



BRENTWOOD Community Council

149 S. Barrington Ave., Box 194, Los Angeles, CA 90049

www.brentwoodcommunitycouncil.org

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BY MAIL AND ELECTRONIC DELIVERY

<http://www.regulations.gov>

Director, Office of Regulation Policy and Management (00REG)

Department of Veteran Affairs

810 Vermont Avenue NW

Room 1063B

Washington, DC 20420

Re: *Notice of Availability of the Draft Programmatic Environmental Impact Statement (PEIS) for the West Los Angeles Medical Center Campus Draft Master Plan*

Ladies and Gentlemen:

The Brentwood Community Council (“BCC”) is the broadest based Brentwood community organization, representing approximately 50,000 stakeholders of the 90049 community. BCC includes 13 homeowners associations, multi-family residential dwellers, business organizations, schools, religious groups, volunteer service groups, public safety and environmental organizations.

The BCC and its numerous constituents have devoted significant time during this compressed period to review the draft Programmatic Environmental Impact Statement and National Historic Preservation Act Section 106 Consultation - West Los Angeles Medical Center Campus Proposed Master Plan for Improvements and Reconfiguration, dated November 2018 and its associated surveys, reports and impact analyses (collectively, the “PEIS”). The PEIS offers a series of evaluations of the impacts that may arise from the implementation of the Draft Master Plan for the Greater Los Angeles VA Campus (the “Master Plan”).

At the outset, the BCC acknowledges and thanks the VA for its significant efforts in preparing the PEIS, and in providing impacted neighbors and constituents with a forum for public comment. The BCC appreciates the VA’s efforts to improve transparency with the Brentwood community and others regarding the Master Planning process. The BCC acknowledges and thanks both Ann Brown and Meghan Flanz who, among others at the WLA VA Campus, are clearly working hard to ensure

that the VA is both a good neighbor to and is transparent with the Brentwood community with regard to the VA's plans.

The BCC is also aware of the settlement (the "Settlement") previously reached between the VA and VETS ADVOCACY respecting *Valentini v. Shinseki*, and respects the Settlement. The BCC is also familiar with the West Los Angeles Leasing Act of 2016, Pub. L. No. 114-226 (the "VA Leasing Act") and supports the VA's compliance with a reasonable and responsible interpretation of the VA Leasing Act. We provide our comments in light of, and with due consideration to, the Settlement and the VA Leasing Act.

The draft Master Plan depicts certain improvements that are not described or discussed in the PEIS. Most notable is that the draft Master Plan indicates a vehicular entrance/exit to the WLA VA Campus from South Barrington Avenue, south of the existing Post Office. We assume this means any thought of this vehicular entrance and exit has been abandoned by the VA. However, as the addition of vehicular traffic onto Barrington Avenue would have catastrophic consequences to the Brentwood community, we must voice our concern and opposition to any vehicular entrance being added along the Barrington Avenue boundary of the WLA VA Campus. There are no mitigation measures that would sufficiently offset the severe traffic problems that would arise from the addition of a Barrington Avenue entrance to the WLA VA Campus.

In addition, while we appreciate the VA's many efforts, , Brentwood bears a particular burden as the next door neighbor to the WLA VA Campus. The boundaries of the WLA VA Campus have become a haven for homeless individuals. Some are homeless Vets, and we hope that the implementation of the Master Plan will provide the housing so desperately needed by our local Vets who served our Nation with honor. We also realize that some of the homeless are not Vets, or are Vets who are not entitled to the benefits provided by the VA. As a community, we ask for the VA's cooperation and support in finding solutions with our other government partners in reducing the homeless population residing just outside the WLA VA Campus' perimeter.

With respect to the PEIS, we have assembled our thoughts, concerns and possible additional solutions or mitigating measures to those included in the PEIS. The mitigating measures being suggested, we believe, should apply whether it is the VA or a third party contracting with the VA or leasing property from the VA undertaking the specific action, Those suggestions follow below, and are organized to correspond to the related titled sections of the PEIS.

Aesthetics

Aesthetics includes the topics of light intrusion and vegetation screening. While the mitigating measures being proposed assist in addressing these issues, we request a few additional specific items be included:

that no illuminated rooftop or top of building signage be installed on any buildings; identification signage should be at ground level, to avoid adding any increased light pollution; and

that all screening needed for neighboring properties be landscaped with materials of such maturity that an effective screen is in place upon being planted for those neighboring properties.

Cultural Resources

At this time, we do not have comments to this component of the PEIS. We look forward to the preservation of the historic buildings identified in the PEIS, notably the old Depot and the Chapel.

Wildlife and Habitat

Animals

The PEIS, acknowledges gophers are present on the VA property. Over the years, the gopher population has grown and expanded into the Brentwood community. The expanding gopher population is presently wreaking havoc on our City park and on our San Vicente Blvd. median. Sadly, this has contributed to the untimely deaths of several of Brentwood's beloved Coral Trees, and made the Barrington Recreation Center field a hazard for all who play on it.

We ask that the following mitigation measures be adopted and included as part of the PEIS and be followed by the VA and other developers throughout the Master Plan process and thereafter where appropriate:

Engage gopher eradication specialists, and adopt a comprehensive gopher eradication program at the VA that is consistently adhered to so that, if not fully eradicated, the gopher population is reduced to a level that keeps them from harming trees on the VA Campus and/or leaving the VA boundaries.

Provide a liaison to the Brentwood community to regularly report on the status of the efforts and the Brentwood community can report of any continuing problems in its neighborhood.

Contribute to the repair of the field at Barrington Park and to the San Vicente median that has been damaged by the gophers.

Trees

We are concerned with the estimated number of trees to be removed to accommodate the Master Plan. Trees provide shade, screening, privacy, help clean our air, and enhance not only the VA environment, but also the Brentwood environment.

We ask that the following mitigation measures be adopted and included as part of the PEIS and be followed by the VA and other developers throughout the Master Plan process and thereafter where appropriate:

That the VA recognize both the City and County of Los Angeles lists of protected trees and to the extent possible leave all such protected trees in place. If minor design modifications would save a protected tree, we ask that such action be considered and taken when reasonably feasible.

With respect to the removal of any trees, including invasive species, we ask the following mitigation steps be adopted when removing any trees, including invasive species:

replace each tree that is of an invasive species at a ratio of 1 new tree to each 1 tree that is removed;

replace each tree that provides screening for the neighboring community at a ratio of 2 new trees to each 1 tree that is removed;

replace each tree that is a protected species at a ratio of 4 new trees to each 1 tree that is removed;

require that all replacement trees be at least of a 24" box or 36" box size; and

all replacement trees should be chosen from among California natives.

