UNITED STATES DEPARTMENT OF VETERANS AFFAIRS

ENVIRONMENTAL ASSESSMENT

SAN FRANCISCO VA MEDICAL CENTER
MENTAL HEALTH CARE AND SLEEP LAB FACILITY
PROJECT NO. 662-607

Submitted to:
US Department of Veterans Affairs

Prepared By:

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Introduction

Project Background

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

The VA's Proposed Action includes the construction and operation of a new 3-story building, to be called Building 24, providing approximately 15,000 square feet of space for sleep lab studies and psychiatric care. The project objective is to relocate and consolidate the psychiatric care and sleep lab units to better serve existing needs and accommodate an expansion of services.

In order to create space for the construction of Building 24, existing Building 20 and Building 32 would be decommissioned. Building 20 was constructed in 1934 as a garage and is now being used for storage. Many of the items currently stored in Building 20 would be disposed of off-site. Other items would be moved into other existing storage areas on the campus that have proper storage space to accommodate the materials.

Building 32 is a temporary modular building with a fenced-in playground constructed in 1991 and currently used as a Child Care Center. Prior to demolition of Building 32, a new Child Care Center would be constructed in the northeast corner of the campus, north of Building 11. This would provide a quieter and more secure location for child care services, as compared to its current location next to a parking lot and Clement Street.

Figure 2 shows surrounding land uses in the general vicinity, including East Fort Miley, the Golden Gate National Recreation Area, and the Outer Richmond District. Figure 3 shows the SFVAMC site plan, including existing buildings and the location of the Proposed Action.

This Environmental Assessment (EA) was prepared in accordance with the regulations set forth by the Council on Environmental Quality implementing the provisions of the National Environmental Policy Act (NEPA) (CEQ Regulations, Title 40 CFR 1500-1508); Executive Order 11514 as amended by Executive Order 11991; and VA Regulations - Environmental Effects of VA Actions (Title 38 CFR Part 26). Guidance provided in the VA's NEPA Interim Guidance for Projects (September 30, 2010) was also used. The purpose of the EA is to report the environmental analysis of the Proposed Action in sufficient detail to allow the VA to determine whether it is necessary to prepare an Environmental Impact Statement (EIS) or to prepare a finding of no significant impact (FONSI) for the Proposed Action.

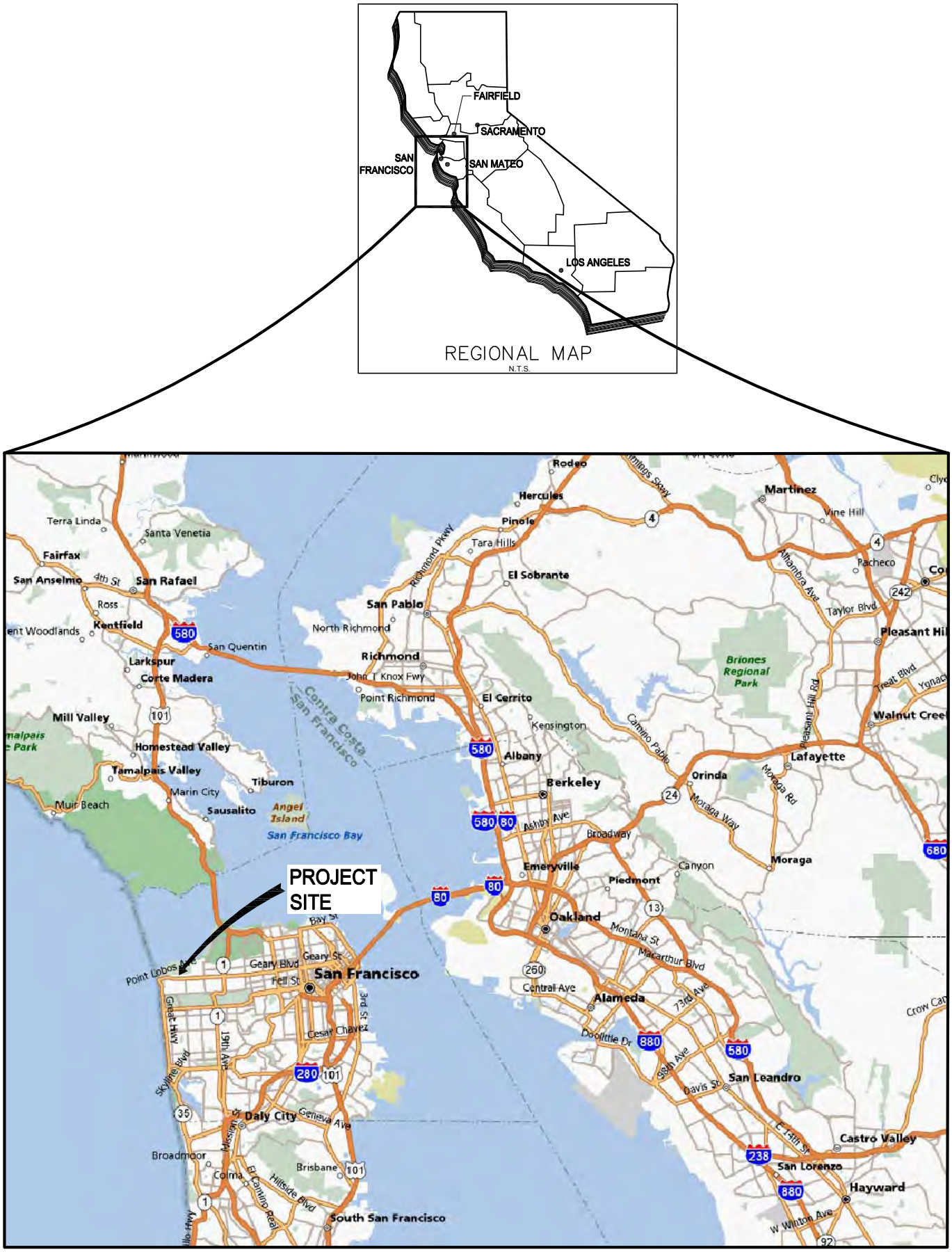


FIGURE 1
VICINITY MAP

WINZLER & KELLY

N

0 600

Feet

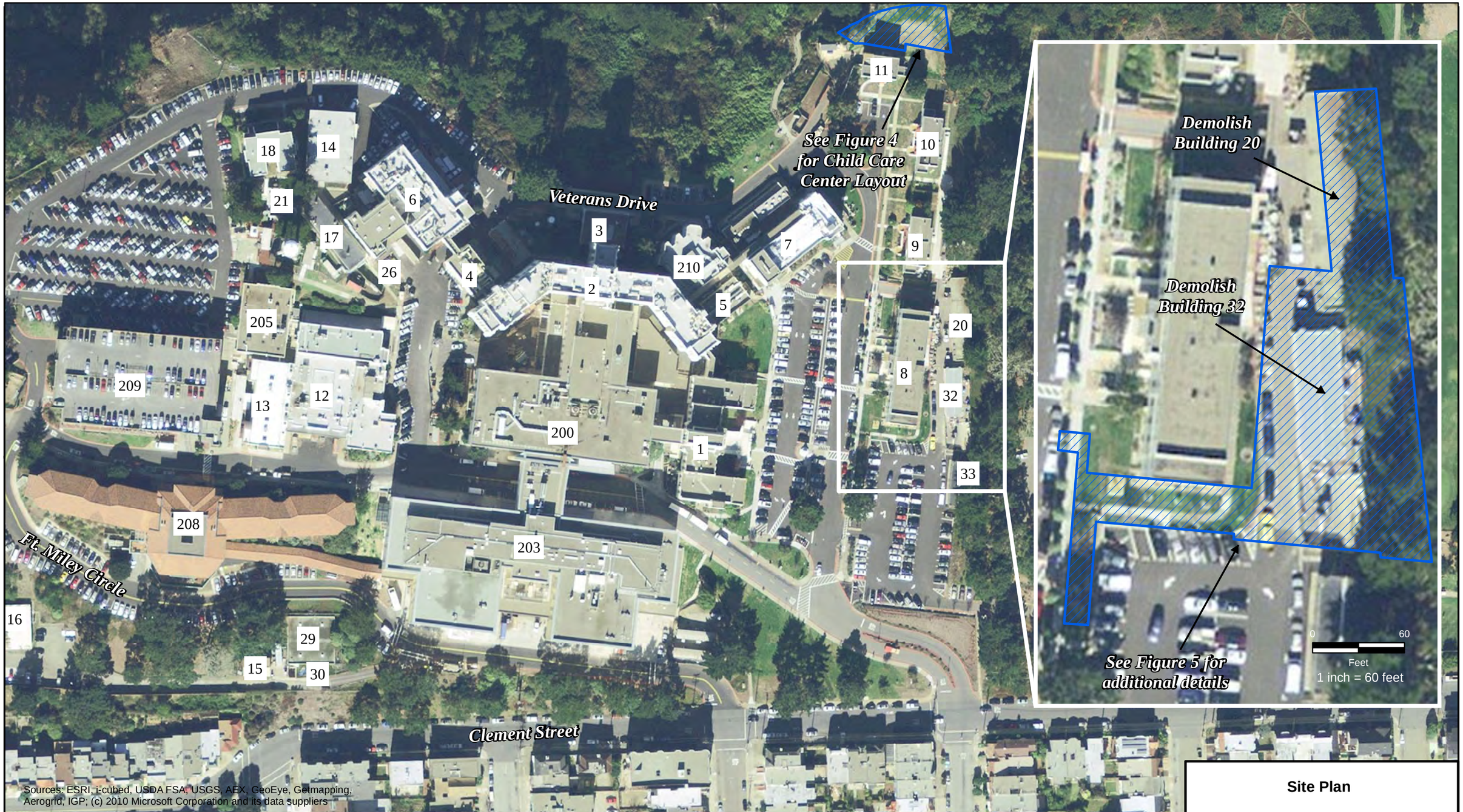
1 inch = 600 feet

Surrounding Land Use

San Francisco Veterans Affairs
Mental Health Care and Sleep Lab Units

Figure 2

Path: J:\12299 - eCIFM Solutions\12299-10-0001 -SFVAMC Sleep Lab EA\08-GIS\Maps\Surrounding Land Use.mxd



Sources: ESRI, i-cubed, USDA FSA, USGS, AEX, GeoEye, Getmapping, Aerogrid, IGP; (c) 2010 Microsoft Corporation and its data suppliers

Legend

Approximate Limits of Construction

200 Building Number

Note: Existing conditions north of Building 11 differ from what is shown on this figure. The area was recently paved, and a legible aerial showing the changed conditions was not available at the time of this report.

N

0 125
Feet
1 inch = 125 feet

Site Plan

San Francisco Veterans Affairs
Mental Health Care and Sleep Lab Units

Figure 3

Path: J:\12299 - eCIFM Solutions\12299-10-0001 -SFVAMC Sleep Lab EA\08-GIS\Maps\Site Plan.mxd

Purpose and Need

The Proposed Action is to relocate and consolidate existing psychiatric care and sleep lab units to better serve existing needs and accommodate an expansion of services. The current campus facilities in which these services are provided are in poor physical condition with deficiencies in indoor air quality, patient safety, noise, and lack space for critical functions. These conditions have resulted in a backlog of care. The Proposed Action serves to meet the existing needs of the Mental Health and Sleep Disorder departments, as well as the need for expansion of services. The new building would be designed to provide a 10-bed unit for psychiatric care with space for supporting staff and facilities, a modern 4-bed Sleep Lab with the capability for overnight monitoring, and space for a Sleep Lab technician and a computer room. The new facility will have the capability to perform sleep studies and diagnosis on all types of sleep disorders.

Alternatives

Development of Alternatives

Two design alternatives were considered for Building 24 and potential analysis in this EA: a 3-story alternative and a 2-story alternative. Each build alternative would require demolition of Building 20 and Building 32 to make space for Building 24, as well as construction of a new Child Care Center north of Building 11. These elements are described in more detail under Alternative 1, Proposed Action.

