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September 19, 2003

Everett Alvarez, Jr.
Chair, CARES Commission
810 Vermont Avenue NW
Washington, DC 20480

Dear Mr. Alvarez:

As local representatives of the nearly one million people residing in Western Los Angeles, we are writing to supplement Supervisor Yaroslavsky's letter of April 14, 2003 which addressed the VA Desert Pacific Healthcare Network's CARES Market Plan. Our concerns about the Network 22 Market Plan and the proposed Land Use Planning Committee have grown substantially as new documents have been released for public scrutiny.

Land Use Committee Charter

We are extremely concerned about the Land Use Committee Charter. Because the Charter has not been included in the Market Plan, it appears to have not had any review by the CARES Commission itself. While we were provided copies of the Charter proposal in a private meeting, it has not been made available for widespread public review. However, despite this omission the Market Plan states that it was submitted (Appendix M, page 17). Obviously, until this is cleared up and the Committee Charter reviewed directly by the CARES Commission, the validity and appropriateness of this Committee must be called into question.

We are also concerned about the charge of this Committee. It is proposed to be made up of health care industry professionals from within the Network system, not land use experts, veterans or people who live in the surrounding community and would be

impacted by potential projects. This plan would allow projects to be considered on a case by case basis without comprehensive review of their cumulative impacts. This is in direct opposition to Section 707 of the Veterans Programs Enhancement Act of 1998 (P.L. 105-368), which requires the development of a Master Plan for this facility.

Excess Land Use Policy

This directly relates to another item of great local concern - the issue of Excess Land. Section C of the Market Plan refers to that fact that a "VISN-22 Excess Land Use Policy (is) to be submitted in the CARES Market Plan". However, as far as we can see this Policy also has not been included in the Market Plan. In addition, there is no mention or documentation of how this Policy was created, nor is there mention of what areas have been identified as excess land or documentation as to how the land was identified. Per the National Environmental Policy Act (NEPA), an environmental assessment must be performed prior to the declaration of any land as excess. Frankly, we are astonished that the VA would consider any of its property in West Los Angeles to be "excess" and are astounded that this information is not included in the Market Plan. This issue is of critical importance, as federal property becomes eligible for sale once it is declared excess. You must know that the terms of the original grant deed prohibit the sale of this land and guarantee its use as an old soldier's home in perpetuity.

Historic Resources

We are also dismayed by the apparent lack of concern given to the historic resources found on the West LA campus. Section 6, Facility Level Information - West LA, VISN Identified Planning Initiatives Narrative states that renovations of the existing complex are "not economical given the age of the buildings and the original design". It is also extremely disturbing to read in the Draft National Cares Plan that "a majority of vacant space to be reduced through demolition of vacated buildings on the north side of the West Los Angeles campus" (CARES website). You must be aware that many buildings on the north campus are eligible for listing in the National Register of Historic Places, and that the north campus includes two historic districts. The decision to demolish these buildings appears to have been made without explanation, documentation or environmental review as mandated by NEPA. If documentation does exist, no local stakeholders have been provided access to it. Furthermore, the VA has completely disregarded the fact that historic buildings can be successfully renovated to current standards, often at comparable or lower prices than the cost to build a completely new building. In fact, there is a good example of a quality renovation right on this campus: New Directions has rehabilitated Building 116, built in the early 20th Century, to tremendous success. It is fully upgraded to today's standards and is utilized to provide valuable services to veterans.

Environmental Review

It is very clear to us that the analysis and review required by the National Environmental Policy Act has been completely ignored by the VA in drafting this Market Plan. An Environmental Impact Statement should have been prepared to inform decision-makers, stakeholders and the public of the impacts resulting from the myriad of proposals included in the document. We request that you immediately revisit this issue and

require that this Market Plan go through the appropriate environmental review to ensure the long term protection of our national resources.

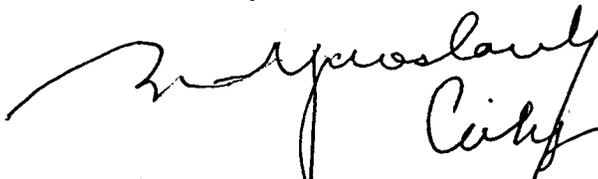
Local Stakeholder Input

Finally, though the VA claims that it has received local input, we believe that local stakeholders, veterans, veterans service organizations and community members alike, have not been heard. The Market Plan was created and decisions were reached with absolutely no input from these local stakeholders. The elements of this plan were either not presented to the community prior to the release of the document, or statements from the community about the issues were misrepresented and miscommunicated in the report. There have been no information gathering forums or surveys on the CARES process or the Land Use Committee, but rather a reliance on information gleaned by the local Administration from other sources.