In addition, with respect to the removal of any hedges or other landscaping that provides a screen between the VAs property perimeter and the Brentwood neighborhood, we ask that replacement screening materials be planted sufficiently inside the property line so that an effective green screen continues. For example, if the Master Plan ultimately calls for the removal of hedge materials that provide an effective screen, and those hedge materials are 100 feet inside of the VA property boundary, it would be acceptable if replacement screen materials are planted within 20 feet of the boundary. All screening materials should be of a height and maturity that an effective physical screen is obtained at time of planting.

Noise And Vibration

Multiple neighborhoods within the Brentwood community abut the WLA VA boundaries, including the neighborhood known as the Brentwood Glen. Sufficient

mitigation measures have not yet been developed to address the noise and vibration that will be generated from the many construction activities necessitated by the Master Plan.

We ask that the following mitigation measures be adopted and included as part of the PEIS and be followed by the VA and other developers throughout the Master Plan process and thereafter where appropriate:

Prior to any construction activities that will generate noise or vibration that could reasonably be expected to adversely impact any adjacent property, that a representative of the VA construction oversight team meet with representatives of the BCC and the impacted neighborhood or neighborhoods to discuss and employ reasonable mitigation measures that will serve to lessen any adverse impact. It would be helpful to have the VA appoint a liaison, who can be available to community members throughout the construction process to address issues as they arise. Despite the best laid plans, a subcontractor may not adhere to the rules.

Develop a construction schedule that ensures there will be no such noise or vibration that would be heard or felt outside of the VA boundaries during the hours of __ p.m. to __ a.m. or during weekends (Friday at 6 pm to Monday at 7 am) or national holidays. We appreciate that similar mitigation measures are suggested for VA led projects, but the same, or more stringent, mitigation measures should apply regardless of the party undertaking the effort.

Land Use

We believe the land uses contemplated by the Master Plan are compatible with the mission of the WLA VA Campus and the original intent of the use of the land, We have addressed elsewhere the various concerns that are raised in either constructing the plAnnd improvements, or the later operation of such improvements, throughout this comment letter.

Floodplains, Wetlands and Coastal Zones

An approximate .5 acre potential wetlands exists within the arroyo on the WLA VA Campus.. We understand no action for is proposed for the arroyo area of the WLA VA Campus and its potential wetlands. Accordingly, we do not have no comments at this time. Were the Master Plan to be revised to impact any wetlands areas, we request the opportunity to review those revisions and provide comment.

Socioeconomics

We do not have comments to this Section of the PEIS.

Community Services

The following comments relate to the portions of the PEIS that address Community Services. *We offer the following observation and suggestions, and ask that the following mitigation measures be adopted and included as part of the PEIS and be followed by the VA and other developers throughout the Master Plan process and thereafter where appropriate:*

Hospital and Clinics

VA Hospital and clinics are veteran only providers. With the large and vulnerable population expected to reside at the property, transportation to health care, urgent care, emergencies and pharmacies etc. will be needed for non-veteran residents. Have you anticipated this need and the impact on traffic? There are 3 emergency rooms within 5.8 miles of the campus.

Fire and Police Protection

The VA relies on Station 37 located within one mile of the VA. LAFD provides emergency transport of patients and if additional support is needed, stations 19, 59 and 92 are all located within three miles of the campus with approximately 5 – 6 minute response times. Due to the ignitable landscape at the VA, the community requests that brush clearance, tree trimming and if necessary, tree replacement be continually monitored.

With regard to Security and Law Enforcement, the VA is required to have a support agreement with local law enforcement agencies, a 24/7 police and security unit to provide physical security and law enforcement for the protection of persons and property. The Community requests b the VA police department meet with a BCC meeting to improve the dialogue between the community and the VA Police and to address any problems caused from differences between federal and local laws.. For example the VA police has been unable to remove overnight parking violators, and squatters from the Barrington Parking Lots.. A better understanding will be vital going forward with the larger population expected to convene at the campus.

Parks

There are many beautiful parks at the campus pictured and discussed in the report as well as 5 additional parks close by. With respect to the Barrington Veteran's Park, the community hopes to serve veterans with several dog programs including obedience training and PTSD therapeutic dog matching/training to foster the spirit of permeable borders and community support. Dog programs and shared use of the dog park can provide a natural area for community and veteran engagement.

Schools

With 10 schools less than .5 miles from campus, a school seems unlikely to be needed as part of the Master Plan. However transportation, after school and homework support programs and day care for children not yet ready for school needs to be considered.

General

With regard to Community Services as a whole, the BCC, Brentwood community members, volunteers and supporters hope that services such as gathering places, a coffee house, a PX type store for sundries, groceries and for lite shopping, spaces for vocational training, shops, shuttles and after school activities can be included to make living at the VA a vibrant experience. The surrounding community looks forward to helping to establish such services.

TRANSPORTATION

The biggest concern Brentwood residents have about any major project is traffic. The region surrounding the WLA VA Campus is already completely gridlocked during peak driving hours, which extend from 7 am to 9 am and 3 pm to 7 pm on weekdays.

During these commute hours, all east-west streets north of the I-10 freeway are gridlocked going westbound during AM Peak and eastbound during PM peak. These streets include Sunset Blvd., Wilshire Blvd., Ohio Avenue, Santa Monica Blvd., Olympic Blvd., and Pico Blvd. Two other major east-west streets in Brentwood, San Vicente Blvd. and Montana Avenue, are similarly gridlocked. Because these streets end just west of the WLA VA Campus, , all eastbound traffic must divert onto one of the other streets to get onto or beyond the I-405.

To make matters worse, Brentwood west of the I-405 has only two north-south streets, Barrington Avenue and Bundy Drive, that allow people to get across Brentwood. Those arteries are similarly congested during peak driving times as commuters cut through Brentwood. Sepulveda Blvd. east of the WLA VA Campus is gridlocked as well. In fact, the WLA VA Campus property itself acts as a barrier that limits the number of streets that drivers can take to get through the area.

Because of the existing extremely poor traffic conditions, we have reviewed many, many DEIRs¹ for this area and observe that any large projects in the Brentwood and West Los Angeles generate a large number of significantly impacted intersections.

