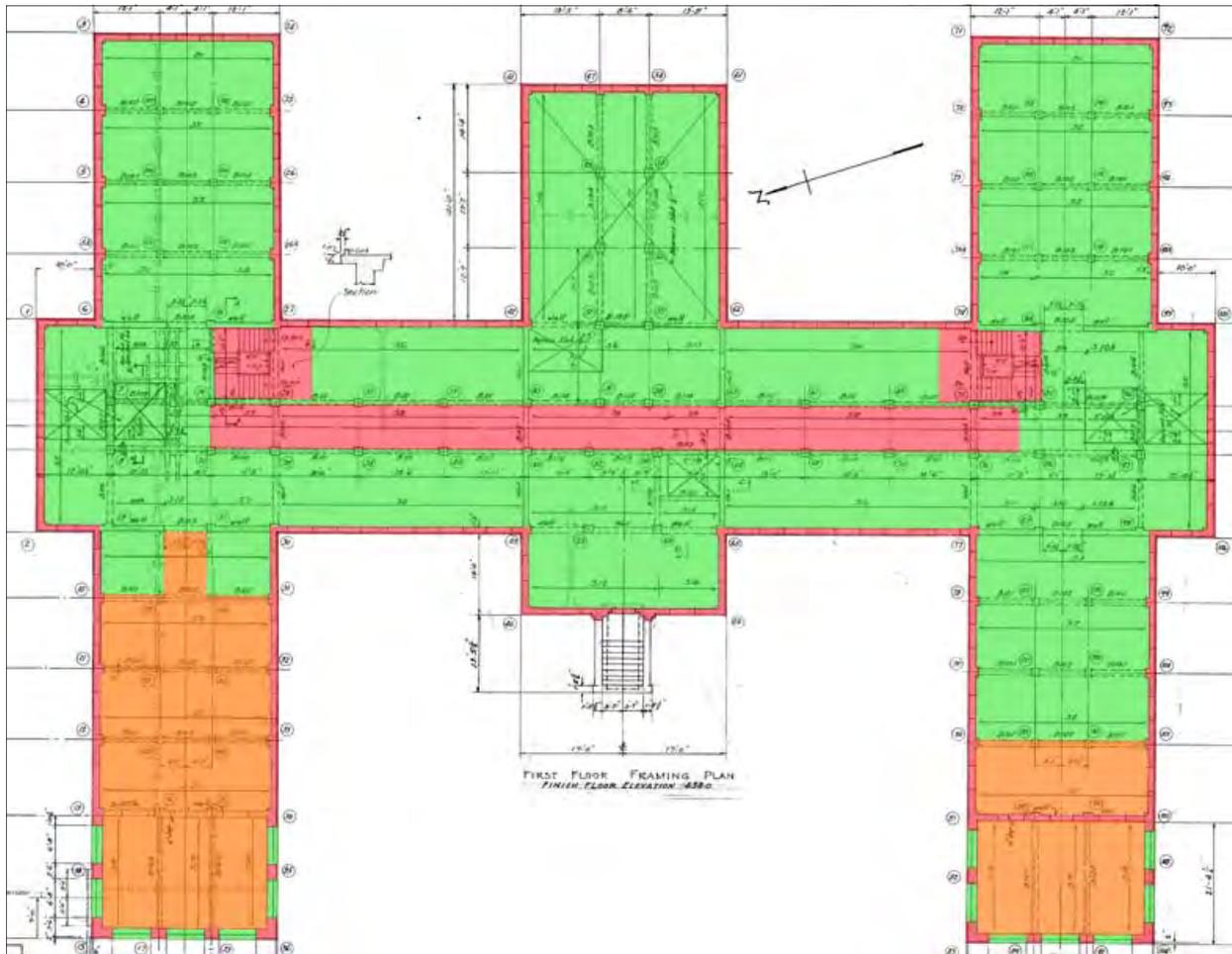
SCALE: 1/2" = 1'-0"

