Appendix H

Coastal Assessment Supporting Information

- Coastal Consistency Determination
- California Coastal Commission Concurrence Letter for the Consistency Determination & Adopted Staff Report

COASTAL CONSISTENCY DETERMINATION
SAN FRANCISCO VA MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN

I. AUTHORITY

The U.S. Department of Veterans Affairs (VA) is submitting this Coastal Consistency Determination in compliance with Section 930.34 et seq. of the National Oceanic and Atmospheric Administration Federal Consistency Regulations (Title 15 Code of Federal Regulations Part 930).

II. DETERMINATION

In accordance with the federal Coastal Zone Management Act (CZMA) of 1972, as amended, VA has determined that the Long Range Development Plan (LRDP) for the San Francisco VA Medical Center (SFVAMC) is consistent to the maximum extent practicable with the CZMA of 1972, as amended, and with the California Coastal Act (CCA) of 1976, as amended.

III. PROJECT DESCRIPTION

The Proposed Action is a LRDP that supports the mission of the San Francisco Veterans Affairs Medical Center (SFVAMC) to provide for the health care needs of Bay Area and North Coast Veterans by providing for the renovation, expansion, and operation of SFVAMC Fort Miley Campus. The LRDP includes development of new and retrofitting of existing buildings and structures that house patient care, research, administrative, and hoptel[1] functions, as well as parking. The SFVAMC has identified a need for retrofitting existing buildings at the Fort Miley Campus to meet the most recent seismic safety requirements and for an additional 589,000 gross square feet (gsf) of medical facility space to satisfy the needs of all San Francisco Bay Area and North Coast Veterans through approximately 2030 (see Figure 1). The LRDP is divided into planned short and long-term phases that would implement various facility components through 2027.

All new development would be designed to achieve Leadership in Energy and Environmental Design (LEED®) Silver certification and would implement the VA Strategic Sustainability Performance Plan (VA SSPP), which identifies VA's sustainability goals and defines VA's policy and strategy for achieving these goals. In addition to new development and associated demolition, buildings would be retrofitted according to VA seismic design requirements (VA Directive H-18-8), in compliance with Executive Order 12941.

An Environmental Impact Statement (EIS) was prepared to evaluate the potential environmental effects associated with implementing the LRDP for the SFVAMC at Fort Miley in San Francisco, California. Four alternatives were evaluated in the EIS process:

- **Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative (Preferred Alternative)**— Alternative 1 is based on the LRDP, which proposes a reduced variation of the layout originally proposed in the October 2010 Draft IMP. Rather than the Draft IMP's proposed 924,200 additional gsf at the SFVAMC Fort Miley Campus, Alternative 1 proposes 322,200 net new gsf of facilities space and 232,252 new gsf of parking.

[1] A hoptel is an overnight, shared lodging facility for eligible Veterans receiving healthcare services. This temporary lodging is available to Veterans who need to travel 50 or more miles from their homes to the SFVAMC Fort Miley Campus.

Source: Data provided by the SFVAMC Engineering Department in 2010

Figure 1: Location of SFVAMC Fort Miley Campus within the Urban Context of San Francisco

garage space, for a total of 554,452 gsf of additional space. This alternative also proposes seismic upgrades to various existing structures on the Campus. Construction would occur in one short-term phase (Phase 1) and one long-term phase (Phase 2). This alternative allows VA to achieve 94% of its determined need of 589,000 net new gsf to serve Veterans through roughly 2030 at a single campus. VA understands this is 6% short of the determined space need.

- **Alternative 2: SFVAMC Fort Miley Campus Buildout Alternative 2**—Alternative 2 is also based on the LRDP, which proposes a reduced variation of the layout originally proposed in the October 2010 Draft IMP. Rather than the Draft IMP's proposed 924,200 additional gsf at the SFVAMC Fort Miley Campus, Alternative 2 proposes 322,200 net new gsf of facilities space and 232,252 new gsf of parking garage space, for a total of 554,452 gsf of additional space. This alternative also proposes seismic upgrades to various existing structures on the Campus. Construction would occur in one short-term phase (Phase 1) and one long-term phase (Phase 2). However a different, longer construction schedule would occur in the form of different phasing and implementation schedules for individual projects compared to Alternative 1. However, the total amount and type of operational space would be the same as that under Alternative 1. This alternative allows VA to achieve 94% of its determined need of 589,000 net new gsf to serve Veterans through roughly 2030 at a single campus. VA understands this is 6% short of the determined space need..

- **Alternative 3: SFVAMC Fort Miley Campus Plus Mission Bay Campus Alternative** —Alternative 3 would include all of the short-term (Phase 1) project components of Alternative 1. However, the long-term (Phase 2) project component would be located off-site. The particular site is unknown at this time; it would be determined and purchased by VA at a later date, and presumably would be located in the Mission Bay area of San Francisco. This alternative would entail adding a total of approximately 170,000 gsf in net new space at a Mission Bay location. This alternative allows VA to achieve 94% of its determined need of 589,000 net new gsf to serve Veterans through roughly 2030 at two campuses. VA understands this is 6% short of the determined space need.

- **Alternative 4: No Action Alternative**—Under the No Action Alternative (Alternative 4), the LRDP would not be implemented. This alternative would be 100% short of the determined space need. The purpose of analyzing the No Action Alternative is to allow decision-makers to compare the impacts of the action alternatives against the impacts of no action in the future. Although this alternative does not meet the purpose and need, it is included to allow decision-makers to compare the impacts of the action alternatives against the impacts of no action in the future.

Under both Alternatives 1 and 2, Phase 1 (short-term) project components would involve new development and/or retrofitting of patient care, research, administrative, hoptel, and parking structures on the existing 29-acre SFVAMC Fort Miley Campus through approximately 2020. The Phase 1 development footprint would take up approximately 0.69 acres within the previously developed areas of the existing 29-acre Campus. Short-term project components are summarized in Tables 1 and 2 and are shown in Figures 2 and 3.

Phase 2 (long-term) project components would be different for Alternatives 1 and 2. For Alternative 1, Phase 2 project components primarily would involve new development of Building 213, a clinical addition building, on the 29-acre SFVAMC Fort Miley Campus through 2027 (see Table 3 and Figure 4). The Alternative 1, Phase 2 development footprint would not take up any new acreage within the previously developed areas of the existing 29-acre Campus, as it would be constructed on the site of Building 12 (which would be demolished as part of

Alternative 1 Phase 1). Implementation of the Alternative 1, Phase 2 project components would involve one subphase of development and retrofitting over approximately 2 years, with completion anticipated by April 2026.

For Alternative 2, Phase 2 project components primarily would involve new development and retrofitting of patient care, research, administrative, and ambulatory care structures on the 29-acre SFVAMC Fort Miley Campus through 2023 (see Table 4 and Figure 5). Like Alternative 1 (Phase 2), the Alternative 2 Phase 2 development footprint would not take up any new acreage within the previously developed areas of the existing 29-acre Campus, as the proposed Building 213 would be constructed on the site of existing Building 12 (which would be demolished as part of Alternative 2 Phase 1) and seismic retrofits to existing Buildings 1, 6, and 8 would not result in new developed acreage. Under Alternative 2, implementation of the long-term (Phase 2) project components of Alternative 1 would involve four subphases of development and retrofitting over approximately 5.5 years, with completion anticipated by approximately March 2026.

Table 1: Alternative 1 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)[1,2]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
Phase 1						
1.1	Bldg 211—Emergency Operations Center and Parking Garage (377 spaces)[5]	155,000 (of which 2,000 is EOC and 3,000 is storage space)	155,000	4	12 months	July 2014
1.2	Bldg 41—Research (requires removal of Trailer 17)	14,200 (of which 4,600 is mechanical penthouse)	12,500	2	15 months	May 2015
1.3	Seismic Retrofit of Bldgs 5 and 7	27,393	0	2 and 3	14 months	May 2015
1.4	Bldg 22 Hoptel and Seismic Retrofit of Bldgs 9 and 10	18,200	8,700	2, 2, and 2	13 months	May 2015
1.5	Bldgs 209 and 211 Parking Garage Extensions (250 spaces)	82,252	82,252	5 and 4	12 months	March 2016
1.6	Bldg 203 C-Wing Extension (Ground-Floor Patient Welcome Center) and Drop-off Area with Canopy Structure	7,100	7,100	1	13 months	August 2016
1.7	Bldg 200 Expansion (Operating Room D-Wing)	5,300	5,300	1	12 months	June 2016
1.8	Bldg 24 Mental Health Clinic Expansion (requires demolition of Bldg 20)	15,600	13,300	3	14 months	October 2016
1.9	Bldg 40—Research (requires demolition of Bldgs 14, 18, and 21; removal of Trailer 23; and relocation of water tower)	110,000	91,300	4 (+ basement and mechanical	39 months	December 2018

Table 1: Alternative 1 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)[1,2]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
				penthouse)		
1.10	Bldg 207 Expansion (IT Support Space)	7,000	7,000	2	14 months	January 2017
1.11	Bldg 43—Research/ Administration (requires removal of Trailer 31)	15,000	13,500	2	15 months	February 2017
1.12	Trailer 36 (New Modular)	2,200	2,200	1	3 months	September 2016
1.13	Bldg 23—Mental Health Research Expansion	15,000	15,000	3 (+ basement)	14 months	December 2017
1.14	Bldg 203 Extension—Psychiatric Intensive Care Unit	1,200	1,200	1	18 months	June 2018
1.15	Bldg 208 Extension—Community Living Center and National Cardiac Device Surveillance Center (requires removal of Trailer 24)	10,000	9,000	3	18 months	August 2018
1.16	Seismic Retrofit of Bldgs 1, 6, and 8	115,547	0	5, 4, and 3	20 months	March 2019
1.17	Demolition of Bldg 12	0	-38,900	N/A	11 months	August 2020
	Total Phase 1 Area	**600,992**	**384,452**	**Total Phase 1 Duration**		**85 months**

Notes:
Bldg = Building; EOC = Emergency Operations Center; IT = information technology; N/A = not applicable
1 This table reflects approximate construction schedules and completion dates.
2 In addition, a total of 321 parking spaces would be eliminated from a combination of surface parking lots D, E, H, J, K, and L.
3 Construction includes all demolition, grading, structure development, and painting activities associated with the Proposed Action.
4 Dates shown represent approximate time frames; funding has yet to be secured for some project components. Furthermore, because of space restrictions, the ability of the U.S. Department of Veterans Affairs to construct multiple phase components simultaneously is limited.
5 The Emergency Operations Center and Building 211 Parking Garage square footage in this table reflects both the habitable (center and storage area) and the nonhabitable (parking garage) space planned for construction. Although the San Francisco Veterans Affairs Medical Center Long Range Development Plan discusses habitable square footage, this Environmental Impact Statement must evaluate the impacts associated with construction of the entire square footage, including nonhabitable space.
Source: VA, 2014

Table 2-1: Alternative 1 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)[1,2]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
Phase 1						
1.1	Bldg 211—Emergency Operations Center and Parking Garage (377 spaces)[5]	155,000 (of which 2,000 is EOC and	155,000	4	12 months	July 2014

Table 1: Alternative 1 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)[1,2]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
		3,000 is storage space)				
1.2	Bldg 41—Research (requires removal of Trailer 17)	14,200 (of which 4,600 is mechanical penthouse)	12,500	2	15 months	May 2015
1.3	Seismic Retrofit of Bldgs 5 and 7	27,393	0	2 and 3	14 months	May 2015
1.4	Bldg 22 Hoptel and Seismic Retrofit of Bldgs 9 and 10	18,200	8,700	2, 2, and 2	13 months	May 2015
1.5	Bldgs 209 and 211 Parking Garage Extensions (250 spaces)	82,252	82,252	5 and 4	12 months	March 2016
1.6	Bldg 203 C-Wing Extension (Ground-Floor Patient Welcome Center) and Drop-off Area with Canopy Structure	7,100	7,100	1	13 months	August 2016
1.7	Bldg 200 Expansion (Operating Room D-Wing)	5,300	5,300	1	12 months	June 2016
1.8	Bldg 24 Mental Health Clinic Expansion (requires demolition of Bldg 20)	15,600	13,300	3	14 months	October 2016
1.9	Bldg 40—Research (requires demolition of Bldgs 14, 18, and 21; removal of Trailer 23; and relocation of water tower)	110,000	91,300	4 (+ basement and mechanical penthouse)	39 months	December 2018
1.10	Bldg 207 Expansion (IT Support Space)	7,000	7,000	2	14 months	January 2017
1.11	Bldg 43—Research/ Administration (requires removal of Trailer 31)	15,000	13,500	2	15 months	February 2017
1.12	Trailer 36 (New Modular)	2,200	2,200	1	3 months	September 2016
1.13	Bldg 23—Mental Health Research Expansion	15,000	15,000	3 (+ basement)	14 months	December 2017
1.14	Bldg 203 Extension—Psychiatric Intensive Care Unit	1,200	1,200	1	18 months	June 2018
1.15	Bldg 208 Extension—Community Living Center and National Cardiac Device Surveillance Center (requires removal of Trailer 24)	10,000	9,000	3	18 months	August 2018
1.16	Seismic Retrofit of Bldgs 1, 6, and 8	115,547	0	5, 4, and 3	20 months	March 2019

Table 1: Alternative 1 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)[1,2]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
1.17	Demolition of Bldg 12	0	-38,900	N/A	11 months	August 2020
	Total Phase 1 Area	**600,992**	**384,452**	**Total Phase 1 Duration**		**85 months**

Notes:
Bldg = Building; EOC = Emergency Operations Center; IT = information technology; N/A = not applicable
1 This table reflects approximate construction schedules and completion dates.
2 In addition, a total of 321 parking spaces would be eliminated from a combination of surface parking lots D, E, H, J, K, and L.
3 Construction includes all demolition, grading, structure development, and painting activities associated with the Proposed Action.
4 Dates shown represent approximate time frames; funding has yet to be secured for some project components. Furthermore, because of space restrictions, the ability of the U.S. Department of Veterans Affairs to construct multiple phase components simultaneously is limited.
5 The Emergency Operations Center and Building 211 Parking Garage square footage in this table reflects both the habitable (center and storage area) and the nonhabitable (parking garage) space planned for construction. Although the San Francisco Veterans Affairs Medical Center Long Range Development Plan discusses habitable square footage, this Environmental Impact Statement must evaluate the impacts associated with construction of the entire square footage, including nonhabitable space.
Source: VA, 2014

Table 2: Alternative 2 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)1,2

Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
Phase 1					
Bldg 211—Emergency Operations Center and Parking Garage (377 spaces)[5]	155,000 (of which 2,000 is EOC and 3,000 is storage space)	155,000	4	12 months	July 2014
Bldg 41—Research (requires removal of Trailer 17)	14,200 (of which 4,600 is mechanical penthouse)	12,500	2	15 months	March 2015
Seismic Retrofit of Bldgs 5 and 7	27,393	0	2 and 3	14 months	May 2015
Bldg 22 Hoptel and Seismic Retrofit of Bldgs 9 and 10	18,200	8,700	2, 2, and 2	13 months	May 2015
Bldgs 209 and 211 Parking Garage Extensions (250 spaces)	82,252	82,252	5 and 4	12 months	March 2016
Bldg 203 C-Wing Extension (Ground-Floor Patient Welcome Center) and Drop-off Area with Canopy Structure	7,100	7,100	1	13 months	August 2016
Bldg 200 Expansion (Operating	5,300	5,300	1	12 months	June 2016

Room D-Wing)					
Bldg 24 Mental Health Clinic Expansion (requires demolition of Bldg 20)	15,600	13,300	3	14 months	October 2016
Bldg 40—Research (requires demolition of Bldgs 14, 18, and 21; removal of Trailer 23; and relocation of water tower)	110,000	91,300	4 (+ basement and mechanical penthouse)	39 months	September 2018
Bldg 207 Expansion (IT Support Space)	7,000	7,000	2	14 months	January 2017
Bldg 43—Research/ Administration (requires removal of Trailer 31)	15,000	13,500	2	15 months	February 2017
Trailer 36 (New Modular)	2,200	2,200	1	3 months	September 2016
Bldg 23—Mental Health Research Expansion	15,000	15,000	3 (+ basement)	14 months	December 2017
Bldg 203 Extension—Psychiatric Intensive Care Unit	1,200	1,200	1	18 months	June 2018
Bldg 208 Extension—Community Living Center and National Cardiac Device Surveillance Center (requires removal of Trailer 24)	10,000	9,000	3	18 months	August 2017
Demolition of Bldg 12	0	-38,900	N/A	11 months	August 2019
Total Phase 1 Area		**485,445**	**384,452**	**Total Phase 1 Duration**	**73 months**

Bldg = Building; EOC = Emergency Operations Center; IT = information technology; N/A = not applicable

Notes:

[1] This table reflects approximate construction schedules and completion dates.

[2] In addition, a total of 321 parking spaces would be eliminated from a combination of surface parking lots D, E, H, J, K, and L.

[3] Construction includes all demolition, grading, structure development, and painting activities associated with the Proposed Action.

[4] Dates shown represent approximate time frames; funding has yet to be secured for some project components. Furthermore, because of space restrictions, the ability of VA to construct multiple phase components simultaneously is limited.

[5] The Emergency Operations Center and Building 211 Parking Garage square footage in this table reflects both the habitable (center and storage area) and the nonhabitable (parking garage) space planned for construction. Although the San Francisco Veterans Affairs Medical Center Long Range Development Plan discusses habitable square footage, this Environmental Impact Statement must evaluate the impacts associated with construction of the entire square footage, including nonhabitable space.

Source: VA, 2014

Source: VA, 2014
Note: The 17 subphases of Phase 1 components identified in Table 1 are indicated in this figure.

Figure 2: Alternatives 1 and 3 (Phase 1) Footprint and Concept Plan through 2020—SFVAMC Fort Miley Campus

Source: VA, 2014
Note: The 16 subphases of Phase 1 components identified in Table 2 are indicated in this figure.

Figure 3: Alternative 2 (Phase 1) Footprint and Concept Plan through 2020—SFVAMC Fort Miley Campus

Table 3: Alternative 1 Long-Term (Phase 2) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2020 through 2027)[1]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[2]	Approximate Completion Date[3]
Phase 2						
2.1	Bldg 213 (Clinical Addition Building)	170,000	170,000	5 (+ basement)	24 months	March 2026
	Total Phase 2 Area	**170,000**	**170,000**	**Total Phase 2 Duration**		**24 months**

Bldg = Building
Notes:
1 This table reflects approximate construction schedules and completion dates.
2 Construction includes all demolition, grading, structure development, and painting activities associated with the Proposed Action.
3 Dates shown represent approximate time frames; funding has yet to be secured for some project components. Furthermore, because of space restrictions, the ability of VA to construct multiple phase components simultaneously is limited.
Source: VA, 2014

Source: VA, 2014
Note: The one Phase 2 subphase component identified in Table 3 is indicated in this figure.

Figure 4 **Alternative 1 Long-Term (Phase 2) Footprint and Concept Plan through 2027—SFVAMC Fort Miley Campus**

Table 4: Alternative 2 Long-Term (Phase 2) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2020 through 2027)[1]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[2]	Approximate Completion Date[3]
Phase 2						
2.1	Bldg 8 (Seismic Retrofit)	25,521	0	3	14 months	December 2021
2.2	Bldg 1 (Seismic Retrofit)	37,765	0	5	20 months	June 2022
2.3	Bldg 6 (Seismic Retrofit)	52,261	0	4	20 months	February 2024
2.4	Bldg 213 (Clinical Addition Building)	170,000	170,000	5 (+ basement)	24 months	March 2026
	Total Phase 2 Area	**285,487**	**170,000**	**Total Phase 2 Duration**		**65 months**

Bldg = Building
Notes:
1 This table reflects approximate construction schedules and completion dates.
2 Construction includes all demolition, grading, structure development, and painting activities associated with the Proposed Action.
3 Dates shown represent approximate time frames; funding has yet to be secured for some project components. Furthermore, because of space restrictions, the ability of the U.S. Department of Veterans Affairs to construct multiple phase components simultaneously is limited.
Source: VA, 2014

Source: VA, 2014
Note: The four subphases of Phase 2 components identified in Table 4 are indicated in this figure.

Figure 5: Alternative 2 Long-Term (Phase 2) Footprint and Concept Plan through 2027—SFVAMC Fort Miley Campus

For Alternative 3, Phase 2 project components would involve primarily development of ambulatory care, research, and parking structures at a potential new SFVAMC Mission Bay Campus. Since only project components located at the SFVAMC Fort Miley Campus are subject to consistency determination by the California Coastal Commission (Commission), Alternative 3 Phase 2 project components would not be applicable and are not discussed further.

Landscaping and Open Space

An objective of the LRDP is to coordinate the location and massing of the buildings so that continued development of the Campus improves connections to surrounding parks and other parts of the City of San Francisco. The public urban spaces that would be created are intended to transform the Campus into an integral urban area that fits with the City. Various open space areas of the existing SFVAMC Fort Miley Campus would be developed with the proposed buildings including the Mental Health Clinic Expansion and the Hoptel Addition. In addition, a new landscape area would be developed within the drop- off circle that is proposed as part of the Patient Welcome Center and Drop-off Area, including a healing garden. Sidewalks and walkways for pedestrians would be modified to improve connectivity and flow between facilities. Six landscape zones are envisioned in the LRDP for the Campus:

1. the gateway landscape zone that would serve as the entry to the SFVAMC Fort Miley Campus, marking the transition from the adjacent city grid to the Campus setting,

2. the buffer zone which would be designed to serve as appropriate buffer and transition areas at the edges of the Campus,

3. the coastal landscape/overlook trail area at the northern edge of the Campus which would include walking trails, as well as a location for formal events and informal gatherings and reflection,

4. the healing garden zone, which would be designed as areas of quiet relaxation and contemplation, incorporating the area’s natural setting and views,

5. the garden landscape areas would be integrated throughout the Campus, with formal landscaped areas that provide a pleasant and comfortable pedestrian environment surrounding buildings and near parking areas,

6. the pedestrian pathways and connections would be incorporated throughout the Campus, with the intent of enhancing the pedestrian environment and encouraging mobility, creating connections to landscaped areas and destinations.

IV. PROJECT AREAS AND ACTIVITIES SUBJECT TO CONSISTENCY DETERMINATION

The existing SFVAMC Fort Miley Campus is located at 4150 Clement Street in the northwestern portion of San Francisco, adjacent to the outer Richmond neighborhood, approximately 2 miles west of State Route (SR) 1 (also known as Park Presidio Bypass Drive in this area) (see Figure 1). The Campus is bordered by Clement Street and private residential uses to the south, and National Park Service lands to the north, east, and west (see Figure 6). The Campus is situated approximately 6 miles west of downtown San Francisco and encompasses approximately 29 acres.

