

**Department of Veterans Affairs (VA) Response
to the Veterans and Community Oversight and Engagement Board (VCOEB)
June 2024 Recommendations**

Recommendation 23-01(A): The Secretary of Veterans Affairs direct the responsible offices within the Agency that a comprehensive supply and demand analysis be prepared and presented to the VCOEB as soon as possible – and certainly before any publication or adoption of the 2025 Master Plan – so that the Board can fulfill its Congressionally-specified role to advise the Secretary on implementation of the draft Master Plan and successive master plans.

VA Response: Concur. VA recommends that the timing for the Veteran housing supply and demand analysis be synchronized closely and efficiently during the periodic 3- to 15-year Master Plan updates with such findings to be incorporated into VA's updated planning document for the VA West Los Angeles (LA) campus. VCOEB, as well as all stakeholders, will be included in the outreach process and will be provided ample opportunity for review, discussion, and feedback.

Recommendation 23-01(B): The Secretary of Veterans Affairs direct the responsible offices within the Agency that the By Name List become the preferred method for measuring veteran homelessness in Los Angeles County and reflected in the monthly "WLA Campus Homeless Veteran Bed Capacity Summary" status report available on the Master Plan website.

VA Response: Non-Concur. While VA agrees that the by name list (BNL) is the preferred method for an actionable way to identify unhoused Veterans and assign them to services, it is not the national standard to measure homelessness. The Department of Housing and Urban Development, which sets Federal policy on measuring homelessness, requires all communities to participate in an annual point-in-time (PIT) count to measure homelessness. BNL cannot be used to substitute for PIT without a change in national policy.

However, VA understands the value of sharing timely information consistently and transparently about changes it observes in homelessness in the Greater Los Angeles (GLA) catchment area. BNL is a useful tool for this purpose. To ensure BNL is accurate and comprehensive, Los Angeles Homeless Services Authority (LAHSA) must provide timely Veteran updates from the Homeless Management Information System to VA. GLA will continue to work with LAHSA and its one team community partners to improve the accuracy and timeliness of BNL with the goal of regularly updating information and making it available on the Master Plan website.

Recommendation 23-01(C): The Secretary of Veterans Affairs direct the appropriate offices within the VA that for current planning purposes, the permanent supportive housing count for the campus shall be 1,057 units concentrated north of Nimitz Avenue in the North Village concept identified by the principal developer.

VA Response: Non-Concur. Due to the current urgent need for homeless Veteran housing, required town center due diligence, planning, and transactional actions, and ongoing environmental and construction challenges within various parts of the VA West LA Campus, VA does not recommend a placement of limits on the quantity of Veteran housing units or the physical location of the Enhanced Use Lease (EUL) projects.

Recommendation 23-02(A): The Secretary of Veterans Affairs confirm for the benefit of the OAEM, the Principal Developer, and the VCOEB that the Principal Developer is not authorized to conduct any further planning or execution of a "Town Center" outlined in Master Plan 2022, including Buildings 13/306/407/408/409/410, as it extends beyond the scope of their contractual relationship with the Agency.

VA Response: Non-Concur. The contractual relationship with the Principal Developer is guided by the EUL statute, the West LA Leasing Act, and the Principal Developer EUL executed on June 29, 2022. Specifically, the relationship is focused on developing permanent supportive housing, which by definition, must include housing with onsite support services for Veterans.

Buildings 13, 306, 407, 408, 409, and 410 are part of the town center as outlined in the Master Plan 2022 and will be the site of permanent supportive housing developed by the principal developer. Those buildings will deliver housing as well as support services and are necessary parts of the plan to deliver the Master Plan 2022. Should Veterans desire community-based services and amenities that go beyond traditional support services authorized under the EUL statute, such as grocery or food options, VA will leverage its own VA Veterans Canteen Service or deliver the identified services or amenities through a service lease as outlined under section 2(b)(2) of the West LA Leasing Act.

Recommendation 23-02(B): The Secretary of Veterans Affairs instruct OAEM to abandon conversion of Building 13 into an Enhanced Use Lease. Instead, VCOEB recommends that the Secretary of Veterans Affairs instruct OAEM to transition planning from Building 13 to Building 211 (Brentwood Theatre) for the creation of a "Town Hall" intended for exclusive use of campus residents. This conversion may take the form of an Enhanced Use Lease or lease that principally benefits veterans and their families authorized in the West Los Angeles Leasing Act of 2016. If the latter, VCOEB advises the Agency to prepare a Request for Qualifications as soon as possible given the growing community of veteran residents on campus.