Attachment E

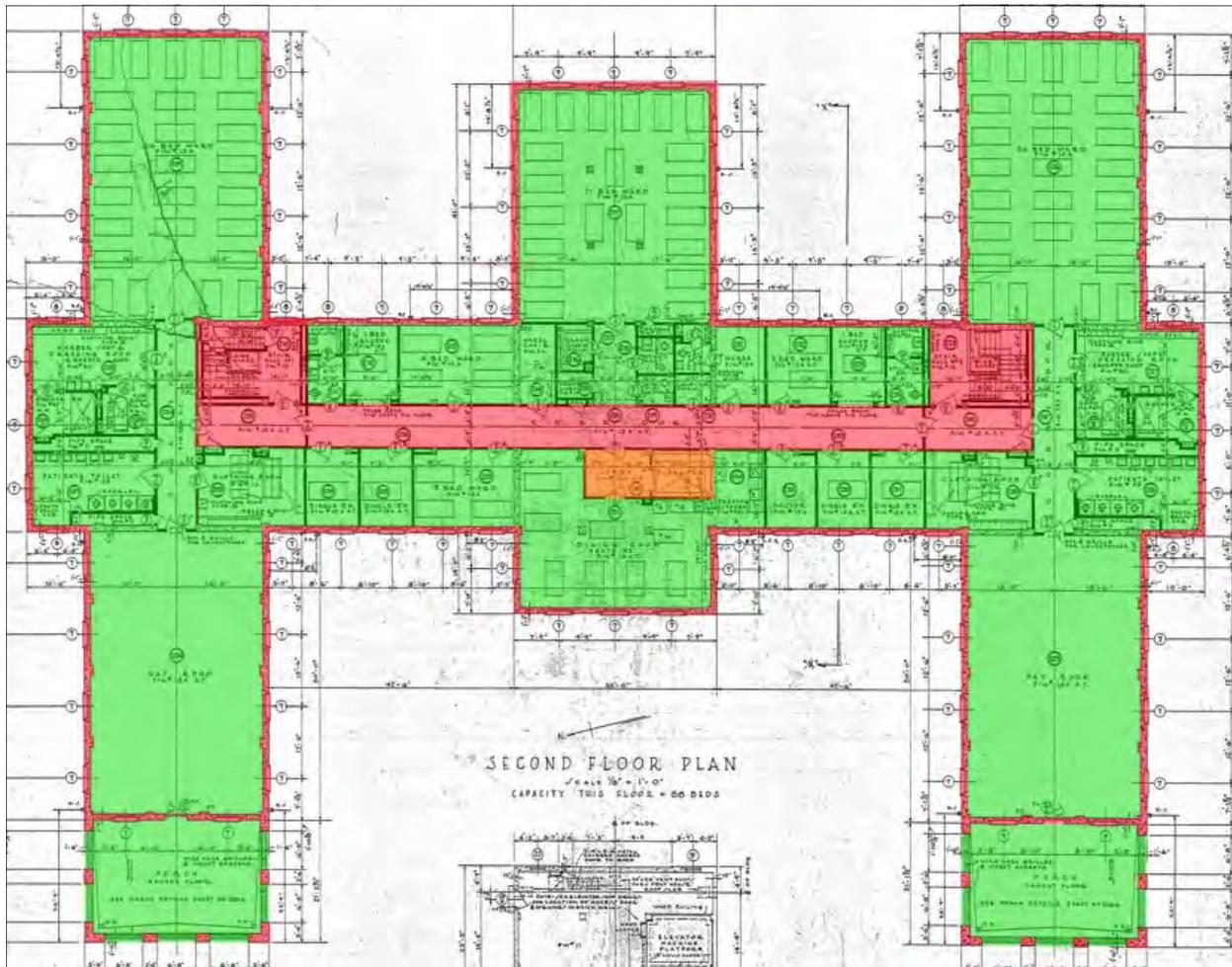
Significant Spaces Maps included in the Determination of Effect Report



Building 209, basement floor plan (red denotes areas of primary significance; orange denotes secondary significance; green denotes tertiary significance)



Building 209, first floor plan (red denotes areas of primary significance; orange denotes secondary significance; green denotes tertiary significance)



Building 209, second floor plan (red denotes areas of primary significance; orange denotes secondary significance; green denotes tertiary significance)

Enlarged Attachments 1 and 5A

Included for convenience

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



December 06, 2011

Reply in Reference To: VA110720A

Daniel Swinton, Project Manager
Office of Construction and Facilities Management
Department of Veteran Affairs
1175 Nimitz Avenue, Suite 200
Vallejo, CA 94592

Re: Section 106 Consultation for Building 209 Seismic Retrofit and Rehabilitation Activities, Veterans Affairs West Los Angeles Healthcare Center

Dear Mr. Swinton:

Thank you for continuing consultation on behalf of the Department of Veterans Affairs (VA) regarding their efforts to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800.

I am writing in response to your 30 October 2011 letter written in reply to my request for additional information regarding this undertaking. You have submitted the following documents for my review:

- SK-01 and SK-02 showing replacement window profiles;
- ASK-01 section through Building 209 and section through existing and proposed window profiles.