Source: VA, 2014

Figure 6: Existing SFVAMC Fort Miley Campus Layout

The SFVAMC Fort Miley Campus is located on federal lands that are owned by VA. The existing SFVAMC Fort Miley Campus facilities occupy approximately 1 million square feet and include a 124-bed tertiary-care hospital, primary- and specialty-care services, and a 120-bed community living center. SFVAMC has identified a deficiency of 589,000 square feet of building space. As shown in Figure 6, the Campus contains 36 buildings totaling approximately 987,000 square feet of habitable development, including:

- An inpatient hospital building
- An outpatient clinical building
- Research buildings
- Two hoptel buildings
- A community living center
- Administrative/office buildings
- Various storage, infrastructure, and other facilities

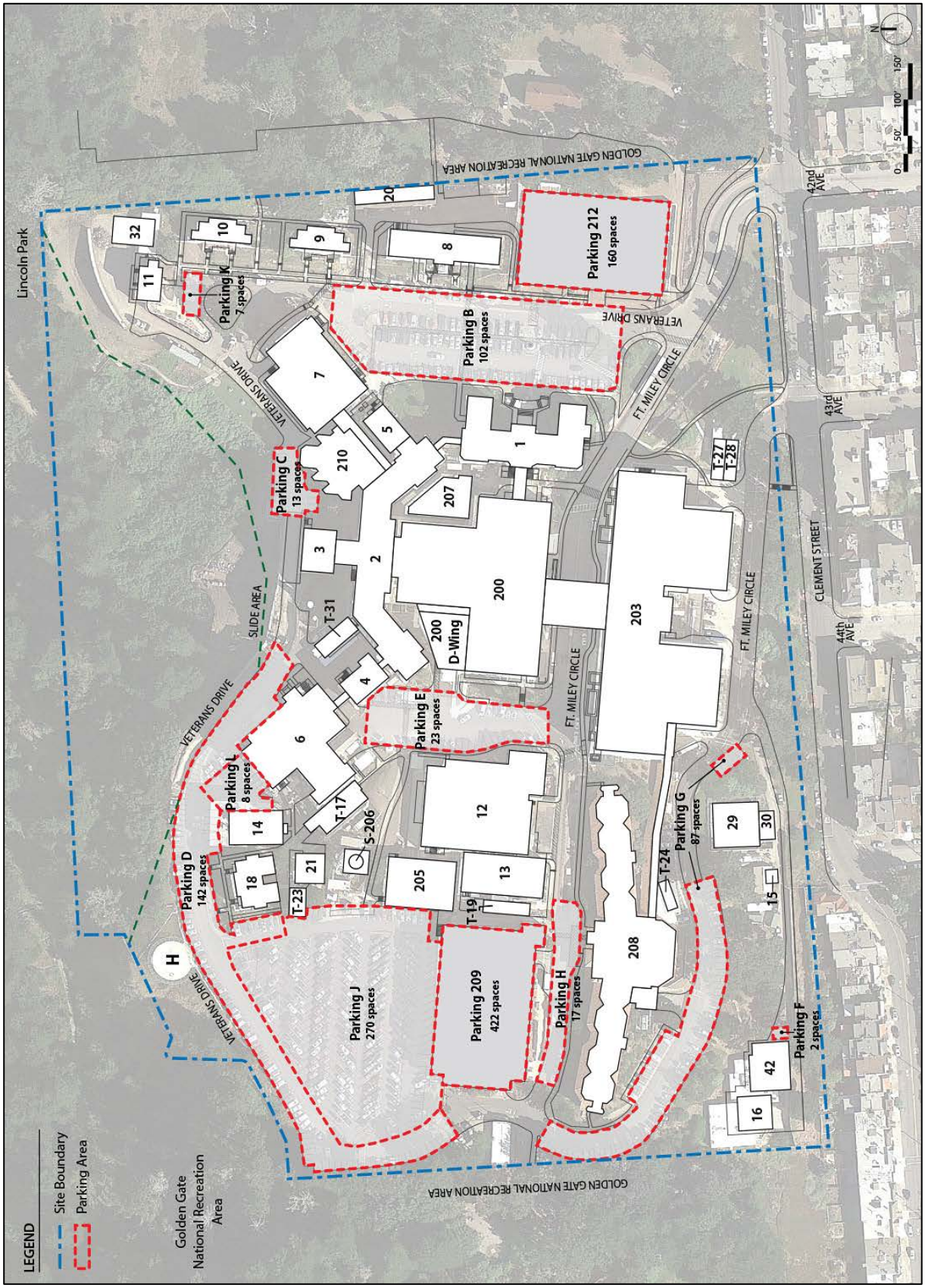
In addition, 10 surface parking lot areas and two parking structures provide 1,253 parking spaces (see Figure 7). A helipad is located at the northwestern corner of the Campus.

The majority of the SFVAMC, primarily the west side (approximately 24.4 acres, or 84 percent) of the Campus is located within the California Coastal Zone boundary (see Figure 8). As defined in Section 304 of the federal CZMA of 1972, the term “coastal zone” does not include “lands the use of which is by law subject solely to the discretion of or which is held in trust by the federal government.” The Campus is within federal jurisdiction and is wholly owned and operated by VA. Although the regulations of the Coastal Zone Management Act are not directly applicable to the existing SFVAMC Fort Miley Campus, VA recognizes that actions outside the coastal zone may affect land or water uses or natural resources along the coast and, therefore, are subject to the provisions of the CZMA.

The coastal zone established by the CCA does not include San Francisco Bay, which is defined as the area east of the Golden Gate Bridge. The San Francisco Bay Conservation and Development Commission (BCDC) is the federally designated State coastal management agency for San Francisco Bay. This designation empowers BCDC to use the authority of the federal CZMA, so that federal projects and activities are consistent with the policies of the San Francisco Bay Plan and State law. The coastal portions of the Mission Bay area are located within BCDC’s area of jurisdiction, which includes the first 100 feet shoreward from the line of highest tidal action (mean high-tide line) around San Francisco Bay. Therefore, only the proposed project activities at the existing SFVAMC Fort Miley Campus are subject to consistency determination under the CCA by the Commission.

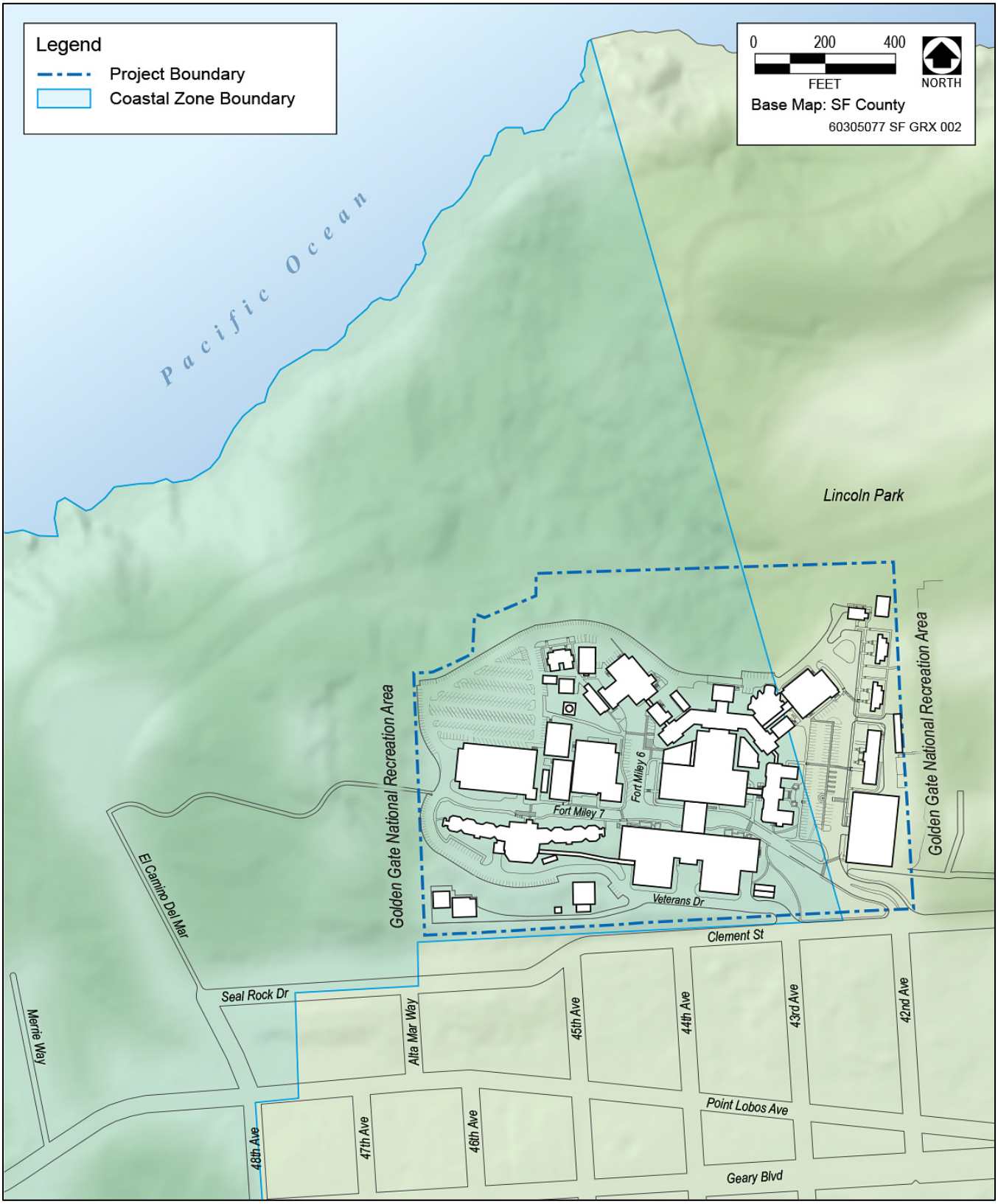
If Alternative 3 is chosen and the selected project site for Phase 2 is situated within 100 feet of San Francisco Bay, a consistency determination would be obtained from BCDC before commencement of construction and the construction contractor would attempt to avoid the BCDC jurisdictional line. If development were to be proposed along the water’s edge of San Francisco Bay, an application would be submitted to BCDC for approval if any of the following actions would need to occur:

- placing solid material, building or repairing docks or pile-supported or cantilevered structures, disposing of material, or mooring a vessel for a long period in San Francisco Bay or in certain tributaries that flow into the bay;



Source: VA, 2012

Figure 7: Parking Facilities—Existing SFVAMC Fort Miley Campus



Source: Base layer from SF County; coastal zone boundary layer from California Department of Transportation TSI/GIS Data Branch, 2009; data compiled by AECOM in 2014

Figure 8: Coastal Zone Boundary

- dredging or extracting material from the bay bottom;
- substantially changing the use of any structure or area;
- constructing, remodeling, or repairing a structure; or
- subdividing property or grading land.

Prior Commission Action on VA Proposals at the SFVAMC Fort Miley Campus

One previous VA action at the SFVAMC has been subject to federal consistency review. On March 12, 2007, the Commission issued Negative Determination (ND) ND-095-06 for the SFVAMC Building 203 Seismic Retrofit Project.

V. CONSISTENCY OF THE LRDP WITH PROVISIONS OF THE CALIFORNIA COASTAL ACT

Since CZMA Section 307 provides the legal authority for the Commission to review federal agency activities along the Pacific Coast in California for consistency with the California Coastal Management Program, this portion of the federal consistency determination analyzes consistency between policy sections of the CCA (Divisions 20, California Public Resources Code) and the proposed LRDP project components on federal lands included within the SFVAMC Fort Miley Campus.

Policies under the CCA that are <u>not applicable</u> to the LRDP include:

- Article 2, Public Access
  - Section 30212 - New development projects
  - Section 30213 - Lower cost visitor and recreational facilities; encouragement and provision; overnight room rentals
- Article 3, Recreation
  - Section 30220 - Protection of certain water-oriented activities
  - Section 30221 - Oceanfront land; protection for recreational use and development
  - Section 30222 - Private lands; priority of development purposes
  - Section 30222.5 - Oceanfront lands; aquaculture facilities; priority
  - Section 30224 - Recreational boating use; encouragement; facilities
- Article 4, Marine Environment
  - Section 30230 - Marine resources; maintenance
  - Section 30233 - Diking, filling or dredging; continued movement of sediment and nutrients
  - Section 30234 - Commercial fishing and recreational boating facilities
  - Section 30234.5 - Economic, commercial, and recreational importance of fishing
  - Section 30235 - Construction altering natural shoreline
  - Section 30236 - Water supply and flood control
- Article 5, Land Resources

- Section 30241 - Prime agricultural land; maintenance in agricultural production
- Section 30241.5 - Agricultural land; determination of viability of uses; economic feasibility evaluation
- Section 30242 - Lands suitable for agricultural use; conversion
- Section 30243 - Productivity of soils and timberlands; conversions

- All sections of Article 7, Industrial Development

Policies under the CCA that are applicable to the LRDP include:

Article 2, Public Access

Section 30210: Access; recreational opportunities; posting. In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse. (Amended by Ch. 1075, Stats. 1978.)

Section 30211: Development not to interfere with access. Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Analysis and Comment: The existing SFVAMC Fort Miley Campus is bounded on three sides by a contiguous system of parklands consisting of Lands End, Fort Miley, and Lincoln Park. Implementation of the project components would not inhibit access to or use of adjacent Golden Gate National Recreation Area (GGNRA) recreational areas. Access to East Fort Miley and West Fort Miley is available from the Campus near the main entrance by way of a paved roadway. During construction, this road could be temporarily closed, although this access road is not the primary entry point into adjacent Fort Miley, some hospital-related staff and recreationists likely use these roadway occasionally to access the parklands. To the extent practicable, the access road would be kept open during construction, however, if a temporary closure of the roadway is necessary, notification of the closure would be posted a minimum of 2 weeks in advance. There are multiple locations to access the Lands End–Fort Miley–Lincoln Park system and the primary access points into the parklands system would remain open and would not be affected, therefore temporary closure of the Campus access road is not expected to inhibit access to and use of these parks.

Section 30212.5: Public facilities; distribution. Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.

Analysis and Comment: Parking structures within the SFVAMC Fort Miley Campus serve the personnel, patients and visitors and are not intended for coastal access parking (see Figure 8). On-street parking in the vicinity of the existing SFVAMC Fort Miley Campus generally consists of unmetered parallel parking. Existing on-street parking conditions were qualitatively assessed by field observations conducted during the weekday peak periods. Based on the field observations, it was determined that on-street parking is well utilized throughout the day, although particular occupancy percentages can vary depending on location and peak period.

Alternative 1, Alternative 2, and Alternative 3 (Phase 1) would result in a net new parking demand of an estimated 132 spaces during the weekday peak period. As part of Phase 1, 321 existing parking spaces would be eliminated and replaced by 377 new parking spaces as part of the proposed Emergency Operations Center and Building 211 Parking Garage. In addition, 250 new parking spaces would be added as part of the extensions of Buildings 209 and 211, for a net addition of 306 spaces by the year 2020 which would exceed the estimated new demand by 174 spaces. Alternative 1 and Alternative 2 (Phase 1 and Phase 2) would generate a demand for 426 parking spaces under 2027 conditions. Parking generally is not considered part of the permanent physical environment, with supply and demand highly variable and dependent on many different factors. The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit services, taxis, bicycles, or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Shifts to transit service are consistent with the City of San Francisco's "Transit First" policy.

Some SFVAMC Fort Miley Campus parking spaces would be temporarily unavailable to accommodate space for temporary modular structures that would be put in place for employees to work in while some buildings are being seismically retrofitted. However, VA parking would not overflow into public parking areas that would affect the public's ability to gain coastal access. During construction periods, VA would provide additional valet parking services on the SFVAMC Fort Miley Campus to address temporary parking reductions. In addition, VA parking (primarily weekday operations) would not overlap with weekend public parking for access to coastal public areas.

Veterans and hospital personnel would benefit from additional park spaces, improved circulation and connections to the surrounding federal park system.

Section 30214: Implementation of public access policies; legislative intent. (a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

(1) Topographic and geologic site characteristics.

(2) The capacity of the site to sustain use and at what level of intensity.

(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.

(4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

Analysis and Comment: Public access to adjacent parklands is not regulated by VA, however connections are available adjacent to the Campus into the Lands End–Fort Miley–Lincoln Park system. There is not a security fence around SFVAMC, therefore, while the site is primarily for patients, visitors and personnel, the public can pass through the Campus. Access to East Fort Miley and West Fort Miley, located within the GGNRA, is available from the Campus near the main entrance through a roadway that may be closed during a portion of construction activities. Access to Fort Miley from the Campus may be used by hospital-related staff, patients, visitors and occasional recreationists. Temporary closure of the access road will not affect use of the

parklands because the primary entry point into adjacent Fort Miley would still be available and there are multiple other locations in which to access the parklands.

During construction the contractor would manage nonhazardous building construction and demolition waste in accordance with VA Specifications Section 017419, which requires efficient waste management and removal and legal disposal of materials. During demolition and construction, hazardous waste would be disposed in a manner consistent with federal, State, and local regulations. During operation of SFVAMC the VA complies with all waste management policies.

Article 3, Recreation

Section 30223: Upland Areas. Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

Analysis and Comment: The existing SFVAMC Fort Miley Campus is bounded on three sides by a contiguous system of parklands consisting of Lands End, Fort Miley, and Lincoln Park. Immediately east and west of the Campus is Fort Miley, part of the GGNRA managed by the National Park Service (NPS). Under the LRDP, no taking of adjacent parklands would occur because all future modifications would be entirely within the existing footprint of the Campus. However, East Fort Miley and West Fort Miley are currently accessible from the Campus by way of a paved roadway from the Campus near the main entrance. Although this access road is not the primary entry points into adjacent Fort Miley, some hospital-related staff, patients, visitors and recreationists may occasionallyaccess the parklands from this road. To the extent practicable, the access roads would be kept open during construction, however, if a temporary closure is necessary, notification of the closure would be posted a minimum of 2 weeks in advance. There are several other locations to access the Lands End–Fort Miley–Lincoln Park system include the main access points, which would remain open during any temporary closure. Therefore, implementation of project components would not inhibit access to or use of the adjacent GGNRA recreational areas.

Article 4, Marine Environment

Section 30231: Biological productivity; water quality. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Analysis and Comment: No creeks or open water bodies are located on or near the existing SFVAMC Fort Miley Campus. During construction, potentially adverse impacts could occur to bird species and bats using the area, related to vegetation removal. However, with the implementation of wildlife surveys and avoidance of the breeding season, impacts would be minor **[EIS Mitigation Measure WH-1]**. Removal of landscape species such as Monterey pine, Monterey cypress, and the understory during construction would not constitute an adverse impact to vegetation and habitats because these species are not native to the area. Because the footprint of operations at the SFVAMC Fort Miley Campus generally would remain the same,

the condition of surrounding habitat is not anticipated to change or become degraded. No impacts to vegetation and habitat would occur from operation of the project.

The project would be required to comply with Article 4.1 of the San Francisco Public Works Code, which regulates the quantity and quality of discharges to the combined sewer system. A storm water pollution prevention plan (SWPPP) would be prepared to reduce project-related pollution of surface water throughout the construction period. Most stormwater runoff from the project site would be collected and treated at the Oceanside Water Pollution Control Plant before discharge to the Pacific Ocean, and therefore would meet the effluent discharge limitations set by the plant's National Pollutant Discharge Elimination System (NPDES) permit. For stormwater that discharges to the small, separate storm drainage system on the north side of the existing SFVAMC Fort Miley Campus along the north-facing slope, the project would be required to obtain coverage under the Construction General Permit (Order 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ), which requires the development and implementation of a SWPPP. Through preparation and implementation of SWPPPs, compliance with required permits, and implementation of VA Specification Section 015719, "Temporary Environmental Controls," construction-related water quality impacts to the Pacific Ocean would be minor.

All wastewater from the SFVAMC Fort Miley Campus would be treated at the Oceanside Water Pollution Control Plant before being discharged to the Pacific Ocean. Treatment would be provided to meet the effluent discharge limitations set by the plant's NPDES permit.

An increase in total or peak runoff volume from the site relative to existing conditions could contribute to the frequency or severity of combined sewer overflow (CSO) events discharged to the Pacific Ocean. Project implementation is anticipated to result in an increase in impervious sites (0.69 acre increase in impervious area, which is a 4 percent increase in impervious area at the 29-acre Campus), compared to existing conditions on the SFVAMC Fort Miley Campus. However, implementation of the project components would result in minimal alterations to runoff conditions because the projects would occur within the existing development footprint of the Campus, primarily on existing impervious sites (i.e., existing paved parking areas and buildings). Submittal and implementation of final drainage plans would ensure proper sizing of infrastructure to handle stormwater and wastewater flows, to protect from downgradient flooding hazards that could affect the coastal zone **[EIS Mitigation Measure HYD-1]**. In addition, the use of Low Impact Development (LID) techniques to infiltrate, evaporate, and detain stormwater would be required to comply with Section 438 of the federal Energy Independence and Security Act and Article 4.2 of the San Francisco Public Works Code, and this would ensure maintenance of predevelopment stormwater runoff conditions. No groundwater would be used as part of the project.

Section 30232: Oil and hazardous substance spills. Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

Analysis and Comment: The project would be required to comply with Article 4.1 of the San Francisco Public Works Code, which regulates the quantity and quality of discharges to the combined sewer system. A SWPPP would be prepared to reduce project-related pollution of surface water throughout the construction period. Most stormwater runoff from the project site also would be collected and treated at the Oceanside Water

Pollution Control Plant before discharge to the Pacific Ocean, and therefore would meet the effluent discharge limitations set by the plant's NPDES permit. For stormwater discharged to the small, separate storm drainage system on the north side of the existing SFVAMC Fort Miley Campus along the north-facing slope, the project would be required to obtain coverage under the Construction General Permit (Order 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ), which requires the development and implementation of a SWPPP. Through preparation and implementation of SWPPPs, compliance with required permits, and implementation of VA Specification Section 015719, "Temporary Environmental Controls," construction-related water quality impacts to the Pacific Ocean would be minor.

Operation of the project would not substantially degrade water quality or contaminate the public water supply. All sanitary wastewater from the proposed buildings and most stormwater runoff from the SFVAMC Fort Miley Campus would flow into the City's combined sewer system, to be treated at the Oceanside Water Pollution Control Plant before discharge into the Pacific Ocean. Treatment would be provided pursuant to the effluent discharge limitations set by the plant's NPDES permit, and therefore would comply with all local wastewater discharge requirements. Stormwater runoff from the north slope of the Campus would flow to the small, separate storm drainage system and would be conveyed off-site through piping equipped with energy dissipaters. In addition, the stormwater runoff to the separate storm drain system that drains areas to the north of the Campus would be monitored by the SFVAMC, pursuant to requirements in the Industrial Class I Wastewater Permit issued by the San Francisco Public Utilities Commission (SFPUC) (Permit No. 10-06550).