The PEIS states only a small number of intersections will be significantly impacted from the traffic generated by the project and asserts that all of the intersection impacts can be easily mitigated with future (but not defined in any detail) TDM and TSM

¹ Draft Environmental Impact Report

plans.² This grossly misrepresents the real situation in our area. Our conclusions are bolstered by:

- 1) No recent DEIR for this area shows the same optimistic portrait of peak hour traffic as the PEIS. We've included a chart comparing the results of several other traffic analyses to this one.
- 2) The VA's previous traffic analysis of this project showed radically different results. The same group of transportation consultants who worked on the PEIS, Crain & Associates, prepared a "Traffic and Parking Analysis for Department of Veteran Affairs, West Los Angeles Medical Center Master Plan Development," dated December 4, 2015 ("2015 Study") that much more accurately described the conditions in the area.
 - a. The 2015 Study stated that 13 of the 25 intersections studied (2 on campus and 11 off-site) currently operate at an LOS³ E or F during one or both peak hours. (page i) Yet the 2018 Transportation Impact Analysis ("2018 TIA") included in the PEIS inexplicably states that only 2 of 55 intersections studied operate at LOS E or worse. (TIA, page 36)
 - b. The 2015 Study concluded that 13 of 25 intersections studied would be significantly impacted and that 12 of those had no feasible physical mitigations. (page ii) The PEIS states that only 8 intersections will be significantly impacted and that all can be mitigated through TDM and TSM plans which have not been created (TIA, page 101). The list of mitigations proposed in the TIA are generic and non-specific to the WLA VA Campus, yet they predict transit ridership can be increased from 5% to 25% on North Campus and 15% to 25% on South Campus (TIA, page 88) without explanation or quantification of how this can be achieved.

Given that no other local project has come up with solutions that solve such difficult traffic challenges, we do not believe claims of "we'll figure out the details" later have any basis in fact and must not be used to sugarcoat the impacts of this project.

- 3) Major inconsistencies exist between the 2018 TIA and the results of the 2015 Study, and the PEIS itself is internally inconsistent. The TIA reports that the project will generate less than half the number of trips as were projected in the 2015 Study. However, the PEIS also projects higher parking requirements than the 2015 Study, a result that makes no sense if fewer trips are generated.
- 4) We see no indication that the TIA has been reviewed by the Los Angeles Department of Transportation ("LADOT") or Metro, the two groups that review and sign off on traffic studies and acceptable mitigations for our area.

² Transportation Demand Management and Transportation Systems Management

³ Level of Service

We are deeply troubled that the 2018 TIA is inaccurate and indefensible. The transportation sections of the PEIS, including any studies of operational traffic, parking, construction traffic, and mitigations must be revised to reflect accurate conditions and must offer real, identifiable, and quantifiable mitigation before the Master Plan is approved. While the BCC fully supports providing housing for veterans and believes that it should be built as quickly as possible, this goal does not mean that the VA can ignore existing conditions and fail to offer tangible solutions to address the extremely serious traffic situation.

Our specific comments and questions on transportation are as follows:

Baseline traffic

Based on our review, we have prepared two exhibits summarizing differences between the 2018 TIA to analyses of other projects. Exhibit A compares the existing conditions in recent DEIRs for local projects to those in the PEIS. Exhibit B compares the results of the 2015 Study to those in the PEIS.

Exhibit A

Existing Conditions of Intersections from PEIS vs. DEIRs from other projects									
		VA PEIS		SM/Barrington Mixed Use Project (Vons)		Brentwood School		Martin Town Expo	
	Measurement period	2017		2016		2014		2014	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS
Barrington/Wilshire	AM	0.752	C	0.555	F			1.011	F
	PM	0.701	C	0.456	F			1.144	F
Barrington/Ohio	AM	0.559	B	0.580	F				
	PM	0.647	B	0.533	F				
Barrington Ave/Santa Monica	AM	0.691	B	0.727	F			1.045	F
	PM	0.613	B	0.577	F			1.148	F
Barrington Ave/Sunset	AM	0.726	C			0.877	D		
	PM	0.597	A			1.351	F		
Barrington Place/Sunset	AM	0.775	B			0.735	C		
	PM	0.661	C			0.904	E		
San Vicente/Federal/Wilshire	AM	0.764	C	0.640	F	0.677	B		
	PM	0.705	C	1.178	F	1.251	F		
Federal/Ohio	AM	0.373	A	0.459	F				
	PM	0.375	A	0.414	F				
Federal/Santa Monica	AM	0.529	A	0.606	F				
	PM	0.423	A	0.445	F				
Sawtelle/Santa Monica Blvd.	AM	0.523	A	0.730	F				
	PM	0.466	A	0.624	F				
Sawtelle/Olympic	AM	0.773	C					1.074	F
	PM	0.760	C					1.338	F
I-405 SB ramps at Santa Monica Blvd./Beloit	AM	0.923	E	0.734	F			1.123	F
	PM	0.750	C	0.673	F			1.050	F
I-405 NB ramps at Santa Monica Blvd./Cotner	AM	0.649	B	0.864	F			0.998	E
	PM	0.569	A	0.706	F			1.091	F
Bundy/Wilshire	AM	0.799	A	0.764	F			0.734	C
	PM	0.780	C	0.744	F			0.766	C
Bundy/Santa Monica	AM	0.668	B	0.667	F			0.600	A
	PM	0.734	C	0.675	F			0.643	B
Sepulveda/Ohio	AM	0.787	C	0.791	F				
	PM	0.815	D	0.726	F				
Sepulveda/Santa Monica Blvd.	AM	0.837	D	0.802	F			1.153	F
	PM	0.740	C	0.829	F			1.196	F
Sepulveda/Olympic	AM	0.873	D					0.968	E
	PM	0.898	D					1.129	F

Exhibit B

Crain & Associates VA Traffic Studies	2015	2017
offsite intersections studied	25 intersections	47 intersections
current LOS	11 LOS E or F	2 LOS E or F
with project	12 significant impact	6 significant impact
after mitigation	no feasible mitigation	0 significant impact
net daily trips at completion	8428 trips	3949 trips
	486 net AM peak	351 net AM peak
	180 net PM peak	355 net PM peak
public transit trips upon completion (neither include Purple Line Impact)	add 7827 trips	add 6867 daily trips
parking	3905 existing spaces	4297 existing spaces
future parking spaces needed	4859-5136 spaces	will provide necessary spaces