After reviewing these documents and the attached cover letter addressing your concerns over retaining and repairing the original, character defining windows including repair difficulties and energy loss, I have the following comments:

- 1) Your letter of explanation describing the need to replace the windows does not justify the window replacement, nor make window replacement meet the Secretary of the Interior's Standards for Rehabilitation (*Standards*) when the existing windows are not deteriorated. In most past cases, windows were constructed to be maintained and repairable. The sash weights in the frame pockets should have access panels for those times when the sash weights were expected to fail on occasion. Once failed or improperly operating sash weights have been repaired and balanced to provide ease of operation, and other maintenance performed on a regular basis, the windows can be expected to operate smoothly for another 65 years and beyond. It is worth noting that modern windows are reduced maintenance because they are not designed to be maintained and are expected to be replaced when they fail.

- 2) All existing windows can be upgraded in their energy efficiency. Clear films can be applied to existing glass that performs as well as new windows. Air infiltration and convection issues can be addressed with proper repair and the addition of interior storms. Interior and exterior shading devices are effective in reducing heat gain, even including the strategic planting of landscape as was practiced in the past.
- 3) Window replacement fails to conserve materials and resources and contributes to the construction waste stream.
- 4) Discussion of the required energy performance of the windows must be presented in the context of the performance of the entire building envelope and the scopes proposed to meet that performance requirement.
- 5) The window sections provided show the removal of original wood sills and trim, and removal of the original plaster wall with radius edges. This replacement does not meet the *Standards*.
- 6) The building section shows suspended ceilings hung below the window heads. This detail does not meet the *Standards*. Restoring the original plaster ceilings is the preferred alternative, but locating the suspended ceiling near the same plane as the original ceiling would meet the *Standards*. A typical solution restores the plaster ceiling in the area of the exterior wall, a GWB fascia is constructed +/- five to eight feet from the exterior wall, and the suspended ceiling completes the rest of the ceiling.
- 7) Window repair of existing steel windows in good condition can meet all functional requirements of the proposed use and meet the *Standards*.
- 8) If all the seismic retrofit options are in the area of the concrete ceiling joists and are concealed by the finished ceilings, then the seismic retrofit options meet the *Standards*.
- 9) OHP strongly recommends that the VA retain and repair all existing windows to avoid adverse effects to the building and the historic district. This is particularly important in light of the increasing volume of submittals proposing modifications to eligible and listed National Register buildings and historic districts within the West LA VA campus. The lack of analysis of cumulative impacts to the district (or subject contributors) posed by this undertaking in conjunction with recent undertakings proposed by the VA at the West LA campus including the introduction of several photovoltaic carport structures within district boundaries, modifications to Building 1001 (a.k.a. the Chapel, a listed resource), and the demolition of Buildings 278 (district contributor) and 298 indicates that the VA has yet to devise an effective preservation plan.
- 10) Pursuant to 36 CFR Part 800.1(a), the Section 106 consultation process seeks to balance federal undertakings with historic preservation in order to avoid, minimize or mitigate adverse effects to historic properties. Importantly, this consultation must occur between the federal agency and interested parties

during the early stages of project planning. While your 15 July 2011 letter conveys your intention to update your National Register documents and create a preservation plan, this strategy should be enacted before funding and implementing undertakings, particularly those resulting in adverse effects. Furthermore, page two of your most recent letter mentions your intent to consult with the public and interested Native American parties as you recognize your "obligation with regard to public outreach" but that you have not yet begun this process. Effective consultations incorporate the opinions of tribes and all interested parties elicited during the early stages of planning rather than after a course of action has been chosen or only when the federal agency determines it necessary to do so. Please provide an update on this process and copies of all letters sent to tribes as provided by the Native American Heritage Commission.

It is my sincere hope the VA reconsiders their approach to this undertaking in favor of a methodology that does not diminish the integrity of historic properties. Thank you for seeking my comments and considering historic properties as part of your project planning. I look forward to working with the VA regarding their treatment and stewardship of Building 209 and the entire West LA campus. If you have any questions or concerns, please contact Ed Carroll of my staff at (916) 445-7006 or at email at ecarroll@parks.ca.gov.

Sincerely,



Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

CC:

Brian Lusher
Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 803
Washington, DC 20004

Kathleen Schamel
Federal Preservation Officer
Historic Preservation Office (00CFM)
Office of Construction & Facilities Management
Department of Veterans Affairs
811 Vermont Avenue, NW
Washington, DC 20420



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management

October 30, 2011

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816
Attn: Ed Carroll, State Historian I

Re: Veterans Affairs West Los Angeles Healthcare Center
Building 209 Seismic Upgrades (Rehabilitation)
Project No. 046-10026-000
Response to Request for Information, reference VA110720A, dated Aug 23, 2011

Dear Mr. Carroll,

Thank you for your comments on our report dated June 13, 2011 that were prepared under Section 106 of the National Historic Preservation Act for Project No. 046-10026-000 (Section 106 report). The Section 106 report focuses on rehabilitation of Building 209, which is located at the Veterans Affairs Greater Los Angeles Healthcare System (West LA campus). Building 209 contributes to a historic district that has been determined by the Keeper of the National Register of Historic Places to be eligible for listing. We evaluated the proposed seismic retrofit and rehabilitation of Building 209 for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards)* and found the proposed work conforms with the exception of the window replacement. The following responds to your comments and questions, dated August 23, 2011.

