



**UNITED STATES DEPARTMENT
OF VETERANS AFFAIRS**

FINDING OF NO SIGNIFICANT IMPACT

**SAN FRANCISCO VA MEDICAL CENTER
MENTAL HEALTH PATIENT PARKING ADDITION
PROJECT NO. 662-CSI-612**

Submitted to:
US Department of Veterans Affairs

Prepared By:

Winzler & Kelly
495 Tesconi Circle
Santa Rosa, CA 95405

July 28, 2010

**U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED MENTAL HEALTH PATIENT PARKING ADDITION AT
THE SAN FRANCISCO VETERANS AFFAIRS MEDICAL CENTER**

FINDING OF NO SIGNIFICANT IMPACT

The U.S. Department of Veterans Affairs (VA) assessed the potential impacts of the various efforts of construction and operation associated with the Mental Health Patient Parking Addition (Proposed Action) at the San Francisco VA Medical Center (SFVAMC). An Environmental Assessment (EA) was prepared in accordance with the regulations set forth by the Council on Environmental Quality implementing the provisions of the National Environmental Policy Act (NEPA) (CEQ Regulations, Title 40 CFR 1500-1508); Executive Order 11514 as amended by Executive Order 11991; and VA Regulations - Environmental Effects of VA Actions (Title 38 CFR Part 26). The attached EA is incorporated by reference into this Finding of No Significant Impact (FONSI).

Description of Proposed Action and Alternatives

The Proposed Action involves construction and operation of a new two-level partially below grade parking structure on the site of existing Parking Lot A in the southeastern portion of the SFVAMC campus. The parking addition is needed due to a severe lack of adequate existing parking for patients seeking mental health services, which has become a major element of dissatisfaction and which causes many patients to arrive late or miss their scheduled appointments. The Proposed Action includes removal or relocation of Mental Health Annex Building 33, which is a modular building located on the northeast portion of existing Parking Lot A.

Alternatives considered but dismissed from further consideration included construction of a one-story parking addition to either Parking Lot B or Parking Lot J, valet parking, and off-site parking with shuttle service. These potential alternatives did not meet the Proposed Action's purpose and need, and therefore they were not evaluated further in the EA. Under the No Action Alternative, the proposed parking addition would not be constructed at the SFVAMC.

Summary of Environmental Consequences

Analysis indicates the Proposed Action would not result in short-term, long-term, or cumulative impacts to the following resources: economic activity, real property, environmental justice, and floodplains/wetlands/watersheds/coastal zone.

The Proposed Action would have minimal to moderate impacts on aesthetics, air quality, community services, cultural resources, geology and soils, hydrology and water quality, land use, noise, public controversy, public safety and solid/hazardous waste, resident population, transportation and parking, utilities, and vegetation and wildlife. No severe impacts were identified.

Construction activity will generate short-term impacts from temporary increases in noise, construction pollutant emissions, including dust, and temporary increases in traffic and loss of parking. Construction activities also have the potential to cause short-term impacts from storm water pollution, safety hazards to the public, impacts from vegetation removal, and temporary

effects on visual quality. Mitigative actions included in the EA minimize these potential adverse effects, as well as potential impacts from seismic and geologic hazards and archaeological resources.

Public Review

The EA was circulated for a 30-day public comment period extending from April 20 to May 20, 2010. A Notice of Availability for the EA was published in the San Francisco Chronicle on five consecutive days from April 20 through April 24, 2010. Hard copies of the EA were mailed directly to interested organizations and government agencies, as well as to the State Clearinghouse for distribution to State agencies. Copies were made available at the SFVAMC Engineering front desk, and the EA was also made available on the SFVAMC website. Four comment letters were received during the review period, as well as one after the close of the review period. Although not required under NEPA, all comment letters received responses. The attached final EA has been revised as necessary to address the comments.

Decision

As a result of the analysis of impacts of the Proposed Action contained in the EA, it is the VA's conclusion that, with the incorporation of appropriate construction practices, compliance with regulatory requirements, and implementation of mitigative actions, as described in the final EA, the Proposed Action would not have a significant environmental impact; therefore an environmental impact statement will not be prepared.



Lawrence H. Carroll
Director, San Francisco VA Medical Center

7/28/10
Date

Attachment: Environmental Assessment



**UNITED STATES DEPARTMENT
OF VETERANS AFFAIRS**

**FINAL ENVIRONMENTAL ASSESSMENT
AND RESPONSE TO COMMENTS**

**SAN FRANCISCO VA MEDICAL CENTER
MENTAL HEALTH PATIENT PARKING ADDITION
PROJECT NO. 662-CSI-612**

Submitted to:
US Department of Veterans Affairs

Prepared By:

Winzler & Kelly
495 Tesconi Circle
Santa Rosa, CA 95405

July 28, 2010

Table of Contents

Introduction	1
Purpose and Need	2
Project Description	2
Location.....	2
Proposed Action	2
Construction	7
Planting and Irrigation	9
Project Measures to Minimize Effects on Historic District Resources.....	9
Operation	10
No Action Alternative	10
Alternatives Considered but Dismissed from Further Evaluation	10
Environmental Impacts of the Proposed Action	12
No Action Alternative	46
List of Preparers.....	47
References	47
Federal Regulations Establishing Environmental Standards	49

Figures

1 - Vicinity Map	3
2 - Surrounding Land Use	4
3 - Parking Addition Site Map.....	5
4 - Visual Simulation Looking North from Clement Street and 42nd Avenue	6
5 - Visual Simulation Looking East from SFVAMC Building 1	6
6 - Visual Simulation Looking West from Access Road on NPS Property.....	7

Tables

1 - Proposed Planting Plan.....	9
---------------------------------	---

Appendix

- A – Response to Comments
- B – Section 106 Consultation Request
- C – Letter from State Historic Preservation Office

Introduction

The San Francisco Veterans Affairs Medical Center (SFVAMC) is located on a 29-acre site in northwest San Francisco (see Figure 1 – Vicinity Map). The SFVAMC is a major tertiary care facility that serves as a U.S. Department of Veterans Affairs (VA) regional referral center for specialized medical and surgical programs. The SFVAMC is designated as a Federal Coordinating Center for the City of San Francisco, and serves as a Primary Receiving Center for the City and Department of Defense (DoD) as contingency backup to DoD medical services in times of a natural disaster or national emergency.

This Environmental Assessment (EA) for construction and operation of a Mental Health Patient Parking Addition (Proposed Action) was prepared in accordance with the regulations set forth by the Council on Environmental Quality implementing the provisions of the National Environmental Policy Act (NEPA) (CEQ Regulations, Title 40 CFR 1500-1508); Executive Order 11514 as amended by Executive Order 11991; and VA Regulations - Environmental Effects of VA Actions (Title 38 CFR Part 26). The purpose of the EA is to report the environmental analysis of the Proposed Action in sufficient detail to allow the Department of Veterans Affairs (VA) to determine whether it is necessary to prepare an Environmental Impact Statement (EIS), or to prepare a finding of no significant impact (FONSI) for the Proposed Action. The EA format follows the recommendations contained in Part II of the *Department of Veterans Affairs Environmental Compliance Manual*.

A draft EA was prepared for the Proposed Action and circulated for a 30-day public comment period extending from April 20 to May 20, 2010. A Notice of Availability for the EA was published in the San Francisco Chronicle on five consecutive days from April 20 through April 24, 2010. Hard copies of the draft EA were mailed directly to the Golden Gate National Recreation Area, the San Francisco Fire Department, the San Francisco Public Utilities Commission, and the San Francisco Municipal Transportation Agency. Fifteen copies were also provided to the State Clearinghouse for distribution to select state agencies. Copies were made available at the SFVAMC Engineering front desk, and the EA was also made available on the SFVAMC website.

Four comment letters were received during the review period, as well as a letter from the State Clearinghouse after the close of the review period. Comment letters were received from:

- Patrick T. Gardner, Deputy Chief, Operations, San Francisco Fire Department
- Raymond R. Holland, President, Planning Association for the Richmond (PAR)
- Frank Dean, Acting General Superintendant, National Park Service, Golden Gate National Recreation Area
- Julie Burns, Co-Chair, Friends of Lands End, and Amy Meyer, Chair, People for a Golden Gate National Recreation Area
- State Clearinghouse

Although not required under NEPA, all comment letters received and responses to the comments are provided as Appendix A to this final EA. This final EA has been revised to reflect the comments as indicated in the comment responses. The VA will consider these comments and responses to the comments

as part of its decision on project approval.

Purpose and Need

The purpose of the Proposed Action is to provide additional parking for Mental Health patients and their visitors adjacent to Mental Health Building 8, where the services are provided. The need for the parking addition is two-fold: 1) existing parking at the SFVAMC is severely inadequate to meet patient demands, and 2) the demand for mental health care services at the SFVAMC is increasing. The existing lack of adequate parking for patients seeking mental health services is a major element of dissatisfaction and is an area in which the SFVAMC receives consistent complaints (CSI Construction Application 2009). The lack of available parking causes many patients to arrive late or miss their scheduled appointments. In addition, the VA has a need to provide the additional parking in a cost effective manner that respects the integrity of the historic buildings and campus historic district.

Project Description

Location

The SFVAMC is situated near the northwest corner of the City and County of San Francisco between Point Lobos and the Golden Gate Bridge. The regional location of the SFVAMC is shown on Figure 1. Figure 2 shows surrounding land uses, including Lincoln Park, the Richmond District, and the Golden Gate National Recreation Area. Figure 3 shows the SFVAMC site plan, including existing buildings and the location of the proposed parking addition. The proposed parking addition would be located on the site of existing Parking Lot A in the southeastern portion of the campus. The site is bounded on the east by a property line shared with the National Park Service. To the south is the main entry drive into the SFVAMC from Clement Street. Further south is the residential area known as the Richmond District. To the west is Veterans Drive, which is the main roadway through the SFVAMC property. Further west of Veterans Drive is Parking Lot B, and beyond is Building 1, a surviving 1934 building from the original campus.

Near the northeast corner of the site are Buildings 32 and 33. Building 32 is the Children's Day Care Center. It is a modular building with a fenced-in playground. Building 33 is the Mental Health annex, also a modular building which extends partially into the footprint of Parking Lot A. To the north is Mental Health Building 8, which is also a 1934 building from the original campus. Between Buildings 8 and 32 is a service drive with an existing connection to Parking Lot A.

Proposed Action

The Proposed Action is to construct a parking addition on the site of an existing parking lot at the southeastern edge of the SFVAMC campus (see Figure 3). The new parking addition would provide two levels of parking, the first level partially underground and the second level an elevated parking deck which meets the grade of the service drive at its north side. The new parking structure would be for patient and visitor parking only and would provide a total of 161 car spaces and 23 motorcycle spaces. The existing surface parking lot on which the new parking structure would be built provides a total of 86 parking spaces. Therefore, in total, the proposed parking addition would provide 75 additional parking spaces and 23 additional motorcycle spaces. Visual simulations of the proposed parking structure from three viewpoints are provided as Figures 4, 5 and 6.

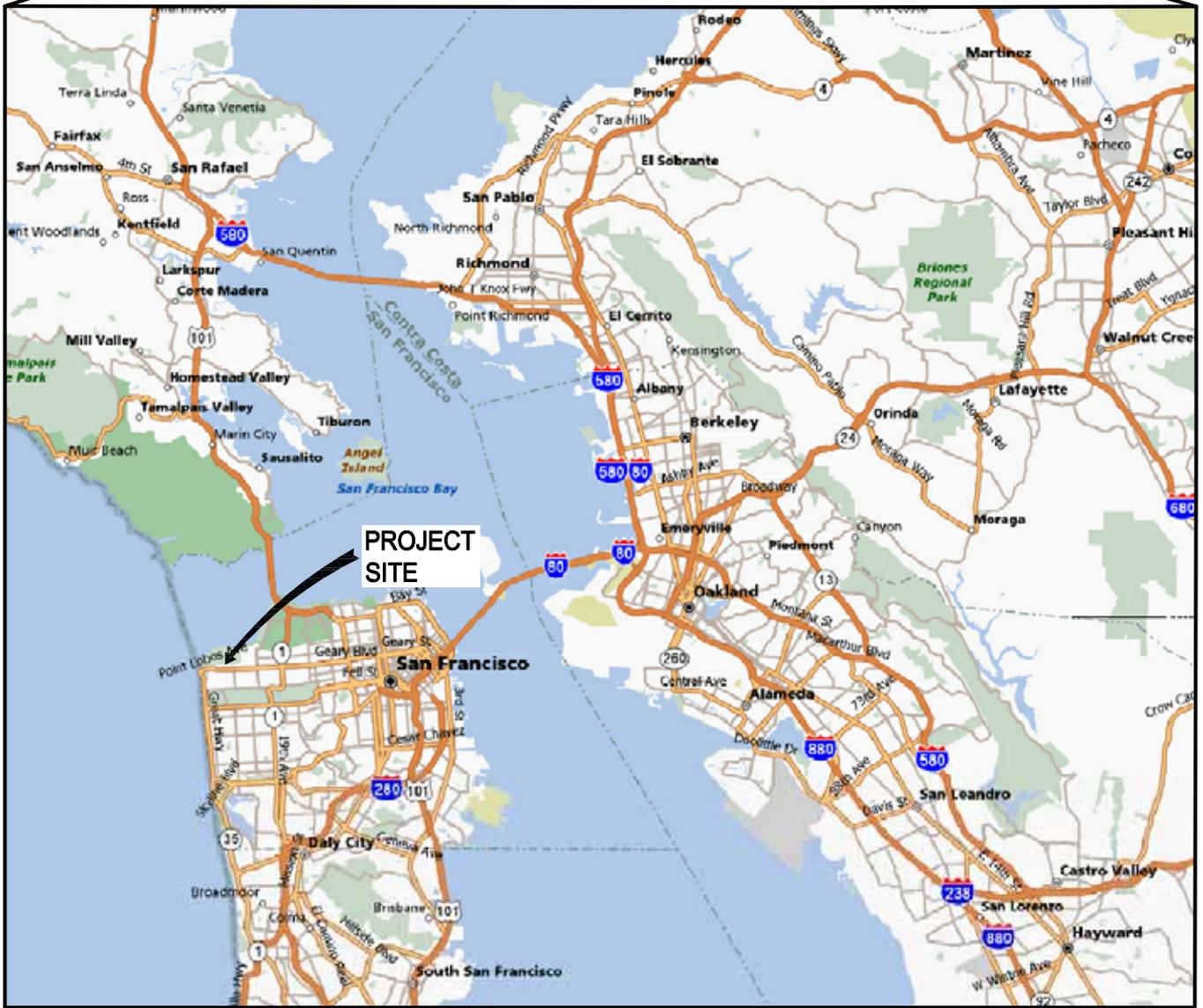
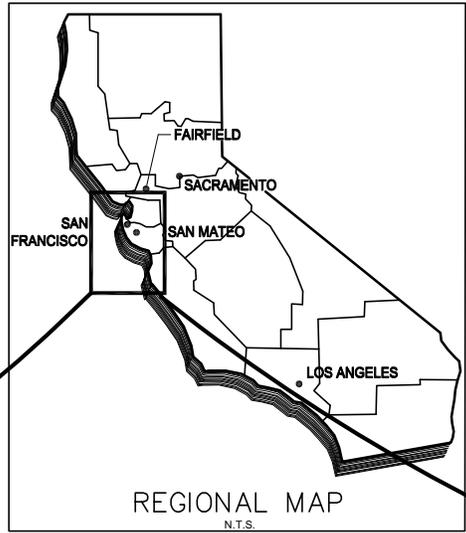


FIGURE 1
VICINITY MAP



Surrounding Land Use

San Francisco Veterans Affairs
Mental Health Parking Addition



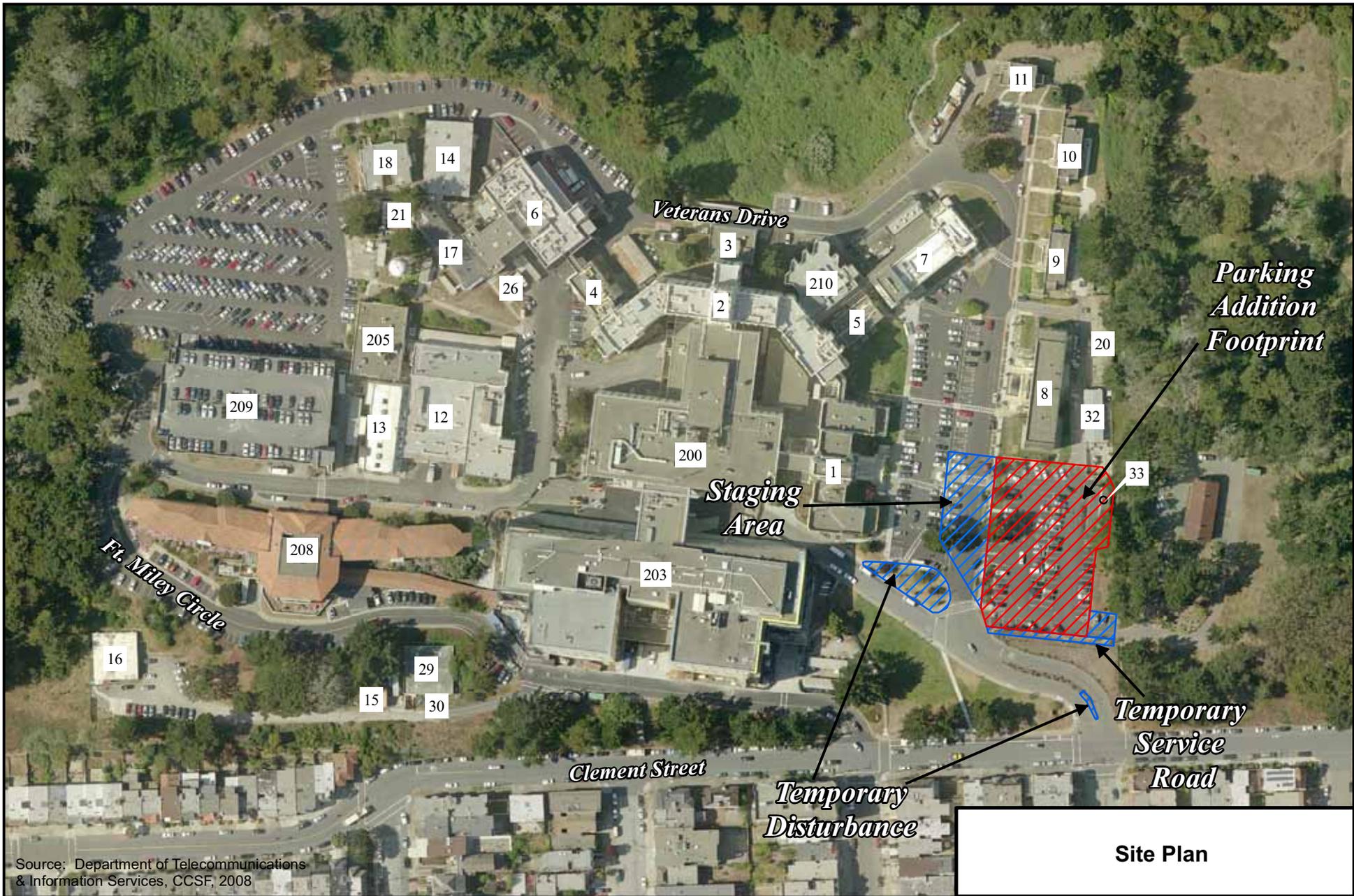
0 600



Feet

1 inch = 600 feet

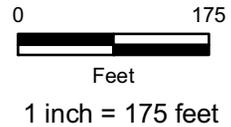
Figure 2



Source: Department of Telecommunications & Information Services, CCSF, 2008

Legend

-  Parking Addition
-  Staging Areas/
Temporary Disturbance
-  Building Number



Site Plan

San Francisco Veterans Affairs
Mental Health Parking Addition

Figure 3



Figure 4 - Visual Simulation Looking North from Clement Street and 42nd Avenue



Figure 5 - Visual Simulation Looking East from SFVAMC Building 1



Figure 6 - Visual Simulation Looking West from National Park Service property known as “East Fort Miley”

Level 1 of the parking structure would utilize floor and/or trench drains to manage storm or wash water from pavement washdown. Drains would be connected to a 750-gallon capacity below-ground sand/oil interceptor and then connected to the existing combined storm/sewer main.

Level 2 of the parking structure would be sloped to allow storm water to drain to trench drains that would be installed at four to six locations. The rainwater would be conveyed to surrounding landscaping along the perimeter of the parking structure.

The proposed parking structure would be internally ramped and would include an elevator, lighting, emergency call system, security cameras, and hose bibs. The parking addition would utilize natural ventilation. Sprinkler and fire alarm systems are not required because the parking structure is designed to be considered “open” by the California Building Code and the National Fire Protection Association.

The Proposed Action includes removal or relocation of Mental Health Annex Building 33, which is a modular building located on the northeast portion of the existing parking lot.

Construction

The permanent footprint of the proposed parking addition would be within the limits of existing Parking Lot A. During construction, the area of disturbance would extend outside the limits of the existing parking lot for construction access, staging, and to provide temporary access to the National Park Service “East Fort Miley” property. To begin construction, the existing asphalt parking lot surface and curbs would be removed to sub-base. Building 33 would be disconnected from utilities and removed or relocated. The existing utility lines to Building 33 would be removed and capped off at the project boundary. Other utility lines on and

adjacent to the construction area would be protected or removed.

During construction, a portion, or all, of the playground area of Building 32 would be closed. The fence that separates the existing parking lot from the playground area would be temporarily relocated five feet to the north. Surrounding sidewalks and landscaping would be protected to the extent possible. Seven existing trees located along the western edge of Parking Lot A would be removed (one Monterey Cypress and six ornamentals). Trees located along the eastern edge of Parking Lot A between the site and the National Park Service property would not be removed.

During construction, a temporary unpaved 8-foot wide service road would be constructed on the south side of the parking structure to avoid disrupting access to the National Park Service property to the east. Once the parking structure is completed, authorized access to National Park Service property would return through the parking structure, similar to the existing access through the surface parking lot, with a height restriction of 8 feet, 2 inches.