The 3-story alternative would have a footprint of approximately 5,000 square feet. This design would use half of the available space east of Building 8. The 3-story option is preferred by the VA as it would allow space for possible additional structures in the future. This 3-story option has been selected as Alternative 1, Proposed Action.

The 2-story alternative would have a 7,500 square-foot footprint, which would require more than half of the available space east of Building 8. This would allow less space for possible additional structures in the future. In addition, the 2-story option with a larger footprint would not result in a reduction of impacts when compared to the smaller footprint of the 3-story alternative, therefore, it has not been retained for detailed analysis in the EA.

The No Action Alternative would be to not construct or operate a new facility for sleep lab studies and psychiatric care. The existing deficient facilities would remain in use. This option has been retained for analysis as Alternative 2 – No Action.

Alternatives Retained For Detailed Analysis

Alternative 1 - Proposed Action.

Alternative 1, Proposed Action, includes construction of new Building 24, a new Child Care Center, and demolition of Building 20 and Building 32. Each of these actions is described in further detail below in the order in which they would occur. The overall construction duration for the Proposed Action is anticipated to be 12 months and is scheduled to begin in September 2011. Construction work would be limited to the hours of 8:00 a.m. to 5:00 p.m., five (5) days a week, with occasional deliveries on Saturday between 8:30 a.m. and 5:00 p.m.

Construction of New Child Care Center

Construction of a new Child Care Center would begin in September 2011 and would take approximately 1 month to construct. The area of the planned Child Care Center is relatively flat and is a paved with 23 parking stalls adjacent to Building 11. The new 5,000 square foot Child Care Center would provide the required space for 50 children (approximately double the current capacity) and would consist of two 24 X 55 foot modular trailers and a fenced playground area. The new Child Care Center would be eligible for certification due to the increase in square footage and the separation of housing for infants and youths.

Two design options are being considered (see Figure 4 – Child Care Center Layout Options). One option consists of two trailers side by side on an east-west axis, with a playground area located to the north. The second option consists of one trailer oriented east-west and the other north-south, with a playground area to the west. The new modular trailers would be painted a color similar to the surrounding buildings. Construction would include installation of the necessary underground utilities for domestic water, sanitary sewer, storm drainage, and electrical power.

Site of proposed Child Care Center. Note Building 11 on the right and tree canopy of East Fort Miley in the background.

Legend

Approximate Limits of Construction

Child Care Center

200 Building Number

Note: Existing conditions north of Building 11 differ from what is shown on this figure. The area was recently paved, and a legible aerial showing the changed conditions was not available at the time of this report.

N

0 125
Feet
1 inch = 125 feet

Child Care Center Layout Options

San Francisco Veterans Affairs Mental Health Care and Sleep Lab Units

Figure 4

Path: J:\12299 - eCIFM Solutions\12299-10-0001 -SFVAMC Sleep Lab EA\08-GIS\Maps\Child Care Center Options.mxd

Building 20 and 32 Demolition

Following construction of the new Child Care Center, Buildings 20 and 32 would be disconnected from utilities and removed from the campus to create space for Building 24. Building 20 is a one-story, wood-frame structure with a rectangular plan and a shallow-pitched roof. The original portion of the building was constructed in 1934 as a garage and was only four bays wide. In 1941, an additional eight bays of the same design were added. Currently, Building 20 is approximately 115 feet long by 25 feet wide. Although changes have compromised the architectural integrity of the building to some degree, Building 20 has retained enough integrity to be a contributing resource to the SFVAMC Historic District. Building 32 is a temporary modular building with a fenced-in playground currently used as a Child Care Center. The existing Child Care Center provides services to 24 children (infants and youths). Building 32 is not considered a contributing resource to the SFVAMC Historic District.

West side of Building 20

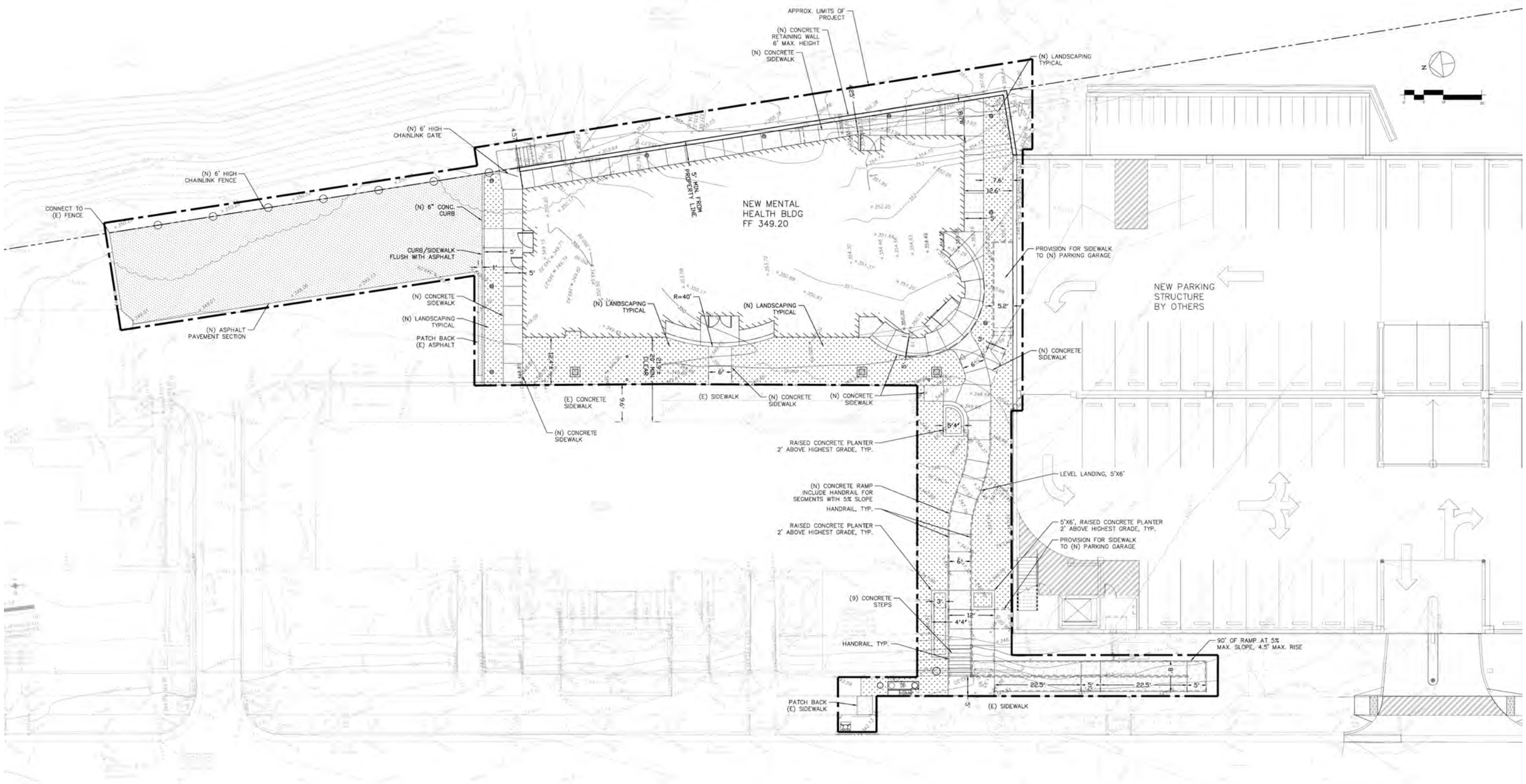
Southwest corner of existing Building 32 and associated playground area

Site of proposed Building 24 looking south. Note Building 20 in the foreground, Building 32 in the background, and Building 8 on the right.

Demolition and clearing of Buildings 20 and 32 would be performed per Section 024100*, Demolition,* of the VA Master Specifications, and performed in a manner to minimize traffic disturbance and utility disruption. The existing utility lines to Buildings 20 and 32 would be removed and capped off at the project boundary. Other utility lines on and adjacent to the construction area would be protected or removed. After removal of existing underground utilities, trenches would be backfilled and re-compacted. Additional aboveground features to be removed include light poles, bollards, retaining walls, and a chained link fence. Demolition of Buildings 20 and 32 would take less than one month to complete.

Construction of Building 24

Following demolition of Buildings 20 and 32, construction of Building 24 would begin (see Figure 5 – Building 24 Layout Plan). Building 24 would be three stories tall, approximately 48 feet above grade, and would provide approximately 15,000 square feet of space for sleep lab studies and psychiatric care (see Figure 6 – Building 24 Exterior Elevations). Group activity areas and facility support areas would be located on the first floor, the 10-bed transitional support units would be located on the second floor, and Sleep Lab units and administration support areas would be located on the third floor. The roof level would house the mechanical system and possibly photovoltaic panels to offset a portion of the Building 24 electrical demand. The facility would be ADA accessible from an adjacent parking area and surrounding buildings. Sidewalks would be provided on the west, south, and north sides of the building for pedestrian traffic. Parts of Building 24 would be operational 24 hours a day, 7 days a week (24/7), while other areas would be closed after normal business hours.



Building 24
Layout Plan

San Francisco Veterans Affairs
Mental Health Care and Sleep Lab Units

Figure 5

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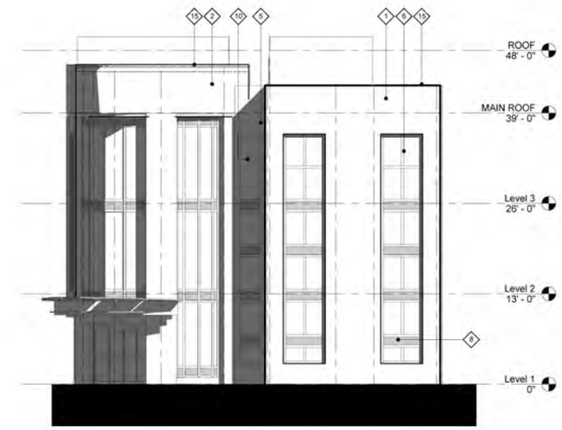
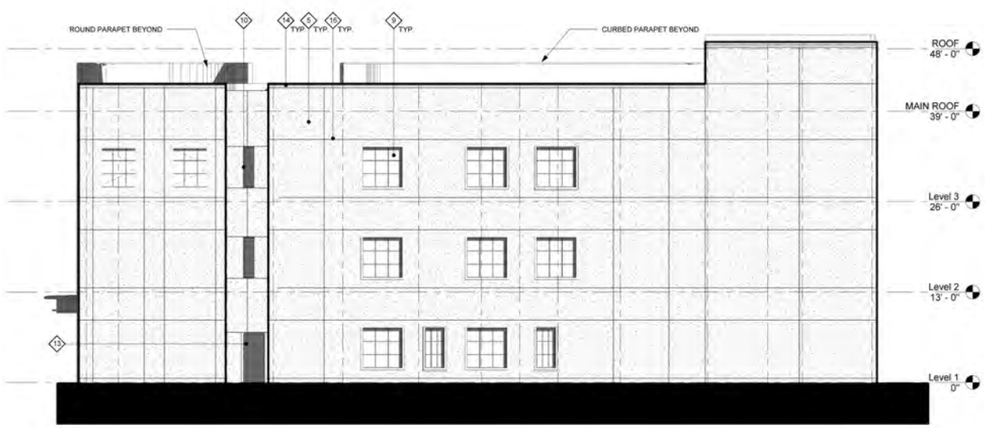
1 WEST ELEVATION
1/8" = 1'-0"



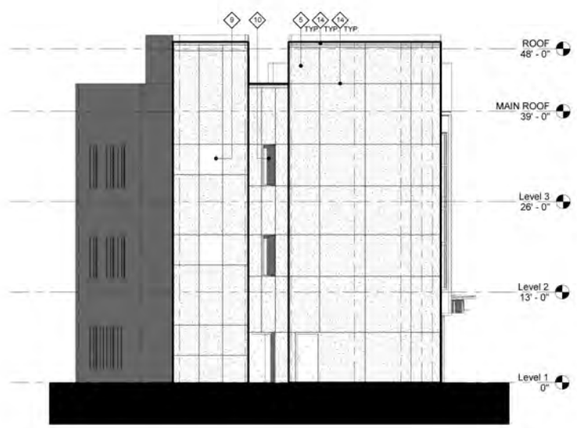
2 SOUTH ELEVATION
1/8" = 1'-0"