The existing SFVAMC Fort Miley Campus and the surrounding area are occupied by structures of various uses that either are known to or presumably manage hazardous materials, medical chemicals, and petroleum products. Furthermore, the Campus is in an area of possible serpentinitic bedrock; therefore, naturally occurring asbestos may be present in the soil. The SFVAMC would be required to adhere to the regulations and standards for inspection, abatement, exposure, and disposal of any hazardous building materials encountered (e.g., lead, PCBs, mercury).

To minimize construction risks associated with hazardous materials exposure, all hazardous materials would be stored, used, transported, and disposed in strict accordance with all local, State, and federal hazardous waste regulations. Furthermore, the construction contractor would be required to submit an environmental protection plan, in accordance with VHA Environmental Protection Specifications Section 015719. This plan would describe the best management practices (BMPs) that would be implemented to minimize risks associated with the use, storage, handling, and transport of hazardous materials and the contingency protocols to be implemented in the event of an accidental release or exposure during construction. Compliance with the environmental protection plan would ensure that impacts associated with potential hazardous materials exposure would be minor.

Operation of the project would generate hazardous wastes similar to those currently permitted to be generated, stored, and/or released on the existing SFVAMC Fort Miley Campus by State and federal agencies. Because the project would expand the Campus, an increase in the generation of hazardous wastes may result. However, the VA SSPP includes the implementation of environmental management action plans. These action plans would provide guidance on reducing the use and disposal of hazardous materials, implementing integrated pest management and landscape management practices that would reduce the use of hazardous chemicals and would increase the use of alternative chemicals and processes. Therefore, compliance with the

VA SSPP and the acquisition and/or maintenance of the appropriate permits from agencies (such as a Hazardous Material Registration, Hazardous Materials Certificate of Registration, and Large Quantity Generator permit for medical waste from the San Francisco Department of Public Health, Hazardous Materials Unified Program Agency (HMUPA) for the operation of Alternative 1 short-term projects would ensure that impacts associated with hazardous waste generation would be minor.

Article 5, Land Resources

Section 30240 Environmentally sensitive habitat areas; adjacent developments. (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas. (Amended by Ch. 285, Stats. 1991.)

Analysis and Comment: No creeks, wetlands, or open water bodies are located on or near the existing SFVAMC Fort Miley Campus. Habitat within the Campus is largely developed and consists of landscaped and planted trees; however, the areas along the northern, eastern, and western perimeters of the Campus property are less developed. The vegetation assemblages, observed on the property in 2008 and 2012 by AECOM staff, are primarily nonnative. Remnant coastal scrub habitat is present in the northern undeveloped area of the Campus. Serpentine-derived soils or outcrops, chaparral, coastal scrub, sand dunes, wetlands, and native grasslands have not been observed on the remainder of the Campus, although some of these habitats historically have existed on the Campus.

Section 30244 Archaeological or paleontological resources. Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

Analysis and Comment: The existing SFVAMC Fort Miley Campus is underlain by artificial fill, dune sand, and the geologic formation known as the Franciscan Assemblage. Because of the young age of the artificial fill and dune sand, and the way in which the Franciscan Assemblage was formed, they are considered to be of low paleontological sensitivity. Furthermore, the result of a records search at the University of California Museum of Paleontology (UCMP) indicated that no fossils have been recovered from areas beneath the Campus. Therefore, construction activities would have minor impact.

Archival research demonstrates that no prehistoric or historic-era archaeological sites, features, artifacts, or human remains have been documented within the existing SFVAMC Fort Miley Campus. Therefore, construction activities at the Campus would have no direct or indirect impact to presently documented archaeological resources and human remains.

If an inadvertent discovery of cultural materials (e.g., unusual amounts of shell, animal bone, bottle glass, ceramics, structure/building remains) or human remains was made during project-related construction activities, ground disturbances in the area of the find would be halted and a qualified professional archaeologist would be notified regarding the discovery. The archaeologist would determine whether the resource was potentially significant as per the National Register of Historic Places (NRHP) and would

develop appropriate mitigation. If human remains were encountered, the San Francisco County Coroner would be notified immediately on their discovery. If the Coroner determined that they were of Native American origin, the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) would apply **[EIS Mitigation Measure CR-1]**.

The Campus includes the SFVAMC Historic District and is adjacent to the Fort Miley Historic District. Implementing the LRDP would result in a direct adverse impact to the SFVAMC Historic District because of the incremental impairment of the integrity of materials, design, feeling, and setting of the Historic District that would result from buildout of all phases.

VA will ensure that any alteration or renovation of buildings that would occur in the SFVAMC Historic District would conform to the Secretary of the Interior's Standards for Rehabilitation to minimize any physical alterations to the buildings' structure and appearance that may compromise their integrity and status as an eligible resource. New construction that would alter the setting of the SFVAMC Historic District also would take the Secretary's Standards into consideration. Treatment or design guidelines for the SFVAMC Historic District may be necessary to ensure that these standards are customized to reflect the historical character of the Historic District. (This mitigation measure would be updated to reflect the consultation with State Historic Preservation Officer (SHPO) and consulting parties taking place under Section 106 of the National Historic Preservation Act of 1966 (NHPA) **[EIS Mitigation Measure CR-2]**). Adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties (Rehabilitation) to Reduce Impacts on the SFVAMC Historic District (implementation of **EIS Mitigation Measure CR-2**) would help reduce the severity of impacts of Alternative 1 short-term projects on the SFVAMC Historic District; however, the impact would remain adverse because project construction would still result in demolition of contributors and increased densification of the SFVAMC Historic District.

Article 6, Development

Section 30250: Location; existing developed area. (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

Analysis and Comment: The project would be located within the development footprint of the existing SCVAMC Fort Miley Campus, primarily on impervious sites (i.e., existing paved parking areas and buildings). The LRDP is consistent with this section.

Section 30251: Scenic and visual qualities. The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the

California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Analysis and Comment: The project would be located within the development footprint of the existing SCVAMC Fort Miley Campus, and none of the proposed structures would exceed the height of Building 2, which is the tallest existing building on the Campus.

Conventional BMPs related to screening of construction staging areas would be implemented during construction, to limit the frequency and prominence of views of construction equipment and materials. This would be a minor impact. Some of the structures proposed for Alternatives 1, 2, and 3 (Phase 1) would be located in relatively central areas of the Campus, which is not as visible from outside the Campus boundaries as areas along the perimeter. Buildings proposed in central portions of the Campus generally would not be visually dominant relative to existing buildings in that part of the Campus, because several of the existing structures are larger than the proposed structures. In addition, views of these new buildings from outside the Campus would be mostly screened from view by existing buildings, and/or would be set back sufficiently from the Campus boundaries to render them visually subordinate to other visible features. Therefore, buildings proposed for the central areas of the Campus would have a minor visual impact to views and would minimally affect the visual character of the Campus.

Buildings proposed as part of Phase 1 for both Alternatives 1, 2, and 3 for the eastern portion of the existing SFVAMC Fort Miley Campus would be intermittently visible in views from East Fort Miley. Although noticeable from GGNRA lands, the proposed new buildings in the eastern portion of the site would not be inconsistent with the character or scale of existing buildings in this area of the Campus, and they would be visible only intermittently through the heavy vegetation along the East Fort Miley and Campus boundary. New buildings proposed for the western portion of the Campus would not be visible from outside the Campus because they would be obscured by existing buildings, dense vegetation, or other landforms.

For Alternatives 1 and 2 (Phase 2), the massing of the proposed Clinical Addition Building (Building 213) would be visible from various publicly accessible locations on GGNRA lands north and east of the existing SFVAMC Fort Miley Campus, resulting in an alteration of the physical surroundings experienced by visitors to that area. Although this proposed multistory building would be visible to hikers from the trail along El Camino del Mar, the location is not a focal or prime destination for hikers; this is generally an area that people pass through on their way to more scenic GGNRA locations with more expansive views that include views of the Golden Gate Bridge and Marin Headlands. Most hiking trails are downslope of the Campus at a lower elevation and views of new buildings would only be noticeable from certain vantage points when the observer is looking upward toward the Campus. The proposed new building would be built with materials, colors, and massing that would be designed to fit with the context of existing buildings of the SFVAMC Fort Miley Campus, including the historic district, thereby minimizing its visual impact. In addition, vegetation currently screens portions of these views. Trees would be removed for construction associated with Buildings 24 and 203, and such tree removal; however, project implementation would result in the planting of trees along the perimeter of the Campus, which would further screen views of the proposed new buildings from the trail along El Camino del Mar and from more distant views such as those from the Marin Headlands and the Presidio. The effect of these proposed development changes to the Campus would be considered a minor impact.

Section 30252 Maintenance and enhancement of public access. The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Analysis and Comment: Based on the ridership totals, sufficient capacity would be available on transit services in the Geary Boulevard corridor (38 Geary, 38L Geary Limited, 38AX Geary "A" Express, and 38BX Geary "B" Express) to accommodate the transit demand of the project, which would generate the majority of its new ridership in the less-crowded "reverse commute" direction.

The project would improve sidewalks and walkways for pedestrians, and would provide improved connectivity across the Campus. Four major citywide bicycle routes consisting of Class I and Class III bikeways are situated in the vicinity of the existing SFVAMC Fort Miley Campus. Class I bicycle facilities are paved off-street paths, and Class III bicycle facilities are signed routes only, where bicyclists share travel lanes with vehicles. The expected increase in bicycle trips that would occur with implementation of the project would not be substantial enough to affect overall bicycle circulation in the area or the operations of adjacent bicycle facilities.

Parking demand generated by construction workers' personal vehicles is expected to be accommodated by existing parking facilities within the existing SFVAMC Fort Miley Campus. A valet parking system has been in place in the parking structures during construction and operation of the SFVAMC over the past couple of years which has assisted with overflow situations. Should parking constraints become an issue, a variety of measures are available at the disposal of SFVAMC and its contractors to minimize traffic and parking effects during construction activities, such as using a vanpool service to connect the construction site with transit stations and off-site parking facilities. For example, VA has leased offsite parking spaces through the NPS for limited temporary construction periods and provided shuttles to SFVAMC. Any offsite parking locations would be at existing parking lots and would not impact public access to parking or impact use of parklands or other adjacent land uses. Overall, construction-related parking demand would be short-term and temporary, and impacts would be minor.

Alternatives 1, 2, and 3 (Phase 1) would result in a long-term parking demand of an estimated 132 spaces during the weekday peak period. As part of Phase 1, 321 existing parking spaces would be eliminated and replaced by the construction of 627 new parking spaces as part of the proposed Emergency Operations Center, and Buildings 211 and 209 extensions, for a net addition of 306 spaces by the year 2020.

Alternatives 1 and 2 (Phase 2) would not include any additional parking facilities beyond the net addition of 306 spaces proposed under Phase 1. The net addition of 306 spaces would not meet the parking demand under Phase 2 conditions in 2027, for Alternative 1 or 2 Parking generally is not considered part of the permanent physical environment, with supply and demand highly variable and dependent on many different factors. The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit

services, taxis, bicycles, or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular would be consistent with the City of San Francisco's "Transit First" policy.

Operation of the project would result in new and additional medical and medical office space to accommodate existing medical needs. No permanent housing component is proposed; therefore, the area's population density would not be affected directly. However, Alternatives 1 and 2 would increase the number of personnel at the existing SFVAMC Fort Miley Campus by 642 (an 18 percent increase) between 2013 and 2020 and 616 (a 15 percent increase) between late 2020 and 2027. Some of these people might use adjacent Fort Miley within the GGNRA (e.g., personnel visiting a local park on their lunch breaks), but this additional usage is not expected to result in a substantial increase in demand for nearby recreational facilities. Furthermore, these employees would have lunch breaks at different times (because they would work various shifts), and only a fraction of daytime employees potentially would use park grounds for lunch or before or after work. The use of nearby recreational spaces by Campus employees is expected to be limited to weekday lunch hours, when resident usage may be lower than during the evening and weekend hours. Visitors and patients are not expected to use nearby parks because their visits to the Campus would be focused on healthcare services. Finally, because open space amenities would be provided as part of the project, access to on-site open space is expected to help offset any potential deterioration of nearby parks caused by Campus personnel, patients and visitors. For the reasons stated above, this impact would be minor.

Section 30253: Minimization of adverse impacts. New development shall do all of the following:

(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

(Amended by Ch. 179, Stats. 2008)

Analysis and Comment:

<u>Flood Hazard</u>

According to both the City and County of San Francisco's Interim Floodplain Maps and the Federal Emergency Management Agency's (FEMA) preliminary Flood Insurance Rate Map (FIRM), the existing SFVAMC Fort Miley Campus is not located within a flood hazard area. The elevation of the Campus ranges from 300 to 350 feet relative to mean sea level (msl), and the Campus is located approximately 1,000 feet (0.2 miles) from the nearest shoreline at its closest point. However, the total or peak runoff volume from the Campus could increase as a result of the project and would contribute to downstream flooding. The SFVAMC would be required to comply with Section 438 of the Energy Independence and Security Act (EISA) and implement LID techniques (e.g., bio-retention areas, permeable pavements, cisterns/recycling, and green

roofs) to mimic predevelopment stormwater runoff conditions by using site design techniques that would store, infiltrate, evaporate, and detain runoff. The SFVAMC also would be required to comply with Article 4.2 of the San Francisco Public Works Code, which requires submittal of a stormwater control plan that meets SFPUC guidelines. For compliance with Article 4.2, the stormwater runoff rate and volume from the portion of the project site that drains to the combined sewer would be required to decrease by 25 percent from the 2-year, 24-hour design storm. Submittal and implementation of final drainage plans would ensure proper sizing of infrastructure to handle stormwater and wastewater flows, to protect from downgradient flooding hazards that could affect the coastal zone **[EIS Mitigation Measure HYD-1]**.

Fire Hazard

Certain construction equipment, materials, and activities, such as welding, may increase the risk of fire on the SFVAMC Fort Miley Campus during construction of Alternative 1 short-term projects. This would be a potentially adverse impact. However, in accordance with VHA Specification Section 010000, "General Requirements," the construction contractor would be required to prepare a fire safety plan (prepared in accordance with Title 29 Code of Federal Regulations Part 1926) before the initiation of work. The plan would provide detailed, project-specific fire safety measures. In addition, all workers would be required to undergo a safety briefing, in accordance with Occupational Safety and Health Administration requirements. Compliance with the Fire Safety Plan and safety measures conveyed at the worker safety briefing would ensure that the potential impacts associated with fire during construction would be minor.

The SFVAMC Fort Miley Campus is located in an urbanized area with no or low wildland fire threat, according to the California Department of Forestry and Fire Protection. The project would operate on the Campus and would maintain existing urbanized land uses; therefore, the wildland fire threat would not increase.

General Hazard

Furthermore, to ensure public safety, the SFVAMC establishes and regularly updates hazards emergency protocols in its All-Hazards Emergency Operations Plan. This emergency operations plan identifies an organized process to initiate, manage, and recover from various types of emergencies that may potentially occur at the SFVAMC Fort Miley Campus. The plan also addresses emergency situations related to fire, hazardous materials/radiological/decontamination, utilities, bomb threats, behavioral emergencies, external emergencies, earthquakes, national disaster medical systems, VA/U.S. Department of Defense contingency hospitals, the national response framework, medical equipment, an infectious diseases/pandemic influx, a 96-hour plan, and medical surges. This emergency operations plan also includes detailed emergency operations procedures for staff and departmental response and communication, recovery procedures, communication procedures, resource and asset management, and security and safety operations. Through continued compliance with the SFVAMC's All-Hazards Emergency Operations Plan at the Campus, impacts associated with hazards and public safety would be minor.

Geologic Hazard

The San Francisco Bay Area is located in a seismically active region. The SFVAMC Fort Miley Campus lies within a region of active faulting and high seismicity, associated with the San Andreas Fault system. The San

Andreas Fault lies approximately 3.5 miles southwest of the Campus at its closest point. Several other active and potentially active faults occur within the project limits: the San Gregorio, Hayward, Point Reyes, Rodgers Creek, Calaveras, and others. The majority of Campus structures are more than 75 years old. Alternatives 1, 2, and 3 (Phase 1) projects, as well as Alternative 2 (Phase 2) projects, would involve seismic, structural, mechanical, and electrical reconstruction activities that would have a long-term beneficial effect on public safety by structurally stabilizing deteriorating buildings and infrastructure.

The SFVAMC Fort Miley Campus is not located within an area that is mapped as a liquefaction hazard zone. Lateral spreading is unlikely because no liquefaction hazard is present at the Campus. The Campus is not located within a designated landslide hazard zone, and no evidence of landslides was observed during a previous investigation.

An engineering geologic hazards (geotechnical investigation) and site-specific ground response report would be required for the Critical and Essential Facilities proposed as part of the project. Consequently, design and construction of the proposed facilities would address seismically induced ground shaking and associated ground failure, through engineering and design recommendations for the proposed facilities. Furthermore, a geotechnical contractor would review the project plans and specifications before construction, to check their conformance with the recommendations of the geotechnical reports. Therefore, because the facilities would be designed and constructed to meet VA's seismic design requirements, operation of the facilities constructed as part of the project would result in a minor impact related to seismically induced ground shaking and associated ground failure.

Native soil on the existing SFVAMC Fort Miley Campus has been found to be moderately to highly expansive. Consequently, design and construction of the proposed facilities would address any potential expansive or corrosive soils, through engineering and design recommendations for the proposed facilities. Furthermore, a geotechnical contractor would review the project plans and specifications before construction to check their conformance with the recommendations of geotechnical reports. Therefore, a minor impact related to expansive or corrosive soils would result from facility operation.

To minimize potential erosion and associated water quality degradation during construction, the SFVAMC would be required to comply with Article 4.1 of the San Francisco Public Works Code, which regulates the quantity and quality of discharges to the combined sewer system. These requirements include controlling sediments and erosion and implementing BMPs for construction materials and waste management and handling. In addition, a SWPPP would be prepared to reduce pollution of surface water throughout the project's construction period. The SWPPP would include specific and detailed BMPs, designed to reduce the amount of sediment and other construction-related pollutants in discharges associated with construction activities.

For the northern portion of the site, which drains to a separate storm system, the SFVAMC would obtain coverage under the Construction General Permit (SWRCB Order 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ), which requires the development and implementation of a SWPPP.

Potential construction impacts also would be minimized by implementing the requirements for protection of land resources, outlined in VA Specification Section 015719, "Temporary Environmental Controls." These include requirements such as setting work area limits, protecting the landscape, reducing exposure of

unprotected soils, protecting disturbed areas, installing erosion and sediment-control devices, managing spoil areas, and following good housekeeping procedures.

(c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.

Based on modeling performed by AECOM (2014), direct, short-term, construction-related emissions of criteria pollutants would be substantially less than the significance thresholds, and the direct impact to regional air quality would be minor. In an effort to reduce the effects of construction at VA facilities on the environment, VA requires that temporary environmental controls be employed during construction activities and enumerated as part of construction specifications (VA Specification Section 015719). These controls typically include actions related to the control of air pollutant emissions. Based on additional modeling performed by AECOM (2014), toxic air contaminants (TACs) and particulate matter ($PM_{2.5}$) emissions generated during construction would result in a minor direct impact with respect to health risks and no indirect impacts would occur.

Asbestos and lead-based paint are expected to be present in each of the structures to be demolished, and they would be abated per VA Specification Sections 028333.13, “Lead-Based Paint Removal and Disposal,” and 028213.41, “Asbestos Abatement for Total Demolition Projects.”

Short-term area- and mobile-source emissions were modeled using CalEEMod (AECOM, 2014), and short-term operational emissions of criteria pollutants would be substantially lower than the de minimis thresholds. Therefore, the direct impact to regional air quality of operational emissions of criteria pollutants would be minor.

Implementation of the project would not increase short-term (2020) traffic volumes in the vicinity of the existing SFVAMC Fort Miley Campus to 44,000 vehicles per hour, the carbon monoxide (CO) hotspot screening level that has been recommended by Bay Area Air Quality Management District (BAAQMD) and that evaluates a project’s relative level of compliance with national ambient air quality standards (NAAQS)and California ambient air quality standards (CAAQS), and no horizontal or vertical restrictions exist in the area that would trap CO and limit mixing. Therefore, receptors in the vicinity of the project would not be directly adversely affected by operation of the project. Impacts from localized CO emissions would be minor.

The Campus is not located near any high-volume roadways (i.e., 100,000 vehicles per day within a 150-meter radius if the SFVAMC site), and daily delivery truck trips to the Campus average approximately two per day. This number could potentially increase in the near term, relative to current conditions, but not substantially. Therefore, localized TAC and PM emissions from both on-site and off-site mobile sources would not directly adversely affect sensitive receptors either on-site (patients) or off-site (residents).

No permitted sources of TACs operate near the existing SFVAMC Fort Miley Campus, outside of the Campus itself. It is unknown whether the project would include any new permitted sources of TACs, such as incinerators, fume hoods, sterilizers, or backup diesel generators, but such a source would require a permit and best available control technology for toxics (T-BACT) to ensure that the patients and the neighboring community would not be adversely affected. Therefore, the operational impacts of TAC and $PM_{2.5}$ emissions from stationary sources would not adversely affect sensitive receptors. Impacts would be minor.

(d) Minimize energy consumption and vehicle miles traveled.

Although the project would involve expanding the existing SFVAMC Fort Miley Campus, the overall energy efficiency likely would improve with the decommissioning, demolition, and replacement of older, energy-intensive buildings. Consistent with the VA SSPP, SFVAMC would incorporate physical features and operational measures that would sustain and improve environmental efficiencies through a sustainable design master plan, to achieve a 30 percent reduction in greenhouse gas emissions by 2020. The improvements in the Sustainable Design Master Plan would include consideration of stand-alone technologies, such as installing photovoltaic panels on the roofs of new and/or existing buildings, as partial shades over windows or in open land areas as a method of providing building electrical power on-site.

The SFVAMC Fort Miley Campus currently contracts with a major transportation service to provide free bus and shuttle service to staff and patients daily. The service operates between the Campus and major transportation hubs in San Francisco, from 5:00 a.m. to 9:00 a.m. and again from 2:30 p.m. to 6:30 p.m. More than 200 staff and patients utilize this service daily. In addition, San Francisco Municipal Transportation Agency (SFMTA or Muni) Lines 38-Geary, 38L-Geary Limited, and 38AX-Geary A Express operate in the vicinity of the Campus. The Campus would continue to experience multimodal access and circulation, including passenger vehicles, buses, shuttle vans, delivery vehicles, emergency medical and fire vehicles, and pedestrians. Therefore, a reduction would occur in vehicle miles traveled.

