



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Pacific Southwest Region
333 Bush Street, Suite 515
San Francisco, CA 94104

IN REPLY REFER TO:
(ER 12/591)

Filed Electronically

18 October 2012

Allan Federman
Acting Facility Planner
San Francisco VA Medical Center
4150 Clement St. (138)
San Francisco, CA 94121

Subject: Review of the Draft Environmental Impact Statement for the San Francisco Veterans Affairs Medical Center, Long Range Development Plan, CA

Dear Allan Federman:

The Department of the Interior has received and reviewed the subject document and has no comments to offer.

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc:
Director, OEPC
Loretta B. Sutton, OEPC Staff Contact



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-PLAN)
OCT 31 2012

Allan Federman, Acting Facility Planner
San Francisco Veterans Affairs Medical Center
4150 Clement Street (138)
San Francisco, CA 94121

Re: National Park Service Comments on the SFVAMC Long Range Development Plan Draft Programmatic Environmental Impact Statement and Finding of Effect

Dear Mr. Federman:

The National Park Service (NPS) appreciates the opportunity to comment on the San Francisco Veterans Affairs Medical Center (SFVAMC) Long Range Development Plan (LRDP) Draft Programmatic Environmental Impact Statement (Draft EIS). The NPS supports the mission of the SFVAMC; and the purpose, goals and objectives outlined in the Draft EIS. With reconsideration of the alternatives analyzed, an alternative can be developed that realizes all of the goals and objectives, but does not adversely impact NPS lands.

As emphasized in our scoping letters, the NPS is very interested in this planning document, as the proposed future development described in the Draft EIS would affect NPS lands adjacent to the SFVAMC. As the Draft EIS describes, the SFVAMC is landlocked by a developed urban neighborhood on one side, and NPS land on the other three sides. Having close proximity to the SFVAMC on three sides, any development along the boundaries of the SFVAMC would affect NPS lands.

Attached are our comments on the impact analysis. We are concerned the analysis does not adequately and/or accurately describe the impacts of the action on NPS lands. A core concern continues to be the new construction of Building 22, 23, and 24 along our boundary. The siting of these new buildings along our eastern boundary would have an adverse effect on this portion of the Ft. Miley Reservation Historic District, and would also impact scenic and recreational resources of the park. As expressed directly to the SFVAMC, we continue to offer our full cooperation and support to design a solution that resolves this issue.

It is unfortunate the analysis does not include an alternative approach for Phase I new construction that utilizes Mission Bay Campus. We feel the Mission Bay Campus is uniquely suited to meet the needs of SFVAMC and does not have the same campus confinement being experienced at the existing site, offering the potential to avoid many of the impacts associated with development at the existing campus. I encourage you to actively engage NPS in the remaining planning process, especially in the development of a reasonable alternative that avoids adverse impacts on NPS lands and resources. If you have any 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 with any questions.

Sincerely,

Frank Dean
General Superintendent

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

NPS Comments

SFVAMC LRDP Draft Environmental Impact Statement

SECTION 1 (INTRODUCTION)

1.7 Public Involvement Process

The NPS believes the scoping process was not adequately accomplished with the existing LRDP. The public was never allowed to provide scoping comments on the current proposed action (LRDP) identified in the Draft EIS. The scoping comments used for development of this Draft EIS came from the Draft Institutional Master Plan (IMP), a completely different proposed action than described in this Draft EIS. Although the NPS appreciates SFVAMC's development of a reduced proposed action to the IMP, the NPS would have liked the opportunity to submit scoping comments on the LRDP proposed action. Our comments (and the general public's) would have been useful in developing this Draft EIS, and could have resulted in reasonable alternatives to include in this Draft EIS that meet Purpose and Need, but avoid impacts to NPS lands.

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 an alternative for Phase I new construction that utilizes Mission Bay Campus. The IMP made reference to a completed Facility Options Study that served as the basis for an off-site alternative. Because there was so very little information available on the Mission Bay campus options, it is difficult to provide substantive comment. The Mission Bay Campus is uniquely situated to meet the needs of the SFVAMC and does not have the same campus boundary restrictions and environmental setting of the current SFVAMC. The study would be helpful in building public understanding of the advantages and disadvantages of keeping all SFVAMC programs and services together or pursuing other options to locate some or all functions off-site.