ELEVATION FINISH SCHEDULE :

1. TERRACOTA RAIN SCREEN WALL SYSTEM BY SCHILDAN OR EQUAL - LOGOTON PROFILE
2. CORRUGATED METAL PANELS BY CENTRIA OR EQUAL - CONCEPT SERIES, PROFILE
3. SOLID METAL PANEL SYSTEM BY CENTRIA OR EQUAL - FORMABOND II PROFILE
4. FIBER CEMENT REVEAL PANEL WALL SYSTEM BY JAMES HARDIE OR EQUAL - HARDIE REVEAL PANEL PROFILE
5. EXTERIOR CEMENT PLASTER - HEAVY DASH FINISH
6. EXTERIOR CURTAIN WALL WINDOWS, WITH CLEAR ANDOIZED FRAME
7. EXTERIOR CURTAIN WALL WINDOWS, WITH BRONZE FINISH FRAME
8. EXTERIOR CURTAIN WALL OPAQUE SPANDREL GLASS
9. EXTERIOR CASEMENT WINDOW WITH CLEAR ANODIZED FRAME
10. EXTERIOR FIX WINDOW WITH CLEAR ANODIZED FRAME
11. EXTERIOR DOUBLE GLASS DOOR WITH CLEAR ANODIZED FRAME
12. EXTERIOR SLIDING GLASS DOOR WITH CLEAR ANODIZED FRAME
13. EXTERIOR DOOR WITH ALUMINIUM FRAME
14. GALVANIZED SHEET METAL COPING, AT CEMENT PLASTER WALLS.
15. METAL COPING PER EXTERIOR FINISH MANUFACTURER'S RECOMMENDATIONS
16. CEMENT PLASTER ALUMINIUM CONTROL JOINT
17. GLASS CANOPY
18. METAL CANOPY W-FLANGE CURRED MEMBER



3 EAST ELEVATION
1/8" = 1'-0"



4 NORTH ELEVATION
1/8" = 1'-0"

Building 24
Exterior Elevations

San Francisco Veterans Affairs
Mental Health Care and Sleep Lab Units

Figure 6

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Site grading for Building 24 would involve excavation for the structure's foundation and for utility trenches. The existing pavement would be removed and the sub grade beneath the pavement would be scarified. The spread footings would be a minimum of 12 inches wide and would be founded at least 18 inches below the lowest adjacent grade. The installation of utility connections would consist of open trench construction. The open trench method involves ground clearing of the work area, grading or pavement cutting, excavation of the trench, installation of the pipe, backfilling of the trench, and restoration of the work surface. Installation of water, sewer, electrical, and gas utility connections would require an approximately 3-foot wide and 3- to 6-foot deep trench. It is estimated that construction would require excavation and disposal of up to 600 cubic yards of soil and import of up to 75 cubic yards of fill.

Building 24 would be steel framed and supported on conventional spread foundations, using cantilevered steel columns where required. Construction would utilize cast-in-place concrete at ground level for the foundation. A concrete or concrete masonry retaining wall would be necessary along the east side of the new Building 24. Excavation behind the wall would be minimal (approximately two feet) to establish concrete form work or to install a layer of drainage rock. The use of tiebacks is not anticipated. The temporary cuts may extend partially into the National Park Service property to the east. No damage to trees roots would be anticipated and no permanent construction would cross property lines.

A new 2-inch domestic water line would be provided to Building 24, which would connect to an existing 8-inch water line along Veterans Drive. The new water line would be metered and sized to meet the peak demand based upon the plumbing fixture count for the building, and include a backflow preventer and isolation valves. A new 6-inch fire service line would be provided to the building, designed to comply with the National Fire Protection Association (NFPA) requirements, and sized based upon the required sprinkler demand for the building and the existing water supply pressure and flow. New fire hydrants would be located and installed on the north side of Building 24. A new 6-inch sanitary sewer service line would be provided to the building, with a minimum wastewater flow velocity of 2 ft/sec. The new sanitary sewer service line would connect to a new 48-inch combined sewer manhole into an existing 6-inch combined sewer line located in the grass area on the east side of Veterans Drive.

A new storm drainage collection system would be installed for Building 24. The system would be designed for a 10-year storm event per the VA Sanitary Design Manual for Hospital Projects and the City of San Francisco Drainage Design Manual. Roof drainage would be collected and piped into infiltration basins consisting of drain rock surrounding a perforated pipe placed into the subgrade in landscaping areas. The basins would allow runoff to infiltrate into the surrounding subgrade to help provide stormwater treatment and reduce runoff volumes. Other paved areas would be routed into new 6-inch storm drainage piping and connected into the existing combined sanitary system located in the grass area on the east side of Veterans Drive.

Electrical services would be supplied from a new substation being constructed as part of the ongoing electrical system upgrade of the campus. Power from a substation to be located at the northeast corner of Building 8 would be supplied via an underground conduit to Building 24.

Construction of Building 24 would require selective pruning of trees along the eastern property line that grow onto the VA property from East Fort Miley. Removal of the trees would not be required. The

Proposed Action would include landscaping features complimentary to the immediate adjacent sites. The area to the north of Building 24 would be landscaped with ground cover and small plants. To the south, pergolas, trellises and tall plants would be used to screen Building 24 from cars and the future Mental Health Parking Addition. On the east side of the building, landscaping would include ground cover, columnar plant materials and wall-mounted trellises. To the west, placement of taller columnar plants would be used to protect against winds. An automated irrigation system and a rainwater capture system would also be installed.

Along pathways and sidewalks, exterior lighting would consist of pole-mounted lighting fixtures. Lighting levels would conform to the Illuminating Engineering Society's recommendations and the VA Design Guidelines for Mental Health Facilities. Incoming telecommunication service would meet VA Telecommunication Building Wiring Standards. Telecommunication service would be provided by 4-inch PVC schedule 40 conduits encased in concrete, from designated manholes on the site, to the Telecommunications Main Distribution Frame (MDF). The telecommunications room would be located on the first floor of Building 24.

Cumulative Projects

A cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions (Council on Environmental Quality). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR §1508.7.).

The Proposed Action is scheduled to begin construction in September 2011 and take approximately 12 months to complete. Additional nearby construction projects at the SFVAMC campus which may overlap with the Proposed Action include a new parking structure on Surface Parking Lot A to the south, and construction of a new building (Building 22) to the north of the Building 24 site and east of existing Buildings 9 and 10. The parking structure project would involve construction of a new two-level partially below grade parking garage on the site of existing Parking Lot A. The Building 22 project would involve construction of an approximately 8,600 square foot Hoptel facility, which would provide overnight, shared lodging accommodations to eligible veterans receiving health care services. Construction activities associated with these projects would result in short term impacts from temporary increases in noise, construction pollutant emissions, and increased traffic and loss of parking. These projects would also have the potential to cause short-term impacts from storm water pollution, safety hazards to the public, and temporary effects on visual quality. The analysis of cumulative impacts is included in this Environmental Assessment.

Project Measures to Minimize Effects on Historic District Resources

The following items have been incorporated into the design of the Proposed Action to mitigate the potential effects on the SFVAMC and East Form Miley historic districts.

Proposed Building 24

- The proposed building site would locate the new construction behind Building 8 and the planned Mental Health Parking Addition. Therefore, it would be mostly out of view from significant locations within the SFVAMC Historic District.
- The new building design would be consistent with *Secretary of the Interior's Standards*.
- The new building would be located at the rear of Building 8 and would not affect the historic building's current associations with Veterans Drive and other historic resources.
- The new building would be located twenty feet away and would not physically connect to the historic building.
- No construction work is proposed for historic Building 8.

Veterans Drive/Main Campus Entrance

- The new building is proposed to be located at the rear of Building 8. Therefore only the southernmost portion of the new building would be visible from most of Veterans Drive.
- None of the proposed construction would interfere with the existing road configuration or with the existing relationship of any historic resources to Veterans Drive.
- The view of the new building would be partially obscured by the construction of the planned Mental Health Parking Addition at Parking Lot A.
- The proposed south and west elevations, which would be partially visible from Veterans Drive and the main entrance, would feature designs that would be compatible with the historic surrounds and adjacent Building 8.

Earthen Berm

- The project would maintain the earthen berm at East Fort Miley.
- The proposed retaining wall at the east side of the project would serve to support the earthen berm and protect it from erosion, while allowing for the partial re-grading of the building site.

East Fort Miley

- The dense vegetation between East Fort Miley and the SFVAMC would be maintained in order to continue to provide a visual screen between the two sites.
- The existing earthen berm would remain and would block much of the new building from view, especially from the Ordnance Storehouse which is situated downhill of the earthen berm.
- Building 24 would maintain a similar appearance to the existing rear of Building 8, thereby essentially maintaining the existing relationship between the two historic districts.
- The proposed sidewalk would connect to the existing sidewalks at East Fort Miley in order to maintain the existing pedestrian connection.

Child Care Center

- The temporary modular buildings would be located behind Building 11 on existing surface parking that is generally out of view of most of the SFVAMC Historic District and East Fort Miley. The modular buildings would be approximately 12' in height, well below nearby Buildings 10 and 11 which are two-stories tall. Therefore, the surrounding historic buildings will maintain visual prominence.
- By locating the trailers at the rear of Building 11, the Building's historic relationships of primary importance to the front yard, Building 10, pathways, and Veterans Drive will be maintained.
- The color of the temporary modular buildings would be sympathetic to the existing color palette of the surrounding buildings.
- The modular building would be sited out of the view of Veterans Drive as much as possible in order to maintain existing views and building relationships.
- The new modular buildings would not physically impact any existing historic structures, therefore if removed in the future the essential form and integrity of the historic property and its environment would be unimpaired.

Building 20

- Demolition of Building 20 would result in the loss of a contributing resource to the SFVAMC Historic District. This impact is discussed in more detail in the Cultural Resources section of this EA.

Environmental Impacts of the Proposed Action

The checklist on the pages that follow provides an analysis of environmental impacts that could potentially result from construction and operation of Alternative 1 (Proposed Action). The analysis considers direct, indirect, and cumulative impacts. Environmental impacts of the No Action Alternative are evaluated starting on page 40.

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

AESTHETICS

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☒	☐	☐

- ☒ VEGETATION REMOVAL
- ☒ LANDSCAPE ALTERATION
- ☐ OPEN SPACE ALTERED
- ☒ NEW STRUCTURE CONSTRUCTION
- ☒ ADVERSE
- ☐ BENEFICIAL
- ☐ BUILDING RESTORATION
- ☒ UTILITY OR SERVICE AREA DEVELOPMENT
- ☒ GROUND IMPROVEMENT AMENITIES
- ☒ LONG TERM
- ☒ SHORT TERM
- ☒ CUMULATIVE

COMMENTS

The SFVAMC site is bounded by Clement Street and the Outer Richmond neighborhood to the south, and property owned by other federal agencies to the north, east, and west. The Proposed Action is located in the eastern portion of the SFVAMC campus, situated within the SFVAMC National Register Historic District and immediately adjacent to the eastern section of the Fort Miley National Register Historic District. A historical architect was retained to evaluate the potential impacts of the Proposed Action on the historic integrity of both the SFVAMC and East Fort Miley historic districts. Please refer to the Cultural Resources section of this EA for that discussion.

The SFVAMC is not located adjacent to any designated state scenic highways, nor is it near any roads that are part of the San Francisco 49-Mile Scenic Drive.

Short Term Impacts. Construction activities would have a temporary adverse effect on visual quality, including ground disturbance and landscape alteration. Mitigative actions described below include placement of construction fencing to block views of the work zone, as well as restoration of all areas disturbed during construction, including areas used for staging. The Proposed Action would require selective pruning of trees along the eastern property line that grow onto the VA property from East Fort Miley. Complete removal of trees would not be required. It is not expected that the pruning of trees along the eastern property line would diminish any views from the adjacent federally owned lands. The Proposed Action would not include nighttime construction.