VA Response: Non-Concur. VA does not agree that the adaptive reuse of Brentwood Theatre should be in place of advancing plans for building 13. Building 13 is part of the town center concept outlined in the Master Plan 2022 and includes permanent supportive housing units on the upper floors. The adaptive reuse efforts of the Brentwood Theater (B211) would be handled outside of the EUL Program as it is not envisioned to include any housing units. These projects could happen simultaneously as they are not dependent on one another.

Recommendation 23-03(A): The Secretary of Veterans Affairs identify one VA office to lead transformation of the North Campus consistent with the operative Master Plan and empower that office with the authority to request, prioritize and implement projects through VA's regular budget process.

VA Response: Non-Concur. The Master Plan describes a significant variety of activities and functions on the West LA Campus, which includes efforts on the North Campus for multiple uses. To have one office oversee all West LA Campus activities and functions would be placing an impractical burden on that office. Instead, responsibilities align with functional uses – housing, clinical, support, major construction, and so on. To manage the integration of the various functions and offices, VA leverages governance, specifically the integrated project team (IPT), to make campus-wide decisions.

As part of the governance process, investments are identified and approved, then submitted as part of the budget process by the responsible executing office.

Recommendation 23-03(B): The Secretary of Veterans Affairs instruct the appropriate office that it identify the capital needs for implementation of a Town Center area and a worker enterprise zone, report those to the VCOEB, and include those in the next SCIP.

VA Response: Concur in Principle. VA has included necessary infrastructure improvement projects in the Strategic Capital Investment Planning (SCIP) process to support housing development, as well as for many other VA clinical and support projects supporting broader campus needs. We will continue to do so, as needed, however VA has limited authority to utilize its own funding to deliver some of the supportive and community services outlined in the Master Plan 2022 and envisioned as part of the town center.

As outlined in the Master Plan 2022, the enterprise zone was removed, integrating the job training functions into the town center function and concept. Except for the portions that can be delivered through the via VA Veteran Canteen Services, the implementation of the town center will, by necessity, be using funding outside of VA capital (for example: a service lease). Therefore, the town center as a whole will not go through the SCIP.

Recommendation 23-03(C): The Secretary of Veterans Affairs instruct the appropriate office that it identify whether legislative changes will be needed in order to accomplish appropriations for the Town Center and worker enterprise zone, and report those to the VCOEB.

VA Response: Non-Concur. VA believes the town center, as contemplated in the Master Plan 2022, can largely be accomplished without legislative change. To the extent that portions of the town center are in buildings containing housing developed by the principal developer, those buildings will be renovated by the principal developer.

Whether the principal developer provides the services or amenities identified for inclusion in the town center will be a service-specific determination. If the contemplated service or amenity is a supportive service that can be provided under VA's EUL authority, it can be provided by the principal developer. If the contemplated service or amenity cannot be provided the EUL authority, the service or amenity may be provided in VA retained/occupied space or under a service lease pursuant to section 2(b)(2) of the West Los Angeles Leasing Act of 2016. At a fundamental level, most of the services and amenities contemplated for the town center in in the Master Plan 2022 may be done under our existing authorities. The scope of the amenities and services provided, however, will be informed by VA's existing legal authorities. The specifics regarding services and amenities that will be provided and the vehicle by which they are delivered throughout the town center will be determined on an individual, fact-specific basis and largely shaped by the authorities by which they may be delivered. If, based on Veteran input, VA identifies services or amenities for inclusion in the town center that cannot be done under the West LA Leasing Act, a determination will be made if it should be done and, if so, what authorities may be necessary.

Regarding appropriations, VA facilities are already substantially underfunded. If VA were to request and receive expanded authorities for us to directly deliver portions of the town center concept, those investments would need to compete with all other VA infrastructure needs across the country, including repairs and upgrades to current VA health care facilities to support the clinical care system.

Recommendation 23-04(A): The Secretary of Veterans Affairs instruct the Agency to post the Urban Land Institute Town Center Final Report to Regulations.gov so it can receive public input in a fair and transparent manner.

VA Response: Non-Concur. VA has posted the Urban Land Institute Town Center Final Report on the Master Plan 2022 website <https://www.westlamasterplan.org/p/town-center>, and also conducted a comprehensive stakeholder survey for potential services to be provided at the proposed town center. Additional outreach and planning for the town center will be conducted on an ongoing basis as well as take place as part of the periodic 3 to 5 year Master Plan updates.