SECTION 3 (AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES)

Page 3-2: The discussion of impacts definition on page 3-2 is confusing. This section describes "adverse" impact as being an indicator of both significance and intensity. Conventionally, NEPA analyses refers to the term "adverse" as a term that simply describes whether the impact has unfavorable environmental consequences, irrespective of the intensity of the impact (e.g. an impact can be either "adverse" or "beneficial"). Using "adverse" impact as an intensity indicator confuses all of the impact discussion because it does not allow the reader to understand the intensity of the impact, a requirement of NEPA. We suggest the impact discussion for all impact topics be revised so that the reader can understand the intensity of the impact beyond whether the impact is "minor".

3.1 – Aesthetics

We request that lights not be directly visible from any place within GGNRA. As noted in comments on previous SFVAMC EA's, the views from GGNRA lands should be considered in the assessment

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 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 East Fort Miley.

We request that 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.

Views and Visual Character: In a letter dated April 12, 2001, which is included in your appendix, NPS raised substantial concerns about the new Sleep Lab building proposed to be constructed immediately on the boundary of East Fort Miley. NPS objections included concerns about losing the visual and functional buffer area between the two properties that has served park visitors and VA patients for many years. We specifically requested that the VA refrain from building in that location because of the adverse impacts that would likely result, or to revise the building design to incorporate measures that might mitigate the adverse impact of having such a massive structure right next to the park. NPS is disheartened to see that the Draft LRDP does neither of these. We are further concerned that the draft plan proposes two more buildings of similar and height and mass for construction at the East Fort Miley property line. Together with the new 2-story parking garage built in 2010, this would result in a 700 foot long, 50 foot high wall running the length of the park. We take exception with the DEIS finding that this impact would be minor, and no mitigation has been proposed for this visual impact. We believe the changes in views and character will be adverse, major, and long-term. Views of the open sky will be forever diminished, and the character will become decidedly urban. These changes will have other affects on park resources and park visitors which are described in other parts of this letter.

Figures 3.1-6 Views 9 and 10 taken from within East Fort Miley, looking toward the VA campus show the existing condition and describe the campus buildings as “moderately visible”; however, there is no visual simulation of how the new buildings, which are immediately adjacent to East Fort Miley boundary, would be seen from those locations. Nor is there a text description of the expected changes to the character and visibility. The DEIS refers to a berm and vegetation. The berm, will help mitigate the visibility of new buildings, but the vegetation, mostly Monterey pines, is long past its life span. Almost all of the pines suffer from cankers and NPS has been steadily removing them over the last several years. The absence of these trees will make the new VA building even more prominent. Given the historic integrity of East Fort Miley, it is unlikely that NPS would replant a row of pine trees in that same location.

3.4 - Cultural Resources

NHPA Section 106, Area of Potential Effect: We appreciate that the Draft EIS addresses both the east and west portions of the Fort Miley Military Reservation Historic District in the document's discussion of potential effects to this National Register site. However, we reiterate our position regarding the determination of the NHPA Section 106 Area of Potential Effect (APE) for the Long Range Development Plan (LRDP), as referenced in our letter to Lawrence Carroll, dated September 4, 2012, that we believe the APE for the LRDP should encompass the entire Ft. Miley Military Reservation National Register District, rather than including just the eastern portion of East Fort Miley and excluding West Fort Miley altogether. The reasons for this are twofold: 1) Because you assess the effects of the LRDP on the Ft. Miley Historic District as a whole in your Draft EIS and NHPA Section 106 Draft FOE, it is therefore logical and reasonable to include the entire Historic District in the APE; 2) As you state in your NHPA Section 106 Draft FOE, vegetation exists between the Medical Center and both the eastern and western portions of Ft. Miley, nonetheless, the two properties abut, are in some cases in clear sight of one another, and much of the vegetation is senescent, diseased and of a somewhat impermanent or ephemeral nature as compared to the longevity of the proposed new structures.