Windows

As stated in the Section 106 report, VA has determined that window replacement is an adverse effect.

This project provides an environment for Veterans transitioning from homelessness to society. The project renovates a historically eligible clinic building appropriate for medical procedures of an earlier era, to a simulated studio apartment building and training center as part of the treatment program. The Veterans in the program may suffer from Post Traumatic Stress Syndrome, military sexual trauma and other mental health maladies.

Discussions with VA staff members who previously worked in similar buildings, related there is a large thermal heat gain through the existing windows, making it extremely difficult to work in this environment.

The mental health medical staff has a concern that due to the small size of the studio apartments, the intense sun will reduce the apartment's daytime useable area. Closing the blinds and turning on the lights increases energy use, this is not part of the energy calculations. From a medical standpoint the window replacement removes another stressor on the road to recovery for these Veterans.

The VA must conform to the Federal mandate to reduce energy usage by 30%. The Los Angeles basin with its temperate climate provides an additional challenge in achieving this energy savings requirement. The 4% is an overall building savings; the solar gain in the studio apartments in the south facing apartments is significantly higher.

The proposed window sash replacement throughout the building provides approximately 4% greater energy efficiency, reduces maintenance concerns, and improves operability. The window survey provides minimal utility as our historic preservation consultant has found the existing windows are not severely deteriorated. Maintenance personnel stated damaged, sash weights are terribly difficult to access and repair. Furthermore, the weight of existing steel sash windows poses an obstacle for future occupants who may be in poor health or may not have sufficient strength to open and close the window. New aluminum windows will be lighter, making operation and repair easier.

To provide clarity to the Section 106 report and schematic floor plans, all windows, including sash and frames, are proposed to be replaced with aluminum frames and sash that approximate proportions and profiles of the existing frame and sash. Existing frame and sash are proposed to be carefully cut out from the surrounding wall, patching damaged wall areas as necessary to match. While proposed frames will not be true divided lights like the existing, applied muntins on the interior, exterior, and between dual panes of glass suggest divided lights and maintain the historic character. A mock-up of the proposed frame and sash, based on drawings provided in attached sketches (Attachments 1: SK-01, SK-02), will be installed in an opening that has previously been replaced. Detailed interior and exterior photographs of the mock-up will be provided at a later date, and will include comparison with adjacent existing window frame and sash.

Seismic Retrofit

The option A selection provides compatibility with existing concrete ceiling joists and remains the most cost-effective option based on our cost estimate. Options B and C also propose to strengthen floor framing, either with steel or fiber reinforced polymer (FRP) in the same areas as Option A. None of the options would destroy historic fabric. Contemporary suspended panels finish all existing ceilings. In the few areas where suspended ceiling panels have been removed, reveal unfinished ceiling joists, plumbing and mechanical systems, and an earlier finished plaster ceiling partially removed prior to this project. Areas of concrete ceiling joists to be strengthened with concrete are not character defining nor have any significant finishes. Furthermore, as the existing ceiling beams are concrete, adding concrete will be compatible with the historic materials and not destroy the historic features. Architectural finishes are not impacted by the seismic retrofit as new structural strengthening will be located above new ceilings, as seen in drawings on attached sketch ASK-001. Therefore, this work conforms with the *Secretary's Standards*, specifically standard 9, and is not an adverse effect.

New Corridor Door

In response to your question regarding how significant space maps were developed, they were generated by analyzing significant, character-defining features overall, at close range, and interior spaces based on 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*.¹ Based on our historic preservation consultant's analysis, the exterior of the building is the most significant feature and contributes to the historic district. Altered areas of the exterior, include the entry stair and handicap accessible ramp at the facade, and in-filled arched openings at the west end of the north and south wings. These areas have not been identified as significant.

As described in the Section 106 report, the interior has been altered to accommodate changing user requirements and technological advances. While the interior retains its primary circulation patterns of the main north-south corridor on each floor and two stairwells, the corridors retain virtually no historic fabric. As the main corridor and two stairs are the most important features of the interior, these areas were identified as having primary significance consistent with National Park Service guidance. The repetitive floor plans, specifically the corridors and stair, are character-defining features.² Contemporary corridor walls are proposed to be removed and replaced in the same location with fire-rated walls. This work will retain the same configuration of the corridor while allowing for a new use that requires minimal change. Therefore, this work conforms with the *Secretary's Standards*, specifically standards 1 and 2, and is not an adverse effect.