The maximum depth of excavation would be 20 feet at the northeast corner of the site. It is estimated that construction would require excavation and disposal of 8,440 cubic yards of soil, which would be disposed of at an approved off-site location. Soil-cement walls would be used for shoring of the excavation activities. In this method of shoring, an auger is drilled into the earth adjacent to the excavation location and a cement slurry is injected. Once cured, the sandy soil would be stabilized, and excavation would occur up to the wall.

During construction, a temporary staging area would be established along the portion of Veterans Drive and Parking Lot B adjacent to the proposed parking structure (see Figure 3). Curbs in Parking Lot B would be temporarily demolished to facilitate traffic flow through the remaining patient parking in front of Building 8. The staging area would be used for delivery and storage of building materials, including delivery of large pre-cast concrete members. Material delivery trucks would enter from 42nd Avenue and park next to the flag pole in Parking Lot B for unloading. A crane would be used to unload and place the pre-cast concrete members. After unloading the pre-cast members, the delivery trucks would either drive around the back side of the SFVAMC and out onto 43rd Avenue, or would back down Fort Miley Circle under flagged traffic control and drive out onto 42nd Avenue. In order for the pre-cast member delivery trucks to back down from Fort Miley Circle, a portion of the grass area and signs next to the existing bus stop on Fort Miley Circle may need to be demolished. In addition, it may be necessary to remove the light poles near the entrance of the SFVAMC at 42nd Avenue to accommodate pre-cast member delivery trucks. Partial staging may also occur on the four parking spaces south of a berm located on the east side of the proposed parking structure.

During the estimated 6-month construction period, Parking Lot A would not be available to patients and visitors, resulting in a temporary loss of 86 parking spaces. In addition, the staging area in parking lot B would result in a temporary loss of approximately 8 handicapped parking spaces for a total of 94 parking spaces. The VA is investigating temporary on-site and off-site parking options to compensate for parking spaces displaced during construction. This may include shuttle service between temporary off-site parking and the SFVAMC campus.

Construction is scheduled to begin in August 2010 and is estimated to take approximately 6 months. Construction work would be limited to the hours of 8:00 a.m. to 5:00 p.m., five (5) days a week, with

occasional deliveries on Saturday within the same work hours.

Planting and Irrigation

Following construction, trees, shrubs, and ground covers would be planted around the new parking structure. The irrigation system consists of bubblers, drip line, and sprinklers. A full list of the proposed plants is presented in Table 1.

TABLE 1
Proposed Planting Plan

Common Name (<i>Scientific Name</i>)	Estimated Quantities	
	Container	Quantity
Trees		
New Zealand Christmas Tree (<i>Metrosideros excelsus</i>)	15 gal	22
Shrubs		
Purple Leafed Hopseed Bush (<i>Dodonaea viscosa</i> “ <i>purpurea</i> ”)	5 gal	15
Statice (<i>Limonium perezii</i>)	1 gal	112
Deer Grass (<i>Muhlenbergia rigens</i>)	5 gal	75
Ground Covers		
Blue Fescue (<i>Festuca glauca</i> “ <i>Elijah Blue</i> ”)	1 gal	704
Irene Trailing Rosemary (<i>Rosmarinus officinalis</i>)	1 gal	162
Shade Tolerant Blend Sod	Sod	248 sq ft

Project Measures to Minimize Effects on Historic District Resources

The following items have been incorporated into the design of the Proposed Action to mitigate the potential effects on the SFVAMC Historic District, based on recommendations made in *Request for Section 106 Consultation on the SFVAMC Project: Mental Health Patient Parking Addition* (see Appendix B).

Building 8

- Construction would not be closer than 25 feet from Building 8.
- The parking structure would be constructed as low as possible to preserve the visual prominence of Building 8 as viewed from Veterans Drive.
- The parking structure would be constructed from reinforced concrete colored to be sympathetic to the existing color palette of the surrounding buildings. Aluminum lighting fixtures would be used to correspond with the theme of aluminum trims in the historic district.

Veterans Drive

- The parking structure would not modify the historic alignment and location of Veterans Drive.
- The Proposed Action would rebuild the corner of Veterans Drive that currently is an unused Parking Lot A entry apron.
- Ample landscaping would be provided to reduce the visual impact to the Veterans Drive streetscape, allowing the 1934-era buildings to retain a superior visual position.

Earthen Berm

- The Proposed Action would preserve the earthen berm in its current configuration.
- Drainage improvements would decrease the risk of erosion of the berm.

East Fort Miley

- The Proposed Action would retain a vehicle entrance into East Fort Miley.
- The Proposed Action would have the lowest possible profile and would utilize the existing earthen berm to shield it from visible prominence from East Fort Miley.

Operation

The new parking structure would be for SFVAMC patient and visitor parking only. Based upon current campus operations, the parking structure would be used mainly during daytime hours, Monday through Friday, with very little nighttime use. Access to both levels of the parking addition would be from Veterans Drive, while the service drive to the north would be used only as needed or as authorized.

No Action Alternative

The No Action Alternative is to keep the existing Parking Lot A and to not construct or operate a Mental Health Patient Parking Addition at the SFVAMC. This alternative does not satisfy the purpose and need for the action, which is to provide necessary parking for patients and visitors to the Mental Health Building 8 to allow the VA to provide acceptable service. Nevertheless, the No Action Alternative is evaluated in this EA as required by NEPA.

Alternatives Considered but Dismissed from Further Evaluation

Alternatives considered but dismissed from further consideration include construction of a one-story parking addition to either Parking Lot B or Parking Lot J, valet parking, and off-site parking with shuttle service.

Parking Lot B is an existing patient and visitor surface parking lot located to the west of Parking Lot A and adjacent to Building 1. Although construction of a Mental Health Patient Parking Addition in Parking Lot B would provide parking in a location adjacent to Mental Health Building 8, the existing dimensions and location of the surface parking lot limit feasibility. Parking Lot B is relatively narrow, measuring approximately 65 feet wide, which limits the amount of parking that could effectively be added. Construction of a Mental Health Patient Parking Addition in Parking Lot B would be immediately adjacent to Building 1 and the flagpole east of the main entrance to Building 1. As described in the Cultural

Resources Section of this EA, Building 1 possesses one of the most significant and least altered building exteriors and is the most architecturally important surviving structure on the SFVAMC. The existing flag pole with stepped concrete base was constructed in 1934 and is also a contributing historic resource. A multi-story parking structure in front of Building 1 would not be cost effective when compared to the Proposed Action and would have greater impacts upon the integrity of historic buildings and the historic district. This potential alternative does not meet the Proposed Action's purpose and need, and therefore it is not evaluated in this EA.

Parking Lot J is an existing employee surface parking lot located on the northwest side of the SFVAMC, approximately 1,100 feet from Mental Health Building 8. Construction of a Mental Health Patient Parking Addition in Parking Lot J could provide additional parking for Mental Health Building 8 patients and visitor; however, its location would require patients and visitors to walk to the opposite side of the campus across on-site roadways and through existing buildings. This would not meet the purpose and need of providing patient and visitor parking for mental health services in a convenient location where those services are provided. Therefore, this alternative has been dismissed from further consideration in this EA.

Valet parking was also considered. However, the estimated costs for yearly valet operation were financially prohibitive, and therefore this alternative was dismissed from further consideration in this EA. Off-site parking with shuttle service was also investigated, but dismissed due to the lack of available parking areas of sufficient size.

Environmental Impacts of the Proposed Action

The checklist on the pages that follow provides an analysis of environmental impacts that could potentially result from construction and operation of a parking addition in the southeast corner of the SFVMC. The analysis considers direct, indirect, and cumulative impacts. Environmental impacts of the No Action Alternative are evaluated on page 45.

S = Severe, M = Moderate, MI = Minimal, N = None

AESTHETICS

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|----------------------------------------------------------------|--------------------------------------------------------------|
| <input checked="" type="checkbox"/> VEGETATION REMOVAL | <input type="checkbox"/> BUILDING RESTORATION |
| <input checked="" type="checkbox"/> LANDSCAPE ALTERATION | <input type="checkbox"/> UTILITY OR SERVICE AREA DEVELOPMENT |
| <input checked="" type="checkbox"/> OPEN SPACE ALTERED | <input type="checkbox"/> GROUND IMPROVEMENT AMENITIES |
| <input checked="" type="checkbox"/> NEW STRUCTURE CONSTRUCTION | <input checked="" type="checkbox"/> LONG TERM |
| <input checked="" type="checkbox"/> ADVERSE | <input checked="" type="checkbox"/> SHORT TERM |
| <input type="checkbox"/> BENEFICIAL | <input type="checkbox"/> CUMULATIVE |

COMMENTS

Figures 4, 5, and 6 in the Project Description show visual simulations of the parking addition as viewed from the north, east, and west. The SFVAMC is not located adjacent to any designated state scenic highways nor is it near any roads that are part of the San Francisco 49-Mile Scenic Drive.

Construction activities would have a temporary adverse effect on visual quality, including ground disturbance and landscape alteration. Mitigative actions described below include placement of construction fencing to block views of the work zone, as well as restoration of all areas disturbed during construction, including areas used for staging. The Proposed Action would not include nighttime construction, and nighttime related lighting would not be more than the existing light poles.

Once constructed, the parking addition would have a minimal affect on the aesthetics at the SFVAMC. It would not be out of character with the SFVAMC site as a whole, which is intensively developed with multi-story buildings, modular buildings, parking lots, and paved streets. The parking addition would be located within the footprint of existing Parking Lot A, and the bottom level would be partially located below ground. The exterior surfaces would be colored to blend with the surrounding buildings, and landscaping is proposed to soften views and screen the structure. Headlights from cars shining into second story windows across Clement Street would not be an issue given that the parking structure would contain a solid wall around the second level of parking, and that the parking addition would generally be used only Monday through Friday from 7 a.m. to 6 p.m. Although the parking addition would include installation of new exterior lighting,

mitigative actions described below would require exterior lighting to be oriented such that light sources would not be directly visible from neighboring residential areas.

Mitigative Actions – Aesthetics: All areas disturbed during construction, including temporary staging and disturbance areas, shall be restored or re-vegetated to their pre-existing condition or better. The construction contractor shall place temporary fencing with green fabric screen around all staging areas to limit the prominence of views of construction equipment and associated construction materials/activities. Permanent exterior lighting shall incorporate cutoff shields and non-glare fixture design and shall be directed on-site and downward. New lighting shall be oriented to ensure that no light source is directly visible from neighboring residential areas. Highly reflective building materials and/or finishes shall not be used.

AIR QUALITY

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|------------------------------------------------------------------------------|-----------------------------------------------------------|
| <input checked="" type="checkbox"/> CARBON MONOXIDE | <input type="checkbox"/> PRESENCE OF ODORS |
| <input type="checkbox"/> PHOTOCHEMICAL OXIDANTS | <input checked="" type="checkbox"/> PARTICULATE EMISSIONS |
| <input checked="" type="checkbox"/> NITROGEN OXIDES | <input checked="" type="checkbox"/> HYDROCARBONS |
| <input type="checkbox"/> OCCURS IN AN AIR QUALITY
MAINTENANCE AREA (AQMA) | <input checked="" type="checkbox"/> SULFUR OXIDES |
| <input checked="" type="checkbox"/> ADVERSE | <input checked="" type="checkbox"/> TEMPORARY |
| <input checked="" type="checkbox"/> BENEFICIAL | <input checked="" type="checkbox"/> LONG TERM |
| | <input checked="" type="checkbox"/> SHORT TERM |
| | <input type="checkbox"/> CUMULATIVE |

COMMENTS

The California Air Resources Control Board (CARB) makes State area designations for ten criteria pollutants: ozone, suspended particulate matter (PM10), fine suspended particulate matter (PM2.5), carbon monoxide, nitrogen dioxide, sulfur dioxide, sulfates, lead, hydrogen sulfide, and visibility reducing particles. In contrast to the State area designations, the U.S. Environmental Protection Agency (U.S. EPA) makes area designations for five criteria pollutants: ozone (8-hour standard), PM10, carbon monoxide, nitrogen dioxide, and sulfur dioxide. The most up-to-date area designation maps show that the San Francisco Bay Area is currently designated as a nonattainment area for the state 1-hour and national 8-hour ozone standards (CARB 2006). The San Francisco Bay Area is also designated as a nonattainment area with respect to the state PM10 and PM2.5 standards (CARB 2006). For all other state and national ambient air quality standards, the San Francisco Bay Area is designated as an attainment and/or unclassified area.

The Bay Area Air Quality Management District (BAAQMD), in conjunction with the Association of Bay Area Governments and the Metropolitan Transportation Commission, has prepared the 2005 Bay Area Ozone Attainment Strategy (OAS), which supersedes the 2000 Clean Air Plan (CAP). BAAQMD is currently preparing the Bay Area 2009 Clean Air Plan (Plan), an update to the 2005 OAS. The 2009 Plan is scheduled for adoption by the BAAQMD Board of Directors in fall of 2010.

Toxic Air Contaminants (TACs) refer to a category of air pollutants that poses a present or potential hazard to human health, but which tend to have more localized impacts than criteria pollutants. There are no ambient standards for TACs, instead stationary sources are regulated directly through emission standards and risk reduction strategies implemented at the sources of the emissions.

The temperature on earth is regulated by the “greenhouse effect,” where naturally occurring gases, such as carbon dioxide, absorb infrared radiation emitted by the Earth’s surface and radiate it back to the surface, thus trapping heat within the atmosphere. Recent increases in greenhouse gases have led to an increase in global temperatures referred to as climate change. In the Fall of 2006, the California Governor signed

Assembly Bill 32 (AB 32), the “Global Warming Solutions Act of 2006,” committing the State of California to reducing greenhouse gas emissions to 1990 levels by 2020.

On October 5, 2009, President Obama signed Executive Order 13514 Federal Leadership in Environmental, Energy, and Economic Performance. Executive Order 13514 requires Federal agencies to set a 2020 greenhouse gas emissions reduction target, meet a number of energy, water, and waste reduction targets, and to develop and carry out an integrated Strategic Sustainability Performance Plan that outlines how the agency will meet the targets. The VA is currently working on the completion of this plan and will comply with the Executive Order.

Under Executive Order 13423, the VA is required to have 15 percent of its building space incorporate sustainable practice by 2015. The VA has currently reached 14.4%. In addition, the VA has a Green Building Action Plan which it uses as a tool to implement Executive Order 13423. The main components of the Green Building Action Plan apply to structures/projects intended for occupation. Where applicable, the Proposed Action will incorporate elements of the Green Building Action Plan, such as the use of water efficient landscape and irrigation strategies.

On February 18, 2010 the Council on Environmental Quality issued draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions for public comment. The draft guidelines provided that Federal agencies should quantify and describe expected direct greenhouse gas emissions where the emissions may be “meaningful.” The draft guidance suggests that for projects reasonably anticipated to cause direct emissions (on-site stationary source) of 25,000 tons or more per year that a quantitative and qualitative assessment may be meaningful to decision makers and the public. This Proposed Action would not create direct emissions of more than 25,000 tons per year, and therefore no quantitative calculation of greenhouse gas emissions is required.

Short Term Impacts. Potential sources of project air pollutants include exhaust from construction equipment and haul trucks, as well as generation of dust from soil disturbance activities. Such emissions can cause increases in localized concentrations of ozone precursors, carbon monoxide, greenhouse gases, and fine particulate matter.

Potential impacts would be minimized by implementing the requirements for protection of air resources outlined in the VA Specification Section 015719, Temporary Environmental Controls. These include compliance with State and Federal air quality regulations and standards, as well as control of particulates, monoxide emissions, and odors during construction.

According to the BAAQMD CEQA Guidelines, ozone precursor and carbon monoxide emissions from construction activity is included in the emission inventory that is the basis for regional air quality plans, and are not expected to impede attainment or maintenance of ozone and carbon monoxide standards in the Bay Area (BAAQMD 1999). Greenhouse gas emissions during construction would be negligible.

Thus, the effects of construction activities would be increased dustfall and locally elevated levels of PM10 downwind of construction activity. The BAAQMD recognizes that these are temporary emissions that vary considerably from day-to-day and does not require quantification of construction emissions. Rather, the

BAAQMD requires implementation of effective and feasible mitigation measures to control PM10 emissions. The BAAQMD finds that although construction emissions vary by the type of equipment, soil types, and weather, the application of basic construction measures presented in mitigative actions below can reasonably reduce PM10 emissions during construction.

Long Term Impacts. The Proposed Action would not induce population growth or development either directly or indirectly and would therefore not generate emissions beyond those accounted for in the air quality plan. The present deficiency in parking spaces at the SFVAMC results in vehicles circling the facility and surrounding neighborhoods in search of parking, thus generating additional vehicle emissions. The additional parking spaces provided by the proposed parking structure would reduce this practice, and therefore would have a slight beneficial effect on local air quality. Use of the parking structure would not conflict with any of the policies for reduction of greenhouse gases adopted or contemplated by the City of San Francisco or the State. The Proposed Action would not result in a stationary source that would cause direct emissions of carbon dioxide greenhouse gas emissions. Air quality impacts are considered minimal.

Mitigative Actions – Air Quality: Construction contractors shall take measures to minimize fugitive dust and dirt emissions resulting from construction. At a minimum, construction contractors shall undertake the following BAAQMD standard mitigation requirements measures, as applicable, to minimize any adverse effects:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

COMMUNITY SERVICES

IMPACTS

ATTRIBUTES

S M MI N

ALTERATION OF PUBLIC FACILITIES
 ADVERSE
 BENEFICIAL

ALTERATION OF PUBLIC SERVICES
 ALTERATION OF PUBLIC UTILITIES
 LONG TERM
 SHORT TERM
 CUMULATIVE

COMMENTS

There would be no change in the type of operations undertaken at the SFVAMC, and no expansion of the public services provided. Therefore, there would be no impact on police protection, fire protection, parks or other community services.

Construction activities would require disposal of solid waste generated from tree removal, demolition of asphalt concrete from the parking lot, excess unsatisfactory soil from excavation activities, and trash and scrap materials. The anticipated volume of solid waste could be accommodated by landfills located in the region, including Keller Canyon (Pittsburg) and Redwood Sanitary (Novato). The Keller Canyon facility has 84 percent remaining capacity and an estimated closure date of December 31, 2030. The Redwood facility has 67 percent remaining capacity and an estimated closure date of January 1, 2039 (Santa Rosa General Plan EIR 2009). Both facilities are permitted to take construction/demolition waste. Impact to solid waste facilities would be minimal.

Please refer to the Utilities Section of this EA for an evaluation of utilities.

CULTURAL RESOURCES

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> NATIONAL REGISTER PROPERTY | <input type="checkbox"/> CRITERIA OF ADVERSE EFFECT |
| <input type="checkbox"/> ELIGIBLE PROPERTY | <input checked="" type="checkbox"/> CRITERIA OF EFFECT |
| <input checked="" type="checkbox"/> ARCHITECTURALLY SIGNIFICANT PROPERTY | <input checked="" type="checkbox"/> ACTION REQUIRES HISTORIC PRESERVATION OFFICER COORDINATION |
| <input checked="" type="checkbox"/> ADVERSE | <input checked="" type="checkbox"/> LONG TERM |
| <input type="checkbox"/> BENEFICIAL | <input checked="" type="checkbox"/> SHORT TERM |
| | <input type="checkbox"/> CUMULATIVE |

Historic Properties

The 29-acre SFVAMC campus was formerly part of U.S. Army Fort Miley (Fort Miley). Fort Miley is one of several historic coastal artillery batteries built by the U.S. Army during the 1890s to guard San Francisco Bay against possible naval attack. In 1932, 29 acres of Fort Miley were acquired by the Veterans Administration for the construction of a new medical center. Today, Fort Miley is a National Register-listed historic district that is part of the Golden Gate National Recreation Area (GGNRA) managed by the National Park Service (NPS). The Fort Miley Military Reservation Historic District surrounds the SFVAMC on three sides.

Construction of SFVAMC began in 1932 with the Army's demolition of the Fort Miley barracks, the officers' club, and support structures. By late 1934, when SFVAMC construction was completed, it consisted of 21 concrete buildings designed in the Art Deco style with Mayan inspired ornamentation. These buildings were clustered in the northern and eastern sections of the landscaped campus.

Beginning in the early 1960s, a three-phase facility modernization program was begun at the SFVAMC. As a result of this modernization program, much of the original landscaping and open space at the SFVAMC was replaced with structures and parking lots. Many of the new buildings were inappropriately sited and designed in relation to the historic structures, and some historic buildings were substantially altered.

However, enough of the original SFVAMC remained that in 1981, the SFVAMC was determined to be eligible for listing in the National Register of Historic Places by the Department of Veterans Affairs Historic Preservation Officer as "a significant component of the thematic group of Veterans Affairs set hospitals developed throughout the United States by the Federal Government in the second quarter of the 20th century to provide an innovative and comprehensive system of health care for American veterans." The SFVAMC was formally placed on the National Register in 1987.

Further studies undertaken in 2001/2002 (Page & Turnbull 2002) identified that only two specific areas of the campus retain enough historic integrity to qualify for listing in the National Register. These include the

north-central and eastern portions of the SFVAMC. The historic integrity of the remaining areas had been compromised by more recent developments to an extent that the campus as a whole is ineligible for listing. In 2008, the VA resubmitted a nomination for listing of a historic district within the SFVAMC that was officially accepted to the National Register on April 20, 2009. The proposed SFVAMC Historic District includes 13 contributing buildings and one contributing structure (Buildings 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 18, 20 and Structure 27); and seven non-contributing buildings and one non-contributing structure (Buildings 14, 25, 26, 31, 32, 33, 210 and Structure 202) (VA 2008). Contributing resources include all original 1934 buildings that display high levels of architectural significance and integrity or are reasonably intact and display visual characteristics of their period. Non-contributing resources include all buildings that were constructed after 1934 or certain older structures that have been altered so often that their lack of physical integrity has declined to such an extent that they are not considered to be contributors to the historic district.

