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19 **UNITED STATES DISTRICT COURT**  
20 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

21 JEFFREY POWERS, *et al.*,

22 Plaintiffs,

23 vs.

24 DENIS RICHARD MCDONOUGH, in  
25 his official capacity, Secretary of  
26 Veterans Affairs, *et al.*,

27 Defendants,

28 BRIDGELAND RESOURCES, LLC,

Intervenor.

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Case No.: 2:22-cv-08357-DOC-KS

**PLAINTIFFS' STATUS UPDATE  
RE: PLACEMENT OF  
TEMPORARY HOUSING UNITS**

1       **I. INTRODUCTION**

2           The Court held a hearing on October 18, 2024, to discuss and order next  
3 steps to place approximately 50 temporary housing units on the VA property within  
4 approximately 90 days. The Court ordered Plaintiffs’ consultants to submit to the  
5 VA detailed specifications and pricing for modular housing options. The deadline  
6 for this submission was Noon on Tuesday, October 22. The Court set a further  
7 hearing for Friday, October 25, 2024.

8       **II. STATUS**

9           As ordered by the Court, Plaintiffs’ consultants did submit specifications and  
10 pricing for modular housing options to VA on Tuesday, October 22, 2024.  
11 Following that submission, Plaintiffs’ consultants met with VA personnel on  
12 Wednesday, October 23, 2024. Plaintiffs’ consultants also continue to evaluate  
13 modular housing options, manufacturers and continue to obtain commitments for  
14 the provision of temporary housing units in order to meet the time frame for move-  
15 in ready units that the Court has contemplated for the initial phase of temporary  
16 housing on the WLA VA campus.

17           The conference call of Plaintiffs’ consultants and VA personnel on October  
18 23, 2024, included a discussion of the following topics to be completed by  
19 Plaintiffs’ consultants:

- 20       • Specifications for RV modular units that would help inform the VA  
21       procurement process scope of work;
- 22       • The preferred vendor, Cavco, was to be contacted to determine its capacity to  
23       deliver 50-100 modular units;
- 24       • Develop and share cost estimates for decking v. trenching as site preparation  
25       options; and
- 26       • Develop and share draft proposed sequencing/timing for soil study, utility  
27       analysis and site prep, modular unit delivery and installation.

1           The meeting of Plaintiffs’ consultants and VA personnel on October 23,  
2 2024, included a discussion of the following topics to be completed by the VA  
3 Support Team:

- 4           • Research requirements related to RV ownership re licensing, registration of  
5 motor home vehicles with DMV;
- 6           • Share information re vendor registration in VA Tungsten System for  
7 government contracting;
- 8           • Finish research on any additional modular unit vendors and incorporate  
9 research into draft scope of work for VA procurement process; and
- 10          • Continue to refine scope of work for site operations including transitional  
11 housing services, security, grounds and custodial services, food services and  
12 monitoring support.

13 **III. OPEN ITEMS AND NEXT STEPS**

14           While substantial progress has been made through the collaborative efforts of  
15 Plaintiffs’ consultants and the VA Support Team to identify modular housing  
16 options that are [a] dignified and respectful units, [b] available for immediate  
17 delivery [within the Court’s time parameters] and installation and [c] at a  
18 reasonable cost, little progress has been made towards the evaluation and  
19 preparation of the sites for the placement of these temporary housing units. For  
20 example, although ordered by Emergency Order #1 to arrange a meeting of the VA  
21 civil engineer with Plaintiffs’ consultants for the purpose of evaluating the existing  
22 infrastructure on the campus, no such meeting has been set. The VA has turned  
23 over the masterplan for the utilities and grading. Detailed information for utility  
24 capacity and utility connection points are critical to the success of the project and  
25 remain outstanding. Plaintiffs’ consultants have not met with either VA civil or  
26 utility engineers to discuss and create a solution. A meeting has been arranged by  
27 Plaintiffs’ consultants for civil engineering personnel, a general contractor,  
28

1 surveyor, and dry utility engineering personnel to assess sites 7, 4A and Magenta  
2 B. This meeting is scheduled for Monday at 10:30 a.m. and the VA team has been  
3 invited to attend.

4 VA personnel have advised Plaintiffs' consultants that, as to some of the  
5 temporary housing sites, they do not have infrastructure information at all. And  
6 yet, no steps have been taken by VA to begin the process of evaluating those sites  
7 for the location, functionality and capacity of the wet and dry infrastructure systems  
8 near the temporary housing sites for which, apparently, no current information  
9 exists.

10 Plaintiffs' consultants propose that, if VA is unable to produce verifiable  
11 information as to the infrastructure in and around parcels 4A, Magenta B and 7 by  
12 November 1, 2024, that the Court order VA to permit site inspections and  
13 excavation as necessary by the following consultants which Plaintiffs' consultants  
14 would engage:

- 15 1. Civil engineering
- 16 2. Utility engineering
- 17 3. Surveyor
- 18 4. Soils engineering
- 19 5. Dry Utilities

20 Each and all of the foregoing private consultants are available to commence  
21 work immediately. The costs associated with private consultants doing this work  
22 should be borne by VA.

23 **IV. CONCLUSION**

24 The progress of the project for the placement of temporary housing within 90  
25 days would also benefit from an update from VA on two other pending issues. The  
26 first relates to the landfill issue inasmuch as the resolution of that issue with the  
27  
28

1 County of Los Angeles impacts the ability to use the lower baseball field on the for-  
2 mer Brentwood School grounds. If the landfill issue is capable of rapid resolution,  
3 then that parcel is suitable for the placement of temporary housing. VA is asked to  
4 provide any further updated information respecting the landfill issue.

5 The second issue relates to discussions with the National Cemetery  
6 Association arm of VA relating to the Columbarium expansion space. If such  
7 discussion can result in a short-term ability to use the expansion space adjacent to  
8 parcel 7, that ability would result in the placement of additional temporary housing  
9 units on the campus at an early time.

10 Respectfully submitted,

11 DATED: October 24, 2024

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19 DATED: October 24, 2024

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DATED: October 24, 2024

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