NHPA Section 106, Draft Finding of Effect: In the NHPA Section 106 Draft FOE, we disagree with your “Not Impaired by LRDP Activities” Findings of Effect (Table 1, page 3) and the Historic Properties to be Affected “No Adverse Effect” (Table 2, page 58) regarding the property East Fort Miley – Ordinance Storehouse (FI-304), as well as the Historic District feeling, setting and association along the shared eastern boundary between our two properties. According to the Code of Federal Regulations 36 CFR Part 800.5, an undertaking would have an adverse effect on historic properties eligible or listed on the NRHP if the effect would alter the characteristics that qualify a property for inclusion in the NRHP. It is our position that the SFVAMC proposed siting of new Buildings 22, 23 and 24 directly along the shared eastern boundary would have an adverse effect on this portion of the Ft. Miley Reservation Historic District with the “introduction of visual and atmospheric elements...that diminish the integrity of the property’s significant historic features” (Draft FOE, page 43/44, 5th bullet). Despite the existence of the Medical Center’s three 3-story Buildings 8, 9 and 10, set back as much as 75 feet from the boundary, the increased massing of three additional structures (two 3-story and one 2-story) directly along the boundary diminishes the integrity of feeling and setting and thus the ability of the Ft. Miley

Reservation Historic District to convey its significance along the pedestrian pathways adjacent to this shared boundary and from historic East Fort Miley Ordnance Storehouse (FI-304). The proposed addition of these three new structures (Buildings 22, 23 and 24) introduces conspicuous visual elements that crowd the boundary and are incompatible with the Ft. Miley Reservation Historic District. Consequently, as our assessment of the proposed impacts does not agree with your assessment, we would propose that you avoid, minimize or mitigate these adverse effects as you continue through the NHPA Section 106 process. We propose discussions to resolve this adverse effect through the Memorandum of Agreement development process.

Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative : The discussion of impacts of Phase 1.3 and Phase 1.5 of Alternative 1 Near-Term Projects and Impacts on the Fort Miley Reservation Historic District (Draft EIS, page 3.4-20 to 24) and of Phase 2.3 of Alternative 1 Long-Term Projects and Impacts (Draft EIS, page 3.4-26 to 27), you concede that the proposed action that includes the construction of new Buildings 22, 23 and 24 “would introduce visual and/or atmospheric intrusions to the Historic District” but we disagree with your finding that “these changes would be somewhat obscured by thick vegetation along the district boundary”. The large openings and gaps among the trees and vegetation along this boundary do not provide a very complete screening. The visual impact through this vegetation of the existing VAMC buildings, such as of existing Buildings 8, 9 and 10, will only increase with the construction of new Buildings 22, 23 and 24 as these buildings introduce even more conspicuous visual elements that crowd the boundary and are incompatible with the Fort Miley Reservation Historic District. 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 an even greater direct visual and atmospheric adverse effect. You also state that the “size and density of the tree canopy along the boundary lines would allow for selective pruning of vegetation without compromising the viewshed of the Historic District” (Draft EIS, page 3.4-23), which sounds as if you are suggesting a possible reduction in the current vegetative cover could be warranted.

You also state in your justification of no direct or indirect impact that “hospital facilities have been located along this border since 1934, and thus, the setting and association would not be substantively changed from current conditions” (Draft EIS, pages 3.4-23 to 24). With the exception of the 1-story historic VAMC Building 20, which you propose to demolish to make way for Building 23, the buildings that you refer to as having been located along this border since 1934 appear to be Buildings 8, 9 and 10, which are set back from this border by as much as 75 feet, thereby greatly lessening their impact to the setting and association.

3.9 Land Use

Construction of the proposed new buildings along the NPS boundary would create cool and shaded conditions, and an uncomfortable urban edge to East Fort Miley which would forever diminish its usefulness as parkland.

3.13 Transportation and Parking

Page 3.13 – 15: The Affected Environment discussion on parking is inadequate. The NPS is disappointed that the SFVAMC did not do more intensive controlled study assessments (rather than qualitative field observations) of parking utilization on adjacent neighborhood and NPS parking areas. Parking utilization in these areas needs to be quantitatively assessed and analyzed in the EIS.

East Fort Miley Access: The Transportation and Parking section needs to recognize GGNRA’s only vehicle access route into East Fort Miley. 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 SF VAMC construct an access driveway in the southeastern corner of East Fort Miley, separating GGNRA vehicles from SF VAMC vehicles. This eventually was determined by the SF VAMC to not be cost effective so the access lane was built on the south side of the Parking Addition.

The one-lane access route provides egress to GGNRA’s Trail Crews which include 17 Park employees, eight interns, dozens of volunteers, trucks, earth-moving equipment, and materials deliveries. East Fort Miley also serves as an operational facility for San Mateo, Ocean Beach, and Sutro Grounds Crews comprising approximately six to eight additional Park 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. NPS and SFVAMC staffs communicate to minimize traffic impacts. The Draft EIS needs to disclose this traffic and safety issue, as these will exacerbate with the implementation of any action alternative. The impact 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.