Public Outreach Status

VA West LA staff is coordinating consultation with Veteran Services Organizations for Section 106 in conjunction with required public participation for the National Environmental Policy Act (NEPA). This consultation has not yet occurred. As stated in the Section 106 report, we will conduct Native American notification and consultation with assistance by archaeologist James Brock of Archaeogroup. Adrian Scott Fine of the Los Angeles Conservancy has recently been updated and provided with a copy of the Section 106 report, as well as a copy of your August 23, 2011 correspondence. The VA recognizes its obligation with regard to public outreach.

Depth of Ground Disturbance

The estimated depth of ground disturbance is estimated to be 5-feet to 8-feet, the amount sufficient to expose and re-waterproof foundations. This is less than prior excavation work for the original construction.

¹ Lee H. Nelson, "Preservation Brief 17: Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving their Character," National Park Service, United States Department of the Interior, 1-2.

²"Incentives! A guide to the Federal Historic Preservation Tax Incentives Program," <http://www.nps.gov/history/hps/tps/tax/incentives/avoiding_17.htm>, site accessed September 16, 2011.

Conclusion

I look forward to continuing our consultation to develop appropriate mitigation for Building 209 to address the adverse effect of window replacement. If you have any additional questions please contact me.

Very truly yours,

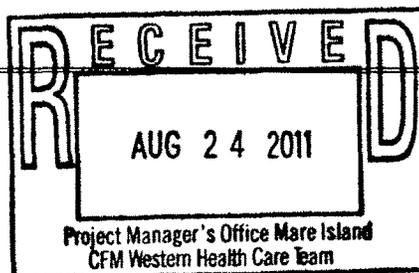
A handwritten signature in black ink, appearing to read "Daniel Swinton". The signature is written in a cursive style with a large initial "D".

Daniel Swinton
Project Manager
US Department of Veterans Affairs
Office of Construction and Facilities Management (OOCFM3B1)
707-562-8418 (work)
Daniel.Swinton@va.gov

Attachments

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



August 23, 2011

Reply in Reference To: VA110720A

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

Re: Section 106 Consultation for Building 209 Seismic Retrofit and Rehabilitation Activities,
Veterans Affairs West Los Angeles Healthcare Center

Dear Mr. Swienton:

Thank you for initiating consultation on behalf of the Department of Veterans Affairs (VA) regarding their efforts to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800.

The VA is proposing to conduct seismic retrofit and rehabilitation activities at Building 209 located within the Veterans Affairs West Los Angeles Healthcare Center. According to the information submitted by the VA, the following project components are being proposed:

- Seismic Retrofit;
- Accessible ramp;
- Window replacement;
- Entrance atrium;
- Installation of new ductwork;
- New corridor door;
- Additional stairwell entrance and;
- Emergency exit at North Wing.

Building 209 (constructed 1945) is listed on the National Register (NRHP) as a contributor to the Brentwood Division Historic District. This district is one of two located on the 110 acre West Los Angeles VA campus and consists of 14 buildings constructed between 1921 and 1952. Building 209's NRHP status requires that all work upon it shall be in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (*Standards*). The VA has determined that the majority of the proposed activities are in accordance with the *Standards* and that only the removal and replacement of the building's windows constitutes an adverse effect. The VA has submitted the results of a literature search at the South Central Coastal Information Center and the following documents in support of this undertaking:

- *Determination of Effect Report* (Chattel Architecture: June 2011)
- *90% Pre-Design Structural Engineering Plans* (undated)
- *100% Building 209 Schematic Design Drawings* (January 2011)

After reviewing these documents, I concur that the Area of Potential Effect has been properly determined and documented pursuant to 36 CFR Parts 800.4 (a)(1) and 800.16(d). To justify

your decision to implement project activities that will result in adverse effects to historic properties, please respond to the following comments and questions:

Window Replacement:

The schematic floor plans indicate that all steel sash windows will be replaced to match existing. The elevations indicate that four steel sash windows will be replaced to match existing, with the rest to be rehabilitated. The schematic documents provided do not define window replacement, but the *Determination of Effect Report (Report)* states that only window sash will be replaced, and not the frame. Please provide clarification on this point. The *Report* also states that window replacement will result in greater energy efficiency, reduce maintenance concerns, and improve operability. Based on the information provided, it appears the existing windows are in good condition however the limited replacement and rehabilitation scope as defined in the elevations would meet the *Standards* if it can be shown that the windows being replaced were in poor condition. If the scope is replacement of all window sash, that constitutes an adverse effect as identified in the *Report*. To establish justification for replacement, please address the following:

- What is the condition of the original windows, as determined by survey?
- How much energy is anticipated to be saved from the replacement? Is there a program of insulation and air sealing also in place as part of the scope?
- If the new custom 15 true divided lite steel window sash are to match the existing, how will maintenance concerns be reduced, and the operability be improved?
- If the frames are also intended to be replaced, how will this be accomplished without damage to the surrounding material the frames are anchored to?