- These exhibits, show the numbers in the PEIS are substantially more optimistic than those in the DEIRs and 2015 Study. Why there is such a difference?
 - Can Crain & Associates review its analysis and refine it as needed in light of the other DEIR data so that it more accurately reflects current local traffic conditions?
- There is no indication in the PEIS that the 2018 TIA was reviewed by Los Angeles Department of Transportation (“LADOT”) as is regularly done with local projects in our area.
 - Has this PEIS been reviewed and discussed with LADOT? If not, can this be done and any suggestions incorporated?
 - The PEIS states that the VA will have a TSM plan that will assist the City of LA with measures such as signal upgrades, transit network improvements, and other improvements (TIA, page 85) but does not state specifics of how this will be implemented. Can the VA work with the LADOT to come up with more specifics for this area prior to presenting any final EIS for approval?
 - The 2015 Study stated that the net trips generated by the project would be 8,428, which included a reduction due to the Westside Subway Extension (Purple Line) (MP,⁴ page 17). The 2018 TIA states that only 3,949 net daily trips will be generated. (TIA, page iv)

⁴ All references to “MP” , or “Master Plan” refer to the main text (i.e., not the appendices) of the Draft Programmatic Environmental Impact Statement and National Historic Preservation Act Section 106

- Please explain why the current projections show less than half as many trips being generated as the 2015 Study showed? Has the project changed that much or was it a change in some of the assumptions? If so, which ones?
 - We note, for example, the PEIS discusses 1,800 units of housing (pages 1, 9) but previous estimates on documents such as the GLA VA Campus Draft Master Plan, January 28, 2016 showed 1,200 units of housing and we are unclear how the number of trips are lower when the number of units of housing has increased by 50%. Please clarify the number of units and how the number of trips was generated?
 - Please see our comments below in the “Parking” section that note that the PEIS assumes that more parking will be required than the 2015 traffic study estimated. How can the 2018 plan generate less half as much traffic if it requires more cars?
- A Draft Environmental Assessment (DEA) was released in October 2018 for buildings 205, 207, and 208.⁵ That DEA referenced a traffic study count done in 2017⁶ but did not include the information about this plan. Based on that study, the DEA concludes that renovation of these buildings will have no impact on traffic.⁷ We did not comment on that project because we assumed that the traffic from those buildings would be incorporated into the transportation analysis for the PEIS. However, it does not appear that those buildings are included in the PEIS.
 - Does the 2018 TIA include the incremental traffic from those building 205, 207, and 208? If not, can the analysis be revised to include them?
 - The DEA states that “a potential future [Purple Line VA Station is conceptually plAnnd near the intersection of Wilshire Boulevard and Bonsall Avenue.”⁸ However, not only is the station not “potential” or “conceptually plAnnd”, it is already approved and under construction. Given that the DEA was issued in October 2018, this statement bolsters our serious concerns that the traffic studies in both the DEA and the PEIS are very problematic.
- The Project Trip Generation Chart (MP, page 43) is missing Building 209 which was recently completed. It does not appear that Building 209 is included in the PEIS.

Consultation, West Los Angeles Medical Center Campus Proposed Master Plan for Improvements and Reconfiguration” released in December 2018

⁵ Draft Environmental Assessment of the Proposed Rehabilitation and Operation of Buildings 205, 207, and 208,

⁶ Page 72 of Draft Environmental Assessment for Buildings 205, 207, and 208

⁷ Page iii of Draft Environmental Assessment for Buildings 205, 207, and 208

⁸ Page 71 of Draft Environmental Assessment for Buildings 205, 207, and 208

- Is this building included already in the traffic analysis and elsewhere? If not, can it be included and the analysis revised as needed?
- Section 4.1 on Trip Generation (MP, pages 42-46) never mentions how many employees work at the VA currently, how many open positions currently exist, or how many new employees are projected to be added once the project is completed.
 - Please provide these employee numbers?
 - How does the number of employees currently working at the WLA VA Campus compare to the number of positions approved to be working there? For example, if there are currently 5,000 employees but 7,000 are approved, we would like to make sure that the baseline traffic numbers account for the fully-staffed 7,000 level. Please provide the actual numbers for currently working and approved and explain what numbers were used to generate the analysis in the PEIS?
 - If the lower number was used (e.g., the 5,000 in the above example), please revise the numbers in the PEIS to account for the higher number (e.g., 7,000 in the above example)?
- Section 8.5 of the TOA (Roadway Segment Impact Analysis) shows no significant impact of the street segments and only a 0% to 2% increase in average daily traffic. (TIA, pp. 66-67) It seems that a project of this size could generate more trips on local roadways adjacent to the entrance points.
 - Can you clarify how a project of this size generates only 0% to 2% increases in traffic at the entrances and exits?
- The PEIS does not provide information on where employees are currently coming from to get to the WLA VA Campus. We've seen DEIRs that have information on where employees live by zip code, which is used to develop directional trip impacts. This information can be also used to develop TDMs to reduce driving.
 - Did Crain & Associates use zip code information of current WLA VA Campus employees and guests to generate the traffic analysis? If so, can this be provided? If not, can the analysis be refined to include this?
 - If zip code information was not used, how was the VA able to determine where vehicles will be going to/from?
 - The PEIS assumes that the number of VA employees riding transit will increase from 5% for North Campus and 15% on South Campus to 25% on both campuses. (TIA, page 88) Was zip code information used to back up this assumption? Does zip code information of where VA employees are coming from demonstrate that it is possible for them to take public transportation to get to the campus? If not, how does the VA propose to increase transit ridership to 3x to 5x what it is today?