Long Term Impacts. Once constructed, Building 24 and the new Child Care Center would have a minimal effect on the aesthetics at the SFVAMC and viewsheds from the adjacent federal lands. The buildings would not be out of character with the SFVAMC site as a whole, which is intensively developed with multi-story buildings, modular buildings, parking lots, and paved streets. The buildings would be located entirely within already disturbed and developed parts of the campus. Building 24 would be similar in height to adjacent buildings, including the three-story Building 8 immediately to the west of Building 24. The exterior surfaces would be colored to blend with the surrounding buildings and landscaping would be provided to soften views and screen the structure.

The new Child Care Center would consist of two modular structures of one-story in height, which may be visible from the trails on and off federal lands below the SFVAMC. However, given the existing screening from trees, the low profile of the modular buildings, and the existing multi-story buildings visible from the trails below, the new Child Care Center would have a minimal change to the viewshed from the trails.

Although the new buildings would include installation of new exterior lighting, mitigative actions described below would require the lighting to be oriented such that light sources would not be directly visible from adjacent federal lands and residential areas.

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

AIR QUALITY

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☒	☐	☐

☒ CARBON MONOXIDE	☐ PRESENCE OF ODORS
☐ PHOTOCHEMICAL OXIDANTS	☒ PARTICULATE EMISSIONS
☒ NITROGEN OXIDES	☒ HYDROCARBONS
☐ OCCURS IN AN AIR QUALITY MAINTENANCE AREA (AQMA)	☒ SULFUR OXIDES
	☒ TEMPORARY
☒ ADVERSE	☐ LONG TERM
☐ BENEFICIAL	☒ SHORT TERM
	☒ CUMULATIVE

COMMENTS

Through the Clean Air Act, the U.S. Environmental Protection Agency (U.S. EPA) regulates air pollutants from mobile and stationary sources. The U.S. EPA has set National Ambient Air Quality Standards for six criteria air pollutants: carbon monoxide, lead, nitrogen dioxide, ozone, sulfur dioxide, and particulate matter (PM_{10} and $PM_{2.5}$). Areas of the country where air pollution levels persistently exceed the national ambient air quality standards are designated "nonattainment." The most up-to-date area designation maps show that the San Francisco Bay Area is currently designated as a nonattainment area for the national 8-hour ozone and $PM_{2.5}$ standards (CARB 2010).

The U.S. EPA regulates all Federal actions that are taken in designated nonattainment areas through the General Conformity Rule. Federal actions with associated emissions below specified de minimis levels are exceptions to the General Conformity Rule and do not have to make a conformity determination. De minimis levels are established for ozone pollutants, but no de minimis level has been established for $PM_{2.5}$. De minimis levels do not apply to Federal actions which would result in no emissions increase or an increase in emissions that is clearly de mimimis, such as “existing structures, properties, facilities and lands where future activities will be similar in scope and operation to activities currently being conducted at the existing structures, properties, facilities, and lands” (CFR 93.153(c)(2)(x). Thus, Federal actions that are clearly de minimis are not required to make a conformity determination.

On October 5, 2009, Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance,* was signed. Executive Order 13514 requires Federal agencies to set a 2020 greenhouse gas emissions reduction target; meet a number of energy, water, and waste reduction targets; and develop and carry out an integrated Strategic Sustainability Performance Plan that outlines how the agency will meet the targets.

Under Executive Order 13423, *Strengthening Federal Environmental, Energy, and Transportation Management*, the VA is required to have 15 percent of its building space incorporate sustainable practice by

2015. The VA has currently reached 14.4 percent. In addition, the VA has a Green Building Action Plan which it uses as a tool to implement Executive Order 13423. The main components of the Green Building Action Plan apply to structures/projects intended for occupation.

On February 18, 2010 the Council on Environmental Quality issued draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions for public comment. The draft guidelines provide that Federal agencies should quantify and describe expected direct greenhouse gas emissions where the emissions may be "meaningful." The draft guidance suggests that for projects reasonably anticipated to cause direct greenhouse gas emissions (on-site stationary source) of 25,000 tons or more per year that a quantitative and qualitative assessment may be meaningful to decision makers and the public. The Council on Environmental Quality does not provide a reference point for indirect greenhouse emissions and cautions that any consideration of indirect greenhouse emissions needs to recognize the limits of feasibility in evaluating upstream and downstream effects of proposed federal actions.

Short Term Impacts. Potential sources of air pollutants include exhaust from construction equipment and haul trucks, as well as generation of dust from soil disturbance and demolition activities. Dust and construction equipment emissions can cause increases in localized concentrations of ozone precursors, carbon monoxide, and fine particulate matter. Demolition activities also have the potential to encounter lead-based paint and asbestos activities. Because Building 32 was constructed in 1991, asbestos containing materials and lead contaminated paint are not anticipated to be present. In addition, a February 2010 study indicated Building 20 had no asbestos materials and lead paint was not suspected to be present. However, because paint on pre-1978 buildings must be presumed to be lead-based unless proven otherwise, it is conservatively assumed that demolition of Building 20 may involve disturbing lead and possibly creating lead wastes. Potential impacts would be minimized by implementing the requirements outlined in the VA Specification Section 028333.13, *Lead-Based Paint Removal and Disposal*. Please refer to the Public Safety and Solid/Hazardous Waste section of this EA.

Potential air quality impacts would be minimized by implementing the requirements for protection of air resources outlined in the VA Specification Section 015719, *Temporary Environmental Controls*. These include compliance with federal air quality regulations and standards, and control of particulate matter, carbon monoxide emissions, and odors.

Greenhouse gas emissions during construction would be negligible. The Proposed Action meets the requirements of (CFR 93.153(c)(2)(x)) because the scope and operation of the new buildings (i.e., sleep lab and child care center) would be similar in scope and operation currently being conducted at the SFVAMC (i.e., Buildings 203 and Building 32). Therefore, the Proposed Action is clearly de minimis and a conformity determination is not required.

Despite this, construction activities from the Proposed Action could increase dustfall locally, and elevated levels of $PM_{2.5}$ and PM_{10} could occur downwind of construction activity, especially during demolition activities. These are temporary emissions that vary considerably from day-to-day and by the type of equipment, soil types, and weather. With the application of construction measures to reduce fugitive dust presented in mitigative actions below, $PM_{2.5}$ and PM_{10} emissions during construction would be reduced to less than significant levels.

Long Term Impacts. The Proposed Action would result in a modest increase in clinical services and associated staffing at the SFVAMC. Therefore, any additional criteria air pollutants (i.e. from traffic) resulting from operation of the Project would be minor. The Proposed Action meets the requirements of (CFR 93.153(c)(2)(x), therefore the Proposed Action is clearly de minimis and a conformity determination is not required. Long-term air quality impacts are considered minimal.

The VA is currently working on the completion of the Strategic Sustainability Performance Plan and the VA would comply with Executive Order 13514. Where applicable, the Proposed Action would incorporate elements of the Green Building Action Plan, such as the use of water efficient landscape and irrigation strategies. Therefore, the Proposed Action would comply with Executive Order 13423. The Proposed Action would not create a new on-site stationary source that would result in direct greenhouse gas emissions. Therefore, no quantitative calculation of greenhouse gas emissions is required.

Mitigative Actions – Air Quality: During construction, the requirements for protection of air resources outlined in the VA Specification Section 015719, *Temporary Environmental Controls*, shall be implemented. Construction contractors shall also take measures to minimize fugitive dust and dirt emissions resulting from construction. At a minimum, construction contractors shall undertake the following measures, as applicable, to minimize any adverse effects:

- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

COMMUNITY SERVICES

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☐	☒	☐

☒ ALTERATION OF PUBLIC FACILITIES
☒ ADVERSE
☒ BENEFICIAL

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

COMMENTS

Short Term Impacts. The Proposed Action includes the demolition of Building 20, which serves as a storage facility, the demolition of Building 32, a modular building that serves as a Child Care Center, and the construction of Building 24 and a new Child Care Center. Although Building 32 would be demolished, child care services would continue to be provided at the campus and would continue to be open to the community. Prior to demolition of Building 32, a new 5,000 square foot Child Care Center would be constructed in the northeast corner of the campus, north of Building 11. This location would provide expanded child care services and a quieter and more secure location, away from Clement Street and Parking Lot A that it is currently adjacent to Building 32.

During construction, the project could have a minimal and temporary adverse effect on the visitor experience at the Golden Gate National Recreation Area (GGNRA) due to construction noise and dust. Mitigative actions summarized in the Air Quality section of this EA require measures to minimize fugitive dust and dirt emissions resulting from construction. Mitigative actions summarized in the Noise section of this EA require providing sound-deadening devices on equipment, using shields or other physical barriers to restrict noise transmission, and providing sound proof housings or enclosures for noise-producing machinery. These measures would substantially reduce impacts to GGNRA visitors.

Construction activities would require disposal of solid waste generated from demolition of Building 20 and Building 32 and site preparation and construction of Building 24 and the Child Care buildings. Additionally, some materials currently stored in Building 20 would be decommissioned and disposed of off-site. The anticipated volume of solid waste could be accommodated by landfills located in the region, including Ox Mountain (Half Moon Bay), Keller Canyon (Pittsburg) and Redwood Sanitary (Novato). The Keller Canyon facility has 84 percent remaining capacity and an estimated closure date of December 31, 2030. The Redwood facility has 67 percent remaining capacity and an estimated closure date of January 1, 2039 (Santa Rosa General Plan EIR 2009). These facilities are all permitted to take construction/demolition waste.

Long Term Impacts. The Proposed Action would improve the ability of the SFVAMC to provide sleep lab studies and psychiatric care to veterans. This would have a beneficial impact on Community Services as it would allow the SFVAMC to meet its mission as a major tertiary care facility and regional referral center for specialized medical programs. The Proposed Action would also improve the SFVAMC's ability to provide

child care services. At approximately 5,000 square feet, the new Child Care Center, including two modular buildings and an outside play area, would accommodate up to 50 children, approximately double the current capacity. The relocated Child Care Center would also be eligible for certification due to the increase in square footage and the separation of housing for infants and youths. The Proposed Action would result in a modest increase in sleep lab and psychiatric care services, as well as child care services at the SFVAMC. However, there would be no substantial change in the overall type of operations undertaken at the SFVAMC. Therefore, there would be minimal impact on police protection, fire protection, parks or other community services.

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

CULTURAL RESOURCES

IMPACTS

S	M	MI	N
☐	☒	☐	☐

ATTRIBUTES

- ☒ NATIONAL REGISTER PROPERTY
- ☐ ELIGIBLE PROPERTY
- ☒ ARCHITECTURALLY SIGNIFICANT PROPERTY
- ☒ ADVERSE
- ☐ BENEFICIAL
- ☒ CRITERIA OF ADVERSE EFFECT
- ☒ CRITERIA OF EFFECT
- ☒ ACTION REQUIRES HISTORIC PRESERVATION OFFICER COORDINATION
- ☒ LONG TERM
- ☒ SHORT TERM
- ☐ CUMULATIVE

Historic Properties

The 29-acre SFVAMC campus was formerly part of U.S. Army Fort Miley (Fort Miley). In 1932, 29 acres of Fort Miley were acquired by the Veterans Administration (now Department of Veterans Affairs) for the construction of a new medical center. Today, Fort Miley is a National Register-listed historic district that is part of the Golden Gate National Recreation Area (GGNRA) managed by the National Park Service (NPS). The Fort Miley Military Reservation Historic District surrounds the SFVAMC on three sides.

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

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

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

Further studies undertaken in 2001/2002 (Page & Turnbull 2002) identified that only two specific areas of the campus retain enough historic integrity to qualify for listing in the National Register. These include the north-central and eastern portions of the SFVAMC. The historic integrity of the remaining areas had been compromised by more recent developments to an extent that the campus as a whole is ineligible for listing. In

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

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

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

To satisfy Section 106 requirements, a historical architect has been retained to evaluate the potential effect of the Proposed Action. The preliminary analysis for each component of the Proposed Action is provided below.