Seismic Retrofit:

According to the *Report*, Option A (preferred option) of the pre-design Engineering Studies was selected although no discussion of the criteria used to make this selection is provided. Option A strengthens concrete beams with concrete, while Option B strengthens the concrete beams with steel, which initially appears to be less intrusive to the historic structure than adding concrete. Because there are no schematic sections or elevations included with the study for Option C, it is difficult to determine how intrusive reinforcing the floor with fiber reinforced polymer would be. It remains unclear how Option A was determined to be the preferred alternative and to have no adverse effect as there are no architectural drawings to interpret how these retrofits integrate into existing architectural finishes.

New corridor door:

The new corridor door to separate the women's wing is not an issue, as apparently all walls, mechanical systems, light fixtures, floor and ceiling finishes are being demolished on both floors. Of greater concern is the removal of corridor walls, floors and ceilings, which according to the *Report* are significant spaces. The *Report* establishes that the corridors have been modified over time but CA SHPO needs a better understanding of how the significant spaces maps were generated, as the *Report* focuses on the integrity of the interior and any remaining character-defining features of the interior and exterior. If the corridors are significant, their demolition and removal would constitute an adverse effect.

Additional Stairwell Entrance:

The *Report* should identify these stairwell entrances as they appear on the floor plans to reduce review time spent locating these elements on the floor plan. They are labeled "(N) Stair #1" and

"(N) Stair #2" on the floor plans. The concern that new openings are added to the original stairs does not rise to the level of adverse effect.

Additional Information Required

Please provide the following to continue this consultation:

- Criteria for selection of seismic retrofit;
- Impact on architectural finishes to install seismic retrofit for all options;
- Scope of window and frame replacement, and answers to questions above;
- Cut sheets and details of replacement sash and comparison to existing sash details;
- Other energy efficiency scopes, if any;
- Justification for Significant Spaces maps, and revised determination of adverse effect.

In addition to the above, I have the following comments:

- 1) Please provide the status of public outreach and participation for this undertaking.
- 2) Please provide the estimated maximum depth of ground disturbance (if any) expected for this project.
- 3) In their 15 July 2011 letter, the VA declares their proposed window replacement "appears" to constitute an adverse effect to historic properties and is consulting with my office to address this effect. Please note this consultation addresses all proposed work concerning Building 209 in addition to the window replacement. Based on the letter's language, the VA's finding of effect for the project in its entirety is unclear.

Thank you for seeking my comments and considering historic properties as part of your project planning. I look forward to working with the VA regarding their treatment and stewardship of Building 209. If you have any questions or concerns, please contact Ed Carroll of my staff at (916) 445-7006 or at email at ecarroll@parks.ca.gov.

Sincerely,



Milford Wayne Donaldson, FAIA
State Historic Preservation Officer



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

In Reply Refer To: OOCFM3B1-691-406-01

July 15, 2011

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816
Attn: Ed Carroll, State Historian I

Re: Veterans Affairs West Los Angeles (VA West LA) Healthcare Center
Building 209 Seismic Upgrades (Rehabilitation)
VA Project No. 691-406
Determination of Effect Report

Dear Mr. Donaldson:

In conformance with Section 106 of the National Historic Preservation Act, please find enclosed a Determination of Effect Report for your review for the above referenced project. The report was completed by our historic preservation consultant, Chattel Architecture. We appreciate your prompt attention in reviewing the report. As described in the enclosed report, rehabilitation of Building 209 largely conforms to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, specifically the *Secretary of the Interior's Standards for Rehabilitation*. One aspect of the proposed project, window sash replacement, appears to result in an adverse effect. We therefore would like to initiate consultation with you to address this adverse effect.

As you may know, the United States Department of Veterans Affairs is undertaking seismic upgrades and limited rehabilitation to 11 buildings located at the VA West Los Angeles Healthcare Center. While Building 209, the focus of this report, is on an expedited schedule separate from those of the other 10 buildings, our consultants are under contract to prepare Section 106 review documents for each of the 11 building being rehabilitated as part of the larger effort, as well as draft a Programmatic Agreement, update the National Register of Historic Places (National Register) nominations, and write a Preservation Plan for the VA West LA. I would like to extend an invitation to you to visit the VA West Los Angeles campus for a tour and to talk more about this project.

