

# Finding of Effect for Long Range Development Plan

## San Francisco Veterans Affairs Medical Center



Prepared for:

San Francisco Veterans Affairs Medical Center



Prepared by:

**AECOM**

May 2013



**TABLE OF CONTENTS**

**1. INTRODUCTION..... 1**

1.1 Previous Section 106 Compliance Activities ..... 1

1.2 Summary Finding of Effect..... 2

**2. DESCRIPTION OF PROPOSED UNDERTAKING ..... 4**

2.1 Project Location ..... 4

2.2 Areas of Potential Effect ..... 4

2.3 SFVAMC Background..... 4

2.4 Description of Proposed Undertaking ..... 9

2.5 Project Alternatives ..... 10

2.5.1 Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative ..... 11

2.5.2 Alternative 2: SFVAMC Fort Miley Campus Plus Mission Bay Campus  
Alternative..... 12

**3. CONSULTATION AND PUBLIC PARTICIPATION..... 14**

3.1 Consultation and Public Involvement Process ..... 14

3.1.1 Consulting Parties ..... 14

3.1.2 Public Involvement ..... 15

3.2 Consideration of Issues Raised Through Consultation and Public Involvement ..... 15

**4. DESCRIPTION OF HISTORIC PROPERTIES..... 15**

4.1 Historic Contexts..... 15

4.1.1 Prehistoric Archaeological Context ..... 15

4.1.2 Historic Period Context..... 16

4.2 Previous Investigations ..... 17

4.3 Previously Identified Historic Properties ..... 27

4.3.1 Archaeological Resources ..... 27

4.3.2 Fort Miley Military Reservation Historic District..... 28

4.3.3 Contributors to the Fort Miley Military Reservation Historic District ..... 29

4.3.4 SFVAMC Historic District ..... 34

**5. APPLICATION OF THE CRITERIA OF ADVERSE EFFECT ..... 42**

5.1 Criteria For Assessing Project Effects ..... 42

5.1.1 Regulatory Framework ..... 42

5.2 Effects Assessment ..... 43

5.2.1 Assessment Methods..... 43

5.2.2 Archaeology ..... 44

5.2.3 Fort Miley Military Reservation Historic District..... 45

5.2.4 SFVAMC Historic District ..... 46

**6. CONCLUSIONS ..... 56**

**7. REFERENCES..... 65**

**TABLES**

Table 1: Findings of Effect ..... 3  
Table 2: Historic Properties Affected ..... 57

**EXHIBITS**

Exhibit 1: Project Location ..... 5  
Exhibit 2: Existing SFVAMC Campus ..... 6  
Exhibit 3: Summary Site Plan ..... 7  
Exhibit 4: Areas of Potential Effect ..... 8  
Exhibit 5: Alternative 2 Mission Bay Campus Location ..... 13  
Exhibit 6: SFVAMC Historic District ..... 36  
Exhibit 7: (A–D) Historic Development ..... 38  
Exhibit 8: Massing Comparison ..... 48

**APPENDICES**

Appendix A: Consulting Parties Correspondence  
Appendix B: LRDP Development Program by Phase

## 1. INTRODUCTION

---

The U.S. Department of Veterans Affairs (VA) is preparing a Long Range Development Plan (LRDP) for the San Francisco Veterans Affairs Medical Center (SFVAMC) at Fort Miley in San Francisco, California. The SFVAMC, which is located in northwestern San Francisco, is a major tertiary care facility that serves as a VA regional referral center for specialized medical and surgical programs. The SFVAMC serves Veterans of the San Francisco Bay Area and northern California coast counties.

The proposed undertaking is an LRDP that supports the mission of the SFVAMC and provides for the healthcare needs of the Veterans it serves. An LRDP is a comprehensive plan that guides physical development such as the location of buildings, open space, circulation, and other land uses. The LRDP for the SFVAMC includes new development and the retrofit of existing buildings and structures that house patient care, research, administrative, and hoptel<sup>1</sup> functions, as well as parking. Implementation of the LRDP would occur in two phases over a 10-year timeframe, through the year 2023. The LRDP is a conceptual planning document that provides a present-day analysis and offers a visionary sketch for a future development. The LRDP is a living, dynamic document, one that will outline a sequence of steps for implementation in both the short and long term, while also providing the institution flexibility to shift priorities as needed. The LRDP is anticipated to go through many changes in the future, as priorities shift to meet the needs of Veterans.