The SFVAMC Historic District is significant under National Register Criteria A and C. It qualified under Criteria C due to its integrity as a very early example of a federal building designed with seismic-resistant buildings technologies and for the design of its Mayan Art Deco ornamentation. It also demonstrates integrity under Criteria A due to its significance as a site of one of the early standardized VA hospitals -- Architecture, Politics/Government, and Military Association. Its period of significance is 1934-1941.

This undertaking may have effects on historic properties pursuant to Section 106 of the National Historic Preservation Act (NHPA). The potentially affected resources include the SFVAMC Historic District and the Fort Miley Military Reservation Historic District. Effects to historic properties may be considered adverse if the Proposed Action causes "Physical destruction, damage, or alteration of all or part of the property;" or "Introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting" (36 CFR 800.5).

To satisfy Section 106 requirements, a historical architect was retained to evaluate the potential effect of the Proposed Action on the historic districts. The report, titled *Request for Section 106 Consultation on the San Francisco Veterans Affairs Medical Center Project: Mental Health Patient Parking Addition*, and dated March 15, 2010, is included in Appendix B. Potentially affected properties include Building 8, Veterans Drive, the earthen berm, as well as East Fort Miley, part of the Fort Miley Military Reservation historic district. The report concluded that the Proposed Action as designed would have no significant impact to the historic properties, because specific actions have been incorporated into the project design to avoid or mitigate impacts (see Project Description on page 9, Project Measures to Minimize Effects to Historic District Resources). The State Historic Preservation Office has concurred with the VA's assessment that the Proposed Action would have No Adverse Effect on a historic resource, as documented in a letter dated June 30, 2010 (Appendix C).

Archeological Resources

A review of the maps and records on file at the Northwest Information Center (NWIC) of the California Archaeological Site Inventory was completed. The review was done to determine if cultural resources studies have been previously undertaken within or near the SFVAMC and if any known archaeological resources have been recorded during the studies. The records search area consisted of all lands within a ¼ mile of the SFVAMC property.

No archaeological resources and no sites or features of Native American cultural importance have been identified on the SFVAMC. Four prehistoric midden sites have been identified and recorded within approximately ¼ mile of the project area. In addition, the project area is within Fort Miley, which was once the location of the City Cemetery Reservation. The City Cemetery Reservation covered a large area including present-day Fort Miley, the SFVAMC, and 150 acres of present-day Lincoln Park. The cemetery's burials were said to have been removed in 1908. However, construction activities at the Palace of the Legion of Honor, approximately ¼ mile to the northeast, revealed human remains in both 1921 and 1993. An 1861 historic map also shows a telegraph station in the location of the present-day SFVAMC.

To identify the presence of any traditional cultural properties (e.g., sacred sites, resource procurement areas) within or near the SFVAMC, a letter was sent to the Native American Heritage Commission (NAHC) requesting information on any known sacred lands and other cultural sites that may be present within the project area, and to request a list of Native Americans to contact regarding the project. In response, the NAHC reported their sacred land file has no information about the presence of Native American cultural resources in the project area, and provided a list of recommended contacts (NAHC 2010), who were subsequently notified regarding the Proposed Action. Tribe contacts were also notified by phone. A written e-mail response was received from the Ohlone Indian Tribe on June 15, 2010 asking if a records search or a pedestrian survey had been completed for the Proposed Action. The results of the archaeological records search were discussed with the Tribe contact, who concurred with the mitigative actions contained in the EA. No other responses have been received.

The Proposed Action is not expected to impact known archaeological resources or other cultural resources. However, given the possibility of the unanticipated discovery of subsurface cultural materials during construction, the follow mitigative actions shall be taken. These procedures conform to the requirements of pertinent cultural resource laws and regulations.

Mitigative Action – Archaeological Resources: The VA shall notify the project contractor involved in ground-disturbing activities within the project area of the potential to encounter subsurface archaeological or historical materials. Archaeological resources may take the form of obsidian and chert flaked-stone tools (projectile points, knives, scraping implements) or toolmaking debris; culturally darkened soil (“midden”) containing heat-altered rock, dietary bone and shellfish remains; and stone milling equipment (mortars, pestles, handstones, and milling stones). Historical materials might include stone or adobe footings or walls; building materials or other remains with square nails; and artifact-filled wells, privies, or other deposits of historic-period metal, glass, and/or ceramic artifacts.

The VA shall retain a qualified archaeologist to be present during ground disturbing activities that may affect archaeological or historical materials as described above. If archeological or historical resources are encountered during construction, the following mitigative actions shall be taken.

Ground-disturbing activities shall be halted and a professional archaeologist would be called in to evaluate the significance of the find. If the find is significant, the evaluating archaeologist would determine whether it would be affected by the Proposed Action. Non-significant finds would not be given further protection. If the Proposed Action would adversely affect a significant resource, a mitigation plan shall be developed and implemented based on the recommendations of the evaluating archaeologist and in consultation with the

California State Historic Preservation Officer. Mitigation may include, but is not limited to, data recovery excavation, consultation with descendent communities, and site recording.

If possible human remains are discovered, potentially damaging activities shall be halted. The VA shall immediately notify the County Coroner and a professional archaeologist to determine the nature of the remains. If the coroner determines that the remains are of Native American origin, the VA shall notify, in writing, the Secretary of the Department, or head of any other agency or instrumentality of the United States, having primary management authority with respect to Federal lands and the appropriate Indian tribe if known or readily ascertainable. The disposition of and control over any cultural items excavated or removed shall be determined as provided for in the Native American Graves Protection and Repatriation Act.

ECONOMIC ACTIVITY

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|---------------------------------------------------------------------|--------------------------------------------------------------------------|
| <input type="checkbox"/> REDUCTION IN WAGES TO AREA | <input checked="" type="checkbox"/> LOCAL PURCHASE OF GOODS AND SERVICES |
| <input type="checkbox"/> ADDITIONAL WAGES WILL BE AVAILABLE TO AREA | <input type="checkbox"/> INCREASE OR DECREASE DIRECT WORK FORCE |
| <input type="checkbox"/> ADVERSE | <input type="checkbox"/> LONG TERM |
| <input checked="" type="checkbox"/> BENEFICIAL | <input checked="" type="checkbox"/> SHORT TERM |
| | <input type="checkbox"/> CUMULATIVE |

COMMENTS

The Proposed Action would make a slight contribution to the local economy by the use of local construction labor and through the possible purchase of local construction materials and supplies. This is a short-term beneficial impact. Operation of the parking structure would not affect economic activity.

FLOODPLAINS, WETLANDS, WATERSHEDS, RIVERS, LAKES, COASTAL ZONE, ETC.

IMPACTS

ATTRIBUTES

S M MI N

- 100 – YEAR FLOODPLAIN
- 500 – YEAR FLOODPLAIN
- CRITICAL ACTION (E. O. 11988)
- ADVERSE
- BENEFICIAL

- COASTAL ZONE MANAGEMENT AREA
- CRITICAL ENVIRONMENTAL AREA OF WETLANDS
- LONG TERM
- SHORT TERM
- CUMULATIVE

COMMENTS

The Proposed Action is not situated within a designated floodplain, and no wetlands or waters of the U.S. occur on or near the site that would be disturbed. The Proposed Action is located outside the Coastal Zone Management Area (City of San Francisco 1974).

The Proposed Action would result in minimal alterations to runoff conditions around the site. The parking addition would be constructed within the footprint of the existing parking lot. Water from the top level of the new structure would be directed through rainfall leaders to landscaped areas. Storm water on the bottom level would be directed to a sand/oil separator prior to discharging to the combined storm/sewer system. Impacts would be minimal.

GEOLOGY AND SOILS

IMPACTS

ATTRIBUTES

S M MI N

ROCK EXCAVATION
 CUT / FILL OPERATIONS
 GRADING
 ADVERSE
 BENEFICIAL

SOIL EROSION
 SOIL COMPACTION
 SOIL HORIZON REMOVAL AND MIXING
 LONG TERM
 SHORT TERM
 CUMULATIVE

COMMENTS

Local geologic and geotechnical information was obtained from geotechnical reports prepared for the Proposed Action by Treadwell and Rollo (2009) and Ninyo and Moore (2004). The geotechnical reports provide site-specific subsurface information, evaluate potential seismic hazards, and provide conclusions and recommendations for the geotechnical aspects of the Proposed Action.

Soil Conditions. To evaluate subsurface conditions beneath the site, four exploratory borings were drilled in July 2009 (Treadwell and Rollo 2009). The exploratory borings indicate that the site is underlain by about one to two feet of fill consisting of sand with varying amounts of clay and gravel. Beneath the fill, Dune Sand is present to depths ranging from about 17 to 34 feet below the ground surface (bgs) corresponding to approximate elevations ranging from 292 to 320 feet above mean sea level. The Dune Sand was loose to medium dense, fine grained, and dry. Below the Dune Sand, medium dense to dense sand with varying amounts of clay, and stiff to hard clay with varying amounts of sand was generally present. These deposits are moist to wet and extend to depths ranging from about 24 to 40 feet, where bedrock was encountered. In a boring drilled near the north end of the parking lot, sand with silt was encountered between 17 and 24 feet bgs. This deposit was loose and wet.

Bedrock is of the Franciscan Complex and consists of sandstone, serpentinite, and shale, and it is typically intensely fractured to crushed, soft to moderately hard, and moderately to deeply weathered. The top of bedrock varies from approximate elevation 285 to 315 feet above mean sea level across the site.

Groundwater Conditions. The depth to groundwater in a monitoring well located at the southeast corner of the existing parking lot was measured at 32.2 and 34.2 feet bgs on March 22, 2004 and August 19, 2009, respectively (Treadwell and Rollo 2009). Based on the results of moisture tests performed on soil samples from the investigation and accounting for seasonal groundwater fluctuations, the high groundwater level anticipated would vary from about elevation 322 feet to 293 feet, at the north and south ends of the site, respectively. The corresponding depth-to-groundwater levels are about 16 feet bgs on the north end 32 feet on the south end.

Regional and Site Seismicity. The site is underlain by the northern extension of the City College fault trace; however, this fault is not considered an active fault. The major active faults in the area are the San Andreas, San Gregorio, Hayward, and Calaveras Faults. The San Andreas is the closest active fault to the site (5 miles west), and has the highest estimated mean characteristic Moment magnitude¹ of 7.90. The 2007 Working Group on California Earthquake Probabilities predicted a 63 percent chance of a magnitude 6.7 or greater earthquake occurring in the San Francisco Bay Area in 30 years.

Seismic and Geologic Hazards. The site is not located within an Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist on the site. Therefore, the hazard of fault rupture at the site from a known fault is low. In a seismically active area, the remote possibility exists for future faulting in areas where no faults previously existed; however, the hazard of surface faulting and consequent secondary ground failure is considered low.

During a major earthquake on a segment of one of the nearby faults, strong to very strong seismic ground shaking is expected to occur at the site. Strong seismic ground shaking during an earthquake can result in ground failure such as that associated with soil liquefaction, lateral spreading, and differential compaction. Each of these is evaluated in more detail below.

- The results of the 2009 Treadwell and Rollo geotechnical analysis indicate an isolated pocket of soil susceptible to liquefaction near the north end of the parking lot. The analysis estimates up to about 1½ inches of liquefaction-induced settlement may occur in this isolated area following a major earthquake. The results of the investigation indicate the soil layers encountered below the groundwater table at the other borings were sufficiently dense and/or clayey that the potential for liquefaction to occur in those other areas is low.
- The potential for lateral spreading to occur at the site is considered low, because the potentially liquefiable soil appears to be an isolated pocket.
- The Dune Sand deposit at the site is susceptible to differential compaction during an earthquake. Differential compaction is a phenomenon in which non-saturated, cohesionless soil is densified by earthquake vibrations, causing differential settlement. The analysis estimates between 1¾ and 2¾ inches of earthquake-induced densification may occur under current site conditions. Because the site would be excavated to about elevation 325 feet to accommodate the proposed below-grade parking level, the magnitude of differential compaction settlement would be less.

The geotechnical evaluation concludes that from a geotechnical standpoint, the parking structure can be developed as planned provided the geotechnical recommendations are incorporated in the plans and specifications and implemented during construction. The primary geotechnical issues for design of the new parking structure and other improvements are:

¹ Moment magnitude is an energy-based scale to quantify the amount of seismic energy released by an earthquake. The moment magnitude scale has superseded the more familiar Richter scale as it provides a more precise study of large earthquakes.

- Potential for seismically induced settlements;
- Selection of a foundation system that will provide satisfactory building support; and
- Support of adjacent structures, streets, utilities, and other improvements during excavation for the proposed partially below-grade parking level.

The parking structure has been designed for conformance with the 2007 California Building Code and the latest editions of applicable standards. The foundation design for the parking addition is based on the Treadwell and Rollo 2009 geotechnical study and includes shallow foundations with continuous strip footings between columns to minimize the differential settlement between them during an earthquake.

The following mitigative actions shall be implemented to reduce potential impacts from seismic and geologic hazards.

Mitigative Action - Geology and Soils: Design and construction shall address the recommendations made in the Treadwell and Rollo 2009 geotechnical report for the Proposed Action to ensure seismic stability and reliability. The geotechnical recommendations shall be incorporated in the final plans and specifications and implemented during construction. The VA shall retain a qualified geotechnical engineer during construction to observe site preparation, shoring installation, fill placement and compaction, and foundation installation. Recommendations in the geotechnical report include, but are not limited to, the following:

- Where topsoil and organics are encountered during site preparation, they shall be removed from the site or stockpiled for later use in landscaped areas, if approved. Site preparation shall include removal of underground utilities less than three feet from new footings, pile caps, slabs-on-grade, or soil subgrade. Utilities greater than six inches in diameter and deeper than three feet shall be backfilled with concrete. Any fill placed across the building pad shall be properly compacted to limit settlement, provide adequate lateral passive resistance for new foundations, and provide a firm surface to support construction equipment.
- A firm subgrade shall be exposed at the bottom of the proposed below grade parking level. The parking structure subgrade shall be scarified to a minimum depth of six inches, moisture conditioned to near optimum moisture content and compacted to at least 95 percent relative compaction. If the subgrade becomes disturbed during foundation excavation or installation, it shall be moisture conditioned to near optimum moisture content and be compacted to at least 95 percent relative compaction.
- If stripped pavement materials are used as backfill, they shall be crushed to less than three inches in greatest dimension and approved by SFVAMC. Where crushed concrete or pavement materials are used, particles between 1-1/2 and 3 inches in greatest dimension shall comprise no more than 20 percent of the fill by weight. Stripped pavement shall be sufficiently mixed with fine-grained soil to fill the voids between the particles. Crushed asphalt shall not be used below the groundwater table.
- All materials to be used as engineered fill shall be non-hazardous, free of organic material, contain no rocks or lumps larger than three inches in greatest dimension, have a low expansion potential, and be free of chemical contamination or other hazardous or deleterious materials. A geotechnical engineer

shall approve all sources of engineered fill at least three days before use at the site. The contractor shall provide analytical test results or other suitable environmental documentation indicating the imported fill is free of hazardous materials at least three days before use at the site. Fill shall be placed in lifts not exceeding eight inches in loose thickness, moisture conditioned to near optimum moisture content, and compacted to at least 95 percent relative compaction.

- All trenches shall conform to current CAL-OSHA requirements. Where necessary, trench excavations shall be shored and braced to prevent cave-ins in accordance with all safety regulations. As a minimum, bedding shall extend at least $D/4$ (with D equal to the outside pipe diameter) below the bottom of the pipe. However, the bedding shall be at least four inches thick. This minimum bedding thickness and either clean sand, rod mill or pea gravel bedding material is adequate for shallow trenches above the groundwater level. Pea gravel, rod mill, and open-graded gravel shall be mechanically tamped in 12-inch lifts. Jetting of trench backfill shall not be permitted. Special care shall be taken when backfilling utility trenches in pavement areas, as poor compaction may cause excessive settlements resulting in damage to the pavement section.
- Where sufficient space exists to allow temporary construction slopes, they shall be excavated no steeper than 1.5:1 (horizontal to vertical). Where space is not available for a sloped cut, a shoring system such as a soldier-pile-and-lagging system shall be used for retaining the excavation. Due to the height of the excavation at the northeast corner, tiebacks may be required. If traffic occurs within 10 feet of the shoring, a uniform surcharge load of 100 pounds per square foot (psf) shall be added to the design. Construction equipment or stockpiled materials shall not be allowed within five feet of the edge of the excavation unless the shoring is specifically designed for the appropriate surcharge. The increase in pressure shall be computed after the surcharge loads are known. The anticipated deflections of the shoring system shall be estimated to check if they are acceptable. The design and testing of shoring shall be in accordance with applicable regulatory requirements and shall achieve lateral stability against the pressures summarized in the Treadwell and Rollo 2009 geotechnical report. The geotechnical engineer shall review the shoring plans and shall observe the installation.
- If temporary tiebacks are used to restrain the shoring, the vertical load from the temporary tiebacks shall be accounted for in accordance with the design criteria presented in the Treadwell and Rollo 2009 geotechnical report. The bottom of the excavation shall not extend more than two feet below a row of unsecured tiebacks. The contractor shall be responsible for determining the actual length of tiebacks required to resist the lateral earth and water pressures imposed on the temporary retaining systems. Determination of the tieback length shall be based on the contractor's familiarity with his installation method. The computed bond length shall be confirmed by a performance- and proof-testing program under the observation of an engineer experienced in this type of work. Replacement tiebacks shall be installed for tiebacks that fail the load test.
- Tieback testing shall be performed in accordance with recommendations presented in the Treadwell and Rollo 2009 geotechnical report. The first two production tiebacks and two percent of the remaining tiebacks shall be performance-tested to at least 1.25 times the design load. The remaining tiebacks shall be confirmed by proof tests also to at least 1.25 times the design load. The geotechnical engineer shall evaluate the tieback test results and determine whether the tiebacks are acceptable.

- Compaction grouting shall be performed prior to completing the excavation of the site. Prior to proceeding with production work, the contractor shall perform a test section to show that the required degree of improvement can be achieved. The compaction grouting test shall be performed using the same equipment and procedure planned for the production operation. The results of the test program shall be reviewed by the geotechnical engineer and recommendations shall be made for the production operation, as appropriate. Following the compaction grouting, the geotechnical engineer shall evaluate the effectiveness by performing Standard Penetration Tests in test borings, Dynamic Penetrometer Tests, or by performing Cone Penetration Tests.
- The continuous strip footings shall be embedded at least 18 inches below the lowest adjacent subgrade and bear on firm native soil. If weak soil is encountered at the foundation subgrade, it shall be removed and replaced with engineered fill or lean concrete. Continuous footings shall be at least 24 inches wide. Because of the potential for seismically induced differential settlement, the mat or strip footings shall be designed to span an unsupported length of 15 feet within the interior. The foundation excavation shall be free of standing water, debris, and disturbed materials prior to placing concrete. A geotechnical engineer shall check the mat subgrade after cleaning, but prior to placement of reinforcing steel to confirm bearing and that loose or disturbed material has been removed.
- The soil subgrade beneath the proposed floor slab shall be scarified to a depth of six inches, and moisture conditioned and compacted in accordance with the Treadwell and Rollo 2009 geotechnical investigation. If the subgrade is disturbed during excavation for footings and utilities, it shall be recompacted. Loose, disturbed materials shall be excavated and removed during final subgrade preparation. Where the floor slab will be used for parking, it shall be underlain by 6 inches of class 2 aggregate base rock compacted to at least 95 percent relative compaction. If there are areas on the ground floor that will be sensitive to water vapor intrusion, a capillary moisture break and a water vapor retarder shall be installed beneath the floor. A capillary moisture break consists of at least four inches of clean, free-draining gravel or crushed rock. The vapor retarder shall meet the requirements for Class C vapor retarders stated in ASTM E1745-97. The vapor retarder shall be placed in accordance with the requirements of ASTM E1643-98. The vapor retarder shall be covered with two inches of sand to aid in curing the concrete and to protect the vapor retarder during slab construction. The particle size of the gravel/crushed rock and sand shall meet the gradation requirements presented in the Treadwell and Rollo 2009 geotechnical report.
- Concrete for the floor slab shall have a water/cement (w/c) ratio less than 0.50. In addition, the slab shall be properly cured. Before the floor covering is placed, the contractor shall check that the concrete surface and the moisture emission levels (if emission testing is required) meet the manufacturer's requirements.
- Permanent basement walls shall be designed to resist lateral pressures imposed by the adjacent soil and surcharge loads, such as vehicles, in accordance with recommendations in the Treadwell and Rollo 2009 geotechnical report. The lateral earth pressures recommended are applicable to walls that are backdrained to prevent the buildup of hydrostatic pressure. Backdraining the wall may be accomplished by placing a prefabricated drainage panel against the back of the wall. The drainage

panel shall extend down to a four-inch-diameter perforated PVC collector pipe placed at the base of the wall. The pipe shall be surrounded on all sides by at least four inches of Caltrans Class 2 permeable material or drain rock wrapped in filter fabric. The geotechnical engineer shall check the manufacturer's specifications regarding the proposed prefabricated drainage panel material to verify it is appropriate for its intended use. The pipe shall be connected to a suitable discharge point. To protect against water infiltration, below-grade walls shall be waterproofed and water stops placed across all construction joints.

- Seismic design shall be in accordance with the provisions in the 2007 California Building Code.
- The recommended pavement sections are presented in the Treadwell and Rollo 2009 geotechnical investigation and pavement components shall conform to the current Caltrans Standard Specifications. The upper six inches of the soil subgrade in pavement areas shall be moisture-conditioned to above optimum and compacted to at least 95 percent relative compaction and rolled to provide a smooth non-yielding surface. Aggregate base shall be compacted to at least 95 percent relative compaction.