Page 3.13 – 21: Mode Split - This section states that SF guidelines are used in the analysis, however, a more detailed explanation of the mode split assumptions need to be identified. The analysis reflects a mode split of approximately 53% for vehicle trips. This rate seems low, particularly considering the proposed uses and current high use of vehicles to the campus.

Page 3.13-27, Construction Traffic: Increased traffic into SFVAMC will affect NPS access to East Fort Miley during construction. The analysis needs to analyze this impact and disclose this in the Final EIS, and include mitigation to minimize impact.

Page 3.13-28, Parking, Construction Workers: Construction of Building 211 will result in a temporary loss of existing parking at Lot J which has a capacity of 270 cars. This loss coupled with increased demand for construction worker parking and construction staging over a period of three to five years will have an impact on the surrounding neighborhood and GGNRA visitor parking lots. The statement that, "overall, construction-related transportation impacts would be temporary and minor" does not adequately address the impacts.

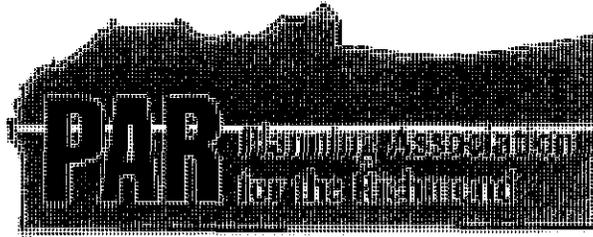
Page 3.13-38 Long-term Projects, Parking: The parking section states that the parking demand is estimated at 730 spaces during the weekday peak period (Table 3.13-12), and that Alternative 1 long term projects would necessitate the provision of 560 new spaces to meet daily and peak demands. It goes on to state, "Therefore, the net addition of 263 spaces would not meet the parking demand of 730 spaces under the 2023 Alternative 1 conditions." This leaves the campus short 297 spaces or a 53% shortfall in code compliant parking requirements. To characterize such a shortage as "minor" does not adequately address the eventual overflow impacts to the surrounding neighborhood and NPS lands. 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 included avoiding or minimizing this impact.

Cumulative Impacts

Add "Mental Health Patient Parking Addition Project 662-CSI-612." to Table 4.1

3.14 Utilities

Wastewater and Stormwater: The discussion of stormwater collection for the separate stormwater drainage system is inadequate. It provides no details on area of collection, conveyance amounts, conveyance discharge, or impacts of conveyance discharge. The NPS has made numerous suggestions to SFVAMC to direct stormwater discharge from the north campus into the City's combined stormwater/sewer system. The NPS continues to have concern that the discharge of concentrated stormwater runoff on the north slopes of the campus will cause additional instability to an already unstable landslide prone area. This planning process presents an opportunity to revise the campus stormwater collection and redirect it to the City's stormwater system. The Final EIS needs provide more Affected Environment/Environmental Consequences information on stormwater collection conveyance/discharge as it relates to the northslope land slide prone area. The downslope area of discharge is on NPS land and includes a major park trail. The SFVAMC needs to commit to long-term monitoring of landslide prone area in relation to its northslope stormwater discharge.



5758 Geary Boulevard, #356, San Francisco, CA 94121-2112
Voicemails & Faxes: (415) 541-5652; Direct & Voicemails: (415) 668-8914
Email: president@sfparr.org Website: www.sfparr.org

October 31, 2012

Mr. Allan Federman, Acting Facility Planner
San Francisco Veterans' Affairs Medical Center (SFVAMC)
4150 Clement Street (138)
San Francisco, CA 94121

In Re: SFVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

This letter transmits the enclosed five sets of comments on the SFVAMC Long Range Development Plan (LRDP), the associated Draft Environmental Impact Statement (DEIS) and Finding Of Effect (FOE).

These comments are organized into five separate documents that address each of the following sets of issues: **Environmental Issues, Historic Preservation, Parking, Process and Transportation.**

The enclosed comments, questions and suggestions have been developed and endorsed by each of the following five organizations, whose principal spokespersons participated in the preparation:

1. **Planning Association for the Richmond** (President Ray Holland, Directors William Shepherd and Gene Brodsky, Emeritus Director Ron Miguel)
2. **Friends of Lands End** (Co-Founders Julie Burns and David Burns)
3. **Coalition to Save Ocean Beach** (COSB, John Frykman and Jason Jungreis);
4. **Friends of Sutro Park** (FOSP, Tom Kuhn)
5. **People for a Golden Gate National Recreation Area** (PFGGNRA Chair Amy Meyer)

Please let either of us know if you have any questions about these comments. Thank you for the opportunity to provide them to you and your colleagues.