Construction of Building 24

The preliminary analysis of Building 24 has determined that construction of Building 24 would not have a significant impact to historic properties because specific actions have been incorporated into the project design to avoid or mitigate impacts (see Project Description on page 14-15, Project Measures to Minimize Effects to Historic District Resources). The proposed Building 24 would be a freestanding three-story building situated between existing Building 8 and the earthen berm at East Fort Miley. Building 8 would be the most directly impacted resource, as the new building would be immediately adjacent. The new building would be located at the rear of Building 8 and would not impact the historic building's current associations with Veterans Drive and other historic resources. The new building would be located twenty feet away and would not physically connect or require any work to Building 8.

The new building would also be somewhat visible from East Fort Miley, but it does not appear that it would have an adverse effect on the Fort Miley Historic District or any of the historic resources within the district boundaries. Currently, dense vegetation, including large Cypress trees, provides a visual screen between the two districts. Additionally, the earthen berm at the western edge of East Fort Miley would remain and would further screen the new building from Fort Miley. The western edge of the earthen berm would be re-graded

for the construction site and a new retaining wall would be installed to support the earthen berm at the property line. The top of the retaining wall would be level with the earthen berm and would not be visible from East Fort Miley. While the new building would be somewhat visible through the existing natural screening, it would essentially maintain the current relationship of Building 8 to East Fort Miley, as Building 24 would be approximately the same height and color.

View of the project site from East Fort Miley

Construction of Child Care Center

Similar to Building 24, the preliminary analysis of the Child Care Center has determined that the new center would not have a significant impact to historic properties because specific actions have been incorporated into the project design to avoid or mitigate impacts (see Project Description on page 14-15, Project Measures to Minimize Effects to Historic District Resources). Overall the new Child Care Center would not be visible from the majority of locations within the historic district and the project does not include any work to or alterations of any existing historic resources. The project would only be visible from the northeast section of Veterans Drive, from the rear of Building 11, and slightly from the properties to the north of the historic district. The Child Care Center would not appear to have any impact on the historical significance of East Fort Miley, as the center would not be visible and would not affect any designated historic resources.

View from northeastern corner of East Fort Miley looking west toward Building 11.

Demolition of Building 32

Building 32 is a temporary modular building that was installed behind Building 8 in 1991 to house a childcare center. In addition to the single story modular building, the childcare center also includes a play lot surrounded by a chain link fence with privacy screening, a wood deck, a shed, and numerous bollards that surround the facility. The building and its associated features are located within the SFVAMC Historic District, but do not contribute to the significance of the district. Their removal would not have an adverse effect on the SFVAMC Historic District, the Fort Miley Historic District, or on any historic resource within the Area of Potential Effect.

Demolition of Building 20

Although the historical integrity of Building 20 has been somewhat compromised, it is listed as a contributing resource to the historic district in the National Register nomination. The demolition of a building that is listed as a contributing resource to a National Register Historic District constitutes an adverse effect on a historic property per the regulations issued in 36 CFR Part 800. Additionally, the removal of a historic resource is not in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

On August 27, 2010 the VA initiated consultation with the State Office of Historic Preservation (SHPO) for the demolition of Building 20. After a review of the documentation provided by the VA, the SHPO concluded that the demolition and removal of Building 20 would constitute an adverse effect. The mitigative actions described at the end of this section would ensure that removal of Building 20 would comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800.

***Mitigative Action – Historical Resources*:** In order to proceed with the removal of Building 20, the VA shall notify the Advisory Council on Historic Preservation (ACHP) of the determination of the adverse effect and determine if the ACHP is interested in participating in the Section 106 consultation. The VA shall then submit a draft Memorandum of Agreement (MOA) pursuant to 36 CFR Part 800.6(c) to the SHPO for review. The MOA shall include mitigation measures being considered in response to the undertaking's potential to adversely affect historic properties. Mitigation measures may include, but would not be limited to, the following:

Building Recordation and Documentation. In consultation with the State Office of Historic Preservation, the VA will determine the appropriate level of documentation to be completed and to which depositories the documentation will be submitted. The documentation may include archival photographs and drawings of the existing building.

Potential Educational and Interpretive Programs. Options include, but would not be limited to:

- Development of an educational booklet describing the history and significance of the SFVAMC. The booklet would be available for public access;

- Installation of interpretative displays/signage to be installed throughout the historic campus that would identify significant historic sites and depict the history of the site for the public; and/or

- Establish a permanent interpretive center within a new building, such as the Metal Health Research Annex, that would provide exhibits on the site's history and significance and would be accessible to the public.

Archeological Resources

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

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

To identify the presence of any traditional cultural properties (e.g., sacred sites, resource procurement areas)

within or near the SFVAMC, a letter was sent to the Native American Heritage Commission (NAHC) requesting information on any known sacred lands and other cultural sites that may be present within the project area, as well as to request a list of Native American tribal organizations to contact regarding the project. In response, the NAHC reported their sacred land file has no information about the presence of Native American cultural resources in the project area and provided a list of recommended contacts (NAHC 2010), which were subsequently notified regarding the Proposed Action. No responses have been received to date.

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

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

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

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

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

ECONOMIC ACTIVITY

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☐	☐	☒

- ☐ REDUCTION IN WAGES TO AREA
- ☐ ADDITIONAL WAGES WILL BE AVAILABLE TO AREA
- ☐ ADVERSE
- ☒ BENEFICIAL

- ☒ LOCAL PURCHASE OF GOODS AND SERVICES
- ☒ INCREASE OR DECREASE DIRECT WORK FORCE
- ☒ LONG TERM
- ☒ SHORT TERM
- ☐ CUMULATIVE

COMMENTS

Short and Long Term Impacts. During construction, the Proposed Action would make a slight contribution to the local economy by the use of local construction labor and through the possible purchase of local construction materials and supplies. This is a short-term beneficial impact. In the long term, SFVAMC employment and patient activities would increase slightly as a result of the expanded child care and sleep lab studies services.

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

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☐	☐	☒

- ☐ 100 – YEAR FLOODPLAIN
- ☐ 500 – YEAR FLOODPLAIN
- ☐ CRITICAL ACTION (E. O. 11988)
- ☐ ADVERSE
- ☐ BENEFICIAL
- ☐ COASTAL ZONE MANAGEMENT AREA
- ☐ CRITICAL ENVIRONMENTAL AREA OF WETLANDS
- ☐ LONG TERM
- ☐ SHORT TERM
- ☐ CUMULATIVE

COMMENTS

Short and Long Term Impacts. The Proposed Action is not situated within a designated floodplain. No wetlands or waters of the U.S. exist on or near the site that would be disturbed. The Proposed Action would also be located outside the Coastal Zone Management Area (City of San Francisco 1974). As the existing site is mostly paved (i.e., impervious), the Proposed Action would result in minimal long-term impacts to storm water runoff conditions around the site. Approximately half of the roof runoff from Building 24 would be routed into landscaped areas for an opportunity to infiltrate into the ground before reaching the storm drainage system. The remaining roof and site runoff would be routed into storm drainage piping and connected into the existing combined sanitary sewer system.

GEOLOGY AND SOILS

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☒	☐	☐

- ☐ ROCK EXCAVATION
- ☒ CUT / FILL OPERATIONS
- ☒ GRADING
- ☒ ADVERSE
- ☐ BENEFICIAL
- ☒ SOIL EROSION
- ☒ SOIL COMPACTION
- ☐ SOIL HORIZON REMOVAL AND MIXING
- ☐ LONG TERM
- ☒ SHORT TERM
- ☐ CUMULATIVE

COMMENTS

Local geologic and geotechnical information was obtained from two separate geotechnical reports. The first report was prepared for the Proposed Action by Engeo, Inc. (Engeo 2010). The Engeo report is used for analysis of the project area in the vicinity of Building 24. The second report, by Fugro West, was prepared for a separate SFVAMC project which involved construction of a parking lot north of Building 11 (Fugro West 2010). Fugro West's report accounted for the placement of portable buildings in the parking lot at a future date. The Fugro West report is used for analysis of the new Child Care Center, which would consist of two modular buildings placed on the parking lot.

Based on the findings of the Engeo and Fugro West reports, the Proposed Action is feasible from a geotechnical standpoint, provided that the recommendations included in the geotechnical reports, along with other sound engineering practices, are incorporated into design and construction (Engeo 2010; Fugro West 2010).

Short and Long Term Impacts. The site of the Proposed Action is not located on a mapped Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act. There are no known active or potentially active faults on the site. Therefore, the hazard of fault rupture at the site is low (Engeo 2010).

The major active faults in the area are the San Andreas, San Gregorio, Hayward, and Calaveras Faults. The San Andreas is the closest active fault to the site (approximately 3 miles west) (Engeo 2010). The 2007 Working Group on California Earthquake Probabilities predicted a 21 percent chance of a magnitude 6.7 or greater earthquake occurring on the northern portion of the San Andreas Fault, and a 31 percent probability of a 6.7 or greater earthquake occurring on the Hayward/Rodgers Creek Fault in 30 years. A moderate to high magnitude earthquake generated within the San Francisco Bay Region would result in considerable ground shaking at the site (Engeo 2010).

The Proposed Action would be required to be designed using sound engineering judgment and the latest California Building Code (CBC) requirements as a minimum. While conformance to the current building code recommendations does not constitute any kind of guarantee that significant structural damage would not occur in the event of a maximum magnitude earthquake, it is reasonable to expect that a well-designed and

well-constructed structure will not collapse or cause loss of life in a major earthquake (SEAOC, 1996).

In general, the subsurface conditions encountered within the vicinity of Building 24 consist of 7 to 17 feet of loose to medium dense sand and clayey sand (Engeo 2010). Under this sand is stiff to hard sandy clay. Laboratory testing found that this soil has a Plasticity Index that is not-detected, which is therefore indicative of soil with low potential for expansion. This material overlies Franciscan bedrock. The Franciscan bedrock encountered generally consists of sandstone or greywacke, with some sheared and weathered claystone and sandstone (Engeo 2010).

Based on the findings from the subsurface exploration and review of the City and County of San Francisco Seismic Hazards Zones map (CDC 2006), the soil profile under the site in the vicinity of Building 24 has a low potential for liquefaction. As such, the risk for liquefaction, liquefaction-induced settlement, and lateral spreading at the study area are considered low (Engeo 2010).

The corrosion potential of soil in the vicinity of Building 24 was also evaluated. A near-surface soil sample was found to contain a sulfate concentration of 3 mg/kg. According to the CBC criteria, this test result is in the "negligible" range (Engeo 2010).

Child care services currently housed in Building 32 would be relocated to two new modular buildings north of Building 11. A separate construction project to stabilize the north slope of the SFVAMC, which is in the proximity of the new Child Care Center, would be completed before its relocation.

Subsurface conditions encountered in the vicinity of the proposed Child Care Center consist of 9 to 35 feet of loose, cohesionless fill and dune sand. Beneath the subsurface sandy soils, two borings encountered wet, clay and clayey gravel deposits at depths of 9 and 35 feet. Three borings encountered a thin layer of residual soil, completely weathered bedrock over the more competent Franciscan formation bedrock. The underlying bedrock consists of both conglomerate (clayey gravel) and claystone (Fugro West, 2010).

Loose, cohesionless fill and dune sand can be susceptible to seismic-induced settlement (Fugro West 2010). The Fugro West report provided recommendations to mitigate the potential for adverse effects at the study area. Recommendations included over-excavating and re-compacting surficial soils with engineered fill and other earthwork, pavement and flatwork recommendations. Since the publication of the Fugro West report, the parking lot project has been completed and the recommendations presented in the report have been implemented, reducing the risk of seismic-induced settlement to less than significant.

The mitigative actions below shall be implemented to reduce potential impacts from seismic hazards.