The purpose of the LRDP is to provide a strategic and organized approach for the future development necessary to meet the mission of the Veterans Health Administration (VHA), one of three major VA branches. To meet the needs of Veterans in the San Francisco Bay Area and northern California over the next 20 years, SFVAMC has determined that existing buildings need to be retrofitted to the most recent seismic safety requirements and that an additional 589,000 square feet of building space must be constructed.

Per the requirements of Section 106 of the National Historic Preservation Act (NHPA), VA has initiated consultation on the development of the LRDP. The LRDP Finding of Effect (FOE) report will be used to consult with Section 106 consulting parties about VA's determination of whether the LRDP will adversely affect historic properties.

### 1.1 PREVIOUS SECTION 106 COMPLIANCE ACTIVITIES

On April 22, 2011, VA contacted the California State Historic Preservation Officer (SHPO) by letter to initiate Section 106 consultation for the SFVAMC Draft Institutional Master Plan, which was a preliminary planning document that has evolved into the LRDP. On June 16, 2011, SHPO responded with a letter requesting additional information.

In December 2011, AECOM prepared baseline documentation that summarized the previous cultural resources studies and Section 106 consultations that were conducted for the SFVAMC.

---

<sup>1</sup> A hoptel is an overnight, shared lodging facility for eligible Veterans receiving health care services. This temporary lodging is available to Veterans that need to travel 50 or more miles from their home to the SFVAMC Fort Miley Campus.

Also in December 2011, VA met with SHPO personnel at the SFVAMC Fort Miley Campus to review the baseline documentation and tour the site.

After extensive discussions with the public and interested agencies, VA determined that an LRDP is the more appropriate planning tool for its purposes. As such, an LRDP replaced the SFVAMC Draft Institutional Master Plan as the principal master-planning document for the SFVAMC Fort Miley Campus. The first public review of the LRDP occurred in summer 2012 at the same time as the review of the Public Draft Environmental Impact Statement (EIS) and Public Draft LRDP FOE.

Per the requirements of Section 106 of the NHPA, 36 Code of Federal Regulations (CFR) 800.3, VA formally initiated Section 106 consultation for the LRDP in a March 2012 letter to the SHPO. In May 2012, SHPO submitted a letter to VA that stated concurrence with the established Area of Potential Effect (APE), the definition of the proposed undertaking, and VA's approach to the Section 106 process.

## **1.2 SUMMARY FINDING OF EFFECT**

Pursuant to NHPA Section 106, 36 CFR 800.5, VA has determined that the LRDP will have an adverse effect on the SFVAMC Historic District. The LRDP will have no adverse effect on the Fort Miley Military Reservation Historic District or archaeological historic properties. Pursuant to Section 106, 36 CFR 800.6(a), and 800.6(b)(1), VA will consult with SHPO and those parties designated as signatory consulting parties regarding the resolution of adverse effects.

An Administrative Draft LRDP FOE was coordinated with the Section 106 signatory consulting parties prior to public release of the Draft LRDP FOE. The Draft FOE was released for public review concurrently with the Draft EIS, which was prepared per compliance with the National Environmental Policy Act (NEPA). VA conducted an integrated public input process, with a concurrent Draft LRDP EIS and Draft LRDP FOE review period and a combined public meeting. Comments provided by the public, concurring consulting parties, and signatory consulting parties are incorporated into this Final FOE. The Section 106 process will conclude when VA, SHPO, and the signatory consulting parties execute an agreement document for the resolution of adverse effects.

Table 1, "Findings of Effect," provides a summary of the findings of effect for each National Register of Historic Places (NRHP) historic property located within the APE. The summary includes a brief statement of how the LRDP would or would not impair individual components of the NRHP-listed SFVAMC and Fort Miley Military Reservation Historic Districts located within the APE.