Section 30254: Public works facilities. New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

Analysis and Comment: Implementation of the LRDP would not require an expansion of the existing water utility system for water treatment or wastewater treatment. The VA SSPP establishes water conservation goals for VA facilities to be achieved by 2020. Specifically, the VA SSPP states that VA facilities have a potable-water reduction target of 26 percent by 2020, as compared to the base year (2007), and an industrial and landscaping water use reduction target of 20 percent by 2020, as compared to the base year (2010). SFVAMC has committed to a 30 percent reduction target that exceeds the goal established in the VA SSPP. The estimated increase in water demand and wastewater generation with implementation of the project would not require expansion of water treatment facilities. In addition, the SFPUC has confirmed that the growth projections used in the SFPUC's 2010 Urban Water Management Plan (UWMP) included implementation of the project; regardless of whether the SFVAMC implements the VA SSPP's reduction target, SFPUC would be able to accommodate the project water demands.

Several utility lines serving the existing SFVAMC Fort Miley Campus are located within the footprint of the project components. These lines would be relocated as necessary before construction of the project components, to prevent interruption of service during construction. To accomplish this, project engineers

would prepare and implement a plan to provide alternate service to these buildings before demolition and during construction. Utilities to be relocated would include domestic water, fire suppression water, and combined storm/sanitary sewer lines, underground electric, natural gas, and compressed air lines.

Although the project would expand the existing SFVAMC Fort Miley Campus, the overall energy efficiency likely would improve with the decommissioning, demolition, and replacement of older, energy-intensive buildings. Consistent with the VA SSPP, as stated above, SFVAMC would incorporate physical features and operational measures that would sustain and improve environmental efficiencies through a sustainable design master plan, to achieve a 15 percent reduction in greenhouse gas emissions by 2015 (29.6 percent reduction by 2020). Existing electricity and natural gas infrastructure capacity is considered adequate to accommodate the anticipated demand at the Campus. Should on-site improvements and connections be required, such improvements would be coordinated with PG&E during the continued planning of the project components, so that the construction and operation of new electric and natural gas distribution lines would be completed in compliance with federal, State, and local regulatory requirements, minimizing the potential for adverse impacts.

Section 30254.5: Terms or conditions on sewage treatment plant development; prohibition. Notwithstanding any other provision of law, the commission may not impose any term or condition on the development of any sewage treatment plant which is applicable to any future development that the commission finds can be accommodated by that plant consistent with this division. Nothing in this section modifies the provisions and requirements of Sections 30254 and 30412. (Added by Ch. 978, Stats. 1984.)

Analysis and Comment: Implementation of the LRDP would not require an expansion of existing wastewater treatment facilities at the Oceanside Water Pollution Control Plant or construction of a new wastewater treatment plant. The SFVAMC Fort Miley Campus is located within the service area of the City of San Francisco's combined sewer system; therefore, both domestic wastewater and stormwater flow into the sewers. The sanitary sewer system at the Campus collects and conveys wastewater from building lateral connections to the site's combined sewer system and eventually to SFPUC's combined sewer interceptor on Clement Street. This method of discharge generally would continue with implementation of the project. Stormwater design would incorporate LID techniques to maintain the site's predevelopment stormwater discharge rates and volumes by using design techniques that would infiltrate, filter, store, evaporate, and detain runoff close to the source, such as green roofs and bioswales, as well as energy dissipaters to prevent concentrated flows. Landscaping and LID practices would be incorporated as part of building design and would provide improved ground/soil absorption of runoff. The use of energy dissipaters to prevent concentrated flows also would minimize the impact of stormwater flows.

The VA SSPP establishes water conservation goals for VA facilities to be achieved by 2020. Specifically, the VA SSPP states that VA facilities have a potable-water reduction target of 26 percent by 2020, as compared to the base year (2007), and an industrial and landscaping water use reduction target of 20 percent by 2020, as compared to the base year (2010). SFVAMC has committed to a 30 percent reduction target that exceeds the goal established in the VA SSPP. The estimated increase in water demand and associated wastewater generation with implementation of the project would not require expansion of wastewater treatment facilities.

Section 30255: Priority of coastal-dependent developments. Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-

dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support. (Amended by Ch. 1090, Stats. 1979.)

Analysis and Comment: The SFVAMC Fort Miley Campus is located adjacent to the Point Lobos bluff at an elevation of 300 to 350 feet relative to msl. The land to the north and west of the site drops sharply downward toward the Pacific Ocean, while the terrain to the east slopes more gently. However, the Campus is not located on the shoreline; the Campus is approximately 1,000 feet (0.2 miles) from the nearest shoreline at its closest point. The Campus has been at its present location since 1934, and the project would be constructed on its existing 29 acres, within a reasonable location adjacent to the same type of medical uses. This location allows patients and visitors to enjoy the views and vistas of the Pacific Ocean and portions of the City that support the healing process.

STATE OF CALIFORNIA -- NATURAL RESOURCES AGENCY EDMUND G. BROWN, *Governor*

CALIFORNIA COASTAL COMMISSION
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200

June 15, 2015

San Francisco VA Medical Center
Attn: Robin Flanagan 00-RF
4150 Clement Street
San Francisco, CA 94121

Re: **CD-0003-15** Department of Veterans Affairs, Consistency Determination, San Francisco VA Medical Center Fort Miley Campus Long Range Development Plan (LRDP), Phase 1, San Francisco

Dear Ms. Flanagan:

On June 12, 2015, by a unanimous vote, the California Coastal Commission **concurred with** the above-referenced consistency determination. Prior to the Commission hearing and vote, the Department of Veterans Affairs agreed that the following clarifications and commitments were incorporated into the project before the Commission:

The Department of Veterans Affairs agrees to submit to the Executive Director, for his review and concurrence, prior to construction:

(1) Stormwater and water storage plans that avoid contributing to geologic instability; and

(2) A combination of landscape screening, building setbacks, and/or stairstep designs to avoid the parking garages being visible from the Camino del Mar Trail.

The Department of Veterans Affairs also agreed that any future plans to use GGNRA parking lots would be subject to Executive Director review and concurrence.

With these commitments, the Commission found Phase 1 of the LRDP to be consistent to the maximum extent practicable with the California Coastal Management Program. If you have any questions, please feel free to call me at (415) 904-5249.

Sincerely,

JOSEPH STREET
Environmental Scientist
Energy, Ocean Resources & Federal
Consistency Division

cc: North Central District Office
Golden Gate National Recreation Area

CALIFORNIA COASTAL COMMISSION
45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105- 2219
VOICE (415) 904- 5200
FAX (415) 904- 5400
TDD (415) 597-5885

F8b

Filed:	4/8/15
60th Day:	6/7/15
75th Day:	6/22/15
Staff:	J. Street-SF
Staff Report:	5/22/15
Hearing Date:	6/12/15
Commission Vote:	10 – 0

ADOPTED STAFF REPORT: REGULAR CALENDAR

Consistency Determination No.:	**CD-0003-15**
Federal Agency:	**Department of Veterans Affairs**
Location:	San Francisco Veterans Affairs Medical Center Fort Miley Campus, 4150 Clement Street, City and County of San Francisco.
Project Description:	San Francisco Veterans Affairs Medical Center Fort Miley Campus Long Range Development Plan, Phase 1.
Commission Action:	Concurrence

SUMMARY OF COMMISSION ACTION

The U.S. Department of Veterans Affairs (VA) has submitted a consistency determination for the San Francisco VA Medical Center (SFVAMC) Fort Miley Campus (Campus) Long Range Development Plan (LRDP[1]). The LRDP is a comprehensive plan created to guide the development of the 29-acre SFVAMC Campus located at 4150 Clement Street in the City of San

[1] Note: Not to be confused with the same term and acronym used in Commission review of State University LRDPs under to Section 30605 of the Coastal Act.

Francisco. The LRDP outlines the construction of new buildings, demolition of old buildings, and retrofitting of existing buildings that would occur through the year 2027. The LRDP would support the SFVAMC's mission to be a major primary and tertiary healthcare center which provides cost-effective and high-quality care to eligible veterans in the SF Bay Area and North Coast of California.

As submitted, the LRDP consistency determination outlines a near-term phase (Phase 1) and a long-term phase (Phase 2), with two location alternatives for Phase 2; one at Fort Miley and the other in Mission Bay in eastern San Francisco. Since the two alternate locations for Phase 2 would result in varying degrees of impact, and because the VA has not made a final determination as to which location will be selected, a "phased" review of this consistency determination is appropriate. Therefore, the Commission's review of the VA's consistency determination will only be for Phase 1 activities within the LRDP. The standard of review for this project is consistency to the maximum extent practicable with the Chapter 3 policies of the Coastal Act.

The SFVAMC Campus is surrounded by Golden Gate National Recreation Area (GGNRA) lands to the north, west, and east, and by the outer Richmond District residential neighborhood to the south. Implementation of Phase 1 development activities would increase parking demand during weekday peaks periods by 132 parking spaces. Since most of the parking in the surrounding area is free, unmetered, parallel parking, off-campus parking by additional employees and users of the medical facility has the potential to affect public access to the coastal zone and nearby GGNRA lands. However, Phase 1 development includes construction of a new parking structure that would provide a net increase of 306 parking spaces on Campus, which would accommodate the parking demand increase generated by Phase 1 development. Therefore, the Commission finds the project consistent with Coastal Act public access and recreation policies (Section 30210, 30211, 30212.5 and 30252).

All of the planned development for Phase 1 would take place within the existing SFVAMC Campus development footprint, consistent with the height, materials, colors, and massing of the existing development. Some of the new structures would be visible from outside Campus through vegetation along trails within GGNRA lands. While this new development would alter the scenery of the area, portions of the trails affected are not primary destinations for hikers. The VA would mitigate permanent and temporary visual impacts by planting native trees along the Campus borders and implementing best management practices during construction to screen construction equipment. The visual impacts of the new parking structures (the buildings nearest the Campus boundary and GGNRA parklands) would be mitigated through a combination of landscape screening, building setbacks, and/or stairstep designs to avoid the parking garages being visible from the Camino del Mar trail. This set of mitigation measures will be submitted to the Executive Director of the Commission, for his review and concurrence, prior to construction. With these measures in place, the Commission finds the project consistent with the visual policies of the Coastal Act (Section 30251).

No creeks, wetlands, open water bodies, federally listed species, or environmentally sensitive habitat areas would be affected by the Phase 1 improvements. Implementation of the LRDP would limit impervious surfaces primarily to existing already impervious sites, resulting in

minimal impacts to the site's runoff conditions. The VA would include low impact development techniques, comply with the San Francisco Public Works Code, and implement a storm water pollution prevention plan to reduce any potential impacts to water quality. In response to concerns voiced by GGNRA staff, the VA has also committed to developing stormwater and water storage plans that avoid contributing to geologic instability; these plans will be submitted to the Executive Director, for his review and concurrence, prior to construction. Therefore, the Commission finds the project consistent with the water quality and hazards polices of the Coastal Act (Sections 30231 and 30253(a) and (b)).

For the above reasons, the Commission **concurs** with CD-0003-15.

TABLE OF CONTENTS

I. FEDERAL AGENCY'S CONSISTENCY DETERMINATION 5
II. ACTION, MOTION AND RESOLUTION 5
III. APPLICABLE LEGAL AUTHORITIES 5
IV. FINDINGS AND DECLARATIONS 6
A. PROJECT DESCRIPTION AND BACKGROUND 6
B. OTHER AGENCY APPROVALS AND CONSULTATIONS 8
C. PUBLIC ACCESS AND RECREATION 9
D. VISUAL RESOURCES 12
E. WATER QUALITY & GEOLOGIC HAZARDS 13

APPENDICES

Appendix A – Substantive File Documents 15

EXHIBITS

Exhibit 1 – SFVAMC Campus Location
Exhibit 2 – Neighborhood Context
Exhibit 3 – Coastal Zone Boundary
Exhibit 4a – Pre-existing Campus Layout
Exhibit 4b – Phase 1 Development
Exhibit 4c – Phase 2-Alternative 1 Development
Exhibit 5a – Pre-existing On-site Parking
Exhibit 5b – New On-site Parking, Phase 1
Exhibit 6 – Construction Parking Impacts Avoidance & Mitigation Measures
Exhibit 7 – Aerial Perspectives
Exhibit 8 – Visual Changes
Exhibit 9 – Public Comments & Staff Response to Public Comments
Exhibit 10 – National Park Service Comments

I. FEDERAL AGENCY'S CONSISTENCY DETERMINATION

The Department of Veterans Affairs has determined the project is consistent to the maximum extent practicable with the California Coastal Management Program (CCMP).

II. COMMISSION ACTION, MOTION AND RESOLUTION

A. COMMISSION ACTION – CONCURRENCE

On June 12, 2015, by a vote of ten in favor, none opposed, the Commission concurred with the consistency determination submitted by the VA on the grounds that the project is consistent to the maximum extent practicable with the policies of Chapter 3 of the Coastal Act.

B. MOTION AND RESOLUTION

Motion:

> *I move that the Commission **concur** with consistency determination CD-0003-15.*

Staff recommends a **YES** vote on the motion. Passage of this motion will result in an agreement with the determination and adoption of the following resolution and findings. An affirmative vote of a majority of the Commissioners present is required to pass the motion.

Resolution:

> *The Commission hereby concurs with consistency determination CD-0003-15 by the Department of Veterans Affairs on the grounds that the project is fully consistent, and thus consistent to the maximum extent practicable, with the enforceable policies of the California Coastal Management Program.*

III. APPLICABLE LEGAL AUTHORITIES

Phased Review

As submitted, the SFVAMC Campus LRDP consistency determination outlines a near-term phase (Phase 1) and a long-term phase (Phase 2), with two location alternatives for Phase 2. The first Phase 2 alternative, involving building demolition and new construction at the Ft. Miley Campus, has the potential to affect public access to the coastal zone because it would increase the number of employees on campus and create new parking demand. However, the actual number of new personnel, and thus the severity of any future Campus parking shortage or spill-over into coastal recreation areas, remains unknown. During the implementation of Phase 1, the VA will have the opportunity to collect new information on Campus use, commute patterns, and parking behavior which will help constrain the potential effects of Phase 2. The second Phase 2 alternative, which would create a new SFVAMC location at Mission Bay, would be far outside the Commission's coastal zone and would not affect coastal resources or public access. Because

two Phase 2 location alternatives, with varying potential for coastal zone effects, remain under consideration, and because the implementation of Phase 1 would allow for the development of new information relevant to Phase 2, a phased review of this consistency determination is appropriate. The Coastal Zone Management Act (CZMA) allows (and encourages) "phased federal consistency reviews" in cases where federal decisions to implement an activity are also made in phases. Section 930.36 (d) of the CZMA implementing regulations provides:

> *(d) Phased consistency determinations. … In cases where federal decisions related to a proposed development project or other activity will be made in phases based upon developing information that was not available at the time of the original consistency determination, with each subsequent phase subject to Federal agency discretion to implement alternative decisions based upon such information (e.g., planning, siting, and design decisions), a consistency determination will be required for each major decision. [15 CFR Section 930.36(d)]*

When reviewing federal agency long range plans, the Commission typically relies on this provision; among other benefits of this type of phased review are that: (1) it provides the federal agency, in advance of specific project or plan implementation, notice of what issues are likely to arise under the CCMP; and (2) it provides the Commission with an overall planning context within which to review specific plans or projects subsequently proposed.

As such, the Commission is only reviewing the LRDP's Phase 1 activities through this consistency determination. The Commission expects that the VA will continue to coordinate the implementation of its LRDP with the Commission, to enable further Commission review of a supplemental consistency determination for Phase 2 activities in the event Phase 2 would affect the coastal zone.

IV. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION

The U. S. Department of Veterans Affairs (VA) has submitted a consistency determination for the San Francisco VA Medical Center (SFVAMC) Fort Miley Campus (Campus) Long Range Development Plan (LRDP). The LRDP is a comprehensive plan created to guide the development of the 29-acre SFVAMC Campus located at 4150 Clement Street in the northwest portion of San Francisco (see **Exhibits 1 – 3** for the project location). The LRDP outlines the construction of new buildings, demolition of old buildings, and retrofitting of existing buildings that would occur through the year 2027. The LRDP would support the SFVAMC's mission to be a major primary and tertiary healthcare center which provides cost-effective and high-quality care to eligible veterans in the San Francisco Bay Area and north coast of California. The proposed development and modifications included within the LRDP would help the SFVAMC meet necessary seismic safety requirements and the needs of veterans in the area over the next 20 years.

The existing SFVAMC Campus occupies approximately 1 million square-feet and includes an inpatient hospital building, an outpatient clinical building, research buildings, two hoptel[2] buildings, a community living center, administrative/office buildings, storage, 10 surface parking lots, two parking structures, and a helipad (**Exhibit 4a**). The SFVAMC has identified in its LRDP a deficiency of 589,000 square-feet of building space. All new development would be designed to meet Leadership in Energy and Environmental Design (LEED) Silver Certification, the VA's sustainability goals as outlined in its VA Strategic Sustainability Performance Plan, and VA seismic design requirements (VA Directive H-18-8) in compliance with Executive Order 12941.

The LRDP is laid out in two phases, a near-term phase (Phase 1) to be completed by 2020, and a long-term phase (Phase 2) to be completed by 2027, as outlined below:

- **Phase 1 (near-term, 2014 – 2020):** New construction or expansion of 14 buildings, including research and administrative facilities, an emergency operations center, and patient welcome center and drop-off area, an expanded mental health clinic and psychiatric intensive care unit, new and expanded parking garages; seismic retrofitting of 7 buildings[3]; relocation of an existing water tower; and demolition of 4 existing buildings, removal of 4 modular trailers, and reductions of existing surface parking lots. Phase 1 work would result in a net of 152,200 new gross-square-feet of facilities space and 232,252 new gross-square feet of parking garage space on the Campus (see, amounting to a net increase of 306 on-campus parking spaces. **Exhibit 4b** provides details on Phase 1 development. The Building 211 parking garage and emergency operations center (previously reported to the Commission as ND-012-11) was completed in July 2014. Phase 1 projects also include several measures to mitigate potential impacts of the development on surrounding GGNRA parklands:
    - Visual impact avoidance measures, including landscape screening, building setbacks and/or stairstep designs, to prevent the new parking garages (extensions to Bldgs 209 and 211; see **Exhibit 4b**) from being visible from the Camino del Mar Trail;
    - Stormwater and water storage plans that avoid contributing to geologic instability in a zone on the northern edge of the campus that is prone to landslides ("Slide Area", **Exhibits 4a, b**).

- **Phase 2 (long-term, 2020 – 2027):**
    - **Alternative 1 - Ft. Miley campus option:** New development of an ambulatory care center (Bldg. 213), comprising 170,000 gross-square-feet of new patient-serving and associated facilities (see **Exhibit 4c** for details on Phase 2 Alternative 1 development).

[2] Overnight, shared accommodations for eligible Veterans receiving health care services.

[3] Under a second alternative (see Phase 2 discussion), three of the seismic retrofit projects would be delayed under Phase 2.

- **Alternative 2 - Ft. Miley, alternate schedule**: Same as Alternative 1, except that three of the seismic retrofit projects listed under Phase 1 would take place during Phase 2.
- **Alternative 3 – Mission Bay campus option:** Same as Alternative 1, except that the ambulatory care center would be built off-site in the Mission Bay area of San Francisco.

The SFVAMC Campus is surrounded by Golden Gate National Recreation Area (GGNRA) lands to the north, west, and east, and by the outer Richmond District residential neighborhood to the south (**Exhibit 2**). The west side of the SFVAMC Campus is located within the coastal zone boundary (**Exhibit 3**); however, because the Campus is on federal land the entire site is considered "excluded" from the coastal zone. Development included in the LRDP could nevertheless have potential impacts on resources within the coastal zone. Activities proposed at the Mission Bay location in Alternative 3 of Phase 2 are within or affecting the San Francisco Bay Conservation and Development Commission's (BCDC's) area of jurisdiction and are not subject to review by the Coastal Commission. In the event that Alternative 3 is chosen for Phase 2 and development is proposed within BCDC's jurisdictional area, a consistency determination would need to be submitted to BCDC prior to finalization.

B. Other Agency Approvals and Consultations

Section 106 Consultation – State Historic Preservation Office

The VA engaged in a formal consultation with the State Historic Preservation Officer (SHPO) under the National Historic Preservation Act (NHPA) for historic, cultural and archaeological resources at the project site. The consultation concluded in January 2015 with the execution of a programmatic agreement between the VA, SHPO and the Advisory Council on Historic Preservation.

Construction General Permit – San Francisco Bay Regional Water Quality Control Board

The VA is required to apply for coverage under the statewide Construction General Permit and implement a Storm Water Pollution Prevention Plan (SWPPP) for construction-related pollutants and storm water discharges to a small drainage system on the north side of the SFVAMC Ft. Miley Campus. Most of the Campus, however, discharges storm water to the City of San Francisco's combined sewer system (see below).

San Francisco Public Utilities Commission Permits

The SFVAMC Fort Miley Campus operates under an Industrial Class I Wastewater Permit (Permit No. 10-06550; effective June 18, 2010) issued by SFPUC under Article 4.1 of the San Francisco Public Works Code , which regulates the quantity and quality of discharges to the City's combined sewer system. This permit requires the implementation of a site-specific Storm Water Pollution Prevention Plan (SWPPP) that describes SFVAMC's storm water management program and includes procedures to reduce or eliminate pollution related to storm water runoff. The existing SFVAMC SWPPP and wastewater permit will be updated as needed prior to the proposed Phase 1 development. Since much of the SFVAMC Campus drainage system discharges to the City combined sewer system, the VA must also apply for a Construction Site Runoff Control Permit from the SFPU, in accordance with Article 4.2 of the Public Works Code. This permit requires the preparation of either an erosion and sediment control plan (ESCP) or

submission of an SWPPP covering construction-related discharges. It is anticipated that a single SWPPP for construction activities, fulfilling both state and local requirements, will be prepared for the entire Campus.

C. PUBLIC ACCESS AND RECREATION

Coastal Act Sections 30210, 30211 and 30212.5 state:

> *Section 30210: In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*
>
> *Section 30211: Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*
>
> *Section 30212.5: Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.*

Coastal Act Section 30252 states (in part):

> *The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, …*

The SFVAMC Campus is surrounded on three-sides by a contiguous system of parklands including the Land's End and Fort Miley areas of the Golden Gate National Recreation Area (GGNRA) and the City-owned Lincoln Park (see **Exhibits 2 and 3)**. An access road to Fort Miley through the SFVAMC Campus may be temporarily closed during construction periods included in Phase 1 of the LRDP. While this road is occasionally used to access the GGNRA parklands, it is not a primary entry point, and multiple other access points exist. The VA intends to maintain this road as an open access way to the maximum extent feasible during Phase 1 construction. However, if closures are needed, notice would be posted two weeks in advance of the closures. As this is not the primary entry or access way to the park, and notice of closures would be posted, temporary closure would not significantly inhibit public access to GGNRA lands.