- The list of mitigations included in the PEIS seems generic and non-specific to the VA Project. (TIA, pages 79-85) Please provide a more detailed analysis to back up these estimates? If such an analysis cannot be prepared at the moment then the traffic reductions indicated should not be used to justify this project.
- We note that the 2015 analysis on the traffic included a regional analysis of the percent of traffic that would be coming from the north, south, east, and west (page 18). Was a similar analysis of directional trips incorporated into the current traffic analysis? If not, please incorporate such an analysis.
- In our local analyses, we assume AM peak of 7 am to 9 am and PM peak of 3 pm to 7 pm. The PEIS assumes peak hours of 7 am to 10 am and 3 pm to 6 pm. (page 32)
 - Can the VA update its analysis to include the 6 – 7 pm hour which is a heavily congested time?
- The dedicated bus lanes on Wilshire Blvd. (the “Wilshire Bus Rapid Transit”) are operational only for buses from 7 am to 9 am and 4 pm to 7 pm and vehicular traffic is excluded during these hours. As such, the capacity of Wilshire Blvd. is reduced when they are operational.
 - Please update the PEIS to take the bus lanes into account? If not, can the 2018 TIA be revised to include the impact of the Wilshire BRT?
- The study area of potentially impacted intersections (Table 8-1, TIA page 63) is missing intersections that should be included. The 2018 TIA area should be expanded to include more intersections? Some intersections that we think should be included are:
 - Sunset Blvd./Church Lane
 - San Vicente Blvd./Montana Avenue
 - Montana Avenue/Bundy Drive
 - Sepulveda Blvd./Constitution Avenue
 - Sepulveda Blvd./Montana Avenue
- There are inconsistencies in the description of what surface streets were included in the study area as it changes between 1 mile (MP, page 17) and 1.5 miles (MP, page 5).
- Section 11.4 states that with mitigations the number of PM peak trips will be reduced by 45 trips. (MP, page 88) Please explain quantitatively how this can be achieved?
- Table 8-3 (MP, page 68) of the West LA Campus Street Segment Analysis states that average daily trips on Bonsall Avenue between the Wilshire Blvd. eastbound ramps and Dowlen Drive will increase by 16%.

- Can you explain why the analysis shows no significantly impacted intersections after mitigations and how this conclusion is reached given this increase in average daily trips at the Bonsall entrances?
- What is the lease parking referred to on page 84 of the Master Plan?

Entrances and Egresses

- The PEIS states (page?) that the only entrances that will be open for vehicular traffic are the four entrances are being used today (Bonsall Avenue north, Bonsall Avenue south, Constitution Avenue, Sawtelle Boulevard), and that the VA will not be opening the entrance on Barrington south of Veteran's Park that was previously discussed or other entrances.
 - What assurances can the community get that this and other entrances will exclusively and permanently remain open to pedestrians and cyclists only and will not be opened to vehicular traffic? (other than possibly the shuttles mentioned below).
- Can the VA commit that the gates that are currently listed (e.g., Gorham/Eisenhower) are not opened to vehicular traffic (other than possible shuttles as proposed below) and that the bicycle/pedestrian gateways proposed for Eisenhower Avenue, Gorham Avenue, Waterford Street/Church Lane, Texas (pending negotiation with the CA National Guard), and south of Veteran's Park will remain closed to vehicular traffic (other than possibly the shuttles mentioned below)?

Purple Line

- It is not clear in the PEIS whether the traffic generated from the Purple Line VA Station was taken into account. The Purple Line is not mentioned at all in the Executive Summary of the PEIS, for example and even Section 3.1.3.2.2 on Public Transit options (MP, page 3-160) fails to mention it despite the fact that construction at the station has already started.
 - Were the future conditions of traffic once the Purple Line Station is completed incorporated into the PEIS?
 - How much additional traffic (all day and AM/PM peak hours) was assumed to be generated by the Purple Line as opposed to the project?
 - Figure 3-2 shows a Proposed Rail and Busway Station at Wilshire/Bundy ("Bundy Station"), but this station is not currently planned or under consideration by Metro and was removed from consideration several years ago. What sources of information did Crain & Associates use for the Purple Line assumptions? Does the traffic analysis need to be updated to include Purple Line information that reflects the final plans?

- It is not clear whether additional traffic generated by the Purple Line Westwood station has been taken into account in the analysis. (MP, Figure 3-1 that references this is blank).
 - Has the impact of the Purple Line Westwood station been incorporated into the analysis in the PEIS? If not, can the analysis be revised to include its impact?
- We do not see any indication in the PEIS that the transportation analysis was reviewed by Metro, and as such we are concerned that Metro's estimated traffic from the Purple Line may not be fully incorporated into the PEIS.
 - Has the PEIS been reviewed and discussed with Metro? If not, why not?
- Page 87 of the TIA states that "The circulation plan recommends measures to be taken to prevent non-Project traffic from entering the Project site." The circulation plan (page L-7) says that gates will be installed to prevent outside visitors from accessing the VA campus when the Purple Line VA Station is open. However, Metro plans to have a "Kiss and Ride" for non-VA transit riders to access the station (TIA, page 52). This means that vehicles from Wilshire Blvd. will need to continually drive onto the campus to drop off and pick up transit riders.
 - Has Metro reviewed the Circulation Plan in the PEIS to ensure that assumptions are consistent with their estimates?
 - How many Kiss and Ride vehicles are assumed in the PEIS analysis, and has the gate concept been reviewed to ensure that this will not cause a major back-up onto Wilshire?
 - Where are the gates assumed to be located, and how will this impact traffic flow from the Purple Line?
 - Can the idea of gates be dropped if the analysis shows a back-up, or if in practice installing these gates causes back-up?
- The BCC has discussed First Mile/Last Mile ideas for the Purple Line VA Station with Metro. We have a major concern that adding the Purple Line traffic to an already gridlocked area can lead to disastrous results. As such, we have proposed that Metro work with the community and the VA to launch a shuttle system that could go from the business districts along San Vicente west to Bundy and from Brentwood Village to and from the Purple Line, stopping at the new VA housing that is being constructed on the WLA VA Campus.
 - This shuttle system would give residents living on the WLA VA Campus and VA employees the ability to easily access the Brentwood community and the Purple Line at the same time that transit riders can access the Purple Line without having to drive to the station.

- Lyft/Ubbers could drop transit riders in these business districts instead of driving onto the WLA VA Campus and causing more congestion on Wilshire and Ohio.
- Motorized scooter riders could go to the shuttle stops in Brentwood instead of trying to get all the way to the station.
- If the shuttles can drive through the WLA VA Campus instead of on Wilshire the drive time would be much shorter, which would encourage more ridership of shuttles and less congestion on Wilshire.
- Is the VA willing to discuss this type of shuttle system with the Brentwood community and Metro? Can a shuttle system like this be included in a revised analysis?
- Ultimately, we'd like to see the Bundy Station which would make Purple Line access much easier for the community and would reduce the number of non-VA people accessing the VA station.
 - Is the VA willing to support the community in its efforts to get funding for a future Bundy Station?