Sincerely,

Raymond R. Holland
President, PAR

Cc: Members, PAR, FOLE, COSB, FOSP, PFGGNRA

People For a Golden Gate National Recreation Area
3627 Clement Street
San Francisco, CA 94121
415-221-8427

October 31, 2012

Mr. Allan Federman, Acting Facility Planner
San Francisco Veterans' Affairs Medical Center (SFVAMC)
4150 Clement Street (138)
San Francisco, CA 94121

In Re: SFVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

This letter provides comments, questions and suggestions on certain general issues as well and on issues of **Historic Preservation** raised by the SFVAMC's Long Range Development Plan (LRDP), the Draft Environmental Impact Statement (DEIS) and the Finding of Effect (FOE).

General Comments

The major inadequacy of the Long Range Development Plan is that the SFVAMC and the University of California have not made the necessary decisions concerning those veteran-serving and research functions that must be located at the SFVAMC's campus and those that are secondary to the primary missions of the SFVAMC, can't fit well or grow there and that should be located elsewhere. Without making the difficult choices and presenting a fundamental mission statement, the SFVAMC will continue to be enmeshed in the dysfunctional planning and construction that has characterized the campus' development on an *ad hoc* basis over many years.

Hospital staff have freely admitted that not all of the activities proposed to be located on the 29-acre campus can fit there. We are now at the stage where the SFVAMC is trying to stuff a size 9 foot into a size 6 shoe. Because of lack of building space and a parking deficit that now totals over 700 on-campus parking spaces, the neighborhood and surrounding national park lands are impacted more each year by the institution.

We all know this is not a static situation. Even if the USA does not fight another war, the population of veterans needing medical care will continue to grow for many years. Research done by UCSF in conjunction with the SFVAMC increases annually and will continue to benefit the veterans and the larger community. It would make better use of funding and do less environmental and community harm if the LRDP declared what programs and services can fit on this campus and which ones cannot.

Comments on Historic Preservation in Regard to Both Historic Districts

From page 20 of the Draft Finding of Effect (FOE): *“At this time [August, 2012] VA has not received any public comments on the Section 106 process.”*

To our knowledge, there has not yet been language presented before this as a basis for these comments. In addition, the time, date and location of the initial meeting of the NHPA Section 106 Signatory Consulting Parties have not even been announced yet.

2) On page 43-44 the LRDP lists *“actions that typically result in a finding of adverse effect on a historic property (here, a pertinent selection):*

“Physical damage to all or part of the property.

“Alteration of the property... that is not consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines.

“Changing the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.

“Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.”

Note especially the last item: some proposed SFVAMC construction would diminish the historic district in the adjacent GGNRA.

3) On page 58, concerning Fort Miley Military Reservation Historic District: *“No adverse effect on the Historic District because its integrity of location, design, materials, workmanship, feeling, and association would not be impaired, and the changes in setting would be consistent with the current setting (adjacent hospital facilities).”*

Such adverse effects are indeed created by aspects of the proposed construction, to a greater or lesser extent depending upon which alternative is under consideration.

4) On page 45: *“Implementation of the proposed LRDP would not result in any physical changes to the Fort Miley Military Reservation Historic District. Although the LRDP proposes development along the border between East Fort Miley and the SFVAMC Fort Miley Campus, hospital facilities have been located along this border since 1934, and thus the setting and association would not be substantively changed from current conditions. As such, implementation of the LRDP would result in no adverse effect on the Fort Miley Military Reservation Historic District.”*

It is also asserted at Appendix C 5.2.3 ...*“Although the LRDP proposes development along the border between East Fort Miley and the SFVAMC Fort Miley Campus, hospital facilities have been located along this border since 1934, and thus, the setting and association would not be substantively changed from present conditions.”*

Comparison of the FOE diagrams showing building proximity and increases in the size of

buildings from 1935 to 2012 (1935, 1965, 1995, and 2012) shows why there should be no further construction of buildings on the border out of scale with the present ones—the new garage (i.e., Building 212) already violates that scale. Respecting this limitation is necessary for the integrity of both the SFVAMC and the Fort Miley Historic Districts.