Phase 1 of the LRDP would result in an increase in parking demand of 132 spaces during the weekday peak period as projected in the *Supplemental Draft Environmental Impact Statement for the SFVAMC LRDP* (Suppl. Draft EIS). Prior to implementing the LRDP, the SFVAMC Campus contained two parking structures (Building 209 and Building 212) and 10 surface parking lots, providing 1,253 total parking spaces (see **Exhibit 5a**). Field observations conducted by the VA have shown that these facilities were filled to capacity during weekday peak periods (typically morning and midday), with occupancies at or near 100 percent. Supplemental on-site valet parking services operated by the VA were also well-used, but have capacity to accommodate additional vehicles. On-site parking occupancy rates during the evening peak period were significantly lower, at approximately 30%. Off-campus parking in the vicinity of the SFVAMC Campus also exists in the form of unmetered parallel parking on city streets, and farther afield, in public parking lots serving GGNRA recreational attractions such as Sutro Baths, Sutro Heights Park and Land's End. VA field observations reported in the Suppl. Draft EIS indicate that on-street parking use within a few blocks of the VA ranged from 80 – 100% during weekday peak hours.

The SFVAMC is located in a dense urban area which provides alternative methods of transportation including transit services, taxis, bicycles, and foot travel. The VA estimates that at present approximately 40% of its SFVAMC staff commute to the Campus using public transportation. Additionally, the VA operates free commuter shuttle services for employees and patients that serve approximately 1,285 people per day. These alternative modes of transportation will continue to be available in the future, and the VA expects that transportation options other than single-occupancy vehicles will continue to be used by a large fraction of SFVAMC employees, patients, and visitors. As discussed in the Supplemental Draft EIS, planned future expansions in municipal bus service has the potential to increase transit ridership among SFVAMC personnel.

In past consistency determinations, the Commission has expressed concern over the adequacy of parking for the SFVAMC and coastal recreational impacts caused by the use of off-site parking on adjacent GGNRA lands by employees and users of the medical facility. In the late 1980s, the SFVAMC constructed a 4-level parking structure (Building 209) to provide additional parking. When reviewing a later project for the development of a District Counsel office building, the Commission noted that, due to fees charged for parking within Building 209, as opposed to free parking within and surrounding the medical center, the use of the structure remained low and the parking problems in the surrounding area persisted (CD-026-91). The Commission nevertheless concurred with the VA's consistency determination, as legislation prohibited the VA from allowing free use of the parking structure, finding the development consistent "to the maximum extent practicable" with the Coastal Act access and recreation policies. At present, the VA charges relatively low parking fees of $1 per day, or $12.50 per month, which would not be a major deterrent to on-campus parking.

Phase 1 of the LRDP includes the construction of a 377-space, 5-level parking garage (Building 211) on an area previously occupied by a surface parking lot (Parking Lot J). The Commission has already authorized this parking garage through concurrence with a VA negative determination (ND-012-11), and this project was completed in July of 2014. Future Phase 1 projects include the expansions of the existing Building 209 and 211 parking garages, which

would create an additional 250 parking spaces. Other new building construction and expansion projects would result in the loss of existing parking spaces (from surface lots D, E, H, J, K and L), but in aggregate, Phase 1 would result in a net increase of 306 on-campus parking spaces. This net addition of parking spaces is well in excess of the projected growth in peak hour parking demand of 132 spaces, and appears adequate to accommodate the proposed Phase 1 development without exacerbating off-campus parking shortages or impeding public recreational access to the coastal areas of GGNRA.

Some Campus parking spaces would be unavailable during Phase 1 construction in order to accommodate construction vehicles and to allow space for temporary modular structures that would be used as work spaces while certain buildings are being seismically retrofitted. This loss of spaces from surface parking lots during construction would be mitigated by the availability of new parking spaces in the Building 211 structure and, as needed, the provision of temporary on- and off-site parking with the use of shuttle and valet services, and the promotion of rideshare, carpool, mass transit vouchers, and work schedule change programs during project construction. For example, during past construction projects, the VA has arranged for overflow parking and shuttle services in parking lots on adjacent GGNRA parkland. However, no similar off-site parking program in GGNRA lots has been proposed for Phase 1 construction, and due to the potential for such overflow parking to interfere with coastal recreational access, the VA has agreed that any future plans to use GGNRA parking lots would be subject to Commission Executive Director review and concurrence. The VA's proposed mitigation of potential parking impacts during the construction period is described in more detail in Mitigation Measure TRANS-2 from the Supplemental Draft EIS, provided here as **Exhibit 6**.

In relation to the remainder of Phase 1 development, the Commission further finds that both temporary and permanent impacts to parking demand resulting from Phase 1 construction would be met by the LRDP planning and mitigation measures, including a net increase of 306 new parking spaces, which would be sufficient to meet the projected increase in parking demand of 132 spaces from Phase 1 development. Moreover, future parking demand would be greatest during weekday peak hours, when the largest number of VA employees is on Campus. Peak recreational parking demand, in contrast, occurs during weekends and holidays, when ample on-campus is available for the relatively small number of employees who must access the Campus. Additional analysis on the issues of parking and coastal access is provided in the Staff Response to Public Comments, included here as **Exhibit 9**.

For the reasons discussed above, the Commission finds that Phase 1 of the LRDP would not adversely affect parking availability for coastal recreation and would be consistent with Coastal Act polices 30210, 30211, 30212.5, and 30252. The Commission expects the VA to continue to coordinate with the Commission in its long-term planning efforts, to ensure that adequate parking and transportation options for employees and users of the medical facility will continue to be available to assure that Phase 2 development would not affect access to the coastal zone and nearby GGNRA lands.

D. VISUAL RESOURCES

Coastal Act Policy 30251 states:

> *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

All of the planned development within Phase 1 of the LRDP would take place within the existing SFVAMC Campus development footprint. The Campus is already substantially developed with medical and research buildings, parking structures, and parking lots that are partially visible to the surrounding area. All of the new proposed development would be consistent with the height of the current development on Campus, with no building height exceeding the height of the tallest existing building (Building 2). All new structures would also be built with materials, colors, and massing consistent with the existing SFVAMC development (See **Exhibit 7**).

New buildings located in the central portion of the Campus would be mostly screened from views outside of Campus by existing buildings. New buildings located on the western end of Campus would be screened by existing buildings, dense vegetation and other landforms, and would not be visible from outside of Campus. New buildings located near the eastern and northern portion of the Campus adjacent to GGNRA lands would be visible through existing vegetation and would alter the physical surroundings experienced by visitors in this area (**Exhibit 8**). While this development would alter the scenery of the area, especially to those hiking along the El Camino del Mar trail, these areas are not primary destinations for hikers, but rather are areas hikers usually pass through on their way to more scenic GGNRA lands. To help mitigate impacts to surrounding views the VA will plant native, drought-resistant trees along the perimeter of the Campus to further screen the new buildings.

Comments submitted by the National Park Service (NPS) (**Exhibit 10**) and a member of the public (C.K. Wai, *see* **Exhibit 9**) prior to the hearing noted that the proposed expansions of the multi-story parking garages (Buildings 209, 211) in the northwestern corner of the Campus (**Exhibits 4b**, **5b**) would extend these structures to the very edge of the campus boundary with the West Fort Miley Historical Area of the GGNRA, potentially changing the visual character of the adjacent parklands. In order to address these concerns, the VA has committed to developing and implementing a set of measures, to include a combination of landscape screening, building setbacks, and/or stairstep designs, to avoid the parking garages being visible from the Camino del Mar trail within the affected area of GGNRA. The VA has agreed to submit the proposed visual impacts mitigation measures to the Executive Director of the Commission, for his review and concurrence, prior to construction of the parking lot expansions.

The presence of construction equipment would also result in minor temporary visual impacts; however, the VA would implement best management practices (BMPs), such as screening construction staging areas, to limit this impact. Construction activities would be limited to daylight hours, which would minimize any construction lighting impact.

Additional discussion of visual resource issues is provided in the Staff Response to Public Comments, included here as **Exhibit 9**.

For the reasons discussed above, the Commission concludes that Phase 1 of the LRDP would protect scenic coastal views, minimize landform alteration, be consistent with the visual character of the surrounding area, and be consistent with the visual resources policy of the Coastal Act (Section 30251).

E. WATER QUALITY & GEOLOGIC HAZARDS

Coastal Act Section 30231 states:

> *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

Coastal Act Section 30253 states, in relevant part:

> *New development shall do all of the following:*
>
> *(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
>
> *(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area …*

No creeks, wetlands, open water bodies, federally listed species, or environmentally sensitive habitat areas are located within or adjacent to the SFVAMC Campus. Implementation of Phase 1 of the LRDP would increase the impervious surfaces on the Campus by approximately 4% (0.69 acres). The increase in impervious surfaces would result in minimal impacts to the site's runoff conditions as the project would occur primarily on existing impervious sites. The VA would also implement low impact development techniques to infiltrate, evaporate, and detain storm water to maintain the pre-development storm water runoff conditions. Any development within the LRDP would require compliance with the San Francisco Public Works Code which regulates the quantity and quantity of discharges into the sewer system. In addition, most storm water and wastewater from the project site would be treated at the Oceanside Water Pollution Control Plant prior to discharging into the Pacific Ocean. Lastly, the VA will develop and implement a storm

water pollution prevention plan to reduce any project related pollution of surface water through construction activities.

Although most campus stormwater runoff is collected in storm drains and redirected into the City's combined sewer system, a fraction of the runoff from the north campus discharges directly onto the northern slope of the campus (**Exhibit 4b**, "Slide Area") and ultimately onto GGNRA land. In comments submitted prior to the hearing (*see* **Exhibit 10**), the NPS noted that this northern slope area is unstable and prone to landslides, and expressed concern that continued or increased stormwater discharge onto this area could cause additional instability. In order to address this concern, the VA has modified its Phase 1 projects to include the development of a Stormwater Plan that would avoid contributing to geologic instability. This plan will be provided to the Commission Executive Director, for his review and concurrence, prior to construction.

Another public comment (J. Burns & co-authors, **Exhibit 9**) argued that the newly-proposed replacement of the existing on-campus water tower with underground tanks would require engineering and geotechnical investigations in order to assure stability, and that no such studies have been completed. As noted in the Staff Response to Comments (**Exhibit 9**), water tower removal or replacement is not among the development projects covered by the VA's consistency determination. Replacing the tower with underground tanks may, depending on its impacts, be subject to separate federal consistency review by the Commission at a future date. Additionally, the VA has committed to developing a water storage plan, to be submitted to the Executive Director for review and concurrence prior to construction, which will assure that any new water storage structures avoid contributing to geologic instability.

For these reasons, the Commission finds Phase 1 of the LRDP consistent with the water quality policy (Section 30231) and hazards policy (Section 30253 (a) and (b)) of the Coastal Act.

APPENDIX A: SUBSTANTIVE FILE DOCUMENTS

Consistency Determination CD-0003-15 (Department of Veterans Affairs, San Francisco VA Medical Center Long Range Development Plan, 2015).

Consistency Determination CD-026-91 (Department of Veterans Affairs, 2-story, 9,900 square-foot District Counsel office building at the Fort Miley Medical Center).

Negative Determination ND-012-11 (Department of Veterans Affairs, 5-level parking structure on an existing parking lot).

Department of Veterans Affairs, *Supplemental Draft Environmental Impact Statement, San Francisco Veterans Affairs Medical Center Long Range Development Plan*, March 9, 2015 (AECOM).

Department of Veterans Affairs, *San Francisco Veterans Affairs Medical Center Long Range Development Plan*, January 31, 2014.

Department of Veterans Affairs, *Draft Environmental Impact Statement San Francisco Veterans Affairs Medical Center Long Range Development Plan*, August 17, 2012 (AECOM).

Department of Veterans Affairs, *Seismic Design Requirements* (VA Directive H-18-8), August 2013.

Department of Veterans Affairs, *Strategic Sustainability Performance Plan*, June 2010.

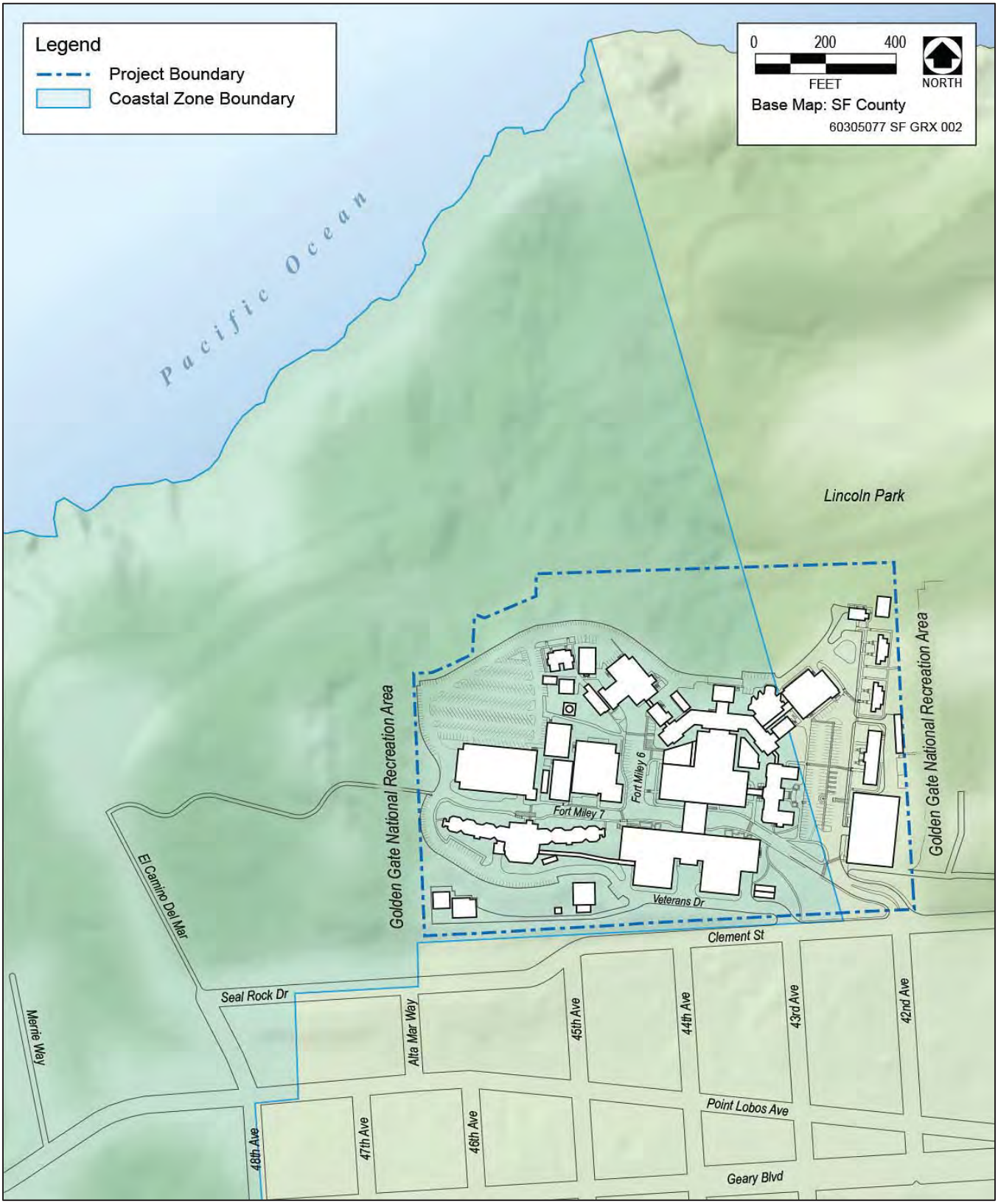
Executive Order 12941, *Seismic Safety of Existing Federally Owned or Leased Buildings*, Federal Register Vol. 59, No. 232, December 5, 1994.

Source: Data provided by SFVAMC Engineering Service in 2010

Location of SFVAMC Fort Miley Campus in San Francisco

Exhibit 1a
CD-0003-15
SFVAMC Long Range Dev. Plan
Page 1 of 1

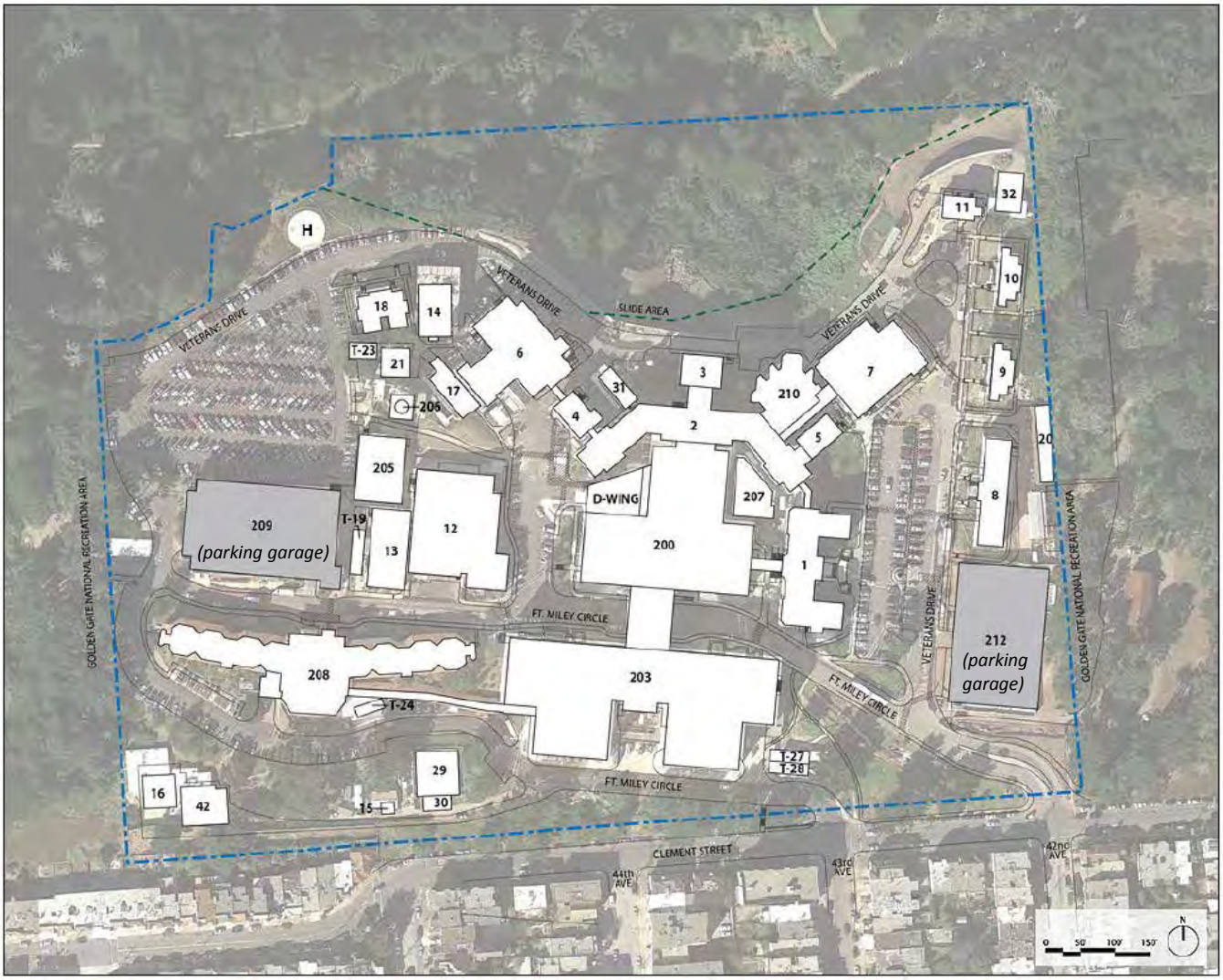
Project Location – Neighborhood Context *Source*: SFVAMC Long Range Development Plan, 2014



Source: Base layer from SF County; coastal zone boundary layer from California Department of Transportation TSI/GIS Data Branch, 2009; data compiled by AECOM in 2014

Coastal Zone Boundary

Exhibit 3
CD-0003-15
SFVAMC Long Range Dev. Plan
Page 1 of 1



Source: VA, 2014

SFVAMC Fort Miley Campus Layout, 2012
(Prior to Long Range Development Plan)

Exhibit 4a
CD-0003-15
SFVAMC Long Range Dev. Plan
Pre-existing Campus Layout
Page 1 of 1

Source: VA, 2014

Alternatives 1 and 3 (Phase 1) Footprint and Concept Plan through 2020—SFVAMC Fort Miley Campus

Exhibit 4b
CD-0003-15
SFVAMC Long Range Dev. Plan
Phase 1 Layout
Page 1 of 1

Source: VA, 2014

Alternative 1 Long-Term (Phase 2) Footprint and Concept Plan through 2027—SFVAMC Fort Miley Campus