Pedestrian, Cycling, and Motorized Scooters

- Bicycle theft is a big issue at Expo Line stations at Bundy and Sepulveda, and it will be important to provide security for bicycles parked at the Purple Line Station.
 - Can the area be guarded by veterans? Can those veterans also provide general security and safe escort for people walking from the station to get off campus onto Wilshire and Ohio?
 - Can bike lockers be provided in addition to bike racks?
 - Have you considered adding showers for cyclists, at least for VA employees?
- Appendix F describes a very large network of bicycle lanes and access with a note that “the following bicycle facilities are planned for future installation in the Mobility Plan 2035, which is a study done by the City of Los Angeles.⁹ Appendix F (page 1299) of the PEIS includes the list of projects from the Mobility Plan 2035 as the basis for the VA’s bicycle plans. However, the Mobility Plan 2035 (page 134) itself states that the projects described in the plan are conceptual and are not anticipated to be implemented:

The networks described herein are identified as aspirational network concepts... any future changes would still need to comply with State planning

⁹ <https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>

law consistency requirement. Future projects to improve City right of ways for the enhanced networks, including selecting alternative streets, would be required to be reviewed under CEQA, including under CEQA Guidelines 15162 to determine if a subsequent or supplemental EIR would be required... A street identified as a Tier 1 Protected Bicycle Lane on the Bicycle Lane Network might ultimately be comprised of successive segments that could include a bicycle lane, a protected bicycle lane and even perhaps a short segment that includes a sharrow.

The Plan is not intended as a recipe book that must be followed to the letter but simply a preliminary roadmap to guide the City in making future multi-modal improvements.

- How will the VA’s bicycle plan as described in Appendix F change if the network in the Mobility Plan 2035 is not implemented to the “aspirational” level? Can the analysis in the PEIS be updated to reflect only bike lanes that have already been approved by the City of Los Angeles?
- Motorized scooters (e.g., Lime, Bird) are not addressed in the PEIS.
 - Does the VA have a policy about motorized scooters?
 - Where would they be allowed to operate?
 - Where will they park especially once the Purple Line VA Station is open?

Parking

- The 2015 Study stated that “Upon Project completion, approximately 4,859 to 5,136 parking spaces would be needed sitewide” (page iii). The current PEIS states that between 4,927 and 5,809 spaces will be needed. (Appendix I page I-18). The 5,809 number is based on “Project-Based Empirical Rates” that assumes that future buildings will require the same amount of parking as buildings with similar uses that exist on the VA today. The lower estimates are based on the Los Angeles Municipal Code (page I-17) and “Externally Derived Parking Rates” (page I-15) so are less credible than the Empirical requirement of 5,809.
 - How does the fact that the current parking study requires more parking than the 2015 Study support the claim that the project will now generate less than half as much traffic?
 - The TIA states in several places that “by the year 2029, the necessary number of parking spaces would be provided on the WLA Campus. Sufficient area is available to increase the parking supply to meet the projected parking demand.” (TIA, pages iv, 16, and 102) yet never states how many spaces will be required. Instead the reader is directed to Appendix I which is thrown into

the middle of a 1,500+ page set of Appendices with no Table of Contents that gives page numbers. It is unreasonable to expect readers to dig out this information. The number of parking spaces required should be stated in the TIA. The same complaint about references in the TIA that expect readers to dig through 1,500+ pages of Appendices to find numbers extends to peak hour volumes (MP, page 32), trip assignments (MP, page 47), Existing plus Project volumes (MP, page 48), transit ridership (MP pp. 73-74), and internal circulation (MP, page 87).

- Where will the 5,809 spaces be located? How much space is required for this parking and can they be accommodated by the areas identified?
- The number of vanpool spaces of 1 per 100,000 sf (with only one additional space for larger buildings) seems low. (TIA, page 82) If the VA wants to encourage vanpooling additional spaces should be allocated so that commuters see them and are encouraged to use the vanpools. If more spaces are allocated commuters will be more encouraged to use vanpools. Furthermore, these designated spaces should not be made available to other vehicles if demand is absent, but instead programs should be devised to encourage vanpooling. Opening these spaces for other uses will induce demand for lower occupancy travel.
 - Will the VA consider increasing the number of vanpool parking spaces?
 - If fewer vanpools materialize, then the parking spaces may be used by other vehicles We think that it is important for vanpool spots to remain open to encourage future vanpool use. Can this principle be incorporated into the parking plan?
- We are aware that parking for the Purple Line cannot be on the WLA VA Campus. However, area traffic could be reduced if parking could be provided at the Federal Building or at other local buildings, since vehicles coming from the north or south on the I-405 will have a place to park. For example, the very large parking lot at the Universal station on the Red line, like the Purple Line VA Station is a line terminus and is very full during the day.
 - Would the VA be willing to support the idea of parking for transit riders at the Federal Building to reduce the number of trips to the WLA VA Campus?
- Metro is planning a new parking structure on the WLA VA Campus to replace the parking that will be lost to the Purple Line VA Station. Has this been incorporated into the parking analysis? If not, can the parking analysis be updated to include this? Where will that lot be located?
- Electric Vehicle charging stations at 1% to 5% of parking capacity seems low in future years. (TIA, page 82)
 - Does the VA have a plan to increase the number of electric charging stations as demand increases? We note that it is much less expensive to add electrical

capacity during initial construction even if the charging stations (EVSEs) are bought and installed later when demand meets/exceeds capacity.

- Additionally, consideration of conversion of VA fleet vehicles should be evaluated.

Construction traffic

The Construction Traffic Analysis (Appendix K) contains no details of plans to mitigate construction traffic. Instead it states that “A Construction Management Plan will be developed by the contractor and approved by the City.” (page K-4) However, the PEIS also states that alternatives A, B, C, and D will have “Potentially major impacts” during construction (MP Executive Summary, page xxviii), This is a big concern.

- Other projects around Brentwood have agreed to coordinate with each other to schedule hauling and other construction activities for times that do not conflict with those of other projects so that the impact on the community is reduced.
 - Is the VA willing to schedule construction so that major hauling will not be done at the same time as Purple Line construction (both for the stations and the tunnels between the stations)?
 - Is the VA willing to coordinate the hours and timing of construction with the Brentwood Glen neighborhood immediately adjacent to the VA campus so as to minimize the impact on that neighborhood?
 - Is the VA willing to coordinate construction vehicles with other local projects using the same haul routes?
- Other local projects (e.g., Brentwood School) have committed that no construction vehicles will be on major arteries such as Sunset Blvd during peak hours. For the VA it would be Wilshire Blvd., Ohio, and Santa Monica Blvd. as well. Is the VA willing to commit to a similar mitigation of scheduling construction vehicles to enter and leave the WLA VA Campus at times other than peak hours? If so, can a statement to that effect be incorporated into the PEIS?
- Can the VA commit to keeping major arteries such as Wilshire Blvd., Sepulveda Blvd., Sawtelle Blvd, and Ohio Avenue open in peak hours during construction and not have any lane closures during peak hours? If so, can a statement to that effect be incorporated into the PEIS?
- Other local projects commit to providing TCOs (traffic control officers) as needed to keep traffic moving at key intersections. Can the VA commit to providing TCOs during construction as well when/where needed?
- Do you plan to do any weekend construction?