Since the LRDP calls for more and larger buildings on this border, we strongly disagree with the assessment proposed in the FOE..

5) Page 47, Alternative 1, SFVAMC Fort Miley Campus Buildout Alternative contains extensive discussion of the damage that would be done, the “*adverse effect to the SFVAMC Fort Miley Campus Historic District due to the cumulative impairment of the integrity of materials, design, feeling, and setting of the District*”.

This should be entirely unacceptable to all concerned.

Over the years, the handsome hospital buildings (e.g., Building 2, etc.) and their relationships to campus landscaping have been subject to unsympathetic changes in bulk and diminution of open space, but nonetheless there is a National Register district on the Medical Center grounds that does have integrity. However, some LRDP alternatives call for demolition of some historic buildings, bulky additions to others, and larger-scale buildings along the East Fort Miley fence line; each would increasingly and adversely affect the integrity of the historic portion of the campus in relation to its Period of Significance. They would permit a gradual chewing away of historic buildings and the construction of buildings unsympathetic to the National Register District until the integrity of the district is lost.

Effects on the Golden Gate National Recreation Area

The SFVAMC is surrounded on three sides by national park land, including the Fort Miley Military Reservation Historic District. The SFVAMC is 29 acres. East Fort Miley and West Fort Miley are each about 12.5 acres. These properties are listed on the National Register of Historic Places. They are parts of what was once the single entity of 54 acres of Fort Miley. They have overlapping historical Periods of Significance. The POS of the fort lands is 1892-1950. The POS of the SFVAMC is from 1934-1941. These overlapping periods must be respected and the integrity of these historic sites should be protected and understood in the context of the whole original military reservation in the middle of which a medical center was placed. This context has natural, scenic, historic, and recreational features, values, and resources.

The enabling legislation for the GGNRA (P.L. 92-589) states:

“Section 1. In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area... is hereby established. In the management of the recreation area, the Secretary of the

Interior... shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this Act, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses, which would destroy the scenic beauty and natural character of the area."

As per the Secretary of the Interior's Standards for Historic Preservation, and the mandate of the Act authorizing the national park, various aspects of the proposed construction, depending upon which alternative is under consideration, would cause significant adverse effect on the GGNRA properties, because of the loss of integrity of location, design, feeling and association on the park lands. Moreover, East Fort Miley is where the legislation authorizing this park began, and its integrity is therefore of special significance to this National Park.

The natural context of the national park includes the habitat of trees, shrubs, and open areas in each of the forts and on Lands End, and the wildlife dependent upon that habitat. While it is particularly visually important at the fort fence lines, the height and bulk of the highly visible VAMC buildings comprise a scene sheltered by the park lands, and that distance from the park needs to be retained. It is not possible for the VAMC to build tall, bulky buildings, especially at the fence lines, without damaging the health of the natural context, which includes daytime sun and shadow, absence of night lighting, wind patterns, noise, and the integrity of views.

Additionally, all who come to either the park or hospital share the outstanding views from this area, well-elevated above the street. Visitors look across from the VAMC property to the GGNRA lands, and from the GGNRA lands to the VAMC. The hilly terrain and the street and road pattern could further the integrity of the total site with agency cooperation. Views from park to hospital and hospital to park can extend the value of each to the other, rather than depending on the second-rate idea of the park screening the views of the hospital with foliage.

Additionally, the GGNRA has had camping programs in the past at both East and West Fort Miley, and has every right and reason to expect to have them again. There are also picnic areas and places to play. That kind of recreation requires a sense of separation from nearby development. The VAMC cannot be allowed to loom over the parklands. Its buildings need to be at the current respectful distance, which should be viewed as a factor in the integrity of the present relationship between two National Register Districts. The SFVAMC should not crowd the national park lands and diminish their value.

Comments relating to Cumulative Impacts

Over time, if some building proposals go forward, a portion of the proposed demolition and construction will have increasingly adverse effect on the SFVAMC's National Register District, and will eventually so denigrate it as to obliterate its Period of Significance and destroy it.