Recommendation 23-04(B): The Secretary of Veterans Affairs direct VA staff to designate a VA "champion" to advocate for the Town Center (defined as someone who has authority to submit budget requests for construction of Town Center components; authority to serve as a convening authority within the Agency on all issues related to implementation of the Town Center; who has past (or current) experience with the Los Angeles campus; and who will report to Meg Kabat).

VA Response: Concur in Principle. VA recognizes the importance of the town center in the overall plan to develop the West LA North Campus and create a vibrant community for Veterans. VA also recognizes the value of a champion or similar role that can coordinate the multiple offices responsible for executing the town center. The decision

to appoint a champion will be reviewed and determined by the West LA Master Plan IPT.

Recommendation 23-04(C): The Secretary of Veterans Affairs evaluate as quickly as possible the existing Principal Developer EUL Release Schedule and determine if the Principal Developer can achieve the targeted number of permanent supportive housing units in areas north of Nimitz.

VA Response: Concur. VA previously completed the recommended evaluation to determine which parcels would be possible to accelerate for housing. The evaluation determined that developing permanent supportive housing units exclusively north of Nimitz would delay other planned housing delivery and negatively impact VA operations and services.

Focusing development north of Nimitz at this time would require significant adjustments to GLA ongoing projects, including relocating existing personnel and equipment in preparation for parcel development. The time and coordination required to revise project and feasibility plans and subsequent implementation would result in the extension of the schedule for housing development. In addition, significant planning is already underway to deliver housing south of Nimitz, which, if halted, would have a negative impact on the schedule for housing development.

The minimal distance between the north and south sides of Nimitz does not justify the potential delays in housing development or the disruptions to VA operations that this shift would cause. However, VA is continuing to evaluate the ability to advance or accelerate future parcel releases to deliver more housing quickly.

Recommendation 23-04(D): The Secretary of Veterans Affairs direct VA staff not to include permanent supportive housing in the Town Center area because of the importance of preserving a distinction (and distance) between private spaces for residents of the campus and public spaces for visitors to the campus, and instead to reprioritize the release of buildings which do not conflict with the Town Center in order to minimize any potential delay to the development of the targeted number of permanent supportive housing units.

VA Response: Non-Concur. Our current plans, specifically Master Plan 2022, establishes permanent supportive housing as part of the town center. Key descriptions provided in the following excerpts:

- A home for Veterans composed of diverse but well-defined mixed-use neighborhoods to form, in the broadest sense, a therapeutic community setting for Veterans to live and reintegrate into civilian society.
[Excerpt from Master Plan 2022, page 130]
- The Core subareas of both districts is intended to support mixed-use development with residential above the ground floor's community-serving uses.

[Excerpt from Master Plan 2022, page 166]

In response to a previous VCOEB request, VA engaged a third party to assess the approach to the town center, including the mixed-use approach outlined in the Master Plan 2022. The Urban Land Institute (ULI) completed their study in 2023. The ULI study supports the mixed-used approach VA is proceeding with, with specific references outlined below:

- To create an inviting, human scaled, mixed-use town center.
[Excerpt from ULI Los Angeles Technical Assistance Panel Report, page 18]
- The Quad open space is well-defined by buildings on all four sides and bounded by a proposed new building with ground floor retail/services and housing above that activates and contains the space.
[Excerpt from ULI Los Angeles Technical Assistance Panel Report, page 31]
- The Panel is recommending at the next stage, the legality of the following uses, are determined or new Federal legislation is pursued regarding the ability to develop:
 - Alternative uses such as hotels
 - Mixed-use such as retail combined with housing.,[Excerpt from ULI Los Angeles Technical Assistance Panel Report, page 38]

Recommendation 23-04(E): The Secretary of Veterans Affairs separate the Town Center into a new master development area and initiate a RFP process to select a new master developer for the Town Center.

VA Response: Non-Concur. The Master Plan is a comprehensive approach to developing a community that serves Veterans, integrating both housing and essential services. The delivery of such a community cannot be segmented into multiple plans. VA does not intend to engage a separate developer, nor create a new/separate master development area, for the town center. The town center is planned as a mixed-use development with housing included, as outlined in the Master Plan 2022. As needed, VA may issue requests for proposals for support services and functions, such as service leases.

**Department of Veterans Affairs
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