Mitigative Action - Geology and Soils: Design and construction shall address the recommendations made in the Engeo 2010 and Fugro West 2010 geotechnical reports to ensure seismic stability and reliability. The geotechnical recommendations shall be incorporated in the final plans and specifications and implemented during construction. The VA shall retain a qualified geotechnical engineer to review final plans and during construction, to observe site preparation, shoring installation, fill placement and compaction, and foundation installation. Recommendations for construction of Building 24 in the Engeo geotechnical report include, but are not limited to, the following:

- ***Grading***. After grading operations commence, geologic observation of cut areas shall be made at frequent intervals, so revised geologic recommendations can be incorporated into updated grading plans as grading proceeds. Ponding of stormwater, other than within engineered detention basins, shall not be permitted at the site, particularly during work stoppage for rainy weather. Before grading is halted by rain, positive slopes shall be provided to carry the surface runoff to storm drainage structures in a controlled manner to prevent erosion damage.
- ***Demolition and Stripping.*** All existing pavement, concrete slabs, and debris in the area of the improvements shall be removed prior to grading and care shall be taken with any existing utility trenches. All excavations from demolition and stripping below design grades shall be cleaned to a firm undisturbed soil surface as determined by the geotechnical engineer or a qualified representative in the field at a time of site preparation. This surface shall then be scarified, moisture conditioned, and compacted prior to the placement of new fill. All excavations shall be backfilled with compacted engineered fill.
- ***Subgrade Preparation***. Following demolition, stripping of surface soils and excavation of loose fills, all areas to receive fill and slabs-on-grade shall be overexcavated, moisture conditioned and compacted to the requirements for engineered fill, to create a zone of engineered fill that is 24 inches thick. The finished subgrade shall be firm and non-yielding under the weight of compaction equipment.
- ***Fill Materials***. On-site material shall be suitable for use as fill material, provided it is processed to remove concentrations of organic material, debris and particles greater than 6 inches maximum dimension. Imported fill materials shall meet the same requirements and have a plasticity index of less than 18. A qualified geotechnical engineer shall sample and test proposed imported fill materials at least 72 hours prior to delivery to site.
- ***Placement of Fill.*** After removal of loose soil, the exposed non-yielding surface shall be scarified to a depth of 12 inches, moisture conditioned and recompacted to provide adequate bonding with the initial lift of fill. The bottom of the excavation for foundation elements shall be compacted to assure stabilization of the underlying material. Landscape fill shall be processed, placed and compacted in accordance with the fill material requirements. Additional recommendations, including compaction control requirements, lift thickness, underground utility backfill and landscape fill requirements are provided in the 2010 geotechnical report, and shall be implemented during construction.
- ***Slopes***. Slope gradients shall be constructed to 2:1 (horizontal: vertical) or flatter. Temporary construction slopes shall be in accordance with CALOSHA requirements.
- ***Spread Footings***. Options for spread footings in the geotechnical report include, but are not limited to, a minimum of 12 inches wide and at least 18 inches below the lowest adjacent grade. Footing trenches shall be cleared of loose soil and rock fragments prior to steel and concrete placement. Footing trenches shall not be allowed to desiccate prior to placing concrete.
- ***Slab-on-Grade Construction***. Options for slab-on-grade construction in the geotechnical report include, but are not limited to, using uniform subgrade material and properly moisturized engineered fill. The upper 24 inches of subgrade shall be moisture conditioned and compacted per recommendations described in the fill placement section of the geotechnical report. The subgrade shall be thoroughly soaked prior to placement of concrete and shall not be allowed to dry prior to concrete placement.
- ***Surface Drainage***. The project site shall be positively graded at all times in order to provide rapid removal of surface water runoff away from the foundation systems and to prevent ponding of water

under floors or seepage toward the foundation systems at any time during or after construction. Ponding of stormwater shall not be permitted during prolonged periods of inclement weather. All roof stormwater shall be collected and directed to downspouts. Additional recommendations are provided in the 2010 geotechnical report, and shall be implemented during construction.

- ***Pavement Design***. Pavement construction and materials shall comply with the requirements of the Standard Specifications of the State California Division of Highways and County requirements. All pavement subgrades shall be scarified to a depth of 12 inches below finished subgrade elevation, moisture conditioned to at least 1-percentage point above optimum, compacted to at least 95 percent relative compaction, and in accordance with applicable City and County requirements. Aggregate baserock materials shall meet current Caltrans specifications for Class 2 aggregate baserock and shall be compacted to at least 95 percent of maximum dry density at a minimum moisture content of optimum. Additional recommendations are provided in the 2010 geotechnical report, and shall be implemented during construction.

The Fugro West report includes the following recommendation which is applicable to the Child Care Center:

- Portable structures placed on the parking lot behind Building 11 should be capable of tolerating the predicted total and differential settlement without collapse, and may need to be re-leveled after a seismic event.

HYDROLOGY AND WATER QUALITY

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☒	☐	☐

- ☒ POTENTIAL FOR EROSION AND/OR SEDIMENTATION (NPDES)
- ☒ POTENTIAL FOR CONTAMINATION OF WATER REGIME (FROM HAZARDOUS / TOXIC WASTES)
- ☒ ADVERSE
- ☐ BENEFICIAL
- ☒ ALTERATION / QUALITY CHANGE OF SURFACE WATER DRAINAGE
- ☒ ALTERATION / QUALITY CHANGE OF GROUND WATER REGIME
- ☒ LONG TERM
- ☒ SHORT TERM
- ☐ CUMULATIVE

COMMENTS

Short Term Impacts. Construction activities can be a source of excess sedimentation if controls are not used to protect disturbed areas of land prior to the onset of rain. Construction activities can also be a source of chemical contamination from use of alkaline construction materials (concrete, mortar, hydrated lime) and hazardous or toxic materials, such as fuels and paints. Finally, construction activities can also result in sediment-laden groundwater from excavation dewatering activities, if such dewatering is needed.

Potential impacts would be minimized by implementing the requirements for protection of land resources outlined in the VA Specification Section 015719, *Temporary Environmental Controls*. These include such requirements as setting work area limits, protecting landscape, reducing exposure of unprotected soils, protecting disturbed areas, installing erosion and sediment control devices, managing spoil areas, and good housekeeping procedures. Because shallow foundations would be used for construction of Building 24, excavation dewatering is not anticipated. Likewise, as the new Child Care Center trailers are modular buildings that would be constructed on top of the existing asphalt parking lot, and excavation would be limited to associated utility trenches, the need for dewatering is not anticipated. However, in the event that dewatering is needed during the excavation of utility trenches, dewatering would need to be performed and discharged in accordance with the SFVAMC's existing wastewater permit, or temporarily stored on site and transported by the contractor for off-site disposal. With implementation of these controls, the potential for soil erosion and chemical contamination is considered minimal.

Long Term Impacts: As summarized in the Project Description, a new storm drainage collection system would be provided for Building 24, designed for a 10-year storm per the requirements of the VA Sanitary Design Manual for Hospital Projects and the City of San Francisco Drainage Design Manual. Roof drainage and paved areas immediately surrounding Building 24 would be collected and piped into infiltration basins in landscaping areas. The basins would allow runoff to infiltrate into the surrounding subgrade to help provide stormwater treatment and further reduce runoff volumes and peak rates.

The new Child Care Center modular buildings would be supported by the existing storm drainage system on the northeastern end of the SFVAMC. The new Child Care Center buildings would be located on an existing

paved parking lot and would not result in new impervious surfaces or increases in runoff.

Mitigative Action – Hydrology and Water Quality: Construction and operation of the Proposed Action shall be in accordance with the procedures outlined in the SFVAMC SWPPP to eliminate or reduce pollution related to storm water runoff. Measures include protecting all storm drain and catch basin inlets, establishing perimeter controls, covering construction materials and mounds, maintaining wash out areas for wet construction materials, inspections, and regular maintenance. In addition, during construction, the requirements for erosion and sediment control outlined in the VA Specification Section 015719, *Temporary Environmental Controls*, shall be implemented. These include such requirements as setting work area limits, protecting landscape, reducing exposure of unprotected soils, protecting disturbed areas, installing erosion and sediment control devices, managing spoil areas, and good housekeeping procedures. If trench dewatering is necessary, dewatering shall be performed and discharged in accordance with the SFVAMC's existing wastewater permit or temporarily stored on site and transported by the contractor for off-site disposal.

LAND USE

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☐	☒	☐

- ☒ ENCROACHMENT ON EXISTING LAND USE
- ☒ CHANGE IN LAND USE PATTERN
- ☒ SERVICE AND OPERATIONAL
- ☒ HOSPITAL-MEDICAL FACILITY
- ☐ LABORATORIES - CLINICS
- ☐ ADMINISTRATIVE FACILITY
- ☐ ADVERSE
- ☐ BENEFICIAL
- ☐ SEWAGE – WASTE TREATMENT FACILITY
- ☒ UTILITIES
- ☐ ROADS AND PARKING
- ☐ RECREATIONAL
- ☐ GROUND IMPROVEMENTS
- ☐ CEMETERY
- ☒ LONG TERM
- ☒ SHORT TERM
- ☐ CUMULATIVE

COMMENTS

Short Term Impacts. The Proposed Action includes the demolition of Building 20, which is currently used as a storage facility. Many of the items currently stored in Building 20 would be decommissioned and disposed of off-site. Other items would be moved into existing storage areas at the SFVAMC which have the proper storage space to accommodate the materials.

The Proposed Action also includes demolition of Building 32, a modular building that serves as a Child Care Center. Although this would cause a change in land use patterns at the campus, child care services would continue to be provided onsite and would continue to be open to the community. Prior to demolition of Building 32, a new 5,000 square foot Child Care Center would be constructed in the northeast corner of the campus, north of Building 11. This would provide a larger space for more children and a quieter location, away from Clement Street and Parking Lot A that it is currently adjacent to Building 32.

Long Term Impacts. Although the SFVAMC is not subject to the jurisdiction of San Francisco's Planning Code or zoning regulations, the San Francisco General Plan and zoning designations are provided here for reference. The San Francisco General Plan land use designation for the SFVAMC campus is Institutional Facility and the zoning designation is P (Public) Use zoning district. The current uses at the SFVAMC include a hospital, nursing home, medical clinics, research, administration buildings, child care facilities, and parking facilities. The Proposed Action would relocate and consolidate existing uses and services to new facilities within the campus. These uses would be consistent with zoning designations.

NOISE

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☒	☐	☐

☐	UTILITY SOURCE GENERATION	☐	OPERATIONAL
☐	TRAFFIC	☐	VIBRATIONS
☒	CONSTRUCTION	☐	LONG TERM
☒	ADVERSE	☒	SHORT TERM
☒	BENEFICIAL	☒	CUMULATIVE

COMMENTS

Roadway traffic on Clement Street, 42nd and 43rd avenues, and the perimeter road within the SFVAMC influence the noise environment of the project site. In addition, parking lot noise (e.g., car doors slamming, car alarms, engines starting, voices, etc.), building mechanical and ventilation equipment, and loading docks also contribute, to a lesser extent, to the existing noise environment.

Sensitive noise receptors in the project vicinity include administrative and out-patient counseling located at Building 8, hoptel services located at Building 9 and 10, research and mental health offices at Building 11, patients and workers on site at other buildings, and existing residences located to the south along Clement Street.

The VA requires project contractors to implement noise control measures in its Specification Section 015719, *Temporary Environmental Controls*. The measures require providing sound-deadening devices on equipment, decibel limitations for repetitive impact noise, and monitoring of sound levels.

Although the SFVAMC is not subject to the jurisdiction of City and County of San Francisco's (CCSF) Noise Ordinance, it is provided here for reference. The CCSF's Noise Ordinance prohibits "unwanted, excessive, and avoidable" noises (San Francisco City Code, Article 29). For example, construction equipment shall not generate a noise level greater than 80 dBA when measured at a distance of 100 feet.