Over time, a portion of the proposed SFVAMC construction would also adversely affect the national park lands next door in two ways. It would be destructive of their historic integrity,

particularly the lands of East Fort Miley because of removal of historic buildings, and the proximity, height and bulk of the proposed buildings intended to replace smaller structures. Also, for all the surrounding park land, including the portion of Lands End adjacent to the SFVAMC that is not part of the Fort Miley Military Reservation Historic District, the bulk and proximity of the construction would detrimentally affect the natural, scenic, and recreational resources that are to be protected by the Secretary of the Interior as mandated in the legislation that authorized the national park.

With sensitivity and collaboration, it would be possible to diminish some of these effects, but the real difficulty is much more fundamental: all of the proposed SFVAMC programs cannot fit on the 29-acre campus.

Sincerely,

A handwritten signature in cursive script that reads "Amy Meyer".

Amy Meyer, People for a GGNRA



5758 Geary Boulevard, #356, San Francisco, CA 94121-2112
Voicemails & Faxes: (415) 541-5652; Direct & Voicemails: (415) 668-8914
Email: president@sfparr.org Website: www.sfparr.org

FOLE.ORG

Friends of Lands End

3755 Balboa Street, Suite 201

San Francisco, CA 94121

V +1.415.666.3092 F +1.415.666.0141

October 31, 2012

Mr. Allan Federman, Acting Facility Planner
San Francisco Veterans' Affairs Medical Center (SFVAMC)
4150 Clement Street (138)
San Francisco, CA 94121

In Re: SFVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

This letter provides comments, questions and suggestions regarding the “**Process**” that has been and will be used for the SFVAMC’s Long Range Development Plan (LRDP) and, accompanying it, the Draft Environmental Impact Statement (DEIS) and the Finding of Effect (FOE).

Last March, we were informed the “final” (as opposed to a “draft”) copy of the LRDP would be completed and published by June of this year. According to its cover page, the first of those two goals was achieved. The LRDP was completed in June but (for reasons that have not been provided) it was not published until mid-August along with the DEIS and the FOE and without any advance notice. While only sixty days was provided to review and respond to all three documents, that period was subsequently increased to about 75 days.

Since many of the individuals who were scheduled to review those documents were out of town during September, thank you for that necessary extension of time (although, we could have used more time)!

Since the LRDP appears intended to be a living document that may be significantly modified or even superseded in the future (*“it is possible that the expansion at an alternative site within San Francisco will be considered in order to accommodate*

potential future development” – LRDP page 3-13), that implies it is only tentative and it may be superseded by a completely different plan in the future. Similarly, the FOE provides (on page 20) that “future versions of this document will emphasize the cultural resources issues discussed at public meetings”. However, the time, date, and location of the initial public meeting of the NHPA Section 106 Signatory Consulting Parties have not even been announced yet!

These imply this is just the beginning of a longer process. If so, we ask that the *approximate* dates for the reviews, meetings and responses to LRDP, DEIS and FOE issues be announced in advance so that members of the public who want to be consulted (or that the SFVAMC wants to consult) can make appropriate arrangements in their schedules and so that we may obtain a better understanding of what that process will include.

Since such an advance schedule would also relate each of those three documents to the other two and to the process that is intended, it would help those of us reviewing those documents to better understand what kinds of inter-relationships are intended.

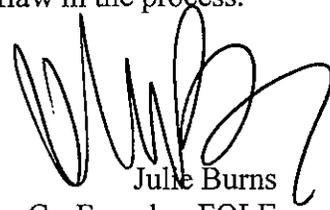
While the LRDP identifies the SFVAMC’s important “partnerships” with the University of California at San Francisco (UCSF) and the Northern California Institute of Research and Education (NCIRE) and the general nature of each on page 1-9, it fails to mention or to identify what role, if any, each of those institutions play or should play in the development of a plan for the SFVAMC’s campus at the Fort Miley site, at other sites or both.

Recently, we were informed that UCSF is now embarking on a long term development planning process for its campuses for 2035. As UCSF has previously claimed Fort Miley as one of its campuses, that process may or may not include that site but it will clearly include other sites that the UCSF now occupies or may want to occupy in the future. It occurs to us that, in order to avoid the danger of the two institutions planning in parallel but not communicating in this densely populated city, it would make more sense for each to participate more actively in the long term development planning process of the other and vice versus.

Finally, because so many of the specific effects of this LRDP are inadequately analyzed in the DEIS, it is not possible to determine the actual cumulative effects of any of the alternatives for the entire project. This represents a serious flaw in the process.

Sincerely,


Raymond R. Holland
President, PAR


Julie Burns
Co-Founder, FOLE