Mitigations

- The recommendations included in the TIA (pp. 79-85) are exceptionally generic, yet based on these mitigations the PEIS assumes that all 8 of the impacted intersections can be mitigated. (TIA, page 101) The DEIRS of other projects list specific intersections where traffic improvements can be made through restriping, signal installation and phasing, and a variety of other specific improvements directly related to the project. Instead, the recommendations in the Transportation Impact Analysis are general descriptions of “Enhanced Shuttle Service”, “An Onsite Transportation Coordinator”, “Bulletin boards, display cases, or kiosks,” and “Safe and Convenient bicycle access” with no specific details, just general language that could be used in any report.
 - Can this list be made more quantitative and specific to the WLA VA Campus?

- It appears that the PEIS assumes that many employees will live in the immediate area:
The community surrounding the Project includes a variety of residential opportunities for Project employees and staff. (TIA, page 79)

This is unrealistic. The area surrounding the WLA VA Campus has a shortage of housing relative to the amount of workspace on the Westside of Los Angeles and housing prices in the area are very high. Currently the VA has hundreds of open positions on the WLA VA Campus, due in part to the low wages for many positions relative to the very high cost of living in the area.

- Did the PEIS assume that a large percentage of employees added by the project would live in the immediate area? What is the percentage and absolute number that was assumed?
- If this assumption was made, can the analysis be updated to include a higher number of employees living outside of the immediate area, and living in areas consistent with the current employees?
- Can the VA include mitigations such as staggered work hours for its employees so that fewer arrive and leave during peak hours?
- The section “Bulletin boards, display cases, or kiosks” in particular (TIA page 81) seems to be a bit outdated given ubiquitous mobile phone usage. Can someone review this list to see whether it should be updated to include VA apps or other more current potential mitigations?

Public Transit Inconsistencies in the Transportation Impact Analysis

- Section 3.2 states that “some of the person trips generated by the Project would utilize public transit as the primary travel mode” but fails to state the percentage. What percentage was used for the assumptions?
- The list of bus lines serving the VA is inaccurate LADOT Commuter Express Service Line 431 route was updated on 9/1/18 removing the mentioned bus stop on Constitution Ave/Davis Ave. Instead this route continues south on Sepulveda past Constitution and ends at Ohio Ave. More information at:
<https://www.ladottransit.com/comexp/routes/431/431.html>
- Section 9.3 of the TIA states that the area is served by 4 transit providers, including Antelope Valley Transit Authority (AVTA), but no ridership data for AVTA is included. Why isn't the AVTA ridership included? Would including it have an impact on the analysis?
- Also in Section 9.3 of the TIA, Culver City Bus's ridership information is over a year older than Metro's or BBB's. Please use concurrent data or give an explanation as to why more recent data was not used?
- Figure 3-1 (TIA, page 28) is blank. It is labelled “Future Westwood/VA Hospital Purple Line Station.” What information is missing here? Is there missing data that would impact the TIA?

Related Projects

- Table 6-1 (MP, page 52) is missing Mount St. Mary's University.

Funding and timing

- Can you clarify the funding cycle for the VA? How many years have already been committed? When does the budget for this project get submitted and approved? Once approved, what is the temporal relationship between the approval and the commitment to start project construction and commence operations?
- Can Federal funding be used for things like the Enhanced Shuttle System (TIA, page 80)?
- How will utilities, roads, and other infrastructure expenditures be paid for over 10 years? Who will submit the requests for funding? How can the funding be guaranteed to meet the project schedule?
- When the section on TSM plan mentions project assistance (TIA, page 86), does this mean that the VA will contribute money towards the improvements? Is this possible under the VA funding mechanisms?

- How will any mitigations that are developed in consultation with LADOT be funded? The Transportation Systems Management (TSM) program (TIA, pp. 85-86) lists a number of potential measures to ease congestion such as shuttles, signal upgrades, transit network improvements, and pedestrian amenities.

Monitoring

- For projects in the City of LA there is a Planning process that gives the community comfort that if the agreed to conditions of construction and operation are not met that the community has a process under which the conditions can be enforced. How can the community get comfort that it will be able to monitor the commitments made by the VA (mitigations, TDMs etc.) and that a process exists under which issues can be called to the attention of the VA and corrected?
 - How will the VA adjust its programs if it does not meet its commitments?
Can we have some sort of annual monitoring program?
- How will the VA ensure compliance of the Neighborhood Traffic Management program? Is there a penalty for non-compliance?
- Can a program be set up for annual monitoring of compliance?

Utilities]

The PEIS clearly indicates the Purple Line VA Station was not calculated into utility capacity and usage rates. The North Campus of the WLA VA Campus requires a wholesale reconditioning or replacement of virtually every major utility, the BCC requests the entire North Campus Master Plan comply with the State of California 2020 statutory standard for a [Net Zero Energy Campus](#) to meet local energy and environmental statutes.

In addition, we ask that the following mitigation measures be adopted and included as part of the PEIS and be followed by the VA and other developers throughout the Master Plan process and thereafter where appropriate:

Comments Applicable to all Services:

All future North Campus or Metro Line utility infrastructure improvements should:

- a. *Not* be trenched for utility lines less than 100 yards from existing residential neighborhoods without approval from the impacted stakeholders;
- b. Utilize onsite VA power generating sub-stations, such as the steam power currently on site and new or expanded solar arrays;
- c. Use *all current access points* for gas, sewer and water and fiber optics on the VA Campus, which may be substantially improved as part of the Master Plan, versus trenching new access points from outside the VA property line into the VA Campus;
- d. *Not* create additional energy/resource burdens on existing community infrastructure outside the VA footprint, including i) the LADWP grid located at Sunset/Church Lane, ii) the main water line to the VA under the Brentwood Glen neighborhood; iii) the Flood Basin sewer line at Ohio Street, and iv) current cell towers;

If North Campus access points must be moved in order to upgrade them, all ingress/egress for VA utilities should be sited as close as possible to the Southeast access point near Sepulveda Boulevard and South of Constitution Avenue, for three reasons:

- e. to take advantage of existing infrastructure improvements in this area versus opening a new construction zone;
- f. to reduce the safety, construction and traffic burden placed on existing residential neighborhoods during and after the Master Plan build out; and
- g. to allow for a single point of access for future repairs and upgrades.