If you have any questions regarding the report, please contact me at 707-562-8418 or Daniel.swienton@va.gov or Jenna Snow at Chattel Architecture at (818) 788-7954 x2 or jenna@chattel.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Swienton", is written over a horizontal line.

Daniel Swienton
Project Manager

Enclosure: Chattel Architecture Determination of Effect Report

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



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management

October 30, 2011

Mr. Larry Myers, Executive Secretary
Native American Heritage Commission
915 Capitol Mall, RM 364
Sacramento, CA 95814

Dear Mr. Myers:

The Department of Veterans Affairs (VA) is preparing National Historic Preservation Act Section 106 documentation for a seismic corrections project involving 11 historic buildings at the West Los Angeles VA Campus. As the lead Federal agency, it is our responsibility to consult with appropriate Native American tribes about this project and recognize the government-to-government relationship of the parties involved under 36 CFR § 800.2(e)(2)(ii).

The project is located on the USGS 7.5' Beverly Hills topographic quadrangle (please see attached maps). This falls within an un-sectioned area of Township 1S, Range 15W, San Bernardino Base Meridian.

A cultural resources records search and a field reconnaissance for the entire approximately 570-acre study area were both negative for Native American resources. The VA Greater Los Angeles (GLA) property has been severely impacted over the years by various building and grading projects. However, there is still some limited potential for intact Native American resources buried on the property. The scope of the seismic corrections project entails structural reinforcement of the eleven buildings along with corrections of functional and code deficiencies. The project is expected to entail very little soil disturbance. All work will be within the existing building footprints or immediately adjacent to them in areas that were previously disturbed during their original construction. GLA predicts that it is very unlikely that any archaeological resources will be impacted throughout the duration of this project.

We are also aware of site CA-LAN-382, also recognized as Serra Springs, which is a well-known site located one-quarter mile to the southwest of the VA property on the University High School property. It is California Historical Landmark Number 522. This is the site of a former Gabrielino Tongva village that was visited by the Portolá Expedition in 1769. This does not extend onto the VA property.

We have consulted several databases and have been unable to identify any tribes with affiliation to Los Angeles County. We would like to request a list of Native American contacts that could

be affected by this project. We also welcome any other input the Native American Heritage Commission might provide.

Very truly yours,

A handwritten signature in black ink, appearing to read "Daniel Swinton". The signature is fluid and cursive, with a prominent initial "D" and a long, sweeping underline.

Daniel Swinton
Project Manager
US Department of Veterans Affairs
Office of Construction and Facilities Management (OOCFM3B1)
707-562-8418 (work)
Daniel.Swinton@va.gov



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

January 25, 2012

In Reply Refer To: 691/00PA

«First_Name» «Last_Name», «Title»
«Post_or_Organization»
«Address1» «Address2»
«City», «State» «Zip»

Bakersfield Community
Based Outpatient Clinic
1801 Westwind Drive
Bakersfield, CA 93301
(661) 632-1800

RE: Veterans Affairs West Los Angeles Medical Center
Building 209 Seismic Corrections and Renovation
Project No. 691-406

Los Angeles Ambulatory
Care Center
351 E. Temple Street
Los Angeles, CA 90012
(213) 253-2677

Dear Veteran Service Organization Stakeholder:

The Department of Veterans Affairs (VA) intends to perform life safety corrections, structural upgrades and in some cases complete rehabilitation of 11 buildings located on the West Los Angeles VA Medical Center (WLA) campus of the VA Greater Los Angeles Healthcare System (GLA). Our initial effort focuses on Building 209 on an expedited schedule from the other 10 buildings. In accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (Section 106), we are seeking any input you may have on this project, specifically on how it may affect historic properties.

Santa Barbara Community
Based Outpatient Clinic
4440 Calle Real
Santa Barbara, CA 93110
(805) 683-1491

Sepulveda Ambulatory Care
Center and Nursing Home
16111 Plummer Street
North Hills, CA 91343
(818) 891-7711

Constructed in 1945, Building 209 is identified in the National Register of Historic Places nomination as "Wadsworth Hospital & Canteen," and is a contributing property to the National Register-eligible historic district known as the "Brentwood Division." Building 209 meets the definition of a historic property under Section 106.

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

Building 209 is proposed to be seismically retrofitted and rehabilitated to accommodate a long term therapeutic supportive housing program for Veterans who are homeless 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. The building will have approximately fifty-five residential units and will accommodate spaces for supportive services and multipurpose areas.