Conclusion

The writers of this Market Plan have ignored NEPA, the Cranston Act and the National Historic Preservation Act. This process has been allowed to proceed without following the Federal guidelines that were put in place for a reason, to ensure that proper input was garnered and that the public has due process. It behooves you to put a stop to this Market Plan and its Land Use Committee, and institute a Master Plan as required by Federal law and as promised by Secretary Principi when he visited Los Angeles in 2001.

Sincerely,




ZEV YAROSLAVSKY
Supervisor, Third District
County of Los Angeles

CINDY MISCIKOWSKI
Councilwoman, 11th District
City of Los Angeles



JACK WEISS
Councilman, 5th District
City of Los Angeles

LOS ANGELES CITY COUNCILMEMBER JACK WEISS
PREPARED STATEMENT FOR THE
DESERT PACIFIC HEALTHCARE NETWORK LAND USE
PLANNING COMMITTEE CAPITAL ASSET REALIGNMENT FOR
ENHANCED SERVICES (CARES) COMMISSION
SEPTEMBER 29, 2003

Thank you for allowing me to speak with you today. Representing the Fifth Council District of the City of Los Angeles, I serve the West Los Angeles communities which surround the West Los Angeles Veterans Administration (VA) property on the east side.

Historically, members of the surrounding community have been concerned that the Veterans Administration was not responsive to their concerns about development proposals for the West Los Angeles VA property. For example, a master planning committee in 2001 proposed a 25-year land use plan that would allow massive development of the site equivalent to three "Century Cities."

A development similar to Century City on this property could have a devastating impact on residents of my district, and in 2001 the community rose to protest this proposed master plan. Fortunately the Veterans Administration recognized that this process was flawed, and this master plan is not currently under

consideration. Understandably, residents remain wary of abrupt decisions by the Veterans Administration that do not include their input.

The West Los Angeles VA property was deeded to the VA with a strict condition that it be used for an "Old Soldiers' Home," meaning as a residential community for retired and disabled veterans. I am extremely concerned that the VA would consider any of its property in West Los Angeles to be "Excess" which would allow the property to be leased to private interests or sold off permanently. This would appear to be in direct conflict with the deeded condition that it be used only for housing veterans.

This property has great economic and environmental significance. It contains some of the largest areas of valuable undeveloped land in the City of Los Angeles. Thriving residential and commercial districts surround the property. Developing unused portions of the VA property should not begin without first conducting a thorough evaluation of the impacts that any development on the property will have in these surrounding neighborhoods.

The scale and significance of this property for the City and County of Los Angeles warrants a comprehensive public process. Decision makers, veterans and the local stakeholders need to fully understand the needs of veterans, the concept of "excess land", the environmental impacts associated with

development, and the importance of preserving approximately 400 acres of National Historic designated land in the West Los Angeles region.

The currently proposed VA Land Use Planning Committee includes six VA health care administrators but does not include experts in land use planning. The lack of expertise in land use planning will hamper this proposed Committee's ability to effectively plan for the future of the VA property. The CARES Commission should continue to focus on health care assessment and reject the proposed land use committee to allow local, state and federal elected officials, land use experts, the surrounding community and veterans to develop a comprehensive master plan for this extraordinary property.

I urge this committee to:

1. Create a new 25-year land use master plan which encourages a public process for veterans, members of the surrounding community, land use experts and elected officials.
2. Include elected officials, veterans and community stakeholders in the land use planning process.
3. Conduct a historic and cultural resources survey because the property has not been surveyed in over 20 years.

Thank you again for giving me the opportunity to speak with you today.



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ZEV YAROSLAVSKY

SUPERVISOR, THIRD DISTRICT

Statement of Los Angeles County Supervisor Zev Yaroslavsky

Before the Department of Veterans Affairs CARES Commission

September 29, 2003

Thank you for providing me with the opportunity to speak before you this morning. My name is Zev Yaroslavsky and I am the Los Angeles County Supervisor for the area encompassing the VA's West Los Angeles Healthcare Center. My district also includes the majority of West Los Angeles and the San Fernando Valley and is home to nearly two million residents.