HYDROLOGY AND WATER QUALITY

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|-----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> POTENTIAL FOR EROSION AND/OR SEDIMENTATION (NPDES) | <input checked="" type="checkbox"/> ALTERATION / QUALITY CHANGE OF SURFACE WATER DRAINAGE |
| <input checked="" type="checkbox"/> POTENTIAL FOR CONTAMINATION OF WATER REGIME (FROM HAZARDOUS / TOXIC WASTES) | <input checked="" type="checkbox"/> ALTERATION / QUALITY CHANGE OF GROUND WATER REGIME |
| <input checked="" type="checkbox"/> ADVERSE | <input checked="" type="checkbox"/> LONG TERM |
| <input type="checkbox"/> BENEFICIAL | <input checked="" type="checkbox"/> SHORT TERM |
| | <input type="checkbox"/> CUMULATIVE |

COMMENTS

Construction activities can be a source of excess sedimentation if controls are not used to protect disturbed areas of land prior to the onset of rain. Construction activities can also be a source of chemical contamination from use of alkaline construction materials (concrete, mortar, hydrated lime) and hazardous or toxic materials such as fuels and paints.

There are no watercourses located within the area. The SFVAMC is served by a combined sewer system that collects both sanitary sewage and storm water and transports this combined flow to the Oceanside Water Pollution Control Plant before being discharged to the Pacific Ocean. Construction storm water discharges from sites served by the combined sewer system are subject to the requirements of Article 4.1 of the San Francisco Public Works Code.

In accordance with Article 4.1 of the San Francisco Public Works Code, the SFVAMC is currently operating under an Industrial User Class I Wastewater Permit issued by the San Francisco Public Utilities Commission (Permit No. 07-0622). This permit includes a Storm Water Pollution Prevention Plan (SWPPP) that describes the SFVAMC's storm water management program and indicates procedures to eliminate or reduce pollution related to storm water runoff. Measures include protecting all storm drain and catch basin inlets, establishing perimeter controls, covering construction materials and mounds, maintaining wash out areas for wet construction materials, inspections, and regular maintenance.

Potential impacts would also be minimized by implementing the requirements for protection of land resources outlined in the VA Specification Section 015719, Temporary Environmental Controls. These include such requirements as setting work area limits, protecting landscape, reducing exposure of unprotected soils, protecting disturbed areas, installing erosion and sediment control devices, managing spoil areas, and good housekeeping procedures.

Construction of the parking structure would require excavation down to 20 feet at the northeast corner of the site, which would be near the expected high groundwater level for the area. If groundwater is encountered within the excavation, temporary dewatering would be necessary to keep the work area dry. Excavation

dewatering could temporarily affect local groundwater levels, but any effects related to lowering of the water table would be temporary and minimal. The excavation water would likely contain sediments and may require settling prior to conveying water to the combined sewer system.

If construction dewatering is necessary, discharge to the combined storm/sewer system would be performed in compliance with Article 4.1 of the San Francisco Public Works Code, as supplemented by Order No. 158170. This would include obtaining a permit no later than 45 days prior to discharge, and the permit would contain discharge standards and other appropriate requirements that shall be achieved before discharge into the storm/sewer system may commence. The Proposed Action's temporary effect on surface water quality during construction is considered minimal.

The Proposed Action would not adversely alter land use or impervious site characteristics. The parking structure would be constructed within the same footprint as the existing parking lot. Water from the top level of the new structure would be directed through rainfall leaders to landscaped areas. Storm water on the bottom level would be directed to a sand/oil separator prior to discharging to the combined storm/sewer system. The effects on surface water quality are considered minimal.

Mitigative Action – Hydrology and Water Quality: Construction and operation of the Proposed Action shall be in accordance with the procedures outlined in the SFVAMC SWPPP to eliminate or reduce pollution related to storm water runoff. Measures include protecting all storm drain and catch basin inlets, establishing perimeter controls, covering construction materials and mounds, maintaining wash out areas for wet construction materials, inspections, and regular maintenance. In addition, during construction, the requirements for erosion and sediment control outlined in the VA Specification Section 015719, Temporary Environmental Controls, shall be implemented. These include such requirements as setting work area limits, protecting landscape, reducing exposure of unprotected soils, protecting disturbed areas, installing erosion and sediment control devices, managing spoil areas, and good housekeeping procedures. If construction dewatering is necessary, discharge to the combined storm/sewer system shall be performed in compliance with Article 4.1 of the San Francisco Public Works Code, as supplemented by Order No. 158170. This would include obtainment of a permit no later than 45 days prior to discharge, and the permit would contain discharge standards and other appropriate requirements that shall be achieved before discharge into the storm/sewer system may commence.

LAND USE

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|---------------------------------------------------------------|------------------------------------------------------------|
| <input type="checkbox"/> ENCROACHMENT ON EXISTING LAND USE | <input type="checkbox"/> SEWAGE – WASTE TREATMENT FACILITY |
| <input type="checkbox"/> CHANGE IN LAND USE PATTERN | <input type="checkbox"/> UTILITIES |
| <input checked="" type="checkbox"/> SERVICE AND OPERATIONAL | <input checked="" type="checkbox"/> ROADS AND PARKING |
| <input checked="" type="checkbox"/> HOSPITAL-MEDICAL FACILITY | <input type="checkbox"/> RECREATIONAL |
| <input type="checkbox"/> LABORATORIES - CLINICS | <input type="checkbox"/> GROUND IMPROVEMENTS |
| <input type="checkbox"/> ADMINISTRATIVE FACILITY | <input type="checkbox"/> CEMETERY |
| <input checked="" type="checkbox"/> ADVERSE | <input checked="" type="checkbox"/> LONG TERM |
| <input checked="" type="checkbox"/> BENEFICIAL | <input checked="" type="checkbox"/> SHORT TERM |
| | <input type="checkbox"/> CUMULATIVE |

COMMENTS

Although the SFVAMC is not subject to the jurisdiction of San Francisco's Planning Code or zoning regulations, the San Francisco General Plan and zoning is provided here for reference. The San Francisco General Plan land use designation for the SFVAMC campus is Institutional Facility, and the zoning designation is P (Public) Use zoning district. The Proposed Action would provide on-site parking for campus visitors and patients and therefore would be consistent with these designations.

The current uses at the SFVAMC include a hospital, nursing home, medical clinics, research, administration buildings, child care facilities, and parking facilities. The proposed parking addition would be constructed within the footprint of existing Parking Lot A, which would represent a continuation of the existing land use in that area of the SFVAMC. Removal or relocation of Mental Health Annex Building 33, and temporary relocation of the playground fence for the Children's Day Care Center Building 32, would not result in a land use change within the SFVAMC. Outdoor activities currently in place at the Child Care Center would continue when construction is complete. The Proposed Action would not interfere with other uses within the SFVAMC.

The closest residences are approximately 180 feet (0.03 mile) south of the proposed parking addition. The parking addition would not encroach on Clement Avenue or the residential areas to the south. In the long term, the Proposed Action would provide a benefit by reducing SFVAMC parking in surrounding residential areas. The VA is investigating temporary on-site and off-site parking options to compensate for parking spaces displaced during construction. This may include shuttle service between temporary off-site parking and the SFVAMC campus. Please refer to the aesthetics, noise, and transportation sections for a discussion of related impacts.

Impacts on land use are considered minimal.

NOISE

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|----------------------------------------------------|------------------------------------------------|
| <input type="checkbox"/> UTILITY SOURCE GENERATION | <input type="checkbox"/> OPERATIONAL |
| <input type="checkbox"/> TRAFFIC | <input type="checkbox"/> VIBRATIONS |
| <input checked="" type="checkbox"/> CONSTRUCTION | <input type="checkbox"/> LONG TERM |
| <input checked="" type="checkbox"/> ADVERSE | <input checked="" type="checkbox"/> SHORT TERM |
| <input type="checkbox"/> BENEFICIAL | <input type="checkbox"/> CUMULATIVE |

COMMENTS

Increased noise levels would be generated by construction equipment and vehicles during the estimated 6-month construction period. These noise levels would be typical of construction projects and would be minimized by implementing the requirements for noise control outlined in the VA Specification Section 015719, Temporary Environmental Controls, which is summarized in the mitigative actions below.

Although the SFVAMC is not subject to the jurisdiction of San Francisco's Noise Ordinance, a summary is provided here for reference. The City of San Francisco has a Noise Ordinance which prohibits unnecessary, excessive and offensive noises (San Francisco City Code, Article 29). For example, a piece of construction equipment shall not generate a noise level greater than 80 dBA when measured at a distance of 100 feet. Typical construction equipment would include drill rig, backhoes, concrete mixer trucks, cranes, dump trucks, excavators, front end loaders, jackhammers, and pickup trucks. Operation of this construction equipment would generate noise levels ranging from 55dBA to 85 dBA at 50 feet. The nearest residences are located approximately 180 feet to the south, and noise levels exceeding 80 dBA are not expected to occur.

In addition, the City's General Plan Noise Element provides a Land Use Compatibility Chart for Community Noise (long-term noise environments, not for construction) that uses L_{dn} weighted values (24-hour averages which give more weight to noises at night). For example, outdoor sound levels at residences should be maintained at 60 L_{dn} dBA or less. Use of the parking structure is not expected to generate increased noise levels substantially above those currently generated by the use of existing Parking Lot A.

Because the site is located adjacent to sensitive receptors in Building 8, which provides administrative and out-patient counseling, and Building 32, the Child Care Facility, additional mitigative actions are described below that would reduce potential impacts. Construction-related noise impacts are considered moderate.

Mitigative Actions – Noise: During construction, the requirements for noise control outlined in the VA Specification Section 015719, Temporary Environmental Controls, shall be implemented. These include such requirements as providing sound-deadening devices on equipment, using shields or other physical barriers to restrict noise transmission, and providing sound proof housings or enclosures for noise-producing machinery.

The Contractor shall designate a noise disturbance coordinator to be responsible for responding to any complaints received by residents about noise from construction activities, evaluate the source of the noise, and implement measures to mitigate the source of the disturbance. The Contractor shall be required to perform noise-producing work in less sensitive hours of the day or week as directed by the Project Engineer, and shall coordinate with the Project Engineer 48 hours prior to performing noise-producing work within 50 feet of Building 32 Children's Day Care Center.

If deemed necessary, measures to reduce construction noises may include placing an acoustical blanket over a portion of Building 8 during the major noise-generating phases of construction (e.g., grading and excavation), and temporarily closing the Child Care Facility or relocating its functions to another on-site building.

POTENTIAL FOR GENERATING SUBSTANTIAL CONTROVERSY

IMPACTS

ATTRIBUTES

S M MI N

- INDIRECT OR DIRECT EFFECTS ON COMMUNITY ORGANIZATIONS
- CONSISTENT WITH PROFILE OF COMMUNITY
- ADVERSE
- BENEFICIAL

- INTERPRETATION OF HOW THE ACTION WILL AFFECT COMMUNITY RESPONSE IS IN QUESTION
- LONG TERM
- SHORT TERM
- CUMULATIVE

COMMENTS

The Proposed Action is not anticipated to generate substantial controversy. Neighborhood meetings were held by the VA on October 27, 2009 and January 12, 2010. Concerns raised included construction hours and the number of construction trips, new permanent lighting, and the potential for headlights to shine into second story windows across Clement Street. Please see the transportation and aesthetics sections for a complete summary of these potential impacts and applicable mitigations to reduce them.

The VA is investigating temporary on-site and off-site parking options to compensate for parking spaces displaced during construction, which may include shuttle service between the temporary off-site parking and the SFVAMC campus. In addition, mitigative actions summarized in the Transportation section of this EA require construction staging to occur completely within the SFVAMC, and to the extent feasible, scheduling of haul trucks for off-peak hours to minimize impacts on peak hour traffic. Mitigative actions summarized in the Aesthetics section of this EA require that permanent exterior lighting incorporate cutoff shields and non-glare fixture design, and be directed on-site and downward. Headlights from cars shining into second story windows across Clement Street would not be an issue, because the parking structure would contain a solid wall around the second level of parking and because use of the parking addition would generally be Monday through Friday 7 a.m. to 6 p.m.

REAL PROPERTY

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|-----------------------------------------------------------|-------------------------------------------------|
| <input type="checkbox"/> REDUCTION OF LAND ON TAX ROLLS | <input type="checkbox"/> EXCESS ACTION |
| <input type="checkbox"/> CHANGES OF LAND VALUES | <input type="checkbox"/> CHANGES IN OWNERSHIP |
| <input type="checkbox"/> ENCROACHMENT ON CRITICAL AREAS | <input type="checkbox"/> BOUNDARIES |
| <input type="checkbox"/> ACQUISITION (DONATION, PURCHASE) | <input type="checkbox"/> CHANGES OF EASEMENT OR |
| <input type="checkbox"/> ADVERSE | RIGHT OF WAY |
| <input type="checkbox"/> BENEFICIAL | <input type="checkbox"/> SHORT TERM |
| | <input type="checkbox"/> CUMULATIVE |

COMMENTS

All construction activities would be located on property owned by the VA, except for a possible temporary off-site parking area that would be established for temporary parking impacts. An agreement for temporary use of a possible off-site parking would not require an exchange or sale of real property. No real property issues are associated with the Proposed Action.

RESIDENT POPULATION

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|--------------------------------------------------------------------|-----------------------------------------------------------------|
| <input type="checkbox"/> ADDITION OF STAFF TO FACILITY | <input type="checkbox"/> CHANGE IN NEIGHBORHOOD CHARACTERISTICS |
| <input type="checkbox"/> ALTERATION OF DEMOGRAPHIC CHARACTERISTICS | <input type="checkbox"/> LONG TERM |
| <input type="checkbox"/> ADVERSE | <input type="checkbox"/> SHORT TERM |
| <input checked="" type="checkbox"/> BENEFICIAL | <input type="checkbox"/> CUMULATIVE |

COMMENTS

The purpose and need for the Proposed Action is to serve existing SFVAMC patients and visitors. It would not increase the resident population, alter demographic characteristics either on- or off-site, or change neighborhood characteristics. Ultimately, the Proposed Action would significantly improve parking conditions at the SFVAMC and result in less demand for off-site parking in the Outer Richmond neighborhood.

PUBLIC SAFETY AND SOLID / HAZARDOUS WASTE

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|-----------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> STEEL REMOVAL/DEMOLITION | <input checked="" type="checkbox"/> CONSTRUCTION SITE |
| <input type="checkbox"/> BULK OPERATIONAL WASTE | <input type="checkbox"/> STOCKPILING |
| <input checked="" type="checkbox"/> EARTH AND / OR ROCK DEBRIS | <input checked="" type="checkbox"/> CONCRETE DEBRIS |
| <input checked="" type="checkbox"/> ADVERSE | <input checked="" type="checkbox"/> HAZARDOUS WASTE |
| <input type="checkbox"/> BENEFICIAL | <input checked="" type="checkbox"/> LONG TERM |
| | <input checked="" type="checkbox"/> SHORT TERM |
| | <input type="checkbox"/> CUMULATIVE |
| <input checked="" type="checkbox"/> POTENTIAL EFFECT ON PUBLIC SAFETY | |
| <input checked="" type="checkbox"/> ADVERSE | |
| <input type="checkbox"/> BENEFICIAL | |
| <input type="checkbox"/> CUMULATIVE | |

COMMENTS

Construction would result in a short term increase in construction waste generation. The construction contractor is required to submit an Environmental Protection Plan pursuant to the Department of Veterans Affairs Environmental Protection Specifications Section 015719. This plan requires the contractor to specify controls to be taken to manage environmental pollution, which includes the handling and disposal of solid waste. Solid waste is required to be transported and disposed of in compliance with Federal, State, and local regulations.

To determine the presence or absence of documented soil or groundwater contamination at or near the site, a review of online data resources for "Cortese List" sites was conducted (GeoTracker 2010). According to information available on the State Water Resources Control Board GeoTracker website, in February 1993, nine underground storage tanks were closed-in-place at the SFVAMC campus and associated piping and affected soil were removed. GeoTracker mapping indicates that the tanks were located near Building 12, which is approximately 800 feet west of the proposed parking addition. The case was closed by the County of San Francisco Local Oversight Program on April 28, 1994. There is no indication that the soil or groundwater in the construction area would be impacted from this former underground storage tank site.

Given the proximity of the construction zone to the outdoor area of Building 32, the Children’s Day Care Center Building, mitigative measures are needed to reduce potential safety hazards during construction.

Mitigative Actions – Public Safety: The construction contractor shall erect exclusion fencing to prevent the public from accessing areas immediately adjacent to or within the construction zone. The VA shall close the playground area of the Child Care Center during construction activities.

TRANSPORTATION AND PARKING

IMPACTS

ATTRIBUTES

S M MI N

- ALTERATION OF PUBLIC TRANSPORTATION
- ALTERATION OF FACILITY ACCESS ROADS
- ADVERSE
- BENEFICIAL

- ALTERATION OF EXISTING ON-SITE ROADS OR PARKING
- CONSTRUCTION OF NEW ROADS OR PARKING
- CONSTRUCTION TRAFFIC
- LONG TERM
- SHORT TERM
- CUMULATIVE

COMMENTS

Short Term Impacts. During the estimated 6-month construction period, construction activities would result in a temporary loss of 94 parking spaces. The VA is investigating temporary on-site and off-site parking options to compensate for parking spaces displaced during construction, which may include shuttle service between the temporary off-site parking and the SFVAMC campus.

Construction traffic would result in short-term increases in traffic volumes on Clement Street and Veterans Drive. This traffic would consist mainly of trucks delivering building materials and equipment and off-hauling excavated soil. The maximum construction traffic volumes expected on any one day would be associated with simultaneous site excavation/grading activities and delivery of building materials. During this time, a maximum of 3 trucks per hour, or 24 trucks per day, is assumed. In addition, a maximum of 10 vehicles per day is estimated for the construction crew. These temporary increases in construction traffic would affect traffic flow and access to the SFVAMC.

Construction activities would also increase the potential for safety hazards due to the potential for conflicts between construction vehicles (with slower speeds and wider turning radii than autos) and vehicles, bicyclists, or pedestrians using the roadways adjacent to the work zone. In addition, during construction, a portion of the grass area and signs next to the existing San Francisco Municipal Railway's Route 38 bus stop on Fort Miley Circle may need to be demolished, which could temporarily alter public transportation.

During construction, access to the GGNRA East Fort Miley area would be rerouted from Parking Lot A to a temporary unpaved road to be built to the south of Parking Lot A. Vehicles accessing East Fort Miley may be subject to delays during construction.

The SFVAMC shall implement the mitigative actions described below in order to reduce the temporary impacts to traffic flow, safety hazards, and public transportation. With implementation of the mitigative actions, the impacts would be moderate.

Long Term Impacts. Following construction, the Proposed Action would have a substantial beneficial effect on parking availability at the SFVAMC, and would also result in less overflow parking in the surrounding neighborhood areas. Traffic volumes would not change as a result of the Proposed Action.

Vehicles entering the lower level of the parking addition would be restricted to a height less than 8'2". The East Fort Miley area is used by the NPS as a maintenance area, and tall vehicles, such as the truck that picks up a 20-cubic yard debris box currently use the VA's Parking Lot A for access 1-2 times a week (personal communication, Dan Coleman, NPS). As a result, some tall vehicles which currently use Parking Lot A for access would no longer be able to reach East Fort Miley. The NPS has never secured an easement from the VA for their access, and the area has no other ingress or egress. The NPS may need to relocate their debris box and front end loader to another part of the GGNRA. Impacts are considered minimal.

Mitigative Actions – Transportation and Parking: The VA shall require the contractor to submit and adhere to an approved traffic control plan developed in accordance with the Manual on Uniform Traffic Control Devices (MUTCD). The VA and construction contractor(s) shall coordinate the traffic control plans for any simultaneous projects occurring at the SFVAMC in order to mitigate the impact of traffic disruption. The coordinated plan shall include measures that address overlapping construction schedules and activities, truck arrivals and departures, and lane closures and detours. Circulation and detour plans shall be developed to minimize impacts on local street circulation. Flaggers and/or signage shall be used to guide vehicles through and/or around the construction zone.

All equipment and materials shall be stored in designated contractor on-site staging areas in such a manner to minimize obstruction of traffic. Locations shall be identified for parking by construction workers, either within the staging area or, if necessary, at a nearby location with transport provided between the parking location and the worksite.

The VA or the contractor shall consult with local traffic and transit agencies, and the San Francisco Fire Department, and shall provide notification in advance of the timing, location, and duration of construction activities and the locations of detours and lane closures. An alternative bus stop location on the SFVAMC shall be established as needed and in consultation with transit agencies. Detours shall be included for bicycles and pedestrians in all areas potentially affected by construction.

The VA and the construction contractor shall schedule delivery trucks and haul trucks during off-peak hours (9:00 a.m. to 4:00 p.m.) to minimize impacts on peak hour traffic.

UTILITIES

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|----------------------------------------------------------|-------------------------------------------------------------|
| <input checked="" type="checkbox"/> WATER SYSTEM, SUPPLY | <input type="checkbox"/> INCINERATOR |
| <input checked="" type="checkbox"/> STORM WATER DRAINAGE | <input type="checkbox"/> AIR CONDITIONING AND REFRIGERATION |
| <input type="checkbox"/> SEWAGE TREATMENT | <input type="checkbox"/> EXCAVATION |
| <input checked="" type="checkbox"/> ELECTRICAL | <input type="checkbox"/> MAINTENANCE AND REPAIR |
| <input type="checkbox"/> HEAT GENERATION | <input type="checkbox"/> CONSERVATION |
| <input checked="" type="checkbox"/> ADVERSE | <input checked="" type="checkbox"/> LONG TERM |
| <input type="checkbox"/> BENEFICIAL | <input checked="" type="checkbox"/> SHORT TERM |
| | <input type="checkbox"/> CUMULATIVE |

COMMENTS

The operational demands of the SFVAMC for water, sewer, gas, and electricity are currently being met. The Proposed Action would result in minor alterations to the water system. An existing 4-inch water line beneath the southern end of Parking Lot A would be removed and replaced with a new 4-inch water line to the south of the parking addition. The Proposed Action would not generate increases in storm water runoff that would exceed the capacity of the combined storm water and wastewater system, as impervious surfaces will not increase. The parking addition would replace existing Parking Lot A, which is lit from two centrally located double headed light poles. Installation of new lighting on both floors of the new parking structure could be adequately served by the existing electrical service.

Impacts on utilities are considered minimal.