Short Term Impacts. Increased noise levels would be generated by construction equipment and vehicles during the estimated 12-month construction period. Typical construction equipment would include backhoes, concrete mixer trucks, cranes, dump trucks, excavators, front end loaders, and pickup trucks. Operation of this construction equipment would generate noise levels ranging from 75 dBA to 85 dBA at 50 feet (not accounting for reduction due to the VA's Environmental Protection Specification).

The SFVAMC buildings immediately adjacent to the construction area for Building 24 which would be exposed to the highest noise levels during construction include Building 8 (mental health services) and Building 9 (hoptel services). Building 8 may experience cumulative noise impacts from simultaneous construction occurring to the north (Building 22), east (Building 24), and south (parking garage). The noise

levels from each of these simultaneous construction projects would be typical of construction projects and would be minimized by implementing the requirements for noise control outlined in the VA Specification Section 015719, *Temporary Environmental Controls*. It is expected that these VA specifications would reduce sound levels substantially, by about 10 to 15 dBA. However, because the Proposed Action would be constructed immediately adjacent to Building 8, which provides administrative and out-patient counseling, additional mitigative actions are described below that may be needed to reduce potential impacts.

Building 11 would experience the highest noise levels during construction of the new Child Care Center. Construction would last one month and construction activities would be limited to extension of utilities (which would produce the highest noise levels), since the new Child Care Center would consist of two pre-fabricated modular buildings. Therefore, given the limited amount of time of construction and implementation of the noise controls outlined in the VA Specification Section 015719, *Temporary Environmental Controls,* impacts to Building 11 would be minimal.

In addition, a number of sensitive receptors off-campus could be impacted by construction noise. The nearest residences along Clement Street are approximately 400 feet south of the main construction areas; maximum noise levels are anticipated to be approximately 67 dBA. Thus, the maximum anticipated noise exposure during construction to off-campus sensitive receptors would be less than CCSF standards.

Long Term Impacts. Building 24 would be constructed in an area currently occupied by Buildings 20 and 32. Noise from Building 24 would primarily be contained within the structure and would be similar to the sources already present in the vicinity. Building 24 would not contribute substantially to the ambient noise environment, and use of the new building is not expected to generate increased noise levels substantially above those currently generated by the existing uses. The impact would be minimal. Prior to demolition of Building 32, child care services would be moved to the northeast corner of the campus, north of Building 11, thus reducing potential noise impacts on this sensitive receptor.

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

The Contractor shall designate a noise disturbance coordinator to be responsible for responding to any complaints received by residents about noise from construction activities, evaluate the source of the noise, and implement measures to mitigate the source of the disturbance. The Contractor shall be required to perform noise-producing work in less sensitive hours of the day or week as directed by the Resident Engineer.

The Contractor shall coordinate with the Project Engineer 48 hours prior to performing noise-producing work within 50 feet of Building 8. If deemed necessary, measures to reduce construction noises may include placing an acoustical blanket over a portion of Building 8 during the major noise-generating phases of construction (e.g., grading and excavation).

POTENTIAL FOR GENERATING SUBSTANTIAL CONTROVERSY

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☐	☒	☐

☒ INDIRECT OR DIRECT EFFECTS ON COMMUNITY ORGANIZATIONS
☒ CONSISTENT WITH PROFILE OF COMMUNITY
☐ ADVERSE
☐ BENEFICIAL
☐ INTERPRETATION OF HOW THE ACTION WILL AFFECT COMMUNITY RESPONSE IS IN QUESTION
☐ LONG TERM
☒ SHORT TERM
☒ CUMULATIVE

COMMENTS

Short Term Impacts. Construction traffic associated with the Proposed Action and other cumulative construction projects at the SFVAMC would result in short-term increases in traffic volumes on surrounding neighborhood roadways. Construction would also result in a permanent loss of parking on campus. Mitigative actions summarized in the Transportation section of this EA require construction staging to occur completely within the SFVAMC and, to the extent feasible, scheduling of haul trucks for off-peak hours to minimize impacts on peak hour traffic. The Proposed Action also includes measures to compensate for parking spaces displaced during construction to ease overall parking demands.

Construction of Building 24 would include installation of new exterior lighting. Mitigative actions summarized in the Aesthetics section of this EA require that permanent exterior lighting incorporate cutoff shields and non-glare fixture design, and be directed oriented such that light sources would not be directly visible from adjacent federal lands and residential areas.

Long Term Impacts. Following construction, the Proposed Action is not anticipated to generate substantial controversy. The Proposed Action would serve a need of the larger veteran's community by providing larger and better space to conduct clinical research. Although Building 32 would be demolished, child care services would continue to be provided onsite and open to the community.

REAL PROPERTY

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☒	☐	☐

- ☐ REDUCTION OF LAND ON TAX ROLLS
- ☐ CHANGES OF LAND VALUES
- ☐ ENCROACHMENT ON CRITICAL AREAS
- ☐ ACQUISITION (DONATION, PURCHASE)
- ☒ ADVERSE
- ☐ BENEFICIAL
- ☐ EXCESS ACTION
- ☐ CHANGES IN OWNERSHIP
- ☐ BOUNDARIES
- ☐ CHANGES OF EASEMENT OR RIGHT OF WAY
- ☒ SHORT TERM
- ☐ CUMULATIVE

COMMENTS

Short and Long Term Impacts. A retaining wall would be constructed east of Building 24 adjacent to East Fort Miley. While the use of tiebacks is not anticipated, the excavation needed for placement of the retaining wall may extend partially onto the East Fort Miley property. No damage to tree roots is anticipated and no permanent construction items would cross property lines. All other construction activities would be located on property owned by the VA.

Mitigative Actions: The VA shall obtain a memorandum of agreement with the National Park Service for any construction that would temporarily extend onto East Fort Miley.

RESIDENT POPULATION

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☐	☒	☐

- ☒ ADDITION OF STAFF TO FACILITY
- ☐ ALTERATION OF DEMOGRAPHIC CHARACTERISTICS
- ☐ ADVERSE
- ☐ BENEFICIAL
- ☐ CHANGE IN NEIGHBORHOOD CHARACTERISTICS
- ☐ LONG TERM
- ☐ SHORT TERM
- ☐ CUMULATIVE

COMMENTS

Short and Long Term Impacts. The purpose and need for the Proposed Action is to relocate and consolidate psychiatric care and sleep lab care units into one facility adjacent to Mental Health Building 8. The Proposed Action would meet the existing needs of the Mental Health and Sleep Disorder departments, as well as the need for expansion of services. The Proposed Action may result in a modest increase in sleep lab and psychiatric care services and associated staffing at the SFVAMC. In addition, the Proposed Action would require the relocation of Building 32, a child care facility. Prior to demolition of Building 32, child care services would be moved to the northeast corner of the campus, north of Building 11. The new Child Care Center would result in a modest increase in children and staff. However, no substantial change would occur in the overall type of operations undertaken at the SFVAMC. The Proposed Action would not alter demographic characteristics either on- or off-site, or change neighborhood characteristics.

PUBLIC SAFETY AND SOLID / HAZARDOUS WASTE

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☒	☐	☐

- ☐ STEEL REMOVAL/DEMOLITION
- ☐ BULK OPERATIONAL WASTE
- ☒ EARTH AND / OR ROCK DEBRIS
- ☒ ADVERSE
- ☐ BENEFICIAL
- ☒ CONSTRUCTION SITE STOCKPILING
- ☒ CONCRETE DEBRIS
- ☒ HAZARDOUS WASTE
- ☒ LONG TERM
- ☒ SHORT TERM
- ☐ CUMULATIVE
- ☒ POTENTIAL EFFECT ON PUBLIC SAFETY
- ☒ ADVERSE
- ☐ BENEFICIAL
- ☐ CUMULATIVE

COMMENTS

Construction would result in a short term increase in construction waste generation. The construction contractor would be required to manage non-hazardous building construction and demolition waste in accordance with VA Specifications Section 017419, *Construction Waste Management*, which requires efficient waste management, removal, and legal disposal of materials. During demolition and construction, hazardous waste would be required to be disposed of in a manner consistent with federal, state, and local regulations. Many of the items currently stored in Building 20 would be decommissioned and disposed of off-site. Other items would be moved into existing storage areas at the SFVAMC which have the proper storage space to accommodate the materials. Any hazardous materials currently stored in Building 20 would be transferred to other existing storage areas with capacity to handle those materials.

To determine the presence or absence of documented soil or groundwater contamination – or other hazardous materials issues – at or near the site, a review of online data resources for "Cortese List" sites was conducted (California EPA 2010). According to information available on the State Water Resources Control Board GeoTracker website, an investigation of a former leaking underground diesel storage tank was performed at the campus in 1994. The case was subsequently closed by the County of San Francisco Local Oversight Program on April 28, 1994. There is no indication that the soil or groundwater in the construction area would be affected from this former underground storage tank site.

Demolition activities also have the potential to encounter lead-based paint and asbestos activities. However, because Building 32 was constructed in 1991, asbestos containing materials and lead contaminated paint are not anticipated to be present. In addition, a February 2010 study indicated Building 20 had no asbestos materials and lead paint was not suspected to be present. However, because paint on pre-1978 buildings must be presumed to be lead-based unless proven otherwise, it is conservatively assumed that demolition of Building 20 may involve disturbing lead and possibly creating lead wastes. Potential impacts would be

minimized by implementing the requirements outlined in the VA Specification Section 028333.13, *Lead-Based Paint Removal and Disposal*, which include performing removal of lead-containing paint in accordance with an approved removal plan and procedures and equipment required to limit occupational and environmental exposure.

Given the proximity of the construction zone to Building 8 and Building 11, as well as to other construction projects ongoing at the campus, the potential for safety hazards due to conflicts between construction vehicles / equipment and vehicles, bicyclists, or pedestrians using the roadways adjacent to the work zone may occur. The following mitigative action is needed to reduce potential safety hazards during construction.

***Mitigative Actions – Public Safety*:** During demolition of Building 20, the requirements for preventing uncontrolled release of lead contamination and for worker and environmental protection outlined in VA Specification Section 028333.13, *Lead-Based Paint Removal and Disposal*, shall be implemented.

The construction contractor shall erect exclusion fencing to prevent the public from accessing areas immediately adjacent to or within the construction zone.

TRANSPORTATION AND PARKING

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☒	☐	☐

- ☒ ALTERATION OF PUBLIC TRANSPORTATION
- ☒ ALTERATION OF FACILITY ACCESS ROADS
- ☒ ADVERSE
- ☐ BENEFICIAL
- ☒ ALTERATION OF EXISTING ON-SITE ROADS OR PARKING
- ☐ CONSTRUCTION OF NEW ROADS OR PARKING
- ☒ CONSTRUCTION TRAFFIC
- ☒ LONG TERM
- ☒ SHORT TERM
- ☒ CUMULATIVE

COMMENTS

The SFVAMC campus is located off of Clement Street and has entrances at 42nd and 43rd Avenues. 42nd Avenue is the main entrance for patients, visitors, and staff. Circulation around the campus and to all campus facilities is provided via Veterans Drive and Ft. Miley Circle. Traffic patterns at the SFVAMC show a clear AM and PM vehicle peak corresponding with a typical weekday commute. The weekday a.m. and p.m. peak hours for the SFVAMC are 7:00 a.m. to 8:00 a.m. and 4:00 p.m. to 5:00 p.m., respectively. San Francisco Municipal Transportation Agency's Route 38 bus has one stop within the SFVAMC at the front entrance between Buildings 200 and 203 along Fort Miley Circle. The same route also has bus stops at the corner of 42nd Avenue and Clement Street and 43rd Avenue and Clement Street.

Short Term Impacts. Construction of the proposed Child Care Center north of Building 11 would result in a temporary loss of approximately 23 parking spaces. In addition, other construction projects occurring simultaneously with the Proposed Action could result in temporary losses of parking. This includes construction of a new parking garage on Surface Parking Lot A, which is estimated to cause a temporary loss of 94 parking spaces. The VA will compensate for temporary cumulative losses of parking from future planned projects through temporary on-site and off-site parking options. This may include shuttle service between temporary off-site parking and the SFVAMC campus, as well as valet parking. The VA will also increase promotion of the SFVAMC's existing rideshare program, mass transit vouchers, and shuttles to/from mass transit hubs to employees, and investigate program participation incentives to be implemented during construction to increase the effectiveness of the programs. These measures would ease the individual and cumulative impacts that the Proposed Action would have on parking.