Exhibit 4c
CD-0003-15
SFVAMC Long Range Dev. Plan
Phase 2 Layout
Page 1 of 1

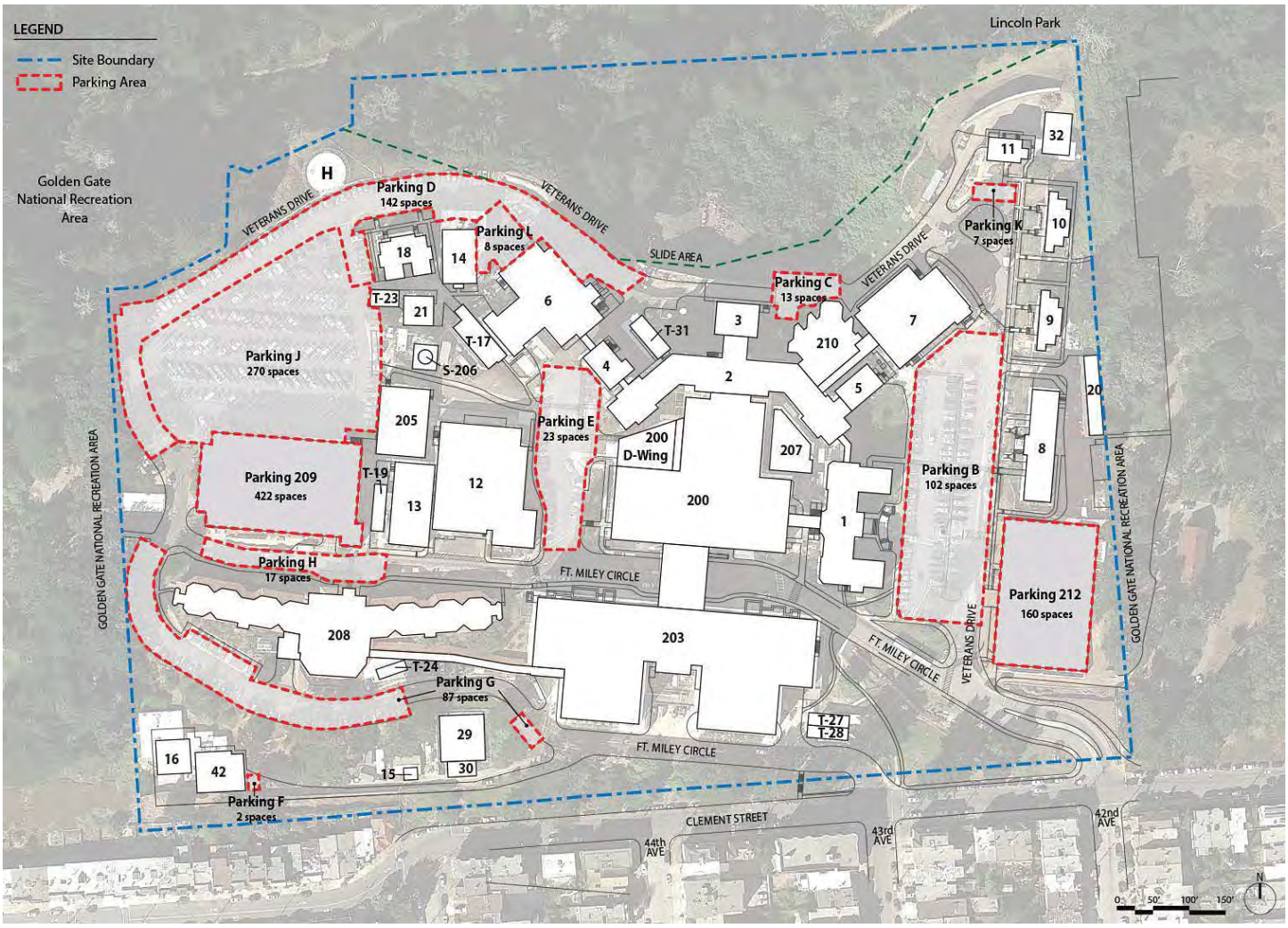


Table 3.13-6: Existing Off-Street Parking Supply at the SFVAMC Fort Miley Campus (2012)

Facility	Configuration	Function/User	Capacity (spaces)
Building 209	Structure	Employee/Visitor	422
Building 212	Structure	Patient	160
Lot B	Surface lot	Patient/Visitor	102
Lot C	Surface lot	Employee	13
Lot D	Surface lot	GSA/Employee	142
Lot E	Surface lot	Patient	23
Lot F	Surface lot	Employee	2
Lot G	Surface lot	Employee	87
Lot H	Surface lot	Patient/Visitor	17
Lot J	Surface lot	Employee	270
Lot K	Surface lot	Employee	7
Lot L	Surface lot	Employee	8
Total			**1,253**

Notes: GSA = General Services Administration; SFVAMC = San Francisco Veterans Affairs Medical Center
Reflects status as of 2012, as reported in the SFVAMC Long Range Development Plan. Some facilities listed have since been permanently or temporarily closed or restriped/reconfigured as a result of construction activities, Americans with Disabilities Act compliance, or other factors.
Sources: VA, 2014a and 2014c

(From SFVAMC Supplemental Draft EIS, Chapter 3.13)

Exhibit 5a
CD-0003-15
SFVAMC Long Range Dev. Plan
Pre-Existing Parking Facilities
Page 1 of 1

New Parking Facilities – Phase 1

Source: SFVAMC Supplemental Draft EIS, Chapter 3.13

LRDP Phase 1 Changes in Parking Supply (to 2020):

- **Building 211 Garage + extension** **+ 377 spaces**
- **Building 209 Extension** **+ 250 spaces**
- **Surface Lot Removal** **- 321 spaces**

Net Gain → 306 spaces

Exhibit 5b
CD-0003-15
SFVAMC Long Range Dev. Plan
Proposed New Parking Facilities
Page 1 of 1

g: ***Mitigation Measure NOI-1:*** *VA will monitor exterior noise levels at on-site receptors located closest to a particular construction site for a 24-hour period at the onset of each major phase of construction (e.g., demolition, trenching, structure erection). If noise levels are found to exceed 55 dBA Ldn, VA will implement additional measures to reduce noise levels at affected on-site receptors as a result of construction noise. These additional measures may include but are not limited to relocating occupied patient beds to other areas of the SFVAMC Fort Miley Campus, installing temporary acoustic attenuating features/barriers, preventing the line of sight between the receptor in question and noise source, and providing in-room sound-masking equipment (e.g., white noise).*

h: ***Mitigation Measure NOI-2:*** *The preexisting condition of all buildings within a 50-foot radius of construction areas (where large construction equipment would be utilized) will be recorded in the form of a preconstruction survey. The preconstruction survey will determine conditions that exist before construction begins and will be used to evaluate damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities susceptible to damage will be documented photographically and in writing before construction. All buildings damaged will be repaired to their preexisting condition.*

i: ***Mitigation Measure NOI-3:*** *Vibration levels will be monitored at the nearest interior location of adjacent medical structures containing vibration-sensitive equipment to monitor potential impacts from construction related to this alternative. In the event that measured vibration levels exceed 65 VdB and would disturb the operation of sensitive medical equipment, additional measures will be implemented to the extent necessary and feasible. These measures include providing notice to equipment operators to coordinate regarding the timing of construction activities showing vibration levels above 65 VdB, possibly temporarily relocating the sensitive equipment, and/or installing isolation equipment (i.e., vibration-dampening mounts).*

j: ***Mitigation Measure NOI-4:*** *VA will retain the services of a qualified acoustical consultant to conduct an additional site-specific noise study to evaluate and establish the appropriate ambient noise levels at the proposed off-site medical research facility for a detailed HVAC and emergency-generator noise reduction analysis. The recommendations of the acoustical consultant will include specific equipment design and operations measures to reduce HVAC and emergency-generator noise to acceptable levels for exterior and interior noise levels as specified in the San Francisco Noise Control Ordinance.*

k: ***Mitigation Measure TRANS-1:*** *SFVAMC will use only a combination of the three haul truck routes identified below for LRDP construction-related activities:*

- *From points north of the Campus: U.S. 101 → SR 1 (Veterans Boulevard/Park Presidio Boulevard) → Geary Boulevard → Point Lobos Avenue → 42nd Avenue or 43rd Avenue*
- *From points south of the Campus: I-280 → SR 1 (Junipero Serra Boulevard/19th Avenue/Crossover Drive/Park Presidio Boulevard) → Geary Boulevard → Point Lobos Avenue → 42nd Avenue or 43rd Avenue; or, alternatively, U.S. 101 (Bayshore Freeway/Central Freeway) → Mission Street → U.S. 101 (Van Ness Avenue) → Geary Boulevard → Point Lobos Avenue → 42nd Avenue or 43rd Avenue*
- *From points east of the Campus: I-80 → U.S. 101 (Central Freeway) → Mission Street → U.S. 101 (Van Ness Avenue) → Geary Boulevard → Point Lobos Avenue → 42nd Avenue or 43rd Avenue*

Use of alternative routes, particularly through the surrounding neighborhoods, is actively discouraged. SFVAMC and its construction contractors will monitor truck arrivals and, if necessary, implement a queue abatement program to ensure that haul trucks do not queue up and idle on the Campus or on adjacent or nearby streets.

l: ***Mitigation Measure TRANS-2:*** *SFVAMC will conduct supplemental surveys of parking occupancy several weeks after completion of Building 211 to determine the utilization of the new parking structure and overall occupancy of on-site facilities throughout the day. The survey will also consider on-street parking in the surrounding area to estimate how much spillover demand has been "recaptured" on the site as a result of the increased parking supply. As construction plans for*

Exhibit 6
CD-0003-15 SFVAMC LRDP
Construction Parking Impacts Mitigation
Page 1 of 2

specific LRDP projects are developed, construction contractors will work with SFVAMC to compare their own estimates of construction-related traffic and parking demand to the estimated parking capacity and surveyed occupancy levels, to determine whether additional temporary measures are required to mitigate expected parking constraints.

Should these coordination efforts indicate that construction activities could result in a major parking deficit on the SFVAMC Fort Miley Campus, SFVAMC will implement measures to ensure that construction-related parking demand, as well as any associated parking loss in on-site parking capacity required to accommodate construction-related activities, does not result in additional spillover into the surrounding neighborhood beyond current conditions.

Potential programs (or other measures deemed necessary and adequate to ensure that spillover parking demand into the surrounding neighborhood does not increase beyond current conditions) could include the following:

- ***Expand the Campus's valet parking program.*** *Upon completion of Building 211, the valet parking program could be made permanent and expanded to include the new parking structure. Based on the estimates provided in the LRDP, Building 211 would provide a total of 461 marked spaces, but a valet parking program for this structure could provide approximately 140 additional spaces, based on the 30 percent increase in parking efficiency documented in field surveys of parking occupancy in Building 209.*
- ***Require general contractors to establish carpool/vanpool programs and encourage transit use.*** *Because some construction workers reside outside of San Francisco, a vanpool service could be tailored to meet worker needs by operating as a "commuter shuttle" to major transit facilities, such as the BART station at Civic Center or 16th Street/Mission. To encourage transit use among construction workers, the contractor could provide free or discounted transit passes. A vanpool service could also be implemented in conjunction with a remote (i.e., off-site) "park-and-ride" facility, affording construction workers some of the convenience of a private vehicle and reducing some of the construction-related traffic effects in the immediate vicinity of the Campus. SFVAMC could work with its contractor to negotiate with the relevant property owners and parking operators in the area to lease spaces in an off-site surface lot or parking structure for a fixed period of time. The vanpool service could be contracted out to a third-party service provider.*
- ***Require general contractors to optimize staging-area needs and coordinate vendor arrival schedules.*** *In the development of construction plans, contractors should be required to optimize site utilization and schedule arrivals to minimize the associated traffic and vehicle parking impacts on the Campus community and surrounding neighborhoods.*

m: ***Mitigation Measure TRANS-3:*** *SFVAMC will implement temporary strategies to ensure ADA compliance while Lot B is in use for modular swing space. Potential strategies could include temporarily striping ADA spaces in other parking facilities on the Campus, such as Building 212, or implementing valet parking at the traffic circle outside the Patient Welcome Center for patients and visitors requiring ADA accommodations.*

n: ***Mitigation Measure WH-1:*** *SFVAMC will implement the following measures to avoid potential effects on nesting birds and bats, should potential nesting or roosting habitat be identified within 150 feet of the proposed development area:*

- *Removal of shrubs, trees, or any vegetative cover will be conducted outside of the breeding season, roughly from September to January 31 (breeding season is typically February through August).*
- *Should vegetation removal be required during the breeding season (approximately March through August), a qualified biologist will conduct a survey for native nesting birds and bats no earlier than 14 days before the removal of trees, shrubs, or buildings. The biologist will determine the time period that the results will remain valid, based on the seasonal timing. The area surveyed will include all locations of vegetation or building removal, as well as areas within 150 feet.*
- *If no active nests or roosts are found, no further action is required. If an active nest or roost is discovered in the areas to be cleared, or in other habitats within 150*

Exhibit 6
CD-0003-15 SFVAMC LRDP
Construction Parking Impacts Mitigation
Page 2 of 2

Source: VA, 2014

Aerial Perspective of 2012 SFVAMC Fort Miley Campus

Source: VA, 2014

Aerial Perspective of SFVAMC Fort Miley Campus Buildout at the End of Alternative 1 Short-Term Projects in Mid-2020

*Note: The relocated water tower, visible on the far left (west) of the post-project view, has been eliminated from the project. The tower will be removed from the Campus.

Exhibit 7
CD-0003-15
SFVAMC Long Range Dev. Plan
Aerial Perspectives

Southeastward View of SFVAMC Fort Miley Campus from GGNRA (El Camino del Mar trail).

(A) Before Phase 1 construction; (B) After Phase 1 construction

Source: SFVAMC Supplemental Draft EIS, Chapter 3.1

Southward View of SFVAMC Fort Miley Campus from GGNRA (Land's End-El Camino del Mar trail junction).

(A) Before Phase 1 construction; (B) After Phase 1 construction

Source: SFVAMC Supplemental Draft EIS, Chapter 3.1

Exhibit 8
CD-0003-15
SFVAMC Long Range Dev. Plan
Views from Coastal Zone Recreation Areas

Southwestward View of SFVAMC Fort Miley Campus from GGNRA (SF Presidio, Lincoln Blvd near Ft. Scott).
(A) Before Phase 1 construction; (B) After Phase 1 construction

Source: SFVAMC Supplemental Draft EIS, Chapter 3.1

*Note: The water tower relocation (shifted west, A->B) has been eliminated from the proposed project. The tower is now proposed to be removed entirely.

Exhibit 8
CD-0003-15
SFVAMC Long Range Dev. Plan
Views from Coastal Zone Recreation Areas

CALIFORNIA COASTAL COMMISSION
45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105- 2219
VOICE (415) 904- 5200
FAX (415) 904- 5400
TDD (415) 597-5885

F8b

June 9, 2015

To: Coastal Commissioners and Interested Parties

From: Mark Delaplaine, Manager, Energy, Ocean Resources and Federal Consistency
Joseph Street, Environmental Scientist

Subject: **Addendum to CD-0003-15 – San Francisco Veterans Affairs Medical Center Long Range Development Plan, Phase 1**

This addendum provides correspondence received by staff in response to the above-referenced staff report and staff's responses to comments, which are hereby also incorporated into staff's proposed Commission findings. This correspondence does not change staff's recommendation that the Commission **concur** with CD-0003-15.

Correspondence Received

- E-mail from C. K. Wai to Joseph Street, Coastal Commission, June 2, 2015
- E-mail from Raymond Holland to Joseph Street, Coastal Commission, June 5, 2015
- Letter from Julie Burns, Friends of Land's End, Richard Corriea, Planning Association for the Richmond, Amy Meyer, People for a Golden Gate National Recreation Area, Jason Jungreis, Coalition to Save Ocean Beach, and Thomas Kuhn, Friends of Sutro Park, to Coastal Commission, June 8, 2015

Staff Response to Comments

In the attached correspondence, the public commenters urge the Commission to object to the Department of Veterans Affairs (VA) consistency determination. These requests are based on several points. Commission staff provides the following summary and response to each of these points and hereby amends its proposed Commission findings to include these responses:

The Consistency Determination is Premature

In the attached correspondence dated June 5, 2015, Mr. Raymond Holland asserts that the VA's consistency determination for the San Francisco Veterans Affairs Medical Center (SFVAMC) Long Range Development Plan (LRDP), Phase 1, is premature for the following reasons:

(1) The LRDP is incomplete, the 2014 LRDP is still a draft, and it is not clear on which version of the LRDP the consistency determination would be based;

(2) The Programmatic Agreement between the VA, the Advisory Council on Historic Preservation and the State Historic Preservation Officer (SHPO), executed in January, 2015, has not been fully performed and a final Finding of Effect (FOE) has not been issued;

(3) No Supplemental Final Environmental Impact Statement (EIS) has been issued for the proposed project, and the comments and suggestions submitted on the March 2015 Supplemental Draft EIS have not yet been reviewed and acted upon;

The latter point, on the absence of a Supplemental Final EIS, is echoed in the attached letter, dated June 8, 2015, submitted by Ms. Julie Burns and co-authors on behalf of five organizations. Ms. Burns' letter also asserts that the proposed replacement of the existing on-campus water tower with underground tanks will require engineering and geotechnical investigations, and that a consistency determination is premature until those studies have been completed.

The VA's consistency determination is based on the current version of the LRDP, dated January 31, 2014. The VA does not characterize this version of the LRDP as a "draft", but it does note that the LRDP is a living document that can and will be updated from time to time as its needs and development plans for the SFVAMC campus evolve. In the meantime, the VA has formally submitted a consistency determination for this current version for the Commission's review, triggering the Commission's review responsibilities, and there is no ambiguity as to which version is being reviewed. In the event that substantive changes are made to the LRDP and/or the development projects contained within the LRDP in the future, the VA would be required to submit additional consistency determinations to the Coastal Commission for federal consistency review under the Coastal Zone Management Act. The 2014 LRDP is the latest in a series of SFVAMC actions that have been reviewed by the Commission, and it is anticipated that this process will continue in the future.

The VA and SHPO initiated formal consultation under Section 106 of the National Historic Preservation Act on May 11, 2012, and on January 9, 2015, issued a Programmatic Agreement outlining reasonable measures to mitigate adverse impacts on historic properties. In addition, the SHPO has formally concurred (as of July 13, 2013) with the VA's Finding of Effect. Implementation of the mitigation measures identified by the SHPO will satisfy the requirements of Coastal Act Section 30244 for the protection of historic resources.

Under the consistency regulations (15 CFR 930.37), the Commission cannot hold up its review pending finalization of an EIS. Commission staff has reviewed all comments submitted on the SDEIS. In addition, if future project changes occur, the Commission can review them under the federal consistency "reopener" procedures. Also, the Commission is not a party to any settlement.

As a recent change in the VA's development plans for the SFVAMC campus, the water tower is not a part of the project subject to the consistency determination before the Commission. Replacing it with underground tanks may, depending on its impacts, be subject to separate federal consistency review by the Commission at a future date.

Parking at the SFVAMC is Inadequate; Parking Spill-over into Surrounding Areas Will Impede Coastal Access; the VA's Parking Analysis is Flawed;

The attached correspondence from Mr. Holland, Ms. Burns and co-authors, and Mr. C. K. Wai (June 2, 2015), makes the following points on the issue of on-campus parking and the adverse effects of parking "spill-over" on coastal access and recreation:

(1) Existing parking facilities at the SFVAMC are inadequate to meet current demand, as evidenced by a 700 vehicle parking deficit identified in the August 2012 Draft EIS for the 2012 iteration of the LRDP;

(2) The VA should be required to eliminate the existing on-campus parking deficit before construction of any new buildings;

(3) The number of new parking spaces provided by Phase 1 development is insufficient, and thus inconsistent with the Coastal Act Section 30252 requirement that new development provide adequate parking facilities;

(4) Parking spill-over from the SFVAMC campus into surrounding recreation areas results in conflict for parking between visitors seeking coastal access and SFVAMC personnel, impeding coastal access and recreation; Phase 1 development will aggravate this problem;

(5) The parking and traffic analyses contained in the 2014 Supplemental Draft EIS are flawed because (a) the VA projected future parking demand based only on its own employees, and neglected other campus users, such as interns, residents and researchers from other institutions; (b) the off-campus area considered in the analyses was of insufficient size and cannot be considered a "representative sampling".

The comments summarized above highlight long-standing concerns over the effects of overflow parking from the SFVAMC on the surrounding community. There have been times in the past when these on-site parking deficiencies have raised legitimate Coastal Act access and recreation concerns. However, Commission staff believes that the proposed Phase 1 development does not raise these concerns, and would reduce parking needs.

The proposed project consists of the VA's Phase 1 long range development plan, which would add new buildings and facilities, including parking structures, to the existing campus. The Commission's role is to assess the consistency of the proposed project with the Chapter 3 policies of the Coastal Act, not to correct historical problems in the baseline condition that are not being exacerbated by the proposed project. Thus, with respect to consistency with section 30252 of the Coastal Act ("The location and amount of new development should maintain and enhance public access to the coast . . ."), the question facing the Commission is limited to whether Phase 1 development would generate additional demand for parking that cannot be absorbed by the existing or proposed on-campus supply, resulting in overflow into public parking spaces in the coastal zone at times and in such a manner that it would interfere with public access to the coast. Information provided by the VA and its traffic and parking consultant indicates that the net number of parking spaces created during Phase 1 development (306 spaces) would exceed the projected increase in parking demand (132 spaces) during peak weekday hours, and that there is no shortage of on-campus parking during weekends and holidays when

demand for coastal access is greatest. The new development proposed under Phase 1 of the LRDP includes adequate new parking to accommodate the new demand generated by the project, would not exacerbate (and would partially alleviate) existing parking shortfalls, and would not interfere with public access to the coast through parking overflow into adjacent coastal zone recreation areas.

As described in the Supplemental Draft EIS (and in more detail in the Transportation Impacts Study, attached to the SDEIS as Appendix E), the VA's approach for projecting the future parking demand generated by Phase 1 development was not dependent on specific estimates of the number of VA employees versus employees or students of other institutions using the campus at any given time. Rather, Phase 1 parking demand was projected based on "parking-demand rates" related to the type (e.g., hospital, office, research building, nursing home) and area (in square feet) of the new buildings and facilities proposed to be added during Phase 1 development. For example, a hospital of a specific square footage was assumed to generate a specific demand for parking (in spaces). The land use-based parking demand-rates used were taken from several Institute of Transportation Engineers (ITE) publications that aggregate empirical data for parking demand collected from a nationwide sampling of different land uses and building types. The parking-demand rates were then adjusted to account for San Francisco-specific transportation mode splits (i.e., transit, bicycling, walking, etc., vs. automobile travel) provided by City guidelines.

Phase 1 Development Does Not Protect Coastal Views and Scenic Resources

The attached correspondence from Mr. Wai and Ms. Burns and co-authors argues that the proposed development is inconsistent with Coastal Act Section 30251 because it would significantly alter coastal views. In particular, Phase 1 structures, including a five-story, 110,000 square-foot research facility (Building 40) and a relocated water tower, would "dramatically" and "radically" impact views from Golden Gate National Recreation Area (GGNRA) parklands, including the Marin Headlands, and would loom over the California Coastal Trail in the Land's End area of GGNRA.

As shown in **Exhibit 8** (p. 3) of the staff report, which depicts the view looking southwestward from the Presidio near the Golden Gate Bridge, SFVAMC structures are at present partially visible, through a screen of vegetation, from points north. A post-project simulation of the same view shows minor changes to the SFVAMC "skyline", with Building 40 and the relocated water tower visible above the trees. However, at this distance of approximately two miles, the visual effect of the project is slight, with no scenic features obscured or significantly degraded. Alterations to the views from Marin County vantage points, three or more miles distant from the SFVAMC, would be even less significant. As noted in Ms. Burns' comment letter, the VA now proposes to remove, rather than relocate, the water tower, which would eliminate concerns about its visual impact. The El Camino del Mar trail, which comprises a local segment of the California Coastal Trail, runs through the Land's End parkland in close proximity to the SFVAMC campus. As shown in **Exhibit 8** (p. 1), Building 40 and the Building 211 parking structure would be visible when looking inland from portions of the trail. However, it is also evident that the campus is situated inland from and well above the elevation of the trail, and would not interfere with ocean and coastal views from Land's End trails. The simulations

provided in **Exhibit 8** do not depict the new trees the VA has proposed to plant along the campus perimeter, which, with time, would partially screen and soften views of the new buildings.