I am here today to voice my grave concerns with Network 22's CARES Market Plan that has been presented to you. As you know, the Department of Veterans Affairs launched the CARES effort to improve the Department's ability to serve the medical needs of our nation's veterans. I fully endorse this effort in the context of healthcare service delivery. Unfortunately, the Network 22 Market Plan has deviated from the intent of the CARES effort by including a method for evaluation of private development proposals on VA property. Network 22 is using the CARES process to address the very sensitive issue of how to best manage its vast land holding in West Los Angeles, and has not given serious thought or effort to the task.

The Market Plan includes a 3-page document proposing the formation of a Land Use Planning Committee to address land use issues within Network 22. Quite simply, this proposal is not consistent with federal law and is a slap in the face to both our community and the veterans served by this agency. The Land Use Committee Charter is an extremely poor approach to land use planning for the site, which consists of nearly 400 acres in the heart of West Los Angeles. First, the committee's membership consists only of department employees and totally excludes veterans, members of the adjacent community, as well as the City and County of Los Angeles. Furthermore, the proposal is very general, leaving numerous unanswered questions. There is no discussion of how development proposals will be evaluated to ensure that they comply with the applicable planning laws such as the National Environmental Policy Act, the California Environmental Policy Act, the Subdivision Map Act, and the National Historic Preservation Act. Given the air pollution and traffic inducing impacts of new developments, and the federal mandate that new construction minimize polluted run-off into the Santa Monica Bay, it is imperative that the proposal be amended to consider these issues. Similarly, there is no discussion of what ethics rules will guide the committee's work. The CARES proposal also fails to disclose how the committee will comply with the Cranston Act, which prevented certain acreage within the property from being labeled as "excess", nor does it include discussion of how the VA intends to comply with federal law requiring preparation of a master plan for the site. The development pressures within West Los Angeles are extremely intense and I must

seriously question the committee's ability to fairly, legally and expertly analyze development proposals.

I am also deeply disturbed by the plan's failure to recognize the historic resources on the property. The plan states that "a majority of vacant space [is] to be reduced through demolition of vacated buildings on the north side of the West Los Angeles campus". It also notes that older buildings are no longer functional and should be demolished. You must be aware that many of the buildings on the north campus are eligible for listing in the National Register of Historic Places, and that the north campus includes two historic districts. A non-profit organization has also recently rehabilitated one of the older buildings on the north campus and the building is now used to provide assistance to homeless veterans. Obviously, such historic buildings can be preserved and can also still provide much-needed services to veterans. The plan's illogical and possibly illegal approach to the property's historic assets is yet another critical failure which must be corrected.

The document's vague discussion of "excess land" is equally problematical. The 3-page description of the Land Use Planning Committee states that the committee will develop "a criteria based process for re-use of excess land located within the VA Desert Pacific Healthcare Network". The document further defines excess land as "VA owned land assets identified by the CARES process as not required for support of the VA's health care mission". Despite this statement, excess land is not identified anywhere within the CARES plan. As you must know, the preservation of the VA West Los

Angeles Healthcare Center property is of critical importance to veterans and the local community. It was the VA's past intent to dispose of excess land that led to passage of the Cranston Act protecting about 100 acres of land on the property. Quite frankly, the public has no clue what the VA means when it states that "excess land" exists within the property. And, it appears that the VA has no clue as well and has simply made general statements with the hope that the public would not notice that this cherished 400-acre property has suddenly been labeled as "excess".

The misstatements within CARES plan regarding excess land and the extremely flawed land use committee proposal have generated tremendous public outrage and opposition to the plan. I strongly urge you to recommend to Secretary Principi that these fatal flaws be corrected. Obviously the national CARES effort is a wise attempt by the VA to evaluate its national health-care delivery system. Land use planning for a 400-acre property in the heart of the most valuable area of Los Angeles has no place within this process. Such land use discussion should be stricken from the Network 22 plan, and instead a recommendation should be made that the VA collaborate with veterans and the local community and embark upon a comprehensive master plan for the property as required by Public Law 105-368.

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