VEGETATION AND WILDLIFE

IMPACTS

ATTRIBUTES

S M MI N

- | | |
|--------------------------------------------------------------------------------|------------------------------------------------------------|
| <input type="checkbox"/> PRESENCE OF ENDANGERED OR THREATENED WILDLIFE SPECIES | <input checked="" type="checkbox"/> TREE REMOVAL/TRIMMING |
| <input checked="" type="checkbox"/> ADVERSE | <input type="checkbox"/> GROUND COVER REMOVAL |
| <input type="checkbox"/> BENEFICIAL | <input checked="" type="checkbox"/> SPECIAL STATUS SPECIES |
| | <input checked="" type="checkbox"/> LONG TERM |
| | <input checked="" type="checkbox"/> SHORT TERM |
| | <input type="checkbox"/> CUMULATIVE |

COMMENTS

Impacts to plant and animal species would be considered severe if the Proposed Action would:

- Cause disruption to or removal of an endangered or threatened species, its habitat, migration corridors, or breeding areas; or
- Result in the loss of a substantial number of native plant or animal species that could affect abundance or diversity beyond normal variability.

Special-Status Plant Species. Information about potential presence of special-status species was obtained from the California Natural Diversity Database (CNDDDB 2008), existing literature, and websites maintained by State and federal agencies. Also a search was made of the project area for species listed on the U. S. Fish and Wildlife Services (USFWS) online database for federal threatened, endangered and potential candidate species (USFWS 2008). The California Native Plant Society online website (CNPS 2008) was also consulted for listed plants reported in the region.

Blue coast gilia (*Gilia capitata* ssp. *chamissonis*), a California Native Plant Society (CNPS) List 1B (meaning rare, threatened or endangered in California) was collected in 1907 at Land's End (CNDDDB occurrence 8), which is north of the SFVAMC. San Francisco gumplant (*Grindelia hirsutula* var. *maritima*), also a CNPS List 1B plant, was observed in 1987 (CNDDDB occurrence 12) approximately 0.5 miles southwest of the site on an oceanic bluff at Point Lobos in similar habitat. Both of these plants are found in coastal bluff scrub habitat.

Prior to urbanization of this area, the vegetation at the site was probably comprised of plant species found in coastal bluff scrub habitats. The CNDDDB list for the U. S. Geological Service (USGS) Point Bonita and San Francisco North 7.5 minute topographical quadrants for plants that were found at one time in coastal bluff scrub habitat include Franciscan thistle (*Cirsium andrewsii*), San Francisco collinsia (*Collinsia multicolor*), fragrant fritillary (*Fritillaria liliacea*), Kellogg's horkelia (*Horkelia cuneata* ssp. *sericea*), rose leptosiphon, (*Leptosiphon rosaceus*), marsh microseris (*Microseris paludosa*), and Choris' pop-corn flower

(*Plagiobothrys chorisianus* var. *chorisianus*) which are all CNPS List 1B plants. There is one San Francisco County record (occurrence 6) for Beach layia (*Layia carnosa*), a federal and state listed endangered species and CNPS List 1B plant, collected in 1904 with no location provided. According to the CNDDDB, San Francisco collinsia, blue coast gilia, Kellogg's horkelia, beach layia and marsh microseris are presumed extirpated from San Francisco County.

There is no record of these special status plant species having occurred at the SFVAMC. The potential presence of sensitive plant species at the site is considered minimal given the landscaped nature of the site and its proximity to urbanization.

Construction would require removal of one mature Monterey cypress tree located near the entrance of existing surface Parking Lot A. Monterey cypress is not naturally occurring in San Francisco County (Barbour et al. 2007). Along with eucalyptus, these trees were often planted as windbreaks along ocean bluffs. Six ornamental trees located along the western edge of Parking Lot A would also be removed. The ornamental trees are not sensitive species. Following construction, the disturbed landscaped areas would be re-planted with trees and shrubs as indicated in Table 1 in the Project Description. Impacts are considered minimal.

Special-Status Wildlife Species. The close proximity to urbanization greatly reduces the potential for the presence of special status wildlife species at the SFVAMC. Monarch butterfly (*Danaus plexippus*) is a native species that could use trees in the vicinity of the project site for winter roosting. CNDDDB records indicate that monarchs have been observed overwintering in Golden Gate Park, the Presidio, and Fort Mason. The monarch has no state or federal listing but could become a candidate species for listing under the ESA.

The trees on and in the vicinity of the site provide nesting habitat for resident and migratory birds. As mentioned above, construction would require removal of seven existing trees located along the western edge of Parking Lot A. In addition, the National Park Service property located to the east of the site includes several mature trees that could be used by nesting birds and that could be disturbed by construction noise. The mitigative actions summarized below would avoid impacts to any nesting birds during construction.

Due to the disturbed nature of the site and its relatively small size, no long-term impacts to vegetation or wildlife are anticipated. Use of the parking structure would not cause disruption to or removal of an endangered or threatened species, its habitat, mitigation corridors, or breeding areas. Use of the parking structure would not result in the loss of a substantial population of native plant or animal species that would affect abundance or diversity beyond normal variability. Impacts are considered minimal.

Mitigative Actions – Vegetation and Wildlife: To avoid nesting birds, tree removal shall be timed for the period between August 15 and January 31, when breeding activities will have been completed and next year's breeding activities will have not yet started. Preconstruction surveys will not be required for construction work carried out between August 15 and January 31.

If tree removal is scheduled to occur between February 1 and August 14, a qualified wildlife biologist shall conduct a pre-construction survey to determine if nesting birds are present in or in the vicinity of vegetation to be removed. The pre-construction survey shall be conducted within 15 days prior to removal. Trees within

a 200-foot radius shall be included in the surveys as construction related activity could cause nest abandonment. If active nests are found in the work area, the biologist shall determine an appropriately sized buffer around the nest in which no work will be allowed until the young have successfully fledged. The size of the nest buffer shall be determined by the biologist in consultation with the California Department of Fish and Game, and shall be based on the nesting species, its sensitivity to disturbance, and the expected types of disturbance.

ENVIRONMENTAL JUSTICE

IMPACTS

ATTRIBUTES

S M MI N

- DISPROPORTIONATELY HIGH AND ADVERSE HUMAN HEALTH OR ENVIRONMENTAL EFFECTS ON MINORITY AND LOW-INCOME POPULATIONS.
- LONG TERM
- SHORT TERM

COMMENTS

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, requires that federal agencies identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs and activities on minority and low-income populations.

The demographic characteristics of the City of San Francisco from the 2000 Census indicate a predominantly White (49.7%) and Asian (30.8%) population. Minority groups in the City of San Francisco include African American, Hispanic/Latino, American Indian/Alaska Native, and Native Hawaiian/Pacific Islanders. Low income populations for this study have been identified based on the median household incomes by ethnicity reported in the City's General Plan Housing Element (City of San Francisco 2004). The median household incomes for African American, American Indian/Alaska Native, and Native Hawaiian/Pacific Islander are in the low range (50-80% of San Francisco Median Household Income), whereas White and Asian median household incomes are not in the low range.

The 2000 Census data for the tracts surrounding the SFVAMC indicate that the Proposed Action would not result in disproportionate impacts to any minority or low-income portion of the community, because the surrounding tracts are predominantly White and Asian. For example, the SFVAMC is located within Census Tract 602 of San Francisco County. According to the 2000 census data for this tract, White and Asian races comprise 83.5 percent of the population. White and Asian races also comprise over 90 percent of the population in the 3 surrounding Census tracts (428, 478, and 479.02). The Proposed Action would not have a disproportionately high and adverse human health or environmental effect on minority and low-income populations.

No Action Alternative

The No Action alternative would be to not construct the Mental Health Patient Parking Addition. This alternative would have none of the environmental impacts described above for the Proposed Action, but would not satisfy the purpose and need for the action, which is to provide severely needed parking for patients receiving Mental Health services at the SFVAMC and for visitors. Without the Mental Health Patient Parking Addition, the existing lack of adequate parking for patients seeking Mental Health services would continue to be a major element of dissatisfaction, as would overflow parking into surrounding neighborhoods.

List of Preparers

Patricia Collins, Winzler & Kelly
Carol Kielusiak, Winzler & Kelly
Brian Bacciarini, Winzler & Kelly

References

Bay Area Air Quality Management District (BAAQMD). BAAQMD CEQA Guidelines, April 1996 (Revised December 1999).

California Department of Fish and Game (CDFG). 2008. California Natural Diversity Data Base, Commercial Version. Computer printout and GIS data for San Francisco County.

California EPA. Cortese List Data Resources, Website accessed on March 10, 2010.
<http://www.calepa.ca.gov/SiteCleanup/CorteseList/default.htm>

California Native Plant Society (CNPS). 2008. On-line Inventory of Rare and Endangered Plants.

California Air Resources Board (CARB). 2006. Area Designation Maps/State and National. Available at <http://www.arb.ca.gov/desig/adm/adm.htm>. Accessed March 2010.

City and County of San Francisco. 1974. San Francisco Planning Department, Map Sheet 4, Post LCP Certification Permit and Appeal Jurisdiction. March 1.

City and County of San Francisco. 1996. San Francisco General Plan Environmental Protection Element. Amended by Resolution No. 14149 and adopted on 6-27-96.

City and County of San Francisco. 2004. General Plan Housing Element. May 13.

City of Santa Rosa. 2009. Santa Rosa General Plan 2035 Draft EIR.

Native American Heritage Commission. 2010. Proposed VA Mental Health Patient Parking Addition. June 14.

Ninyo and Moore. 2004. Preliminary Geotechnical Evaluation, Veterans Administration Medical Center, Below Grade Parking Structure. April 7.

Page & Turnbull Incorporated. 2002. Historical and Architectural Assessment, Department of Veterans Affairs San Francisco Medical Center. April 5.

Personal Communication. Dan Coleman, National Park Service. March 23, 2010.

Sonoma State University Anthropological Studies Center. 2010. Archaeological Resources Records Search for the Veteran's Affairs Medical Center. June 22.

Stantec. 2010. Request for Section 106 Consultation of the San Francisco Veterans Affairs Medical Center Project: Mental Health Patient Parking Addition. February 22.

Treadwell and Rollo. 2009. Geotechnical Investigation, Mental Health Patient Parking Structure, Veterans Administration Medical Center. September 14.

U.S. Census Bureau. 2000. Table DP-1, Profile of General Demographic Characteristics: 2000, San Francisco, California.

U.S. Fish and Wildlife Service (USFWS). 2008. On-line Database for Federal Threatened, Endangered and Potential Candidate Species Lists.

U.S. National Archives and Records Administration, Executive Order 12088 – Federal Compliance with Pollution Control Standards.

Department of Veterans Affairs (VA). National Register of Historic Places Registration Form. 2008.

Department of Veterans Affairs (VA). FY 2009 CSI Construction Application, Mental Health Patient Parking Addition.

Department of Veterans Affairs (VA). Office of Construction and Facilities Management. Master Construction Specifications Section 015719, Temporary Environmental Controls.

Veterans Administration Medical Center. 2007. Industrial User Class I Wastewater Permit No. 07-0622, San Francisco Public Utilities Commission, Wastewater Enterprise/Collection System Division. June 18.

Veterans Administration Medical Center, Medical Center Memorandum No. 00QES-55, Storm Water Pollution Prevention Plan.

Federal Regulations Establishing Environmental Standards

- FI - REQUIRES FURTHER INVESTIGATION
- MR - MITIGATION REQUIRED, NON-COMPLIANCE ANTICIPATED
- CA - COMPLIANCE ANTICIPATED
- NA - NOT APPLICABLE

<u>NA</u>	EXECUTIVE ORDER 11988, FLOODPLAIN MANAGEMENT (Specify 100-YEAR, CRITICAL ACTION, or 500-YEAR)
<u>NA</u>	EXECUTIVE ORDER 11990, PROTECTION OF WETLANDS
<u>NA</u>	EXECUTIVE ORDER 11987, EXOTIC ORGANISMS
<u>CA</u>	EXECUTIVE ORDER 12088, FEDERAL COMPLIANCE
<u>CA</u>	EXECUTIVE ORDER 12898, FEDERAL ACTIONS TO ADDRESS ENVIRONMENTAL JUSTICE IN MINORITY POPULATIONS AND LOW-INCOME POPULATIONS
<u>CA</u>	EXECUTIVE ORDER 13514, FEDERAL LEADERSHIP IN ENVIRONMENTAL, ENERGY, AND ECONOMIC PERFORMANCE
<u>CA</u>	FEDERAL WATER POLLUTION CONTROL ACT, SEC. 313, AS AMENDED BY CLEAN WATER ACT OF 1977 (33 USC 1323)
<u>CA</u>	ENDANGERED SPECIES ACT AS AMENDED (PL 93-205)
<u>NA</u>	WILD AND SCENIC RIVERS ACT (16 USC 1274 ET SEQ.)
<u>CA</u>	NOISE CONTROL ACT OF 1972
<u>NA</u>	SAFE DRINKING WATER ACT, SEC., 1447, (PL 93-523)
<u>NA</u>	COASTAL BARRIER RESOURCES ACT (PL 97-348)
<u>CA</u>	COASTAL ZONE MANAGEMENT ACT (16 USC 1451 ET SEQ., AMENDED BY PL 101-508)
<u>NA</u>	EPA REGULATIONS ON DISCHARGE OF DREDGED OR FILL MATERIAL INTO NAVIGABLE WATERS (40 CFR 230)
<u>NA</u>	EPA REGULATIONS ON DETERMINATION OF REPORTABLE QUANTITIES FOR HAZARDOUS SUBSTANCES (40 CFR 117)
<u>CA</u>	EPA REGULATIONS ON THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (40 CFR 122)
<u>NA</u>	EPA REGULATIONS ON POLYCHLORINATED BIPHENYLS MANUFACTURING, PROCESSING DISTRIBUTION IN COMMERCE AND USE PROHIBITIONS (40 CFR 761)
<u>CA</u>	ADVISORY COUNCIL ON HISTORIC PRESERVATION REGULATIONS, PROTECTION OF HISTORIC AND CULTURAL PROPERTIES (36 CFR 800)

Appendix A
Response to Comments

The draft EA was circulated for a 30-day public comment period extending from April 20 to May 20, 2010. Four comment letters were received during the 30-day public review period, as well as a letter from the State Clearinghouse after the close of the review period. Comment letters were received from:

- Patrick T. Gardner, Deputy Chief, Operations, San Francisco Fire Department
- Raymond R. Holland, President, Planning Association for the Richmond (PAR)
- Frank Dean, Acting General Superintendent, National Park Service, Golden Gate National Recreation Area
- Julie Burns, Co-Chair, Friends of Lands End, and Amy Meyer, Chair, People for a Golden Gate National Recreation Area
- State Clearinghouse

The comment letters are provided below, with responses following each letter. In some instances, changes to the EA have been made in response to the comment letters. For clarity, those changes are shown in strike out and underline mode. The changes have already been incorporated into the final EA.

JOANNE HAYES-WHITE
CHIEF OF DEPARTMENT



GAVIN NEWSOM
MAYOR

PATRICK T. GARDNER
Deputy Chief of Operations

SAN FRANCISCO FIRE DEPARTMENT
CITY AND COUNTY OF SAN FRANCISCO

May 3, 2010

Mr. John Pechman
Project Engineer
SFVAMC
4150 Clement Street
San Francisco, CA 94121

Dear Mr. Pechman:

The San Francisco Fire Department has reviewed the proposed SFVAMC Mental Health Patient Parking addition and there are two main concerns. First, a fire lane needs to be maintained through the construction's "Staging Area" to allow our apparatus to respond to the Northern portion of the property.

Second, there is a fire hydrant located at the center of the Western portion of the new parking structure. How will construction effect this hydrant?

The San Francisco Fire Department would like to be updated on construction dates and made aware of any closures or rerouting of traffic.

If you have any questions on the above concerns, please feel free to contact me at 558-3402 or by fax at 558-3407.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Patrick T. Gardner".

Patrick T. Gardner
Deputy Chief, Operations

Enclosure

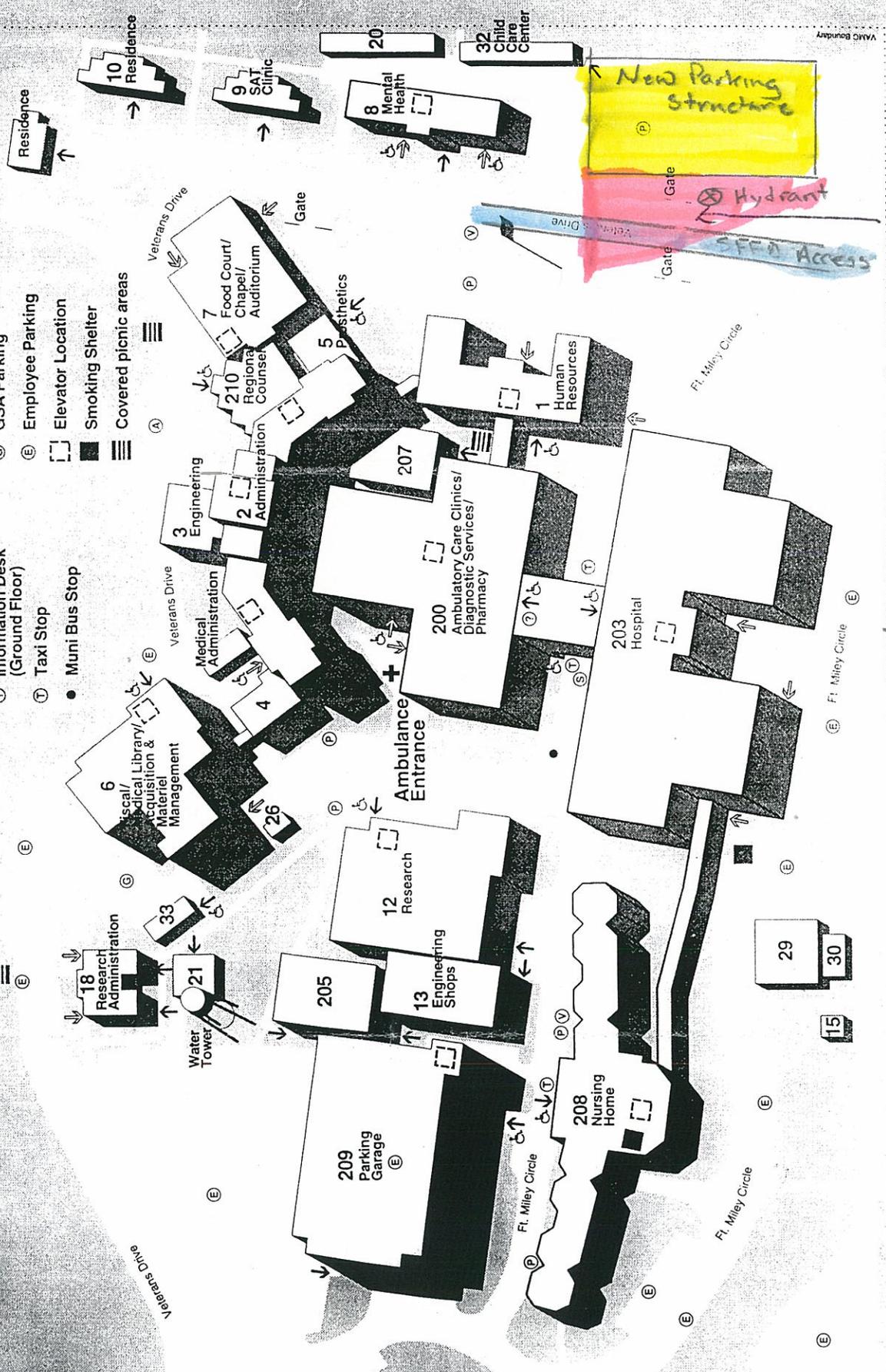
San Francisco VA Medical Center

4150 Clement Street • San Francisco, CA 94121 • 415 221-4810



BC-7

- Main Entrance
- ⇨ Other Entrance
- ♿ Entrance for the Disabled
- ⊕ Ambulance Entrance
- Ⓜ Information Desk (Ground Floor)
- Ⓣ Taxi Stop
- Muni Bus Stop
- Ⓢ Shuttle Bus Stop
- Ⓟ Patient Parking
- Ⓟ Visitor Parking
- Ⓜ Authorized Vehicles only
- Ⓞ GSA Parking
- Ⓧ Employee Parking
- Ⓛ Elevator Location
- Ⓜ Smoking Shelter
- ≡ Covered picnic areas



New Parking Structure
Hydrant
SFFA Access
Staging Area

42nd Ave

37th Ave

33rd Ave



Response to Comment Letter from the San Francisco Fire Department Dated May 3, 2010

Thank you for providing comments on the EA for the Proposed Mental Health Patient Parking Addition at the SFVAMC. Below are responses to the comments by issue area.

Fire Truck Access and Use of Fire Hydrant

The entrance off Clement Street at 42nd Avenue would remain open during construction, and the VA will maintain a 12-foot wide fire lane around the construction staging area on the west half of Parking Lot B to allow fire truck passage. Fire truck access could also use the entrance off of Clement Street at 43rd Avenue. The fire hydrant near the west edge of Parking Lot A would be protected during construction, and access to the fire hydrant by fire trucks would be maintained during hours of construction. Other nearby hydrants, located near Buildings 1 and 8, would be available at all times. The fire hydrant near Building 8 is next to the southwest entry doors to the building, next to the construction site.

Pre-Notification

The Fire Department will be provided notification in advance of the timing, location, and duration of construction and the locations of detours and lane closures.

Text on page 39 of the draft EA is revised as follows:

The VA or the contractor shall consult with local traffic and transit agencies, and the San Francisco Fire Department, and shall provide notification in advance of the timing, location, and duration of construction activities and the locations of detours and lane closures.

PAR Planning Association for the Richmond

3145 Geary Blvd., # 205 - San Francisco CA 94118-3316
Voice Mail and Facsimile (415) 541-5652 --- www.sfpar.org

May 19, 2010

Mr. John Pechman, Facility Planner
San Francisco VA Medical Center
4150 Clement Street
San Francisco, CA 94121

Dear John:

These comments and suggestions are being submitted with respect to the "Environmental Assessment: Patient Parking Addition" that you published on April 20th of this year.