Phase 1 Development Would Disturb Natural Habitat and Recreational Areas
In the attached correspondence, Mr. Wai suggests that increased traffic, noise and human presence related to the new development could disturb natural habitats, vegetation and species. Ms. Burns and co-authors cite Coastal Act Section 30240(b), the policy governing development adjacent to environmentally sensitive habitat areas (ESHA) and parks and recreation areas, and argue that (a) the proposed extensions of the Building 209 and 211 parking structures to near the SFVAMC fence line would have a significant adverse impact on the aesthetic, recreational, and historic values of adjacent GGNRA parklands, and (b) that the placement of these buildings should come no closer to the fence line than they do at present.

No ESHA or sensitive species have been identified within the SFVAMC campus or in the coastal zone parklands immediately adjacent to the campus. Phase 1 development would not extend beyond the SFVAMC fence line, and would not directly or indirectly impede public recreational access to coastal areas. As discussed above, Commission staff does not believe that the new buildings that would be visible from adjacent GGNRA parklands would significantly degrade their aesthetic value.

RECEIVED
JUN 02 2015
CALIFORNIA
COASTAL COMMISSION

ATTENTION:
MR. STREET

Consistency Determination
CD-0003-15
Dept. of Veterans Affairs
San Francisco
Long Range Dev.Plan for
VAMC, Fort Miley
City & County of San Francisco
Item No: F8b
Agenda No: 8 b

C.K. Wai
10 Seal Rock Drive
S.F. CA. 94121-1437
June 2, 2015

OPPOSITION TO COASTAL STAFF RECOMMENDATION
CONCURRING WITH THE CONSISTENCY DETERMINATION
FOR THE SAN FRANCISCO VETERANS AFFAIRS MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN PHASE I

Dear Coastal Commissioners:

The SFVAMC's Parking and Traffic studies on only 3 blocks area were insufficient size and were inadequate representative sampling. The validity of the studies was questionable. The parking dificit is 700 spaces and the proposed 306 spots are not sufficient to be consistent with Coastal Act Sect.30252 (4) " providing adequate parking facilities. " The deficiency " Interferes with the public right of access to the sea " per Coastal Act Sect. 30211. It will impede public recreational access to the coastal areas of the Golden Gate Recreational Areas by SFVAMC's staff and invitees taking up public parking spaces.

The proposed expansion dramatically and permanently alters the coastal views from the Federal Protected Parkland looking south from Marin County. It therefore violates the intent of the Coastal Act. Sect. 30251 " to protect views to and along the ocean and scenic areas, to minimize the alteration of natural land forms...."

The increase in traffic, noise, and human presence at the SFVAMC can further disturb the natural habitat, both vegetation and animals. It will deprive human recreational portunities and that is inconsistent with Coastal Act Sect. 30210

I strongly object to such extensive project. Please vote NO on SFVAMC's LRDP. Thank you very much for your attention.

Sincerely,
C.K. Wai

P.S. Thank you Mr. Street for talking to me and for distributing my letter to the Commissioners.

From: Raymondsnf@aol.com [Raymondsnf@aol.com]
Sent: Friday, June 05, 2015 10:15 PM
To: Street, Joseph@Coastal
Subject: Comments and Suggestions, Proposed Consistency Determination (CD-0003-15)

Dear Mr. Street:

The following are my comments and suggestions with regard to the draft of a "Consistency Determination" (CD-0003-15) that your office has been asked to propose to the Commission for adoption at its meeting of June 12th with regard to Phase 1 of the "Long Range Development Plan" (LRDP) for the San Francisco Veterans Affairs Medical Center's (SFVAMC's) Fort Miley Campus.

Until two months ago, I was the President of the Planning Association for the Richmond, one of San Francisco's largest neighborhood organizations. For over 40 years, PAR has been and still is concerned with the multitude of plans that have been proposed by the SFVAMC to expand both the number and size of buildings on its 29.2-acre campus at Fort

The fact that a "phased consistency determination" is being recommended for adoption implies that sufficient information already exists for the Commission to determine the consistency of Phase 1 of the SFVAMC's LRDP with "the enforceable policies of the California Coastal Management Program".

Because:

- The LRDP is still incomplete (e.g., it is not clear if the proposed determination would be based on the SFVAMC's August 2010 *DRAFT* Institutional Master Plan, on its June 2012 *DRAFT* LRDP, on its January 2014 *DRAFT* LRDP or on some other *DRAFT* of that still-evolving plan);

- the consistency of any draft of that plan with the Finding of Effect (FOE) that is required for it under section 106 of the *National Historic Preservation Act* and with a *FINAL DRAFT* of an Environmental Impact Statement (EIS) that is required for it by the *National Environmental Policy Act* cannot possibly be determined until:

    - the Programmatic Agreement that was executed by the SFVAMC, the Advisory Council on Historic Preservation and California's Historic Preservation Officer in December of 2014 and January of 2015 has been fully performed and an FOE issued (no date for that issuance has even been estimated yet); and

    - all comments and suggestions that were submitted by May 8th of 2015 with regard to the Supplemental *DRAFT* Environmental Impact Statement (SDEIS) that was issued in March of this year have been reviewed and acted upon;

such a determination would be very premature because everything associated with the LRDP (i.e., the LRDP itself, the EIS, the FOE, etc.) is not even drafted yet or is still in draft form.

However, if you decide to proceed with a proposed Phased Consistency Determination for adoption next Friday, I would strongly suggest it be "conditional" and that it address the following "major federal decisions" that should have already been made.

1. For more than thirty years, the SFVAMC has consistently under-estimated the number of dedicated parking spaces demanded by those with work sites on the SFVAMC's Fort Miley Campus and the number of parking spaces either on the campus or in nearby parking lots under temporary lease arrangements. It is highly improbable that temporary leases for nearby parking lots will any longer be available. As documented in the SFVAMC's initial Draft Environmental Impact Statement of August 2012, the result has been an average of at least 700 "spill-over vehicles" have been parked in one of the two parking lots of the nearby Palace of Legion of Honor Museum and in the adjacent Outer Richmond District residential neighborhood. Those impacts have been very adverse.

   Therefore, it is strongly recommended that the SFVAMC be required to eliminate completely that continuing deficit in on-campus parking spaces (with Building 211, it has now been lowered from 700 to about 500) BEFORE construction of any new buildings (other than parking facilities) be permitted and that, when new construction is permitted to start, that increased demand for on-campus parking spaces be provided *ad seriatim* and in a manner that is consistent with the Historic Design Guidelines that have been adopted.

2. In the most recent Supplemental Draft Environmental Impact Statement, the SFVAMC again ignored the continuing deficit in on-campus parking spaces and projected the increased demand for additional spaces based only on its own employees. Since the SFVAMC is also a teaching facility and is one of the nation's leading research facilities, the appropriate basis for projecting future demand should always include the employees of the UCSF who are interns or residents and of the Northern California Institute for Research and Education (NCIRE) who are essential to its research activities. The two sets of employees combined approximate the number of SFVAMC employees.

   As a result, it is recommended that all projections of demand for parking on the SFVAMC's Fort Miley Campus always be based on the aggregate number of employees of the SFAMC, the UCSF, the NCIRE and other collaborating organizations combined.

3. In addition, it is also recommended that each of those employers be required to use their own labor-management agreements as one of the primary methods for mitigating any unavoidable environmental impacts that result from any continued off-campus parking. For some curious reason, that manner of mitigation has never been mentioned in any of the SFVAMC's Environmental Impact Statements.

I would be more than happy to discuss with you or anyone else the background for these three alternate "Phased Consistency Determinations" that I am proposing instead.

Sincerely,

Raymond R. Holland
747-23rd Avenue
San Francisco, CA 94121-3736
1-415-668-8914

Cc: Julie Burns, FOLE
Amy Meyer, P4GGNRA
Jason Jungreis, CSOB
Tom Kuhn, FOSP
Richard Corriea and Directors, PAR

P.S.: I will be unable to attend the Commission's June 12th meeting in Newport Beach. If the email addresses of all Commissioners, Alternates for the Commissioners and the four non-voting members of the Commission are readily available, would you please provide them to me? Thank you.

Street, Joseph@Coastal

From:	Julie Burns <julieburns@sealrock.com>
Sent:	Monday, June 08, 2015 4:13 PM
To:	Street, Joseph@Coastal; Delaplaine, Mark@Coastal
Cc:	Richard Corriea; a7w2m@earthlink.net; Jason Jungreis; Thomas Kuhn; Ron Miguel; Raymondsnf@aol.com; C.K. Wai; FoxSDuggan@aol.com; Eric Mar; john.rahaim@sfgov.org
Subject:	CONSISTENCY DETERMINATION FOR THE SAN FRANCISCO VETERANS AFFAIRS LONG RANGE DEVELOPMENT PLAN CD-0003-15, Item F8b
Attachments:	Coastal Commission Submission 06082015.pdf

The attached represents our submission in opposition to the Consistency Determination for the SF VAMC Long Range Development Plan, on the agenda for the Coastal Commission's meeting on Friday, June 12, 2015 in Newport Beach. These organizations are stakeholders in protecting the Coastal Zone resources adjacent to the SFVAMC, including natural and historical resources of the Golden Gate National Recreation Area (GGNRA) and ensuring continual access to coastal resources for residents and visitors alike.

Our organizations include:

osition: Opposition

- Planning Association for the Richmond (PAR), San Francisco's largest member-supported neighborhood organization
- Friends of Lands End (FOLE)
- People for a Golden Gate National Recreation Area (PFGGNRA)
- Friends of Sutro Park (FOSP)
- Coalition to Save Ocean Beach (CSOB)

These organizations have been actively engaged for years – in some cases, decades – with both the Department of Veterans Affairs/SFVAMC and the National Park Service, as well as the City and County of San Francisco.

We also support the comments submitted separately by Raymond Holland, former PAR President and C.K. Wai, Richmond District Resident.

Please contact me with any questions.

Julie Burns, Ph.D.
Seal Rock Research
San Francisco
+1.415.666.3092 direct +1.415.666.3060 main +1.415.341.6060 mobile
julieburns@sealrock.com

Agenda Item: F8b
Application #: CD-0003-15
Julie Burns, for five organizations listed below
Position: Opposition

FROM: Planning Association for the Richmond (PAR)
Friends of Lands End (FOLE)
People for a Golden Gate National Recreation Area (PFGGNRA)
Friends of Sutro Park (FOSP)
Coalition to Save Ocean Beach (CSOB)
RE: Consistency Determination CD-0003-15
Department of Veterans Affairs, San Francisco
Long Range Development Plan for the SF Veterans Affairs Medical Center

Background

The five organizations submitting these comments are advocates for the integrity of the neighborhoods and national park lands surrounding the San Francisco VA Medical Center (SFVAMC), including the Coastal Zone and its resources.

Legal Status. In March, 2006, two of our organizations, the Planning Association for the Richmond (PAR), San Francisco's largest member-supported neighborhood organization, and Friends of Lands End (FOLE) filed a **Complaint against the Department of Veteran Affairs** with the United States District Court (Northern California) stipulating the SFVAMC was in violation of the National Environmental Policy Act of 1970 (NEPA).

The Complaint was settled on June 6, 2008. Terms of the Settlement Agreement (SFVAMCCB06B02321-SBA) enjoin the SFVAMC from proceeding with development until the completion of an Institutional Master Plan (IMP) – subsequently renamed the Long Range Development Plan – and a full and final Environmental Impact Statement (EIS). **The latter has not yet been delivered.**

Our Position

We oppose the Consistency Determination for the SFVAMC for two reasons:

- The SFVAMC Long Range Development Plan is **not consistent with the enforceable policies of the California Coastal Management Program (CCMP).**
- Any Consistency Determination for or against the SFVAMC would be **premature** prior to the issuance of the Court-ordered Environmental Impact Statement (EIS). Currently, a Draft Supplemental EIS has been made available for public comment. The SFVAMC has not released a final EIS as required by the Settlement Agreement.

Our organizations have been engaged with the SFVAMC for many years regarding development on the Fort Miley Campus. We recognize the SFVAMC as a nationally important institution for health care, research and education, and support it in its missions. We are concerned with the conservation of the values of the Coastal Zone and its national parklands, cultural and historical resources (including those on the Historic Register), recreational resources, and the residential neighborhood that provides access to – and in some cases lies within – the Coastal Zone.

Support for our Position

Chapter 3 of the Coastal Act (http://www.coastal.ca.gov/fedcd/cach3.pdf) cites several factors we have used to determine whether or not the SFVAMC LRDP is consistent with the Act.

Section 30221 Oceanfront land; protection for recreational use and development

Our overarching interest is the protection of the national park lands for the kinds of use and development appropriate to a national park as well as access to the California Coastal Trail, a state resource.

Section 30240 Environmentally sensitive habitat areas; adjacent developments

Section (b) *Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

West Fort Miley: **The** present garage buildings, 209 and 211, do not impact West Fort Miley because they are well back from the border between the SFVAMC and National Park Service properties. However, the proposed extensions of these garages to the fence line of West Fort Miley, and the proposed five- to six-story heights, will have a significant adverse impact on the aesthetic, recreational, and historic values of that portion of the GGNRA. The placement of these buildings should not come closer to the fence line than they do today. This matter has been raised in the comments submitted on the Draft Supplemental EIS (DSEIS).

Section 30251 Scenic and visual qualities

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

By these criteria, both Building 40 and the Water Tower **fail** the consistency test.

Building 40. Phase I of LRDP includes a five-story building devoted to research (110,000 gsf) in the northwest corner of the SFVAMC campus. Such a building would radically impact views from NPS parklands on the Marin Headlands, would loom over the California Coastal Trail, and is adjacent the North Slope slide area.

Water Tower. At a public meeting seeking comments on the DSEIS (April 14, 2015), we noted that maps in the DSEIS show that the SFVAMC intends to move its water tower, S-206. Maps show its new location at the north corner of the fence with NPS's West Fort Miley. A photo simulation shows the tower would be very prominent. Its height would have a significant adverse effect on the Golden Gate in general and West Fort Miley in particular.

Also, we note that the location would permanently obstruct a gate that provides the best possibility of a level access for SFVAMC patients and other people with physical impairments into the West Fort Miley parklands. There is no site analysis for this change and no evidence that the SFVAMC sought to avoid this adverse effect.

On June 3, 2015, our groups learned from the NPS that the SFVAMC is proposing to replace the water tower with underground tanks. While this sounds like a solution that would have less impact on the scenic and visual qualities of the Coastal Zone, engineering studies should be done and reviewed before a Consistency Determination. Tanks would be in sandy soil and in a slide area boundary which could impact NPS as well as the integrity of the North Slope, the site of a massive stabilization project in 2011. Until engineering and hydrogeological data is available, a vote on the Consistency Determination is premature.

Section 30253 Minimization of adverse impacts

New development shall (5) where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, ore popular visitor destination points for recreational uses.

The former West Fort Miley Military Reservation (listed on the National Register of Historic Places) serves 10,000 students a year with a ropes course and outdoor educational programs. An octagonal house, the only one of three in this area on public land, was formerly the property of the historic Marine Exchange. The NPS Lands End Trail (part of the California Coastal Trail) and the USS San Francisco Memorial are popular destinations for visitors from around the world. **The proposed LRDP would have an adverse impact on these resources.**

Conflict for parking between visitors seeking coastal access and SFVAMC staff (some of whom park near the SFVAMC, then take the University of California-San Francisco shuttle to other UCSF sites) is a serious problem that will be aggravated by the LRDP. **As the SFVAMC acknowledges, the LRDP does not mitigate the parking deficit, and will have an adverse impact.**

Summary

The coastal resources of the Lands End area routinely feature in "top ten" or "best" lists and have been lauded recently in the *Los Angeles Times* (January 16, 2015), *Town and Country* (February 2015), outdoor writer Tom Stienstra (*SF Chronicle*) and many others, as well in social media. For a flavor of the importance of this area, consider its Yelp reputation http://www.yelp.com/biz/lands-end-trail-san-francisco .

The proposed Long Range Development Plan (LRDP) has the potential to dramatically and permanently alter the viewshed of the Coastal Zone from federally-protected parklands of the GGNRA in San Francisco and Marin. It would also affect permanently their recreational use. The GGNRA and the California coast are resources of national interest; the GGNRA is a national and international icon; and it is the intent of the 1976 Coastal Act to protect the integrity of the Coastal Zone for its visual qualities and for recreation.

The Coastal Commission staff has not been able to base its evaluation on the information contained in the Draft Supplemental Environmental Impact Statement to the SFVAMC's LRDP. The DSEIS is still in draft status. Nor does the staff have information about the replacement of the water tower with underground tanks.

We therefore feel it is premature for the Coastal Commission to make a Determination on the LRDP's consistency with the Coastal Act until it has up-to-date necessary information. We also must oppose the Consistency Determination because of the damage that would be caused by projects that would affect the quality of our national parklands and Coastal Zone.

//Signed//

Julie Burns, Co-Chair, Friends of Lands End julieburns@sealrock.com

Richard Corriea, President, Planning Association for the Richmond sfparpresident@gmail.com

Amy Meyer, Chair, People for a Golden Gate National Recreation Area a7w2m@earthlink.net

Jason Jungreis, Esq., Coalition to Save Ocean Beach jasonjungreis@gmail.com

Thomas Kuhn, Chair, Friends of Sutro Park tom@tomkuhn.com

National Park Service
U.S. Department of the Interior

Golden Gate National Recreation Area
Division of Planning
Fort Mason, Building 201
San Francisco, CA 94123
www.nps.gov/goga

Memorandum

TO: Mark Delaplaine

FROM: Larry Miranda

DATE: June 11, 2015

SUBJECT: NPS Concerns regarding CD-0003-15, San Francisco Veterans Affairs Medical Center's Long Range Development Plan

The Golden Gate National Recreation Area, a unit of the National Park Service, submits the following comments on CD-0003-15, San Francisco Veterans Affairs Medical Center's (SFVAMC's) Consistency Determination for the Fort Miley Campus Long Range Development Plan (LRDP):

Article 4 - Marine Environment:

As expressed to you in an earlier Memorandum dated December 12, 2012, regarding CD-046-12, NPS had concerns that north campus stormwater is directed to the north slopes of the campus and discharges onto NPS land, including a major park trail. At a December 17, 2014 meeting with the SFVAMC, NPS staff were informed that the north slope storm water drainage system would be fully redirected into the SFPUC combined sewer system as a project component in the construction of Building 40 (Phase 1). However, in the SFVAMC's Supplemental Draft Environmental Impact Statement (SDEIS), subsection titled, Sewer and Stormwater (Pages 2-9, 2-13 and 2-16), it reads, "…stormwater runoff would be redirected away from the sewer system to direct-discharge outfalls." NPS, again, expressed its earlier concerns in its May 8, 2015 comment letter to the SFVAMC on its SDEIS (letter attached) because NPS still believes this practice will likely cause additional instability to an already unstable landslide prone area.

Article 6 – Development

Historically, there has been a buffer area between SFVAMC and NPS parkland that did not include buildings of large stature. This development, as well as others being planned, is

EXPERIENCE YOUR AMERICA
The National Park Service cares for special places saved by the American people so that all may experience our heritage.

placing structures (buildings with vertical massing) within this buffer area that will forever change the character of adjacent NPS parklands. Building within this buffer area, close to NPS parklands, causes concern that the new facility will adversely impact certain park resources as a result of its location adjacent to NPS lands.

The NPS has requested SFVAMC use design tools commonly used in urban areas, such as property line setbacks and "sky exposure planes" (where multi-story buildings gradually step back from the property line) to minimize impacts at street level. Design using these approaches can capitalize on the qualities of adjacent properties rather than turn the project's back on them.

Geologic Hazard – see comments made above in Marine Environment regarding North Slope Stormwater

Public Access – The NPS owns and manages public lands west of the SFVAMC and provides parking areas for the public to enjoy coastal access, views from the coastal bluffs, and coastal bluff trail access in an area known as Lands End. We have expressed concerns to SFVAMC regarding SFVAMC related parking taking up public parking spaces on our Lands End parking. CD-0003-15 does not adequately address coastal public access. The NPS knows from past SFVAMC construction that loss of parking due to construction impacts the parking capacity on NPS lands. The impacts need to be fully discussed in the CD and mitigations added that would minimize public access impacts.

Please see additional NPS concerns in the attached SDEIS comment letter to SFVAMC as referenced above.

United States Department of the Interior

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

IN REPLY REFER TO
L76 (GOGA-PL)

MAY - 8 2015

Bonnie Graham
Medical Center Director
Attn: Robin Flanagan
San Francisco Veterans Affairs Medical Center
4150 Clement Street
San Francisco, CA 94121

Re: National Park Service Comments on the Supplemental Draft Environmental Impact Statement for the Long Range Development Plan

Dear Ms. Graham:

The National Park Service (NPS) appreciates the opportunity to comment on the San Francisco Veterans Affairs Medical Center (SFVAMC) Supplemental Draft Environmental Impact Statement (EIS) for its Long Range Development Plan (LRDP). NPS supports the mission of the SFVAMC, and the purpose, goals, and objectives outlined in the Supplemental Draft EIS. As emphasized in our earlier scoping letters and comments, NPS is still concerned that the proposed future development described in the Supplemental Draft EIS would affect NPS lands adjacent to the SFVAMC. Having close proximity to the SFVAMC on three sides, any development along the boundaries of the SFVAMC has the potential to affect NPS lands.

Enclosed are our comments on the document. As we noted in our comments for the 2012 Draft EIS, we remain concerned the analysis in the Supplemental Draft EIS does not adequately describe the impacts of the action on NPS lands. A core concern continues to be the proposed construction of Buildings 22, 23, and 24 along our east boundary, as well as the expansions of Garages 209 and 211, and the proposed new water tower location on the west boundary. The siting of these new buildings along our boundaries would have an adverse effect on the Fort Miley Military Reservation Historic District. However, as we have expressed directly to the SFVAMC, we continue to offer our full cooperation and support to design solutions that resolve these issues.

We encourage you to continue to engage NPS staff in this and future planning processes, especially in the development of an alternative that avoid adverse impacts on NPS lands. If you have questions regarding our comments, please feel free to contact Katharine Arrow (Liaison to SFVAMC) of my staff at (415) 561-4971 or katharine_arrow@nps.gov.

Sincerely,

for

Christine Lehnertz
General Superintendent

cc: California State Historic Preservation Officer
Advisory Council on Historic Preservation

Enclosures (1): NPS Comments – SFVAMC LRDP Supplemental Draft EIS

SECTION: EXECUTIVE SUMMARY

Public Involvement and Agency Coordination

(Page ES-14) Amend the statement "In addition, the City and County of San Francisco has provided information, comments, and input during the EIS process" to include that the NPS/GGNRA has also done so.