You can find Images and information on this project through GLA's website at www.losangeles.va.gov. For questions about the project, or to submit a comment, please contact Erik Gutierrez with the Office of Communications and External Affairs at (310) 478-3711 x41052 or erik.gutierrez@va.gov. Written correspondence may be sent to VA Greater Los Angeles Healthcare System, 11301 Wilshire Blvd Building 500, Rm 6005, Los Angeles, CA 90073.

Comments must be received no later than February 27, 2012.

Page 2

Building 209 Seismic Corrections and Renovation

The proposed work conforms with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph Tillman". The signature is fluid and cursive, with the first name "Ralph" being more prominent than the last name "Tillman".

Ralph Tillman
Chief, GLA Communications & External Affairs

cc: Kathleen Schamel
Federal Preservation Officer
Historic Preservation Office (00CFM)
Office of Construction & Facilities Management
Department of Veterans Affairs
811 Vermont Avenue, NW
Washington, DC 20420

APPENDIX B

Notice of Availability

March 25, 26, 27 - 2012

NOTICE OF AVAILABILITY DRAFT ENVIRONMENTAL ASSESSMENT U. S. DEPARTMENT OF VETERANS AFFAIRS Proposed Seismic Upgrade and Renovation of Building 209 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 Environmental Assessment" (DEA) for the proposed rehabilitation of Building 209 located at the VA West Los Angeles Campus, 11301 Wilshire Blvd, Los Angeles, CA 90073. This project will rehabilitate the historic building for contemporary use and includes correction of safety and building systems deficiencies and architectural renovation. The project is needed to provide 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 Veteran's reasonable life goals. In accordance with the National Environmental Policy Act (NEPA), the VA prepared a DEA to examine the potential for environmental impacts from the proposed action. VA intends to issue a "Finding of No Significant Impact" (FONSI) following a thirty 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 DEA are available for review at the following public libraries and online at <http://www.losangeles.va.gov>. In addition, copies of the DEA will be available in the medical library located on the 6th 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 DEA are requested by April 24, 2012. Comments or questions may be directed to: Erik Gutierrez, Public Affairs Liaison 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: Erik.Gutierrez@va.gov For further information, please contact Mr. Gutierrez at 310-478-3711, ext 41052

RECORDING/FILING REQUESTED BY AND MAIL TO:
Castle-Rose Inc
3209 Old Pacific Hwy S
Kelso, WA 98626

PROOF OF PUBLICATION
(California Code of Civil Procedure 2010, 2015.5)

STATE OF CALIFORNIA
County of Los Angeles

I am a citizen of the United States and a resident of the aforesaid County. I am over the age of eighteen years (18) years, and not a party to or interested in the above-entitled matter. I am the Principal Clerk of the printer of the **LOS ANGELES TIMES**, a newspaper of general circulation, printed and published DAILY in the City of Los Angeles, County of Los Angeles and which newspaper was adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of April 28, 1952, Case Number 598599. The notice, a true and correct copy of which is annexed, has been published in each regular and entire issue of said newspaper on the following dates, to wit:

SUNDAY; MARCH 25, 2012, MONDAY; MARCH 26, 2012
TUESDAY; MARCH 27, 2012

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

Dated at Los Angeles, California,

This 11th day of MAY, 2012

Signature

Veronica Chavez

NOTICE OF AVAILABILITY DRAFT ENVIRONMENTAL ASSESSMENT U.S. DEPARTMENT OF VETERANS AFFAIRS Proposed Seismic Upgrade and Renovation of Building 209 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 Environmental Assessment (DEA) for the proposed rehabilitation of Building 209 located at the VA West Los Angeles Campus, 11301 Wilshire Blvd, Los Angeles, CA 90072. This project will rehabilitate the historic building for contemporary use and includes correction of safety and building systems deficiencies and architectural renovation. The project is needed to provide 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 Veteran's reasonable life goals. In accordance with the National Environmental Policy Act (NEPA), the VA prepared a DEA to examine the potential for environmental impacts from the proposed action. VA intends to issue a Finding of No Significant Impact (FONSI) following a thirty day comment period in accordance with the Council on Environmental Quality Regulations for Implementing NEPA, Section 1503.12, provided there are no substantive comments which warrant further evaluation. Copies of the DEA are available for review at the following public libraries and online at <http://www.losangeles.ca.gov>. In addition, copies of the DEA will be available in the medical library located on the 6th 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 11309 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) 575-8272. All comments on the DEA are requested by April 24, 2012. Comments or questions may be directed to: Erik Gutierrez, Public Affairs Liaison Office of Communications & External Affairs (001 00PA) VA Greater Los Angeles Healthcare System 11301 Wilshire Blvd Los Angeles, CA 90072. Facsimile: 310-268-4941 Email: Erik.Gutierrez@va.gov For further information, please contact Mr. Gutierrez at 310-475-3711 ext 41052.