We applaud the increase that is being planned for 92 more on-campus parking spaces for 72 more automobiles and twenty more motorcycles. That will reduce somewhat the adverse impact of almost six hundred vehicles that are estimated to now being parked on the streets of the Outer Richmond District neighborhood adjacent to the SFVAMC and on El Camino del Mar between the Palace of Legion of Honor and East Fort Miley.

We trust the mitigations identified in the assessment for blocking all light that would otherwise be visible to the upper stories of the residences on Clement Street from the fixtures on the second floor of the parking structure and the headlights of vehicles that will be using it will be effective. When we discussed that issue at our April 20th meeting, SFVAMC representatives seemed a little uncertain.

We also trust that an acceptable alternative will be developed for the National Park Service to gain access to East Fort Miley with its heavy equipment because the new parking structure will otherwise block its passage through the campus.

We suggest that the appearance of the structure would be greatly enhanced if the surfaces of its concrete walls were textured in some way and if planters were placed on top of the street-facing walls with plants (e.g., rosemary, etc.) hanging down them.

Thanks for such a thorough, clear and well written assessment!

Sincerely,



Raymond R. Holland
President

Cc: Sharon E. Duggan, Esq.
PAR Board of Directors
Julie Burns, FOLE

Response to Comment Letter from the Planning Association for the Richmond (PAR) Dated May 19, 2010

Thank you for providing comments on the EA for the Proposed Mental Health Patient Parking Addition at the SFVAMC. Below are responses to the comments by issue area.

Lighting Impacts

As noted on page 13 in the draft EA, mitigative actions require that permanent exterior lighting incorporate cutoff shields and non-glare fixture design and be directed on-site and downward. The light fixtures that would be used are full cutoff, meaning that the lamps would not be exposed on the sides and all light would be directed downward. The light fixtures would also be directional. The two southernmost light fixtures would be oriented east and west with only the minimum amount of light needed -- 1-2 footcandles - - which is the recommended lighting level for the garage perimeter. As noted on page 34 in the draft EA, the use of the parking garage would generally be Monday through Friday 7 a.m. to 6 p.m. Headlights would be screened by the solid wall around the second level of parking, and the trees that would be planted along the south side of the garage.

Access Road to East Fort Miley

As noted on page 7 in the draft EA, an 8-foot wide service road would be provided during construction. Once construction is completed, NPS access to East Fort Miley could continue through the parking addition for vehicles that can maneuver within the garage and are less than 8 feet, 2 inches high. As part of a separate project, the VA is pursuing a memorandum of agreement for construction of a permanent access road to East Fort Miley. The access road would be evaluated under NEPA as a separate action.

Visual Impacts

As noted on page 8 in the draft EA, trees, shrubs, and ground covers would be planted around the parking structure. The main trees that would be planted are New Zealand Christmas Trees, which reach a height of 25-35 feet and a width of 25 feet. The height of the parking structure wall facing Clement Street is about 17 feet. Six New Zealand Christmas Trees and two White Crape Myrtles (20-30 feet in height) would be planted along the side of the structure facing Clement Street; 13 New Zealand Christmas Trees would be planted along the side of the structure facing Building 1. The visual simulation on pages 5 and 6 of the draft EA shows fewer trees than are actually proposed for the project. When the trees are established, the structure would be substantially screened from view.

Because the parking addition is located inside a historic district, it is important that the structure be readily discernible as a new structure, rather than a copy of the true historic structures. Therefore, because the existing historic structures use texture and façade articulation, the parking structure should not use similar texturing. As a result the

architects designing the parking addition have used coloration instead, which is intended to blend with the historic Mayan art deco style, yet be distinct.



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

L 76 (GOGA – PLAN)

May 20, 2010

Mr. John Pechman, Project Engineer
San Francisco VA Medical Center
4150 Clement Street
San Francisco, CA 94121

Re: Response to the San Francisco Veterans Affairs Medical Center (SFVAMC) Mental Health Patient Parking Addition Environmental Assessment

Dear Mr. Pechman:

Thank you for the opportunity to provide comments on the SFVAMC parking garage addition Environmental Assessment. The NPS acknowledges the importance this proposed facility has to the improved operation of the SFVAMC. Enclosed are NPS comments on the Environmental Assessment.

As stated in the EA, the project would construct a new two level 53,600 gross square foot parking garage (27,300 square foot first level and 26,300 square foot second level). This new parking structure would be constructed on the southeast side of the SFVAMC campus on the existing Parking Lot A, and once constructed, would provide an additional 72 parking and 20 motorcycle spaces. As a unit of the NPS, Golden Gate National Recreation Area (GGNRA) has an interest in this proposed project because NPS manages the property immediately adjacent to and surrounding the 29-acre SFVAMC campus on three sides.

1. National Park Service East Fort Miley Access Road:

- *Construction, page 7:* Please acknowledge that even though an 8ft. wide service road will be maintained for NPS access to East Fort Miley, this access road would not be sufficient for all NPS access needs. As a result, SFVAMC has agreed to work cooperatively with National Park Service for an alternative access road to East Fort Miley.

- *Page 9, East Fort Miley:* Please add as a mitigation measure that SFVAMC will work cooperatively with NPS to fund the design, compliance, and construction of alternative access to East Fort Miley.
- *Page 31, Land Use:* This section should acknowledge NPS ownership and occupation of East Fort Miley, and the NPS use of this property is important for accomplishing mission critical work to the Golden Gate National Recreation Area. The East Fort Miley facility is an administrative facility used for maintenance utility trucks, heavy duty equipment and vehicles. Please acknowledge in this section the impact the garage would have on NPS access and the commitment SFVAMC has given to NPS to work cooperatively to provide alternative access.

2. National Historic Preservation Act (NHPA):

- NPS commends the SFVAMC for initiating Section 106 review with the SHPO, and requests to be included in the consultation because NPS manages one of the historic properties, the Fort Miley Historic District, that is being affected by this undertaking.
- *Appendix A – NHPA Section 106 Consultation:* NPS requests inclusion in this consultation process, as the undertaking is having an impact on the Ft. Miley Historic District, a property managed by and within NPS jurisdiction. As part of this consultation, NPS would like to be a party to arriving at a final finding of effect.
- *Appendix A - Section 106 Consultation, page 11:* Please clarify the Section 106 finding of effect. As written, the document mixes NEPA and Section 106 terms, stating that the undertaking will have adverse effects, listing steps to mitigate effects, and concluding that there will be no significant impacts to historic properties. This appears to mean that the Section 106 finding is that there will be no adverse effects to historic properties, but again, please clarify.

3. Archaeological Resources:

- *Mitigative Action, page 20:* NPS recommends that an archaeologist periodically monitor the upper 3 feet of ground disturbing activities and that the archaeologist provide construction crews basic awareness training prior to construction, so that they are capable of identifying an archaeological deposit should it be encountered.
- *Mitigative Action, page 20:* This section also describes the way discovery of Native American human remains should be handled under State law. Because the VA project is occurring on federal land, State law does not apply. Instead, the federal Native American Graves Protection and Repatriation Act applies. Please revise this section accordingly.

4. Other Issues:

- *Light Pollution:* To avoid light pollution, and to protect night sky quality and nocturnal habitat, any parking lot light fixtures should be full-cutoff, and that lighting levels should be the minimum necessary to provide for safety. Because of the potential for light trespass, we request VA consult with NPS staff on lighting design. Please contact and coordinate with Katharine Arrow, Business Management Analyst, at (415) 561-4971.

- *Material from Excavation:* Within the EA it is estimated that approximately 8,000 cubic yards of old dune sand will be excavated during construction of the parking addition. If this sand is clean and not mixed with fill material, please contact Katharine Arrow to see if the NPS could use the material for restoration projects or sand barrier at Ocean Beach for erosion control.
- *Page 38, Transportation and Parking:* Also, the NPS has committed to SFVAMC the use of parking along El Camino Del Mar for employees vehicles that may be displaced during the construction of the garage. If known, state the number of vehicle spaces that are being requested.

In summary, regarding access into East Fort Miley, the NPS understands that the SFVAMC has agreed to design, fund, and construct an alternative maintenance facility access road and to provide temporary access during the construction of the proposed parking addition. We appreciate the cooperation and commitment SFVAMC has given to NPS regarding access to East Fort Miley. NPS considers access to East Fort Miley as mission critical. We look forward to your continued cooperation and coordination with GGNRA on this project as well as others in the future. If you should have any questions on our comments please contact Katharine Arrow (415) 561-4971 of my staff.

Sincerely,

A handwritten signature in cursive script that reads "Frank Dean". The signature is written in dark ink and is positioned above the printed name and title.

Frank Dean
Acting General Superintendent

Response to Comment Letter from the National Park Service, Golden Gate National Recreation Area, Dated May 20, 2010

Thank you for providing comments on the EA for the Proposed Mental Health Patient Parking Addition at the SFVAMC. Below are responses to the comments by issue area.

Access Road to East Fort Miley

As noted on page 7 in the draft EA, an 8-foot wide service road would be provided during construction. Once construction is completed, NPS access to East Fort Miley could continue through the parking addition for vehicles that can maneuver within the garage and are less than 8 feet, 2 inches high. As noted on page 39 in the draft EA, NPS ownership and occupation of East Fort Miley and the impacts of the project on access to East Fort Miley are acknowledged. As part of a separate project, the VA is pursuing a memorandum of agreement for construction of a permanent access road to East Fort Miley. The access road would be evaluated under NEPA as a separate action. It is not included as a mitigation measure for the Proposed Project.

Section 106 Consultation Process

The VA initiated consultation with the State Historic Preservation Officer (SHPO) via a request for Section 106 consultation on March 15, 2010. Additional information has been provided to the SHPO as requested. The EA provided a detailed discussion of historic resources, and the request for consultation was provided as an Appendix to the EA. The EA was posted on the SFVAMC website and copies were provided to the NPS and other interested agencies and parties.

Text on page 19 in the draft EA is revised as follows:

The State Historic Preservation Office has concurred with the VA's assessment that the Proposed Action would have No Adverse Effect on a historic resource, as documented in a letter dated June 30, 2010 (Appendix C).

The VA would like to thank NPS for being closely involved with the Mental Health Parking Addition project since August 2009, and values the comments provided by NPS throughout the design stages and the EA. This close collaboration has included input and comment during multiple public and private meetings. In addition, the SFVAMC is working in close cooperation with the NPS on maintaining a temporary service road through the construction site pending completion of an alternate access road.

Archaeological Resources

Text on page 19 and 20 in the draft EA is revised as follows:

A review of the maps and records on file at the Northwest Information Center (NWIC) of the California Archaeological Site Inventory was completed. The review was done to determine if cultural resources studies have been previously undertaken within or near the SFVAMC and if any known archaeological resources have been recorded during the studies. The records search area consisted of all lands within a ¼ mile of the SFVAMC property.

No archaeological resources and no sites or features of Native American cultural importance have been identified on the SFVAMC. Four prehistoric midden sites have been identified and recorded within approximately ¼ mile of the project area. In addition, the project area is within Fort Miley, which was once the location of the City Cemetery Reservation. The City Cemetery Reservation covered a large area including present-day Fort Miley, the SFVAMC, and 150 acres of present-day Lincoln Park. The cemetery's burials were said to have been removed in 1908. However, construction activities at the Palace of the Legion of Honor, approximately ¼ mile to the northeast, revealed human remains in both 1921 and 1993. An 1861 historic map also shows a telegraph station in the location of the present-day SFVAMC.

To identify the presence of any traditional cultural properties (e.g., sacred sites, resource procurement areas) within or near the SFVAMC, a letter was sent to the Native American Heritage Commission (NAHC) requesting information on any known sacred lands and other cultural sites that may be present within the project area, and to request a list of Native Americans to contact regarding the project. In response, the NAHC reported their sacred land file has no information about the presence of Native American cultural resources in the project area, and provided a list of recommended contacts (NAHC 2010), who were subsequently notified regarding the Proposed Action. Tribe contacts were also notified by phone. A written e-mail response was received from the Ohlone Indian Tribe on June 15, 2010 asking if a records search or a pedestrian survey had been completed for the Proposed Action. The results of the archaeological records search were discussed with the Tribe contact, who concurred with the mitigative actions contained in the EA. No other responses have been received.

The Proposed Action is not expected to ~~would have no~~ impact on known archaeological resources or other cultural resources. However, given the possibility of the unanticipated discovery of subsurface cultural materials during construction, the following mitigative actions shall be taken. These procedures conform to the requirements of pertinent cultural resource laws and regulations.

Mitigative Action – Archaeological Resources: The VA shall notify the project contractor involved in ground-disturbing activities within the project area of the potential to encounter subsurface archaeological or historical materials. Archaeological resources may take the form of obsidian and chert flaked-stone tools (projectile points, knives, scraping implements) or toolmaking debris;

culturally darkened soil (“midden”) containing heat-altered rock, dietary bone and shellfish remains; and stone milling equipment (mortars, pestles, handstones, and milling stones). Historical materials might include stone or adobe footings or walls; building materials or other remains with square nails; and artifact-filled wells, privies, or other deposits of historic-period metal, glass, and/or ceramic artifacts.

The VA shall retain a qualified archaeologist to be present during ground disturbing activities that may affect archaeological or historical materials as described above. If archeological or historical resources are encountered during construction, the following mitigative actions shall be taken.

Ground-disturbing activities shall be halted and a professional archaeologist would be called in to evaluate the significance of the find. If the find is significant, the evaluating archaeologist would determine whether it would be affected by the Proposed Action. Non-significant finds would not be given further protection. If the Proposed Action would adversely affect a significant resource, a mitigation plan shall be developed and implemented based on the recommendations of the evaluating archaeologist and in consultation with the California State Historic Preservation Officer. Mitigation may include, but is not limited to, data recovery excavation, consultation with descendent communities, and site recording.

If possible human remains are discovered, potentially damaging activities shall be halted. The VA shall immediately notify the County Coroner and a professional archaeologist to determine the nature of the remains. If the coroner determines that the remains are of Native American origin, the VA shall notify, in writing, the Secretary of the Department, or head of any other agency or instrumentality of the United States, having primary management authority with respect to Federal lands and the appropriate Indian tribe if known or readily ascertainable. The disposition of and control over any cultural items excavated or removed shall be determined as provided for in the Native American Graves Protection and Repatriation Act. ~~coroner must contact the Native American Heritage Commission (NAHC) which will identify the Most Likely Descendent (MLD). The MLD shall have 48 hours to complete a site inspection and make recommendations for treatment of the remains. A range of possible treatments includes nondestructive removal and analysis, preservation in place, relinquishment of the remains and associated items to the descendents, or other appropriate treatment.~~

Lighting Impacts

As noted on page 13 in the draft EA, mitigative actions require that permanent exterior lighting incorporate cutoff shields and non-glare fixture design and be directed on-site and downward. The light fixtures that would be used are full cutoff, meaning that the

lamps would not be exposed on the sides and all light would be directed downward. The light fixtures would also be directional, and would use the minimum amount of light needed to meet the recommended lighting level for the garage perimeter.

Coordination with NPS for Soil Disposal and Off-Site Parking

As noted on page 37 in the draft EA, the handling and disposal of soil must comply with Federal, State, and local regulations. The VA would dispose of excess excavated soil at a facility approved to accept such soil and which meets the scheduling needs of the Proposed Action.

Details on temporary off-site parking to compensate for parking spaces displaced during construction are still being worked out. The number of parking spaces needed is not known at this time. The VA will continue to coordinate with the NPS on this matter.

May 20, 2010

Mr. John Pechman, Project Engineer
San Francisco VA Medical Center
4150 Clement Street
San Francisco, CA 94121

Dear Mr. Pechman:

The intent of this letter is to provide comments on the “ENVIRONMENTAL ASSESSMENT, SAN FRANCISCO VA MEDICAL CENTER, MENTAL HEALTH PATIENT PARKING ADDITION PROJECT NO. 662-CSI-612.”

FOLE is pleased to see the SF VAMC addressing the deficit of parking on the Clement Street campus by providing a net addition of 75 automobile parking spaces and 23 spaces for motorcycles. Our comments on the Environmental Assessment address two phases of the project:

1. Design and operation of the completed structure
2. Construction activities

Design and operation of the completed structure

- Access to East Fort Miley. We understand that the proposed access to East Fort Miley presented in the EA has changed to a much better idea of constructing separate park maintenance access to East Fort Miley along the fence line between Lincoln Park golf course and the Fort, so that the GGNRA is no longer dependent on getting its vehicles through the VAMC campus. We do understand that this will require inter-agency cooperation, as well as cooperation with SF Recreation and Parks. We welcome further details on this plan.
- Spillover parking. We hope the expansion of Parking Lot A will reduce spillover into residential streets. However, by limiting Parking Lot A to patients and visitors, it will not mitigate parking by SF VAMC employees.
- Lighting. We are pleased to see lighting concerns addressed as follows: “*Permanent exterior lighting shall incorporate cutoff shields and non-glare fixture design and shall be directed on-site and downward. New lighting shall be oriented to ensure that no light source is directly visible from neighboring residential areas.*” We note, however, that the light standards proposed are higher than the current lights at Parking Lot A. Based on the simulation, we are concerned that

viewed from below, this lighting – even though directed downward – will increase the lighting in the neighborhood, especially under foggy conditions.

- Aesthetic and historical impact. We believe the EA does not go far enough to address aesthetic and historic issues. In particular, the monolithic expanse of bare walls is dissonant with the texture and ornamentation of nearby historic buildings and to East Fort Miley. We urge the VAMC to go to mitigate these concerns. including coloring of the cement that faces East Fort Miley and including a screen of planting along that side of the garage. We would like to see a softening of the front of the building as viewed from Clement Street, via plantings or green (aka living) walls.
- Security. The EA states that “*there would be no impact on police protection.*” We disagree. The new structure will include ramps, an elevator and, presumably, a stairwell (although the EA does not describe one). We urge the VAMC to reconsider whether or not this structure will be attractive vagrants or individuals with malicious intent. Vagrants have been observed at East Fort Miley.

Construction activities

- Hours. We are pleased to see the VAMC acknowledge concerns about construction hours (p. 34). We remain concerned about the hours of construction and its impact on VA patients, visitors, day care clients and staff and the adjacent residential and park areas.
 - The 7:30-5pm schedule places an unacceptable burden on nearby residents. Problems with pre-staging of construction workers have aggravated early hour construction in the past. We urge the VAMC to begin construction at 8 am.
 - While the EA discusses “occasional” Saturday disturbances, we would like to see these disturbances quantified, and how the VAMC plans to mitigate these disturbances.
 - We would like detailed information on plans to schedule “*haul trucks for off-peak hours to minimize impacts on peak hour traffic.*” and the impact of these out-of-hours activities.
- Traffic delivery and waste disposal. The EA proposes up to 3 trucks per hour or 24 trucks per day delivery. While the EA does discuss two possible routings for trucks on the VAMC campus, there is no discussion of the routing of these trucks once they exit the VAMC campus. We believe this project may have significant impact on street conditions, public transit/MUNI, residents, businesses, cultural and recreational institutions and parklands.
 - The EA should outline a plan for routing delivery vehicles and waste haulers and the impact of this traffic.
- Groundwater and potential for dewatering. If dewatering is needed, the 45-day permit

process would significantly extend the proposed 6-month construction schedule. Also, San Francisco Public Utilities Commission is considering plans to mingle well water from the west side of the City with current water from Hetch Hetchy. Again, we believe the EA lacks details about potential impacts.

Thank you for the opportunity to comment on the proposed project.

Sincerely,

Julie Burns, Co-Chair <i>Friends of Lands End</i>	Amy Meyer, Chair <i>People For a Golden Gate National Recreation Area</i>
------------------------------------------------------	------------------------------------------------------------------------------

Cc: Speaker Nancy Pelosi
Frank Dean, Acting General Superintendent, GGNRA
Nancy Horner, Chief of Planning and Compliance, GGNRA
Wayne Donaldson, California SHPO/ACHP
Dennis Herrera, San Francisco City Attorney
Phil Ginsberg, San Francisco Recreation and Park Department
Supervisor Eric L. Mar
Ron Miguel, President, San Francisco Planning Commission
Ray Holland, President, Planning Association For the Richmond
Gene Brodsky, Planning Association For the Richmond
Sharon Duggan, Esq.

Response to Comment Letter from Friends of Lands End (FOLE) Dated May 20, 2010

Thank you for providing comments on the EA for the Proposed Mental Health Patient Parking Addition at the SFVAMC. Below are responses to the comments by issue area.

Access Road to East Fort Miley

As noted on page 7 in the draft EA, an 8-foot wide service road would be provided during construction. Once construction is completed, NPS access to East Fort Miley could continue through the parking addition for vehicles that can maneuver within the garage and are less than 8 feet, 2 inches high. As part of a separate project, the VA is pursuing a memorandum of agreement for construction of a permanent access road to East Fort Miley. The access road would be evaluated under NEPA as a separate action.

Off-Site Parking by Employees

As noted on page 1 in the draft EA, the purpose of the Proposed Action is to provide additional parking for Mental Health patients and their visitors adjacent to Mental Health Building 8, where the services are provided. Additional parking for employees is planned as part of separate projects at the SFVAMC, which will further mitigate parking in residential streets. As noted on page 8 in the draft EA, the VA is investigating temporary on-site and off-site parking options to compensate for parking spaces displaced during construction. This includes coordination with the NPS on the use of off-site parking on NPS property. Details on temporary parking to compensate for parking spaces displaced during construction are still being worked out. The VA will continue to coordinate with the NPS on this matter.

Lighting and Visual Impacts

As noted on page 13 in the draft EA, mitigative actions require that permanent exterior lighting incorporate cutoff shields and non-glare fixture design and be directed on-site and downward. The light fixtures that would be used are full cutoff, meaning that the lamps would not be exposed on the sides and all light would be directed downward. The light fixtures would also be directional. The two southernmost light fixtures would be oriented east and west with only the minimum recommended lighting level for the garage perimeter.