Water Chilled Air Cooling Systems:

The PEIS highlights an antiquated system which is mostly inoperable; water chilled cooling systems cannot be justified in a drought environment, such as Los Angeles. The system should not be utilized.

Natural Gas:

We agree with the findings that aged pipe on the North Campus be replaced with newly installed, highly efficient turbines and natural gas for steam power, with proper repair of pipes and leaks.

Electricity/Solar/Alternative Energy:

The entire VA Campus sources electrical power from one SCE substation near Ohio Street. The addition of the Purple Line Station and Master Plan buildout will overwhelm the substation grid. In fact, the PEIS does not calculate usage rates from the Metro Line on the VA grid, although the train runs on electricity. All Master Plan construction should be in compliance with the State of CA 2020 Near Zero Energy mandate, including integration with, and substantial expansion of, the existing mass solar array on the North

Campus, use of steam power from the newly installed, natural gas generators on site and, if practicable, other forms of alternative energy. Given the current small solar arrays at the VA account for 17.2% of annual power use across the entire VA Campus, it is possible to implement the NZE guidelines and achieve 100% of day time electrical demand on the North Campus from solar power, without significant grid upgrades.

- a. Page 14 of the PEIS Tree Report indicates that old growth trees will be removed for construction, degrading the shade canopy on the North VA Campus, in addition to the case by case removal of trees within 25 feet of a construction area. We disagree with the lack of specific guidance on tree removals within 25 feet of a building. If a tree is 25 feet or less away from a building and the tree height is higher than the lowest roofline, it should not be removed. This will preserve as much shade canopy as possible and reduce energy consumption.

Water:

The methodology was flawed in determining water demand, excluding the number of future residents and “Vet Village” commercial center, water pressure requirements for fire safety and the demand of public restrooms at the Purple Line Station. Combined, these elements of the Master Plan/Purple Line will place significant pressure on the Brentwood LADWP water line that serves the adjacent community, including a constrained pipe system feeding the West LA VA Campus from the main LAWDP joint, adjacent to Brentwood School. Demand capacity should be controlled with water reclamation systems and underground sewage effluent treatment tanks on the WLA VA Campuys at the corner of Ohio and the 405 freeway, where the current sewage testing center is located. The entire North Campus and some of the South Campus suffer from significant water pressure issues. Each building should be outfitted with both water reclamation systems and pressure pumps.

Sewer System:

We agree the entire North Campus Sewer System pipeline must be replaced; new lines should be re-routed so that no retrenching and removal of old sewage lines occurs within 100 yards of existing residential neighborhoods.

The entire system is built to empty into the City of Los Angeles Flood Control District outlet under Ohio Avenue at the South Entrance. Can this outlet handle the increased demand of the Master Plan?

This study does not account for the increased demand of the Purple Line VA Station, which is installing larger sewer pipes connecting the new station to the VA sewer system, with all outflow to the Ohio Street Flood Basin pipe. Given the VA sewage testing station

is already located in the parking lot adjacent to the 405 Freeway and Ohio Street, *a small sewage effluent treatment plant* should be added to that site to recapture and treat as much wastewater as possible to reduce the burden on the Flood Control basin and decrease domestic water use by the VA.

The Veteran recreation fields on the Northwest Campus near Barrington Avenue require dedicated sewer lines and bathrooms; there are no nearby facilities for the Veterans in the Master Plan, and they deserve basic amenities.

Environmental Justice.

We believe that an important part of Environmental Justice is to ensure the safety and security of all Vets living on the campus and the safety and security of Brentwood residents- the VA's next door neighbors. We want the community and the VA to work together to ensure that veterans living on the WLA VA Campus are afforded the dignity they deserve. The current WLA VA building identification system does not include street addresses for buildings, which makes difficult applying for school, getting mail, and even simply identifying where one lives. procedures and policies should also be established for veterans who who suffer from a disability that causes them to pose a safety or security risk to other VA residents and the broader Brentwood community. There is anecdotal evidence of security lapses at the VA that could have put its patients, its residents, and the Brentwood community, in harm's way, and improvement is needed.

We ask that the following mitigation measures be adopted and included as part of the PEIS and be followed by the VA and other developers throughout the Master Plan process and thereafter where appropriate:

That all living areas on the VA Campus have a street address - each Vet resident deserves the dignity of being able to give a proper address for their residence;

That the VA utilize a resident intake process that evaluates whether the individual poses a safety concern to other residents on the VA Campus or the Brentwood community;

That the development include separate living areas for women Vets, Vets with children, or other special circumstances that would indicate a separate or group-specific living area increase a resident's sense of safety, security and belonging;

Appropriate screening procedures adopted to ensure no firearms are brought onto the WLA VA Campus, apart from authorized VA security or visiting security personnel licensed to do so; and

Appropriate fencing for the protection of the VA Campus, its residents, and the surrounding neighborhoods. In instances where fencing is protecting adjacent residential

neighborhoods as well as the VA, we would appreciate the VA consulting with the impacted neighborhood in advance so that there could be a productive collaboration in the fence design, construction and installation.

We appreciate the VA Master Plan's concept to have a buffer zone, or permeable zone, between the VA uses and the neighboring Brentwood community. This buffer zone includes uses compatible with the Leasing Act, including parking lots and parks. These uses must benefit the VA and its resident veteran. This can also incidental but important benefits to the Brentwood community and serve an important function in making the VA and its residents welcomed in the community, and our community welcomed to the VA. This is most particularly evident with respect to the real estate that borders Barrington Avenue north of the multi-family residential area. We noted that at various places in the PEIS, there is the suggestion that part of the existing Veterans' Park licensed to and operated by the City of Los Angeles could be impacted by the implementation of the Master Plan. We ask that all existing buffer zones be respected and not be impacted. We ask that the VA redesign any improvements to be compatible with all existing buffer zones, and that the VA continue to support the enhanced use leases and related uses, including the Barrington Village Parking Lot, the Barrington Veterans' Park, and the Dog Park.

We also suggest that the VA and other developers under contract with it consider integrating LEED based criteria in the development and design of improvements on the WLA VA Campus, whether or not LEED certification is sought.

Respectfully submitted,

Brentwood Community Council

cc: Congressman Ted Lieu
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