Table ES-1: Summary of Environmental Impacts and Mitigation Measures

(Page ES-26) Hydrology and Water Quality: Change drainage effect from minor to Minor with Mitigation. Amend to include Mitigation to redirect storm water currently directed to the north slope storm drainage system into the combined sewer system consistent with commitment made by VA management to the NPS.

(Page ES-42) Note: f: Mitigation Measure CR-3, a.iv, SFVAMC has not yet finalized or posted the HDDG to its LRDP website by April 3, 2015 as stated.

SECTION 2 (ALTERNATIVES)

Per NEPA (Sec. 1502.14), the analysis needs to consider a reasonable range of alternatives. A reasonable alternative to include in the analysis is one of the alternatives eliminated from further review, i.e., Further Reduced Development at the Existing Campus. Under NEPA, a reasonable alternative recommended by another agency and the public cannot be eliminated, as this one is, if it only partially satisfies the purpose and need of the LDRP. Moreover, an agency cannot craft a Purpose and Need (P&N) statement that unduly restricts reasonable alternatives. In fact, the VA is required to involve the public and agencies in defining the P&N of a project. It is also a best practice for agencies to include a broad range of alternatives for controversial projects, including alternatives that only partially satisfy the P&N statement should be found reasonable and therefore analyzed.

Secondly, an alternative selected for analysis needs to be substantially different and distinguishable from the other alternatives considered for review. The NPS considers the proposed Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative 1 (Preferred Alternative) and Alternative 2: SFVAMC Fort Miley Campus Buildout Alternative 2 are not substantially different and are barely distinguishable as required by NEPA. Therefore, the NPS recommends the VA to eliminate the proposed Alternative 2 and to replace it with Further Reduced Development at the Existing Campus as a more reasonable Alternative 2.

In the NPS comments to the previous Draft EIS (letter dated October 31, 2012), NPS stated that a reasonable alternative was not evaluated for Phase 1 new construction that utilizes the Mission Bay Campus in place of new construction on the Fort Miley Campus. In response, this Supplemental Draft EIS states on *page 2-3* that such an option "would result in less opportunity for collaboration and interaction between programs at the SFVAMC Fort Miley Campus....therefore, it is not feasible to further reduce the facilities' density and achieve a more efficient interactive setting at the existing SFVAMC Fort Miley Campus, because a...reduction would not allow VA to close its space deficit and meet program needs." In our estimation, this justification for not considering moving all new construction to Mission Bay that *would* allow the SFVAMC to fill space deficit (off-site) is at the expense of impacts to two Fort Miley National Register Historic Districts, as well as construction and operational impacts voiced by neighborhood community groups. This alternative should be more fully evaluated.

Table 2-1: Area, Massing, and Construction Schedule for Alternative 1 and 3 Short-Term (Phase 1) Projects at the SFVAMC Fort Miley Campus (2013-2020) *(page 2-6)* and Table 2-3: Area, Massing and

Construction Schedule for Alternative 2 Short-Term (Phase 1) Projects at the SFVAMC Fort Miley Campus (2013-2020)

The NPS contends that new construction proposed in Phase 1.4 (Building 22 Expansion), Phase 1.5 (Buildings 209 and 211 Parking Garage Extensions), Phase 1.8 (Building 24 Expansion), Phase 1.9 (Building 40, including relocation of the water tower S-206), and Phase 1.13 (Building 23 Expansion) at the SFVAMC/ East & West Fort Miley GGNRA boundaries constitutes structural crowding resulting in diminished park experiences as park viewsheds are impacted and the feeling and setting of the Fort Miley Military Reservation Historic District are adversely affected. The current aged condition of many of the existing trees is such that they will not continue to provide adequate screening of new construction projects. Consequently, the NPS expects the proposed new building sites—particularly Buildings 22, 23, 24, 209 Extension, 211 Extension, and the new water tower site—may be pulled back from the Campus/Park boundary, be reduced in height, size, be screened with new tree plantings or the impacts mitigated in other ways.

(Pages 2-6 and 2-15) At the SFVAMC meeting of April 6, 2015, NPS/GGNRA staff were informed that the height of the Building 24 Expansion (Phase 1.8) has been reduced from three stories to two and would be 10,000 gross square feet. Consequently, the figures in Table 2-1 and Table 2-3 for Phase 1.8 and Total Phase 1 Area need to be updated.

Landscaping and Open Space Areas

(Pages 2-7 and 2-14) The NPS would like assurance that vegetative screening, particularly tree planting, will be incorporated into the short-term project phases to provide for screening as mitigation for new construction on the Campus/Park boundaries at East and West Fort Miley. The text "...and potentially along the eastern Campus boundary adjacent to Golden Gate National Recreation Area lands" does not provide assurance that screening will take place, nor that it will be placed at *both* east *and* west sides of the Campus/Park interfaces. The intent is for SFVAMC to mitigate viewshed impacts from the park of new construction of Buildings 22, 23, and 24 on the East Fort Miley side and Buildings 209 Extension and 211 Extension, and the new location of the water tower on the West Fort Miley side.

In addition, we request that the Final EIS recognize the two agencies' intention to collaborate on strengthening existing pedestrian connections and exploring new opportunities between the SFVAMC Campus and the Park. Unfortunately, the potential to enhance these connections for the benefit of the broad public is in some ways diminished by proposed construction described in this document; particularly the little-used northern gate at West Fort Miley that would be dominated by the water tower and expansion of 211, and a gateway to East Fort Miley to compensate those likely to be lost by construction of Buildings 22 and 24.

(Page 2-9, 2-13 and 2-16) At the SFVAMC meeting of December 17, 2014, NPS staff were informed that the north slope storm water drainage system would be fully redirected into the SFPUC combined sewer system as a project component in the construction of Building 40 (Phase 1). The subsection titled, Sewer and Stormwater, needs to reflect this commitment rather than continuing the current practice which states, "Furthermore, where practical, stormwater runoff would be redirected away from the sewer system to direct-discharge outfalls."

Parking

(Pages 2-10, 2-19, and 2-22) The current text discusses how much parking would be added under the Alternative discussed, but does not address how this relates to the overall Campus need for parking. NPS requests you clarify the overall parking need, and if the balance is a deficit, state any plans to mitigate the impacts caused by the deficit. This should also be reflected in Section 4.0 Cumulative Impacts and its corresponding Table 4-3 section on Transportation, Traffic, and Parking on *pages 4-4,* as well as Section 4.4.5 "Transportation, Traffic, and Parking Alternative 1" *(pages 4-70 to 4-77).* The NPS knows from past SFVAMC construction, that loss of parking due to construction impacts parking capacity on NPS lands. This impact needs to be fully disclosed, and mitigation suggested minimizing this impact.

SECTION 3 (AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES)

3.1 Aesthetics

(Page 3.1-2) Views and Visual Character/ Existing SFVAMC Fort Miley Campus: Except for the selection of one vantage point (View 9), NPS staff was not consulted when view locations to be studied were selected. Consequently, the relatively few number and location of vantage points in East and West Fort Miley do not adequately reflect visual impacts caused by proposed new construction. Omitting these impact view locations compromises the analysis, since visual impacts were assessed based upon incomplete information. We would like to see additional viewshed studies at West Fort Miley, where virtually no viewshed analysis were performed, especially between Views 4 and 5 to assess impacts from proposed Garage Extensions 209 and 211, and the new water tower location and at East Fort Miley between existing viewsheds 9 and 10 to assess impacts from proposed new construction of Buildings 23 and 24, as well as moving View 10 to the north end of the Building FI-304 to better assess impacts from proposed construction of Building 24, as well as Building 212.

(Page 3.1-2) Table 3.1-1: Existing SFVAMC Fort Miley Campus View Locations: Add to the description of View 10 the identification of the National Park Service Building, FI-304.

(Page 3.1-18 &19) Operation: The study concedes that intermittent unobstructed views of Campus buildings (both existing and proposed) exist from the trails of East Fort Miley, but takes into consideration only *character* and *scale* when evaluating compatibility. It is our position that the close *proximity* to the edge of the Campus/Park boundary and the proposed building heights make the increased density of new construction incompatible. We believe the overall level of impact to be greater than the "minor impact" noted in the document *(page 3.1-19)* and the overall impact should be considered "moderate."

(Page 3.1-19) The third paragraph appears to be referring to the Alternative 1 *short-term* projects, not the long-term projects as identified, for this portion of the document falls under the *Short-Term Projects* heading *(page 3.1-17)*.

(Page 3.1-21) View 5a description should include the proposed new water tower location to the list of buildings that would be visible, along with Buildings 40 and 211.

(Page 3.1-25) View 11a description should include the proposed new water tower location to the list of buildings that would be visible, along with Buildings 40, 43, and 211.

(Page 3.1-25) View 12a description should include the proposed new water tower location to the list of buildings that would be visible, along with Buildings 40.

3.4 Cultural Resources

(Page 3.4-5) Cultural Resources Identified in the Project Area: Add the word "Reservation" to read: Fort Miley Military Reservation Historic District.

(Page 3.4-13) Regulatory Framework/ National Historic Preservation Act of 1966: Update the end of this section with a mention of the history of how this Supplemental Draft EIS came to be.

(Page 3.4-17) Historic Properties, 2nd paragraph, 2nd sentence: The statement "Construction would introduce visual and/or atmospheric changes to the Fort Miley Historic District; however, these changes would be obscured from view by existing trees and steep terrain that diminish the views from the Fort Miley Historic District in the GGNRA toward the SFVAMC Fort Miley Campus" is exaggerated on several accounts. The new construction would not be completely obscured from view, but only *partially* obscured from view, a point supported by this document's admission in the View and Visual Character analysis section *(see page 3.1-19, 4th paragraph)* that states, "These proposed development changes to the

Campus would result in a minor impact." Our position that the new construction would not be completely obscured from view is also supported in that impacts are also assigned to the proposed buildouts in Table 3.4-1: Impacts of Alternative 1 Short-Term Projects on the SFVAMC and Fort Miley Historic District *(page 3.4-18)*. If the buildings were obscured from view as this document states, there would be no impact listed. And, as stated before in our comment for *page 3.1-18 & 19* above, our position is that the impact is moderate, not minor. Many of the trees and vegetation referred to are old and dying and, being more impermanent than the construction of the new buildings, once gone, there will be clearly foreseeable and much greater direct adverse effects to viewsheds and to the feeling and setting of the historic Fort Miley Military Reservation Historic District.

The NPS disagrees with the text on *page 3.4-17* that concludes, "Therefore, there would be no direct or indirect adverse impacts on the Fort Miley Historic District from the future buildout of the SFVAMC LRDP under Alternative 1 short-term projects." The NPS believes there *would* be adverse impacts associated with the "minor visual impact" status assigned to each of the following views: view 5a and 7a *(page 3.1-21)*, and views 8a, 9a, 11a, 12a *(page 3.1-25)*. Furthermore, it is our position that the impact at these locations is moderate, not minor. As mentioned in our previous comment, we also believe the overall level of impact to be greater than the "minor impact" noted in the document *(page 3.1-19)* but is in fact, moderate. We also disagree that the impacts would be "indirect," as stated on *page 3.4-17,* but instead believe them to be "direct" impacts affecting the feeling and setting of the Fort Miley Military Reservation Historic District. Consequently, we disagree with *Page 3.1-19, 4th paragraph* that states, "The Fort Miley Historic District retains its integrity of location, design, feeling, and setting and would continue to convey its significance."

The increased mass of three additional structures directly on the East Fort Miley boundary, the Building 209 and 211 Extensions and the new water tower location on the West Fort Miley boundary, diminish the integrity of feeling and setting and thus the ability of the Fort Miley Military Reservation Historic District to convey its significance along the pedestrian pathways adjacent to our shared boundaries. Furthermore, because of these impacts, we would like to see a CR Mitigation Measure to plant new trees along our shared boundaries of a sufficient size to provide the necessary screening for the foreseeable future.

(Page 3.4-18) Table 3.4-1: Impacts of Alternative 1 Short-Term Projects on the SFVAMC and Fort Miley Historic District: Corrections are required for the Impact on Fort Miley District column for Phase 1.9 (change from "No" to "Indirect" as per View 5a on *page 3.1-21* and Views 9a, 11a and 12a on *pages 3.1-25*) and Phase 1.11 (change from "No" to "Indirect" as per View 7a on *page 3.1-21* and Views 8a, 9a, and 11a on *pages 3.1-25*). In addition, we believe each of the impacts on this table currently labeled as "Indirect," as well as those just mentioned for Phases 1.9 and 1.11, to be "Direct" as they directly impact the feeling and setting of the Fort Miley Military Reservation Historic District.

(Page 3.4-20) Mitigation CR-3, HDDG a.iv. should reflect that the April 3, 2015 date has passed without completion, or change the expected completion date.

(Page 3.4-21) Mitigation CR-3, HDDG d., change reference of "CR-2" to "CR-3" if reference is incorrect.

(Page 3.4-21) Operation: The operation of the Alternative 1 new construction buildings identified in notes for *page 3.4-17*above <u>does</u> in fact involve "permanent visual changes" to historical resources, as identified in the viewshed impacts mentioned in this previous comment.

(Page 3.4-23) Alternative 2, Short-Term Projects: Add Mitigation Measure CR-3 to the mention of CR-1 and CR-2.

(Page 3.4-23) Alternative 3, Short-Term Projects: Add Mitigation Measure CR-3 to the mention of CR-1 and CR-2.

(Page 3.4-25) Alternative 4, Short-Term and Long-Term Projects, Construction: Clarify which historic district is being referred to by adding "SFVAMC" to the sentence "This would be a direct adverse impact on the Historic District."

3.6 Geology, Soils, and Paleontological Resources

(Page 3-12) Geology and Soils, states, "An Alternative analyzed in this EIS is considered to result in an adverse impact related to geology and soils if it would… be located on a geologic unit or soil that is unstable, or would become unstable as a result of the project, and potentially result in on- or off-site landslide..." However, the evaluation of Alternatives 1 and 2 found on *pages 3.6.15 and 3.6.17* state that no impact related to seismically induced landslides or slope failures would result from the operation of Alternative 1 short-term projects. The statement notes that, "…the mapped landslide scarps to the north of the Campus and another previous landslide area on the northern slope of the Campus…are outside the proposed development footprint and do not pose a risk to the development activities associated with Alternative 1 short-term projects…" This statement is not consistent with the requirement that the EIS needs to consider an adverse impact potential in an off-site landslide. The proposed improvements are within a few hundred feet or less of the landslide area and within the VA Campus.

The current storm water management practice of discharging storm water on to a known landslide area combined with a seismic event would potentially have an adverse impact and needs to be studied further. The Fugro West, Inc. report commissioned by the VA for the North Slope Stabilization project dated March 2010 states, "Discharge of surface water onto the North Slope is a major destabilizing factor contributing to on-going slope failure…there are certain risks associated with discharging storm water onto the landslide, including: the potential for erosion on and beyond the VA property, increased risk of localized land sliding downslope of the proposed walls, and the potential for undermining the proposed retaining walls due to continued landslide movement."

3.8 Hydrology and Water Quality

(Page 3.8-2) The paragraph states, "A small separate storm drainage system conveys stormwater off-site on the north side of the existing SFVAMC Fort Miley Campus along the north-facing slope. The drainage area being served by this separated system is relatively small. This separate system appears to have adequate capacity for its current drainage area and no known drainage problems (HGA, 2010)." NPS requests that this section be revised to better reflect the comments made above in 3.6 Geology, Soils, and Paleontological Resources.

(Page 3-12) Specifically quantify the volume of flows from the campus and reflect the concerns of the Fugro West report. A Storm and Sanitary Sewer Site Plan dated March 2006 for Project No 662-05-119 shows the approximately 6-8 storm drains that feed the north storm water drainage system, which has been modified with the retaining wall project possibly representing 20+/- % of the total storm water for the Campus. Upon quantifying the volume of flows, add this amount in to the SFPUC calculations for volumes consistent with SF Public Works Code, Articles 4.1 and 4.2 as applicable.

NPS recognizes that the North Slope Stabilization project improved the potential landslide conditions, but this section does not reflect the NPS's oft-stated concerns about the drainage situation. Further, this section states that "…native shrubs and trees were planted below the retaining wall after construction." Unfortunately, most of these plants died, none were planted on the east retaining wall, and none of the 14 trees identified in the EA appear to have survived. Hence, the larger retaining wall can be seen from the Marin Headlands. This impact needs to be resolved with re-screening of the retaining wall.

(Page 3.8-17) Last paragraph discusses the continued use of the north slope for storm water drainage. See above comments in Section 2 Alternatives, *(page 2-9, 2-13 and 2-16)* regarding discontinuing use of the north slope to discharge storm water.

(Page 3.8-18) Management Measure HYD-1 (2): See above comment regarding use of north slope for stormwater discharge.

3.13 Transportation, Traffic, Circulation, and Parking

Figure 3.13-7 needs to be updated to show the partial removal of Lot J and the addition of Parking Garage Building 211.

(Page 3.13-21 and 28) The discussion titled, *Loading Existing Fort Miley Campus,* should be expanded to include the East Fort Miley access road as it is the only source for materials and equipment deliveries for the NPS Trails Crew facility at East Fort Miley. This intersection is also an occasional pinch point that blocks traffic into and out of the main 42nd and Clement entrance when NPS has large vehicles entering or exiting this road. Loading Demand on *page 28* should also include a discussion regarding loading at East Fort Miley.

(Page 3.13-23) Table 3.13-6: Existing Off-Street Parking Supply at the SFVAMC Fort Miley Campus. Footnote states, "Reflects status as of 2012, as reported in the SFVAMC Long Range Development Plan. Some facilities listed have since been permanently or temporarily closed or restriped/reconfigured as a result of construction activities, Americans with Disabilities Act compliance, or other factors." This three year old table needs to be updated to current conditions, particularly the partial removal of Lot J and the addition of Parking Garage Building 211.

(Page 3.13-40, 42 and 67) Table 3.13-10: Net-New Person-Trip Generation—Alternative 1, Table 3.13-14 and Table 3.13-19. Update line 1.8 to reflect the reduced size of the building from 15,600 square feet to 10,000 square feet.

(Page 3.13-59) East Fort Miley Access: Campus traffic impacts on GGNRA East Fort Miley access needs to be quantitatively assessed and analyzed in the Supplemental Draft EIS. This section needs to describe GGNRA's only vehicle access route into East Fort Miley in more detail. Construction of the access lane was planned as mitigation for the construction of the two story garage referred to as the Mental Health Patient Parking Addition Project 662-CSI-612. The original plan was to have the SFVAMC construct an access driveway in the southeastern corner of East Fort Miley, separating GGNRA vehicles from SFVAMC vehicles. This eventually was determined by the SFVAMC to not be cost effective so the access lane was built on the south side of the Parking Addition.

The one-lane route provides access to GGNRA's maintenance facility which comprises numerous employees, interns, volunteers, trucks, earth-moving equipment, and materials deliveries. East Fort Miley also services as an operational facility for park lands in San Mateo County, Ocean Beach, and the Sutro Heights Grounds Crew comprising additional staff. Due to the reduced turning radius provided at the westerly end of the lane, delivery vehicles and GGNRA trucks require multiple maneuvers to align with the road. Larger delivery vehicles have blocked the key intersection at Fort Miley Circle and Veteran's Drive for up to 30 minutes. The Final EIS should include mitigation designed to resolve or minimize this impact. Although the proposed Patient Welcome Center drop-off circle is expected to reduce this impact, large delivery vehicles would continue to cross into oncoming cars and buses in order to make the hard right turn onto the access road.

This section needs to also describe in more detail and clarify, what is meant by, "would not involve implementing specific changes to GGNRA access to and from East Fort Miley," but "SFVAMC would implement some minor changes to the internal roadway network …" and overall, "[it]…is not anticipated to result in adverse operational impacts on GGNRA access…." Without more information it is unclear how the impact assessment was determined to be minor.

3.14 Utilities

Wastewater and Stormwater: See comments regarding north slope storm water drainage concerns in Sections 3.6 "Geology, Soils, and Paleontological Resources" and "Hydrology and Water Quality".

(Page 3.14-5) Revise "This system is described further in Section 3.18, 'Hydrology and Water Quality' to read, "Section 3.8."

SECTION 4 (CUMULATIVE IMPACTS)

Table 4-1: Cumulative Projects in the Vicinity of the SFVAMC Fort Miley Campus
(Page 4-4) Project No. 3: Change the Completion Date text from "Completed in 2012" to "2012 and beyond" as the implementation of the GGNRA Dog Management Plan is still in progress and will be ongoing.

(Page 4-4) Project No. 4: Change the Completion Date text from "2012 and beyond" to "2015 and beyond" as the GGNRA's general management plan (GMP) approvals were signed in 2015. The Final EIS should document that the GMP describes the desired future conditions for park lands adjacent to the SFVAMC, including Fort Miley and Lands End. During the GMP planning process, the public expressed great interest in preserving dark night sky conditions and other natural resources in these areas. The GMP documents the National Park Service's commitment to preserve and enhance those resource conditions. The night-time illumination of the multi-level parking garage, Building 211, is changing conditions in the area and is readily visible from many locations, including the Marin Headlands. The NPS is concerned the proposed expansion of the garages (209 and 211) will further impact night sky conditions if constructed without mitigation.

Table 4-3: Cumulative Environmental Impacts
(Page 4-20) Operation: Views and Visual Character: The NPS does not agree with the statements, "Because views of GGNRA land and the existing Campus from any one location are relatively limited, the new permanent structures associated with this Alternative would not be visually intrusive when combined with cumulative projects in the same viewshed, and the visual character of the area would not change substantially. Therefore, this would be a minor cumulative impact." In fact, the permanent SFVAMC structures *would* be somewhat visually intrusive in some park areas, and the visual character of the park area *would* change moderately in certain areas. The NPS believes this would be a moderate cumulative impact.

APPENDIX E: TRANSPORTATION
Impacts Study – On-Site Circulation Optional Recommendations (Memorandum) AECOM Memorandum, July 11, 2014
(Page 3) NPS requests adding the recommendations below to the analysis within the Supplemental Draft EIS, Chapter 3.13 Transportation, Traffic, Circulation, and Parking:

"It is recommended that consideration be given to removing this driveway access from the site and constructing a new driveway access point off of Clement Street for GGNRA vehicles at a location east of the Campus or a new driveway located off of Camino del Mar. This would separate the truck movements from other traffic movements at this intersection, reducing confusion.

It is recommended that VA work closely with the GGNRA to understand the volume and types of trucks that must access this driveway each day to determine the full extent of the impact of this driveway if it remains within the Campus. Truck turning templates should be developed to confirm whether trucks will be unable to complete this movement in one maneuver and to ascertain how many maneuvers this movement may require."