As noted on page 9 of the draft EA, the Proposed Action would be partially buried, have the lowest possible profile, and utilize the existing earthen berm to partially shield East Fort Miley. The side of the parking structure facing East Fort Miley would use the same color pattern as shown for the side of the garage facing Clement Street, even though this color pattern is not shown on the visual simulation on pages 5 and 6 of the EA. In addition, as noted on page 8 in the draft EA, trees, shrubs, and ground cover would be

planted around the parking structure. The trees that would be planted are New Zealand Christmas Trees, which would reach a height of 25-35 feet, and a width of 25 feet, and White Crape Myrtles, which reach a height of 20-30 feet. The height of the parking structure wall facing Clement Street is about 17 feet. Once the trees are established, the structure would be substantially screened from view.

Vagrancy and Vandalism

No vandalism or vagrancy has been observed in the other parking garages at the SFVAMC. SFVAMC security would be provided and would monitor activities.

Construction Schedule

The VA has agreed to begin construction at 8:00 a.m. Text on page 8 in the draft EA is revised as follows:

Construction is scheduled to begin in August 2010 and is estimated to take approximately 6 months. Construction work would be limited to the hours of ~~7:30~~ 8:00 a.m. to 5:00 p.m., five (5) days a week, with occasional deliveries on Saturday within the same work hours.

Saturday deliveries and construction may be needed for approximately 4-8 weeks.

Haul Truck Traffic and Routes

As noted on page 39 in the draft EA, mitigative actions require the VA and the construction contractor to schedule delivery trucks and haul trucks during off-peak hours to minimize impacts on peak hour traffic. This means that haul trucks would be scheduled during the day outside the a.m. and p.m. peak hours, which typically fall during the period of 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m.

Text on page 39 in the EA is revised as follows to clarify off-peak hours:

The VA and the construction contractor shall schedule delivery trucks and haul trucks during off-peak hours (9:00 a.m. to 4:00 p.m.) to minimize impacts on peak hour traffic.

The main route for trucks leaving the site would be 42nd Street to Geary Boulevard or Clement Street to Park Presidio Boulevard, from which trucks would head north or south to regional highways. As noted on page 38 in the draft EA, the maximum haul truck trips expected on any one day would be 3 trucks per hour, or 24 trucks per day. This period of time may last one to two weeks. The average number of daily trucks would be less. The increase in traffic would be minor in relation to the existing traffic volumes on the roads. For example, a 2007 traffic count for Geary Boulevard at 30th Avenue recorded 10,413 westbound vehicles and 10,462 eastbound vehicles over a 24-hour period. The 24 westbound and 24 eastbound trips over one day would be less than 0.5 percent of the existing traffic. An older traffic count for Clement Street at 36th Avenue recorded 658

westbound vehicles and 2,921 eastbound. The 24 westbound trips would be less than 4 percent of the existing traffic; the 24 eastbound trips would be less than 1 percent.

Groundwater Dewatering

The San Francisco Public Utilities Commission (SFPUC) groundwater project mentioned in the comment was not considered for two reasons: 1) the dewatering needed for construction of the Proposed Action would be completed before the SFPUC project began, and 2) the SFVAMC campus does not overlie the Westside Groundwater Basin, which is located further to the south.

If needed, the permitting process for dewatering would begin prior to excavation to expedite groundwater disposal needs.



STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
GOVERNOR
May 25, 2010

CYNTHIA BRYANT
DIRECTOR

John Pechman
Department of Veterans Affairs
4150 Clement Street
San Francisco, CA 94121

Subject: San Francisco VA Medical Center Mental Health Patient Parking Addition
SCH#: 2010042070

Dear John Pechman:

The State Clearinghouse submitted the above named Environmental Assessment to selected state agencies for review. The review period closed on May 20, 2010, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

A handwritten signature in black ink that reads "Scott Morgan".

Scott Morgan
Acting Director, State Clearinghouse

Document Details Report
State Clearinghouse Data Base

SCH# 2010042070
Project Title San Francisco VA Medical Center Mental Health Patient Parking Addition
Lead Agency Veterans Affairs, Department of

Type EA Environmental Assessment
Description NOTE: Review Per Lead

The VA proposes to build a two level partial below grade parking structure on the site of an existing parking lot at the San Francisco Va Medical Center. The parking structure would provide much needed parking for mental health patients and their visitors. The parking addition would be constructed at the southeastern edge of the Medical Center campus and would provide an additional 75 parking spaces and 23 motorcycle spaces.

Lead Agency Contact

Name John Pechman
Agency Department of Veterans Affairs
Phone 415-221-4810 x 4600 **Fax**
email
Address 4150 Clement Street
City San Francisco **State** CA **Zip** 94121

Project Location

County San Francisco
City San Francisco
Region
Lat / Long
Cross Streets 42nd Ave
Parcel No. 1313-023
Township 2S **Range** 6W **Section** 3 **Base** MDB&M

Proximity to:

Highways US 101
Airports
Railways
Waterways Pacific Ocean
Schools Lafayette ES
Land Use Z: P-Public
GP: Institutional Facility

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Cumulative Effects; Geologic/Seismic; Landuse; Noise; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 3; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Regional Water Quality Control Board, Region 2; Native American Heritage Commission; State Lands Commission

Date Received 04/21/2010 **Start of Review** 04/21/2010 **End of Review** 05/20/2010

Response to Comment Letter from the Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit dated May 25, 2010

The VA appreciates the assistance of the State Clearinghouse in providing the EA to selected state agencies for review and comment.

Lead Agency Revisions

The changes to the EA presented in this section were generated by the VA. The changes do not constitute new information leading to new adverse affects or increases in the severity of any adverse affect.

VA Specification Section 015719, Temporary Environmental Controls, includes compliance with State and Federal air quality regulations and standards, as well as control of particulates, monoxide emissions, and odors during construction. The mitigative action on page 16 in the EA includes measures identified by the Bay Area Air Quality Management District to control fugitive dust, exhaust and particulate emissions. The basic measures identified were updated in June 2010 as part of newly adopted Air Quality Guidelines.

The mitigative action on page 16 in the draft EA is revised as follows:

Mitigative Actions – Air Quality: Construction contractors shall take measures to minimize fugitive dust and dirt emissions resulting from construction. At a minimum, construction contractors shall undertake the following BAAQMD standard mitigation requirements measures, as applicable, to minimize any adverse effects:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the

Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

- ~~Water all active construction areas at least twice daily.~~
- ~~Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.~~
- ~~Apply water or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.~~
- ~~Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites.~~
- ~~Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.~~
- ~~Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph.~~

Appendix B
Section 106 Consultation Request



DEPARTMENT OF VETERANS AFFAIRS
Medical Center
4150 Clement Street
San Francisco, CA 94121

In Reply Refer To: 662/138

Mr. Milford W. Donaldson
State Historic Preservation Officer
California Office of Historic Preservation
Department of Parks and Recreation
Sacramento, CA 94296-0001

March 25, 2010

Subject: RE: San Francisco Veterans Affairs Medical Center Mental Health Patient Parking Addition

Dear Mr. Donaldson,

We are writing to you with regard to the Section 106 requirements of the National Historic Preservation Act as they relate to the San Francisco Veteran Affairs Medical Center Mental Health Patient Parking Addition. The project involves an addition of a ground and second level parking garage within the historic district.

To the extent that it facilitates the review and approval process, the Veterans Affairs Administration (VA) has authorized certain experienced and knowledgeable consultants to address its Section 106 requirements on its behalf. In permitting this arrangement, the consultants have been instructed to keep the VA informed by forwarding copies of all transmittals to our attention, and immediately contacting the VA on matters deemed to be of significant importance.

Until further notice, this authority is extended to Stantec Consulting Services, for this project. We encourage you to contact us with any issue needing our attention during the review process.

Please contact Jon Bassignani at (415) 221-4810 extension 2840 with any questions.

Sincerely,

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

Floyd Devenbeck
Chief, Engineering Service
San Francisco VA Medical Center
4150 Clement Street
San Francisco, CA 94121



Stantec Consulting Services, Inc.
405 Howard Street, 5th Floor
San Francisco, CA 94107

March 15, 2010

Mr. Milford W. Donaldson
State Historic Preservation Officer
California Office of Historic Preservation
1416 9th Street, Room 1442
Sacramento, CA 95814

Dear Mr. Donaldson,

Subject: Request for Section 106 Consultation on the San Francisco Veterans Affairs Medical Center project: Mental Health Patient Parking Addition

Under the authority of the U.S. Department of Veterans Affairs (VA), Stantec is overseeing Section 106 consultation for the proposed Mental Health Parking Addition project at the San Francisco Veterans Affairs Medical Center (SFVAMC).

The VA is requesting Section 106 consultation with your review of the following project description, the definition of the Area of Potential Effects (APE), the assessment of adverse effects, and potential mitigation of these effects. A description of historic properties and an evaluation of eligibility to the National Register of Historic Places (NRHP) are provided. A discussion of the application of the Criteria of Adverse Effect (CFR 2004:800.5 [b-2, and b-3]) pursuant to Section 106 compliance and potential mitigation measures are also included.

The information compiled below addresses the Section 106 requirements of the National Historic Preservation Act (NHPA) as they relate to the proposed project. The project under consideration (presented below), involves no alteration to buildings that have been previously determined eligible for the NRHP as part of a historic district.

In 1980, the VA began a survey of its potential historic properties to fulfill the requirements of Section 110 of the NRHP. On May 11, 1981, the Keeper of the NRHP issued a Determination of Eligibility Notification for the SFVAMC campus. The district boundaries in that determination were altered in 1982 due to significant construction and renovation work since the original facility was built. In 2005, a formal NRHP nomination was submitted to the State Historic Preservation Officer and the Keeper of the NRHP. A letter dated May 26, 2005, from Mr. Donaldson agreed with the eligibility of the

Mr. Milford W. Donaldson
State Historic Preservation Officer
California Office of Historic Preservation
1416 9th Street, Room 1442
Sacramento, CA 95814

SFVAMC Historic District under Criterion A and Criterion C, but the nomination was later withdrawn. A modified NRHP application was resubmitted to the Keeper of the NRHP in 2008 and has since been accepted. Based on the content of the resubmitted nomination, the request for Section 106 consultation herein accounts for the finalized boundaries of the proposed SFVAMC Historic District.

Project Description

The SFVAMC is located on a 29-acre site in northwest San Francisco (Attachment, Figure 1) and is a major tertiary care facility that serves as a VA regional referral center for specialized medical and surgical programs. In addition, the SFVAMC is part of the National Disaster Medical System, a federally coordinated initiative that augments the nation's emergency medical response capability. The SFVAMC serves as the Federal Coordinating Center for the northern California area. The SFVAMC has a severe shortage of parking spaces and property for any parking expansion. Health care services for the Mental Health patients are provided in Building 8, located to the north of existing Parking Lot A. Due to a significant increase in Mental Health care services, the SFVAMC needs to construct additional parking capacity to meet the current demands and mitigate complaints. The project consists of replacing the existing surface Parking Lot A with a two-level, partially below grade parking structure. Building 33, a non-contributing modular building on the parking lot, will be removed or relocated as part of the work.

Existing Facilities

Parking Lot A is located in the southeastern portion of the SFVAMC site (Plate 1). This surface parking lot was constructed sometime in the early 1960's. Grading required the removal of most of the "sand hill" that had occupied the location, and some of the spoils were bulldozed into a pile along the eastern boundary of the campus and historic district, giving the earthen berm the appearance that exists today.

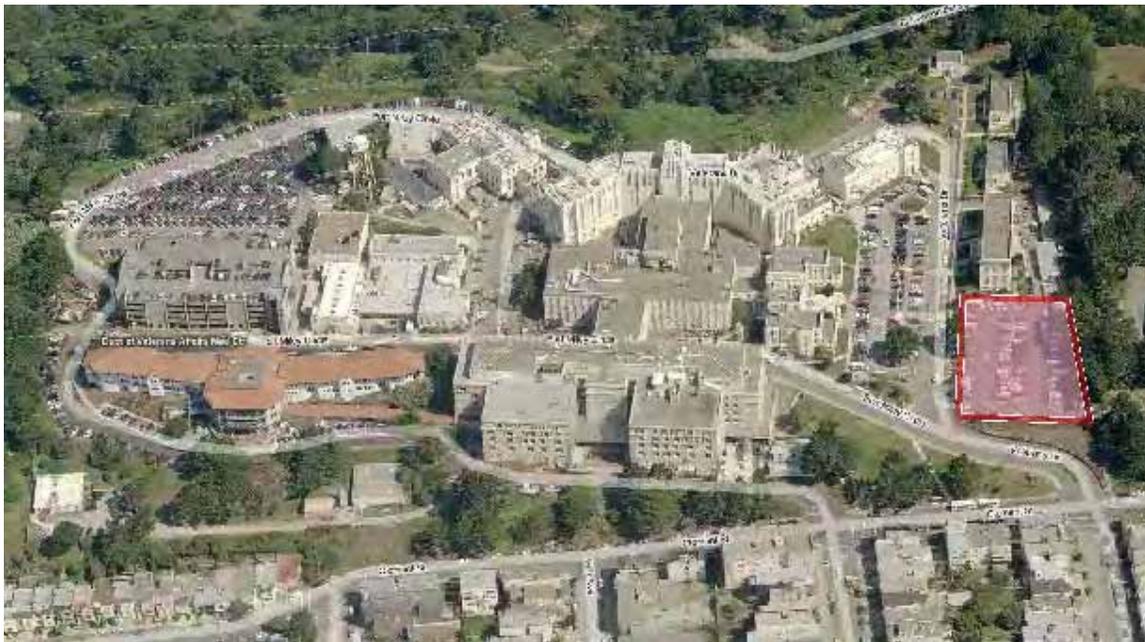


Plate 1. Site photo showing project location

Project-Related Construction Activities

Parking Lot A was part of the original campus landscaped area, with a sand hill somewhere within its boundaries. It was graded and paved in the early 1960's and has functioned as a parking lot until the present. The proposed work at SFVAMC involves two alternatives for the necessary parking addition.

Alternative 1 is a no-build alternative and does not involve construction. The parking lot remains in use without alteration.

Alternative 2 includes the construction of a partially below grade two level parking structure.

The parking structure will essentially fit within the perimeter boundary of the existing surface lot. The top (roof) level of the structure will be a ramped parking deck and will be set at the approximate height of the northeast corner of the existing lot (high corner) to facilitate connection with the existing service drive between buildings 8 and 32. The lower level will be set at the approximate level of the Veteran's Drive roadway at the southwest corner of the lot, which is about 12 feet below the upper garage level (Plate 2). Therefore, the structure will have a one-story south façade, east and west facades that are one story at their south side and taper to disappear underground at the north side, and it will have virtually no north façade, as the structure will be underground at that point. The north edge of the structure will be approximately 25 feet clear of its closest neighbor, Building 8. Construction will impair views of Building 8 from the south as one enters the

campus, however views of the building will be minimally impaired along the north-south Veterans Drive alignment. Construction will not be close enough to present a danger of destabilization to Building 8. Construction activities will be approximately 20 feet from the nearest property line, and the earthen berm between the property line and the structure will be disturbed as little as possible.

Construction staging may occur on the front lawn of the VA Medical Center, on Veteran's Drive adjacent to the project site, both within the historic district. Regardless of the location of staging activities, the staging site will be videotaped prior to the start of construction, and will be rebuilt to pre-construction condition at the end of the construction period.



Plate 2. Rendering of the completed garage, looking east from Building 1 across a parking lot and Veterans Drive. Building 8 appears at the left edge of the rendering.

Area of Potential Effects (APE)

The APE encompasses the construction footprint and all construction areas and any buildings, structures, or other cultural resources adjacent to those areas where potential project-related effects may occur (see Attachment, Figure 2). The proposed project is located within the SFVAMC Historic District (See Attachment, Figure 3).

Description of the Historic Property

Historic resources within the APE include the SFVAMC Historic District's main entrance location, Veterans Drive, the earthen berm, and Building 8. The adjacent East Fort Miley historic district is also considered within the APE.

SFVAMC Historic District

The SFVAMC campus (Ref. Plate 1) was originally determined to be eligible for NRHP listing under Criteria A and C in 1981. A Determination of Eligibility was made by Gjore J. Mollenhof, VA Federal Preservation Officer, and was signed by the Keeper of the NRHP on May 11, 1987. The 2005 NRHP nomination proposed a historic district eligible under Criteria A and C that contained 14 contributing buildings and 18 noncontributing buildings. Karen R. Tupek, VA Federal Preservation Officer, and Milford W. Donaldson, State Historic Preservation Officer, certified the nomination, but the nomination was later withdrawn. The resubmitted NRHP nomination in 2008 proposes a historic district that contains 13 contributing buildings, six noncontributing buildings, and one noncontributing structure set on 12 acres of the overall 29-acre campus (see Attachment, Figure 3). The SFVAMC Historic District and its contributing buildings date to a period of significance from 1934 to 1941. Designed by VA architects, the contributing structures were built by the Herbert M. Baruch Corporation. The buildings in the district were mainly constructed in 1933–1934 in Art Deco style elaborated with Mayan-inspired ornate polychrome terra cotta moldings, termed “Mayan Deco” to describe a West Coast interpretation of the style that was particularly popular in southern California. The completion of the original SFVAMC campus in 1934 consisted of 21 buildings designed in the Mayan Deco style set in a sprawling semiformal landscape of lawns and undulating paths to lessen the impact of large concrete buildings on the adjacent neighborhood and to provide ample space for patient convalescence and recreation.

The SFVAMC campus was once the site of the Post of Fort Miley, the elevated center of Fort Miley Military Reservation, a former coastal artillery battery built in the 1890s to protect the San Francisco harbor. In 1933, the old post, consisting of parade grounds, barracks, and other garrison buildings, was demolished and the creation of the SFVAMC bisected the reservation into East Fort Miley and West Fort Miley, which remained operational until after World War II. The boundary between SFVAMC and Fort Miley is delineated with a chain-link fence and dense vegetation that has overgrown since Fort Miley was decommissioned after World War II. As a result, the boundaries of the historic district have some areas of thick Monterey cypress, willows, and cottonwoods forming a green buffer between the SFVAMC, the Outer Richmond neighborhood, and the Golden Gate National Recreation Area.

The 2008 district nomination includes 13 contributing buildings (Buildings 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 18, 20); six noncontributing buildings (Buildings 14, 25, 26, 31, 32, 210); and one noncontributing structure (Structure 202). For the purposes of this Section 106 consultation, the contributing buildings are considered eligible as part of the SFVAMC Historic District. Of the 13 contributing buildings, Buildings 1, 6, 8, 9, 10, and

11 are intact to a high degree, while many of the other original 1934 buildings have been unsympathetically altered, particularly those with large additions. The boundaries of the proposed historic district do not include most of the later infill buildings on the original SFVAMC campus.

Building 8 (B/8)

B/8 is a 25,521-square-foot, three-story-over-basement, reinforced-concrete building with a flat roof (Plate 3). It was constructed in 1934 as the main nurses' quarters and now houses mental health offices and clinic group rooms. The façade is 14 bays wide and features a prominent entrance in the center with a suspended metal canopy and terra cotta surrounds. The rest of the façade is articulated by an alternating arrangement of stepped pilasters and recessed window bays with terra cotta spandrel panels. The concrete exterior is finished in a thin layer of stucco. Although the interior has been altered, the exterior of B/8 has undergone comparatively few changes. The replacement of the original aluminum casements with double-hung aluminum windows in 1964 was the most significant exterior change. More recently, the exterior stair was widened and a handicapped entry added. The building's visual prominence, architectural quality, and exterior integrity are significant to the historic district.

Earthen Berm

In addition to lawns and other landscaping, an earthen berm is located in the southeastern part of the historic district. An analysis of historic maps and aerial photographs reveal that there was a naturally occurring sand hill in the southeastern corner of the campus. Maps made of Fort Miley in 1919 label the feature as a "sand hill." The construction of the SFVAMC left the hill largely intact, although the extreme northeastern corner was removed in order to construct Building 8 (the nurses' quarters). A photograph taken in 1942 shows the hill covered with scrub and Monterey Cypress. Aerial photographs of the area indicate that the hill remained unchanged until the mid-1960s. At some point in the early 1960s, the growing number of non-resident staff required the construction of two large parking lots near the main entrance at Forty-Second Avenue. Parking Lots 1 and 2 were constructed immediately south of Building 8. Grading required the removal of most of the sand hill and some of the spoils were bulldozed into a pile along the eastern boundary of the campus and proposed historic district, giving the earthen berm the appearance that exists today.

Roads and Walkways

Although the original network of the roads and walkways in the district has been changed incrementally over the years to accommodate new construction, the basic circulation pattern has been partially retained. The internal automobile circulation path for the SFVAMC consists of Veterans Drive. A length along the north edge of the historic district has been known as Fort Miley circle, however this was recently changed to unify the perimeter road as Veterans Drive, retaining Fort Miley Circle for the road that crossed the campus (east to west). Veterans Drive begins at the historic main entrance, at the intersection of Clement Street and Forty-Second Avenue. Soon after entering the campus, Veterans Drive heads north and forms the central axis of the eastern part of the

Mr. Milford W. Donaldson
State Historic Preservation Officer
California Office of Historic Preservation
1416 9th Street, Room 1442
Sacramento, CA 95814

campus (historic district), with the facades of Buildings 1, 5, 7, 8, 9, 10, and 11 all facing it. The path that Veterans Drive follows is original to the 1934 design. In some areas, particularly adjacent to Buildings 8, 9, 10, and 11, the exact alignment is retained. The curbs, sidewalks and stairs leading to the entrances of these buildings are all in their original alignment. The construction of parking lots elsewhere along the route has resulted in changes to the alignment as well as the removal of most original curbs.



Plate 3: Building 8 viewed from Parking Lot A (looking north)

Evaluation

SFVAMC Historic District

The proposed SFVAMC Historic District has been determined eligible for the NRHP under Criteria A and C. It represents thematic VA hospitals developed in the early 20th century to provide innovative and comprehensive health care for veterans. Contributing buildings to the district represent standardized design used in a period of early VA hospital construction from the 1931 until 1941. The VA took over the responsibility of providing medical benefits to veterans in 1931 and soon began constructing dozens of new medical centers across the nation. The core design promoted consistency in function and façade designs. As a thematic group, the VA medical centers illustrate a major concept in the delivery of health care to veterans. Pervasive throughout the United States, the VA medical centers demonstrate a variety of façades reflecting design tastes and traditions of the host communities, over consistent structural design for specific building functions representing a prototype plan and health care delivery philosophy for a new generation of hospitals. The SFVAMC represents this nationally significant group in construction, functional layout, plan, elevations, and general approach to medical care design. The SFVAMC Historic District represents this theme with Art Deco architectural design and Mayan-inspired ornamentation that embodies “the distinctive characteristics of a type, period or method or construction.”