Construction would occur Monday through Friday from 8:00 a.m. to 5:00 p.m., with occasional deliveries on Saturday between 8:30 a.m. and 5:00 p.m. Construction traffic would result in a short-term increase in traffic on Clement Street, 42nd Avenue, and Veterans Drive from construction equipment and workers. The main route for trucks leaving the site would be 42nd Avenue to Geary Boulevard or Clement Street to Park Presidio Boulevard, from which trucks would head north or south to regional highways. If the deliveries and haul trucks were to occur during peak hours, it may have moderate impacts on traffic flow on surrounding

roadways. Mitigative actions below require the VA and the construction contractor to schedule delivery trucks and haul trucks during off-peak hours to minimize impacts on peak hour traffic.

Construction traffic within SFVAMC campus would consist mainly of trucks delivering building materials and equipment and off-hauling excavated soil. Traffic flow at the SFVAMC could be affected by partial road closures of short duration as a result of the delivery of the construction equipment and materials and the construction of utility connections to Veteran's Drive. Construction traffic from simultaneous construction occurring (Building 22 and Surface Parking Lot A) could also potentially worsen the transportation issues. Cumulative construction activities could also increase the potential for safety hazards due to the potential for conflicts between construction vehicles (with slower speeds and wider turning radii than autos) and other vehicles, bicyclists, or pedestrians using the roadways adjacent to the work zone.

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

Long Term Impacts. Construction of the proposed Child Care Center north of Building 11 would result in a permanent loss of approximately 23 parking spaces. As described above, the VA will be increasing promotion of the SFVAMC's existing rideshare program, mass transit vouchers, and shuttles to/from mass transit hubs to employees, and investigating program participation incentives to increase the effectiveness of the programs. These measures would ease the direct long-term impacts that the Proposed Action would have on parking. In addition, the long-term impact is considered minimal as two parking structures are currently being designed / constructed at the campus that would provide approximately 400 additional parking spaces, which would absorb the loss of the 23 spaces behind Building 11.

The Proposed Action would result in a modest increase in clinical services and associated staffing at the SFVAMC. However, no substantial change would occur in the overall type of operations or staffing at the SFVAMC.

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

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

The VA or the contractor shall consult with local traffic and transit agencies, as well as the San Francisco

Fire Department, and shall provide notification in advance of the timing, location, and duration of construction activities and the locations of detours and lane closures. Detours shall be included for bicycles and pedestrians in all areas potentially affected by construction.

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

UTILITIES

IMPACTS

S	M	MI	N
☐	☐	☒	☐

ATTRIBUTES

- ☒ WATER SYSTEM, SUPPLY
- ☒ STORM WATER DRAINAGE
- ☒ SEWAGE TREATMENT
- ☒ ELECTRICAL
- ☐ HEAT GENERATION
- ☒ ADVERSE
- ☐ BENEFICIAL
- ☐ INCINERATOR
- ☒ AIR CONDITIONING AND REFRIGERATION
- ☒ EXCAVATION
- ☐ MAINTENANCE AND REPAIR
- ☐ CONSERVATION
- ☒ LONG TERM
- ☒ SHORT TERM
- ☐ CUMULATIVE

COMMENTS

Short and Long Term Impacts. The operational demands of the SFVAMC for water, sewer, gas and telecommunications are currently being met. The Proposed Action would result in minor alteration to the existing water service, sewer service and telecommunication service, but would not exceed the capacity of the existing services. The relocated Child Care Center would require the installation of the necessary underground utilities for domestic water, sanitary sewer, storm drainage, electrical power and low voltage utilities to the modular buildings. A new electrical substation, being constructed as part of the ongoing electrical system upgrade of the campus, would adequately serve the needs of the additional lighting, HVAC systems and other utilities as required by Building 24. The Proposed Action may also use photovoltaic panels to offset a portion of the energy demand in new Building 24.

An increased rate and volume of stormwater runoff is not anticipated as the quantity of new impervious surface is approximately equal to the amount of the existing impervious surface. Roof drainage and paved areas immediately surrounding Building 24 would be collected and piped into infiltration basins in landscaping areas. The basins would allow runoff to infiltrate into the surrounding subgrade to help provide stormwater treatment and further reduce runoff volumes and peak rates.

All utilities would be designed in accordance with applicable industry standards and regulations and would also be designed to achieve sustainable design standards and minimize energy consumption. The use of irrigation water would only be needed for establishment of landscape plantings; its use would temporary, minimal, and met by existing supplies. Once established, the native shrubs and trees used in the plantings would have a water use demand of very low to moderate. The Proposed Action would not generate increases in stormwater runoff over present levels and would not exceed the capacity of the combined stormwater and wastewater system, as impervious surfaces would not increase.

Impacts on utilities are considered minimal.

VEGETATION AND WILDLIFE

IMPACTS ATTRIBUTES

S	M	MI	N
☐	☒	☐	☐

- ☐ PRESENCE OF ENDANGERED OR THREATENED WILDLIFE SPECIES
- ☒ ADVERSE
- ☐ BENEFICIAL

- ☒ TREE REMOVAL/TRIMMING
- ☐ GROUNDCOVER REMOVAL
- ☐ SPECIAL STATUS SPECIES
- ☐ LONG TERM
- ☒ SHORT TERM
- ☐ CUMULATIVE

COMMENTS

Impacts to plant and animal species would be considered severe if the Proposed Action would cause disruption to or removal of an endangered or threatened species, its habitat, migration corridors, or breeding areas; or result in the loss of a substantial number of native plant or animal species that could affect abundance or diversity beyond normal variability. Information about potential presence of special-status species was obtained from the California Natural Diversity Database, existing literature, and websites maintained by State and federal agencies. In addition, a search was made of the project area for species listed on the U. S. Fish and Wildlife Services (USFWS) online database for federal threatened, endangered and potential candidate species. The California Native Plant Society online website was also consulted for listed plants reported in the region.

Short Term Impacts. Records have not indicated the existence of any special status plant or wildlife species occurring at the SFVAMC campus. The potential presence of sensitive plant species at the site is considered minimal given the landscaped nature of the site and its proximity to urbanization. Similarly, the close proximity to urbanization greatly reduces the potential for the presence of special status wildlife species at the SFVAMC. The trees on and in the vicinity of the site provide nesting habitat for resident and migratory birds, subject to the Migratory Bird Treaty Act. The National Park Service property located to the east of the project site includes several mature trees that could be used by nesting birds and that could be disturbed by construction noise. The mitigative actions summarized below would avoid impacts to any nesting birds during construction.

Long Term Impacts. Due to the disturbed nature of the site and its relatively small size, no long-term impacts to vegetation or wildlife are anticipated. Use of Building 24 and the new Child Care Center would not cause disruption to or removal of an endangered or threatened species, its habitat, migration corridors, or breeding areas. Use of Building 24 and the new Child Care Center would not result in the loss of a substantial population of native plant or wildlife species that would affect abundance or diversity beyond normal variability.

***Mitigative Actions – Vegetation and Wildlife*:** If construction activities, including tree removal or pruning,

is scheduled to start between February 1 and August 14, a qualified wildlife biologist shall conduct a pre-construction survey to determine if nesting birds are present on or in the vicinity of the project. Trees within a 200-foot radius shall be included in the surveys as construction related activity could cause nest abandonment. If active nests are found in the work area, the biologist shall determine an appropriately sized buffer around the nest in which no work will be allowed until the young have successfully fledged. The size of the nest buffer shall be determined by the biologist in consultation with the California Department of Fish and Game, and shall be based on the nesting species, its sensitivity to disturbance, and the expected types of disturbance. Preconstruction surveys shall not be required for construction work commencing between August 15 and January 31.

ENVIRONMENTAL JUSTICE

IMPACTS ATTRIBUTES

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☐	☐	☐	☒

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

COMMENTS

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires that federal agencies, whenever practicable and appropriate, maintain information on populations by race, national origin, or income and shall use this information to determine whether their programs, policies, and activities have disproportionately high and adverse human health or environmental effects.

Short Term and Long Term Impacts. The demographic characteristics of the City of San Francisco from the 2010 Census indicate a predominantly White (53.9%) and Asian (31.4%) population (U.S. Census Bureau 2010). Minority groups in the City of San Francisco include African American, Hispanic/Latino, American Indian/Alaska Native, and Native Hawaiian/Pacific Islanders. The 2010 Census data also indicates that these minority groups have greater percentages of population below the poverty level than White and Asian populations. According to the 2010 census data for the six census tracts surrounding and including the VA campus (census tracts 427, 428, 478, 602, 47901, and 47902), White and Asian races comprise 86.9 percent of the population. This indicates that the Proposed Action would not result in disproportionate impacts to any minority or low-income portion of the community. The Proposed Action would not exclude, deny, or subject persons to discrimination as any environmental effects would not be located in a high minority or low-income census tract area.

No Action Alternative

The No Action Alternative would be to not construct Building 24. This alternative would have none of the environmental impacts described above for Alternative 1 - Proposed Action, but also would not satisfy the purpose and need for the action, which is to relocate and consolidate psychiatric care and sleep lab care units into one facility and provide a better space to conduct clinical research. Without the new building, psychiatric care and sleep lab studies would continue to be provided in spaces that are in poor physical condition, are overcrowded, and lack space for critical functions.

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Federal Regulations Establishing Environmental Standards

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

NA	EXECUTIVE ORDER 11988, FLOODPLAIN MANAGEMENT (Specify 100-YEAR, CRITICAL ACTION, or 500-YEAR
NA	EXECUTIVE ORDER 11990, PROTECTION OF WETLANDS
NA	EXECUTIVE ORDER 11987, EXOTIC ORGANISMS
CA	EXECUTIVE ORDER 12088, FEDERAL COMPLIANCE
CA	EXECUTIVE ORDER 12898, FEDERAL ACTIONS TO ADDRESS ENVIRONMENTAL JUSTICE IN MINORITY POPULATIONS AND LOW-INCOME POPULATIONS
CA	EXECUTIVE ORDER 13423, STRENGTHENING FEDERAL ENVIRONMENT, ENGERY, AND TRANSPORTATION MANAGEMENT
CA	EXECUTIVE ORDER 13514, FEDERAL LEADERSHIIP IN ENVIRONMENTAL, ENERGY, AND ECONOMIC PERFORMANCE
CA	FEDERAL WATER POLLUTION CONTROL ACT, SEC. 313, AS AMENDED BY CLEAN WATER ACT OF 1977 (33 USC 1323)
CA	ENDANGERED SPECIES ACT AS AMENDED (PL 93-205)
NA	WILD AND SCENIC RIVERS ACT (16 USC 1274 ET SEQ.)
CA	NOISE CONTROL ACT OF 1972
NA	SAFE DRINKING WATER ACT, SEC., 1447, (PL 93-523)
NA	COASTAL BARRIER RESOURCES ACT (PL 97-348)
NA	COASTAL ZONE MANAGEMENT ACT (16 USC 1451 ET SEQ., AMENDED BY PL 101-508)
NA	EPA REGULATIONS ON DISCHARGE OF DREDGED OR FILL MATERIAL INTO NAVIGABLE WATERS (40 CFR 230)
NA	EPA REGULATIONS ON DETERMINATION OF REPORTABLE QUANTITIES FOR HAZARDOUS SUBSTANCES (40 CFR 117)
CA	EPA REGULATIONS ON THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (40 CFR 122)
NA	EPA REGULATIONS ON POLYCHLORINATED BIPHENYLS MANUFACTURING, PROCESSING DISTRIBUTION IN COMMERCE AND USE PROHIBITIONS (40 CFR 761)
CA	ADVISORY COUNCIL ON HISTORIC PRESERVATION REGULATIONS, PROTECTION OF HISTORIC AND CULTURAL PROPERTIES (36 CFR 800)