During the VA’s national building campaign, dozens of hospitals were constructed in a variety of different regions. The new facilities were designed to blend into their local contexts. Contextual design employed naturalistic site planning and sympathetic exterior elaborations of otherwise standardized building plans. The SFVAMC Historic District also represents the brief period of Art Deco popularity in American architecture in the early 1930s. SFVAMC was the first VA medical center constructed in the western United States, an early example of the type in a unique “Mayan Deco” style. Additionally, the SFVAMC was an early example of federal seismic-resistant building technologies. At the time, the SFVAMC was designed to withstand earthquake hazards and damage (although not to the seismic standards that have developed significantly since the 1930s).

Alterations to the overall SFVAMC campus have dictated the boundaries of the proposed historic district. These include the demolition of the original entrance gates and realignment of the entrance road, and the front yard, entrance, and lobby of the main hospital Building 2 to make way for the new Building 200 in 1964. The north wall of Building 7 was altered beyond recognition and Building 210 was built adjacent to it. Many other minor alterations have been made since the original construction. Several large buildings were constructed in the open spaces of the original naturalistic setting, particularly in the southwestern portion of the campus, creating a more overall urban setting. The majority of the original exterior materials survive relatively intact, although the interiors of most of the major clinical and administrative buildings have been remodeled, in some cases repeatedly. Several of the original interior public spaces displayed intricate workmanship with carved and molded plaster ornament, terrazzo flooring, and decorative aluminum metalwork. Virtually all of these original interior

finishes and materials have been removed. The landscaping of the campus has also undergone some alteration, with its original lawns and open views gradually obscured by significant growth of Monterey cypress stands and undergrowth to the north and east of the historic district.

However, the SFVAMC Historic District retains its integrity despite significant alterations to the campus site. It retains its original location; it adequately conveys the historic appearance of its period of significance 1934–1941. In areas, it retains sufficient levels of design; the campus setting has been altered within its own boundaries with the addition of several large buildings and parking lots, although its external setting has been preserved as it is bounded by protected lands in the Golden Gate National Recreation Area to the north, east, and west. It retains its primary materials mainly consisting of reinforced concrete, steel framing, stucco and terra cotta ornament, and aluminum fixtures. It also retains its integrity of workmanship, feeling, and association.

Two areas within the SFVAMC Historic District retain a high degree of integrity: the eastern portion of the campus, including Buildings 1, 8, 9, 10, and 11, and the northwestern portion of the campus, including Buildings 4, 6, and 18. To date, these two areas have undergone the fewest permanent alterations. Fort Miley Military Reservation was listed in the NRHP on May 23, 1980. It is nationally significant as it pertains to the defense of the San Francisco harbor during the period from 1892 to 1950. The fortification of Point Lobos was part of the final phase of the Endicott system of coastal defense that focused on protecting the inner harbor. The defense engineering theory is represented in the Chester and Livingston concrete and earth batteries, and later installations demonstrate the evolution of defense strategies. From the turn of the 20th century through World War II, Fort Miley is part of the historically significant coastal defense system that also incorporated the Presidio of San Francisco, Fort Mason, Fort Winfield Scott, Fort Funston, Fort Baker, Fort Barry, Fort Cronkhite, and Fort McDowell.

Despite being divided by the site of the former Post of Fort Miley, which has been occupied by the SFVAMC campus since 1934, the surviving batteries are in a historic district with two parts, East Fort Miley and West Fort Miley. The current growth of the thick vegetation obscures some views from both portions of the district. Fort Miley Military Reservation retains a high level of integrity, particularly around its battery walls.

Application of the Criteria of Adverse Effect

Alternative 1 is a no-build alternative and does not involve construction.

The area is currently used as a parking lot. A modular building occupies part of the lot and is partially within the area of the earthen berm, the berm being held back by a retaining wall. Lot A is filled to capacity with cars from approximately 7 am to 5 pm. In addition to the main entrance to the lot off Veterans Drive, the lot connects to a service drive at its northeast corner that travels to the east of Building 8 in a north-south

Mr. Milford W. Donaldson
State Historic Preservation Officer
California Office of Historic Preservation
1416 9th Street, Room 1442
Sacramento, CA 95814

direction. It also has a vehicular connection through the property line to East Fort Miley at its southeast corner.

Alternative 2 includes the construction of a partially below grade two level parking structure.

The construction of the parking structure will approximately double the parking capacity currently on Lot A. This will serve the medical campus by providing adequate parking accommodation to mental health patients and visitors to the adjacent Mental Health Building 8. The materials in the structure will be primarily reinforced concrete, of a color to compliment the adjacent existing buildings, and lighting fixtures will be aluminum in keeping with the prevalent materials used within the adjacent historic district. The exposed concrete will be precast, which provides a high quality finish and consistent coloration. The structure will have minimal impact on the earthen berm to its east. Because of the existing earthen berm between the property line and the project, the structure will be visible from East Fort Miley only at its extreme southern corner (Plate 4). The project preserves the existing alignment of Veterans Drive, although it replaces portions of the roadway curb. The existing parking Lot A entry apron will be demolished, and a new entry apron will be constructed approximately 15 feet north of the current location. The corner where Veterans Drive transitions from the S-curve entry to its north-south alignment will be rebuilt, as it currently exists as an unused entry to Lot A.



Plate 4. Rendering of completed garage, looking west from East Fort Miley. Project will be visible from East Fort Miley at its extreme southern edge only. Note earthen berm in center of photo, garage at left, and existing building on East Fort Miley to the right.

This undertaking will have adverse effects on the VASFMC historic district pursuant to Section 106. The affected resources include Building 8, Veterans Drive, the earthen berm, as well as East Fort Miley, part of the Fort Miley Military Reservation NRHP-listed historic district. Specific steps have been taken to mitigate the potential effects of this project on these resources:

Building 8

- Construction will not be closer than 25 feet away from this building.
- Parking structure is as low as possible to preserve the visual prominence of Building 8 viewed from Veterans Drive.
- Parking structure will be constructed from reinforced concrete colored to be sympathetic to the existing color palette of the surrounding buildings. Further, aluminum lighting fixtures will be used to correspond with the theme of aluminum trims in the historic district.

Veterans Drive

- Parking structure will not modify historic alignment and location of Veterans Drive.
- Project will rebuild corner of Veterans Drive that currently does not exist (currently is an unused Lot A entry apron).
- Project will use ample landscaping to reduce the visual impact to the Veterans Drive streetscape, allowing the 1934-era buildings to retain a superior visual position.

Earthen Berm

- Project will preserve the earthen berm (remains of the sand hill that once resided on the project site) in its current configuration.
- Drainage improvements will decrease the risk of erosion of the berm.

East Fort Miley

- Project will retain an automobile entrance into East Fort Miley.
- Project has the lowest possible profile, and utilizes existing earthen berm to shield it from visible prominence from East Fort Miley.

Summary

The VA is requesting consultation on the above undertaking to fulfill Section 106 requirements of the NHPA. The project as designed has no significant impact to the historic properties within the APE. The VA is requesting your comments and concurrence on this undertaking.

Mr. Milford W. Donaldson
State Historic Preservation Officer
California Office of Historic Preservation
1416 9th Street, Room 1442
Sacramento, CA 95814

Please direct your comments to Floyd Devenbeck, Senior Project Engineer, San Francisco VA Medical Center, 4150 Clement Street, San Francisco, CA, 94121, (415) 221-4810, ext. 3664.

Please contact me at (415) 946-6694 with any questions.

Robert Shurell, AIA, LEED AP
robert.shurell@stantec.com

Attachments:

- Figure 1 – Site Location / Project Location Map
- Figure 2 – Areas of Potential Effect
- Figure 3 – Proposed SFVAMC Historic District Boundary

LOCATION MAP

FIGURE 1



VICINITY MAP



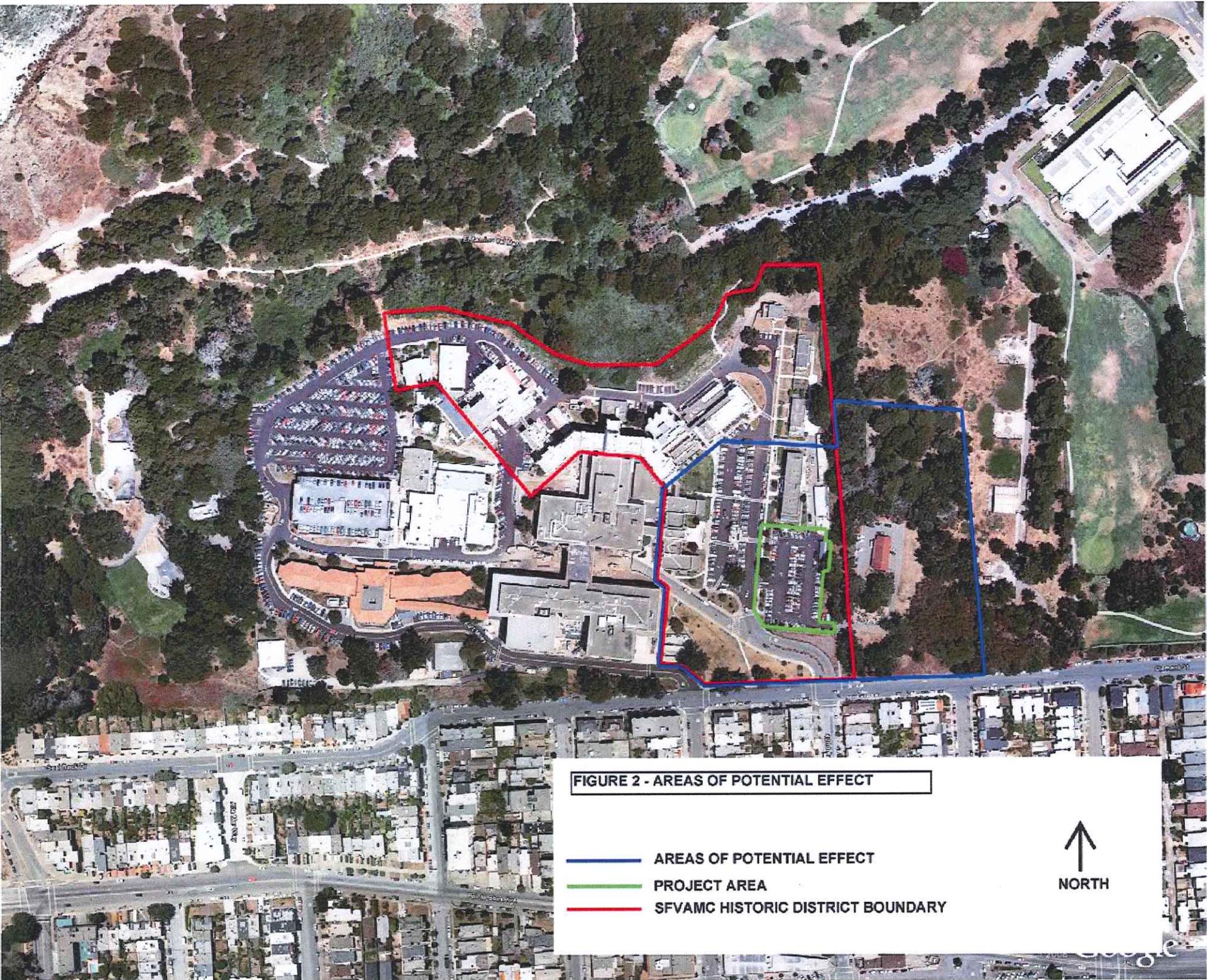


FIGURE 2 - AREAS OF POTENTIAL EFFECT

-  **AREAS OF POTENTIAL EFFECT**
-  **PROJECT AREA**
-  **SFVAMC HISTORIC DISTRICT BOUNDARY**



United States Department of the Interior
 National Park Service

FIGURE 3 - SFVAMC HISTORIC DISTRICT

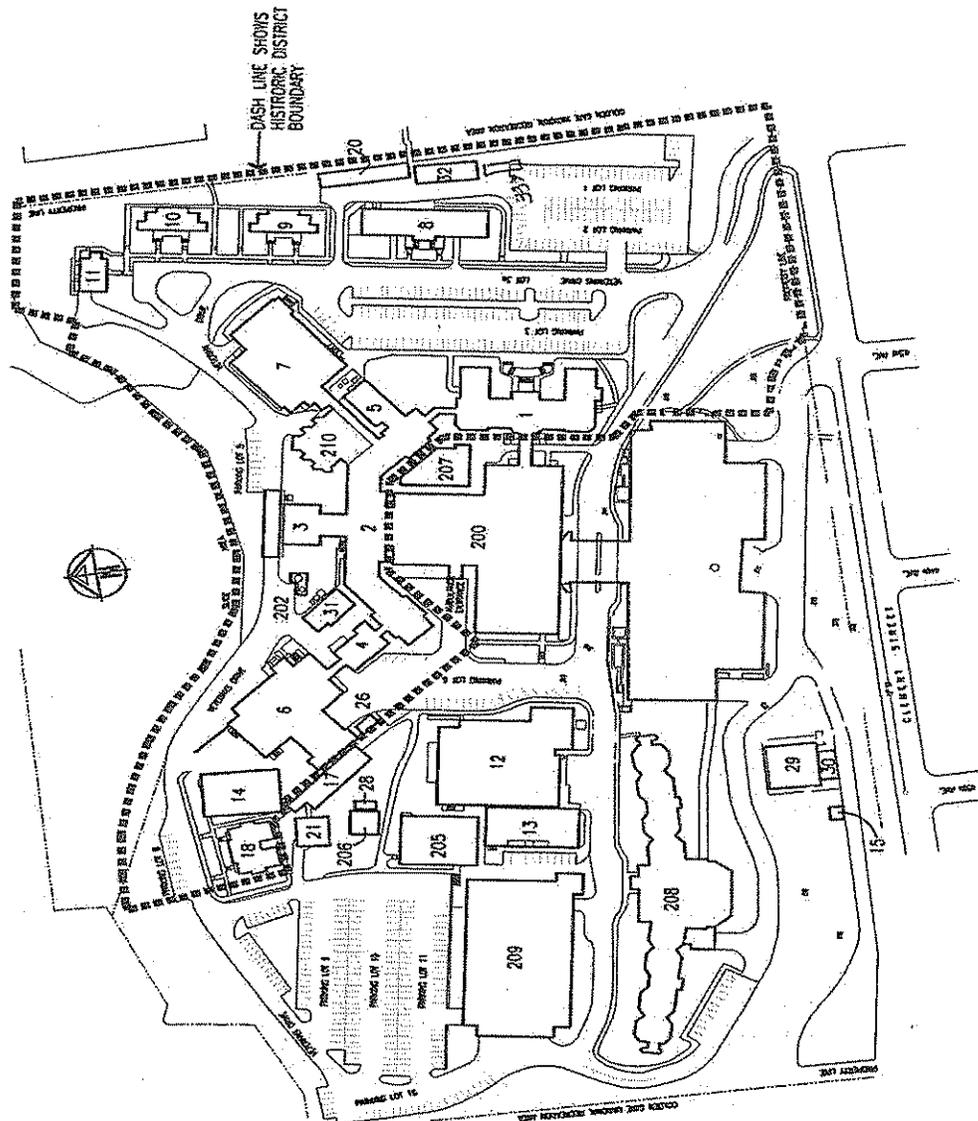
REPRINTED FROM 12/02/2008 RESUBMITTED NATIONAL REGISTER
 NOMINATION

National Register of Historic Places
 Continuation Sheet

Section number 10. Geographical Data

Page 2 of 2

SFVAMC - Historic District Map



- BUILDING LEGEND**
- 000 VACANT
 - 1 LABORATORY/PROBABLE/RESEARCH
 - 2 ADMINISTRATION
 - 3 ENGINEERING
 - 4 RESEARCH/ADMINISTRATION
 - 5 PHYSIATRY
 - 6 SUPPLY/INVENTORY/RESEARCH
 - 7 CATERING/CHALET/AUDITORIUM
 - 8 MEDIA WAREHOUSE/RESEARCH
 - 9 SATELLITE CLINIC
 - 10 QUARTERS
 - 11 QUARTERS
 - 12 RESEARCH
 - 13 ENGINEERING SHOPS/RESEARCH
 - 14 STORAGE
 - 15 RESEARCH ADMINISTRATION
 - 16 STORAGE
 - 17 STORAGE
 - 18 AMBULATORY
 - 19 ENGINEERING SHOPS
 - 20 STORAGE
 - 21 GYM
 - 22 RESEARCH
 - 23 RESEARCH
 - 24 RESEARCH
 - 25 RESEARCH
 - 26 RESEARCH
 - 27 RESEARCH
 - 28 RESEARCH
 - 29 RESEARCH
 - 30 RESEARCH
 - 31 RESEARCH
 - 200 CLINIC/EMERGENCY/AMBULATORY
 - 201 CLINIC/EMERGENCY/AMBULATORY
 - 202 CLINIC/EMERGENCY/AMBULATORY
 - 203 CLINIC/EMERGENCY/AMBULATORY
 - 204 CLINIC/EMERGENCY/AMBULATORY
 - 205 CLINIC/EMERGENCY/AMBULATORY
 - 206 CLINIC/EMERGENCY/AMBULATORY
 - 207 CLINIC/EMERGENCY/AMBULATORY
 - 208 CLINIC/EMERGENCY/AMBULATORY
 - 209 CLINIC/EMERGENCY/AMBULATORY
 - 210 CLINIC/EMERGENCY/AMBULATORY

Appendix C
Letter from State Historic Preservation Office

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

P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov
www.ohp.parks.ca.gov



June 30, 2010

Reply in Reference To: VA100326A

Floyd Devenbeck, Chief
Engineering Service
San Francisco VA Medical Center
4150 Clement Street
San Francisco, CA 94121

Re: Section 106 Consultation for Construction of Parking Garage at Veterans Affairs Medical Center,
4151 Clement Street, San Francisco, CA

Dear Mr. Devenbeck:

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

Due to a significant increase in Mental Health care services, the VA is proposing to construct a two-level, partially below grade parking structure to replace the current Parking Lot A area at the San Francisco VA Medical Center (SFVAMC), a listed National Register Historic District (NRHD). The project area is located approximately 25 feet from Building Eight, a district contributor constructed in 1934. The parking structure will obstruct the southern view of Building Eight but will not affect its, or the historic district's, character defining features that make them eligible for the National Register of Historic Places (NRHP). The new structure will occupy the same basic footprint as Parking Lot A. The structure's color and lighting will be designed to match the surrounding buildings and the overall character of the historic district. The project area is located within the immediate vicinity of the Fort Miley Military Reservation Historic District, but all proposed construction will not be visible or adversely impact this district. Equipment staging will occur on the center's front lawn, a non-contributing district element. Project components include:

- Construction of a partially below grade, reinforced concrete two level parking structure with a ramped upper level to facilitate connection with an existing road and a lower level adjacent to and even with Veteran's Drive;
- Ground disturbance for new construction to a maximum of 20 feet below grade and 150 feet in width;
- Landscaping and drainage improvements;
- Removal and possible relocation of Building 33, a non-contributing modular structure and;
- Realignment of Veteran's Drive to facilitate access to new parking structure.

The results of a record search indicated that no eligible or listed National Register resources are located within the direct area of potential effect (APE); however, the project area has historically been the location of or adjacent to the City Cemetery Reservation (ca. 1872), the Fort Miley Military Reservation and a telegraph station (ca. 1861). Additionally, four prehistoric midden sites (CA-SFR-20, CA-SFR-5, CA-SFR-21, and CA-SFR-24) have been identified and recorded within ¼ mile of the project area. The remnants of a sand hill lines the eastern edge of the project area, but it is my understanding that this formation will not be altered or affected by this project. Given the depth of

ground disturbance associated with this undertaking, the project area's immediate proximity to the Fort Miley Military Reservation Historic District, and the possibility of the unanticipated discovery of subsurface cultural materials, I suggest that the VA ensures that a qualified archeologist is present during all ground disturbing activities associated with this project. As a result of this information, the VA is requesting my concurrence with their determination that this project will not adversely affect historic resources.

The VA has submitted maps delineating the project's location and APE, photographs, and evidence of tribal consultation in support of this undertaking. After reviewing this information, I have the following comments:

- 1) I concur that the Area of Potential Effects (APE) has been properly determined and documented pursuant to 36 CFR Parts 800.4 (a)(1) and 800.16(d).
- 2) Should the VA decide to relocate Building 33 within the boundaries of the medical center historic district, please consult with my office regarding this relocation's potential to adversely affect historic properties before initiating project activities.
- 3) If you agree to the above mentioned monitoring condition, I suggest a finding of conditional No Adverse Effect pursuant to 36 CFR Part 800.5 (b) is appropriate for this project and that the documentation supporting this finding has been provided pursuant to 36 CFR Part 800.11(d).
- 4) Please be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, you may have future responsibilities for this undertaking under 36 CFR Part 800.

If you agree with the conditions that I have proposed, please evidence your agreement by signing the signature block below. Please return the letter to me as soon as possible. Alternatively, you may provide me with a separate letter concurring in the proposed determinations. Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions, please contact Ed Carroll of my staff at your earliest convenience a (916) 653-9010, or email at ecarroll@parks.ca.gov.

Sincerely,

Susan K Stratton for

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

F. C. Devenbeck Date 7/2/2010

Floyd Devenbeck, Chief
Engineering Service
Veteran's Affairs

The Office of Historic Preservation will be moving to a new location as of July 14, 2010. The new address for the office will be 1725 23rd Street, Suite 100, Sacramento CA 95816. Please update your records accordingly. The entire office will also be receiving new phone numbers, and those numbers will be posted on our website at www.ohp.parks.ca.gov when they are active.