**Table 1: Findings of Effect**

<b>Archaeological Sites</b>	<b>No Historic Properties Affected</b>
<b>Fort Miley Military Reservation Historic District</b>	<b>No Adverse Effect</b>
West Fort Miley—Battery James Chester (FI-1, FI-2)	Not impaired by LRDP activities
East Fort Miley—Batteries LaRhett Livingston (FI-329) and Anton Springer (FI-330)	Not impaired by LRDP activities
East Fort Miley—Ordnance Storehouse (FI-304)	Not impaired by LRDP activities
West Fort Miley—Searchlight Powerhouse (FI-3) and Fire Control Stations (FI-350, FI-351, and FI-352)	Not impaired by LRDP activities
West Fort Miley—Battery 243 (FI-4)	Not impaired by LRDP activities
West Fort Miley—Unidentified earthworks	Not impaired by LRDP activities
Historic District (as a whole)	Alterations of current setting are consistent with historical setting and do not impair the location, design, materials, workmanship, feeling, or association that convey the district's historical significance
<b>SFVAMC Historic District</b>	<b>Adverse Effect</b>
Building 1 (Administration, Research)	Alteration of physical and setting characteristics
Building 2 (Administration, Clinics, Research)	Not impaired by LRDP activities
Building 3 (Engineering)	Not impaired by LRDP activities
Building 4 (Research)	Alteration of setting characteristics
Building 5 (Clinic, Research)	Alteration of physical characteristics
Building 6 (Research, Library)	Alteration of physical and setting characteristics
Building 7 (Various)	Alteration of physical characteristics
Building 8 (Mental Health, Clinic)	Alteration of physical and setting characteristics
Building 9 (Hoptel)	Alteration of physical characteristics
Building 10 (Hoptel)	Alteration of physical characteristics
Building 11 (Research/Offices)	Alteration of physical characteristics
Building 18 (Office)	Demolition
Building 20 (Storage)	Demolition
Flag Pole and Base	Not impaired by LRDP activities
Historic District (as a whole)	Alteration of physical and setting characteristics could impair the district's ability to convey its significance

## **2. DESCRIPTION OF PROPOSED UNDERTAKING**

---

### **2.1 PROJECT LOCATION**

The SFVAMC is a 29-acre site located in the northwestern corner of the City and County of San Francisco, adjacent to the Outer Richmond District neighborhood (see Exhibit 1, “Project Location”). It is bounded by Clement Street/Seal Rock Drive and the outer Richmond District neighborhood to the south, and Golden Gate National Recreation Area (GGNRA) land, which is owned by the National Park Service (NPS), to the north, east, and west (see Exhibit 2, “Existing SFVAMC Campus”).

### **2.2 AREAS OF POTENTIAL EFFECT**

The LRDP includes planned improvements (see Exhibit 3, “Summary Site Plan”) within and adjacent to the SFVAMC Historic District and adjacent to the Fort Miley Military Reservation Historic District, which is a listed NRHP district that is administered by the NPS. The proposed archaeological and architectural APEs have been drawn to include the entire SFVAMC Fort Miley Campus, which encompasses the construction footprint and all construction areas and any buildings or structures adjacent to those areas where potential LRDP-related effects may occur (see Exhibit 4, “Areas of Potential Effect”).

Because of the proximity of the Fort Miley Military Reservation Historic District to the SFVAMC Fort Miley Campus, there is some potential to affect the setting, feeling, or association of the Historic District through implementation of the LRDP. Thus, the architectural APE includes all GGNRA land included in the NRHP historic district, directly east and west of the SFVAMC Fort Miley Campus.

### **2.3 SFVAMC BACKGROUND**

The mission of the VHA is to “Honor America’s Veterans by providing exceptional health care that improves their health and well-being.” In fulfillment of this mission, VHA provides comprehensive, integrated healthcare services to Veterans and other eligible persons. The SFVAMC carries out the mission of VHA by providing the medical, educational, and research space necessary for care of military Veterans in the San Francisco Bay Area and northern California.

Since 1930, the VA healthcare system has grown from 54 hospitals to include 152 medical centers; more than 1,400 outpatient clinics; 135 nursing home care units (Community Living Centers); and 48 domiciliaries.<sup>2</sup> The growing population of Veterans (both service-connected and nonservice-connected) seeking VA healthcare services results in an increase in the demand for medical facilities, including research space, on VA medical center campuses.

VA constructed and continues to operate the SFVAMC, which is located at Fort Miley in San Francisco, California. Fort Miley was established as a Coastal Defense Battery in 1893. Approximately 29 acres of land were transferred from the U.S. Army to VA in 1932 for

---

<sup>2</sup> A domiciliary provides residential rehabilitation treatment programs for a wide range of problems including: medical, psychiatric, vocational, educational, and social.



Source: SFVAMC Engineering Department



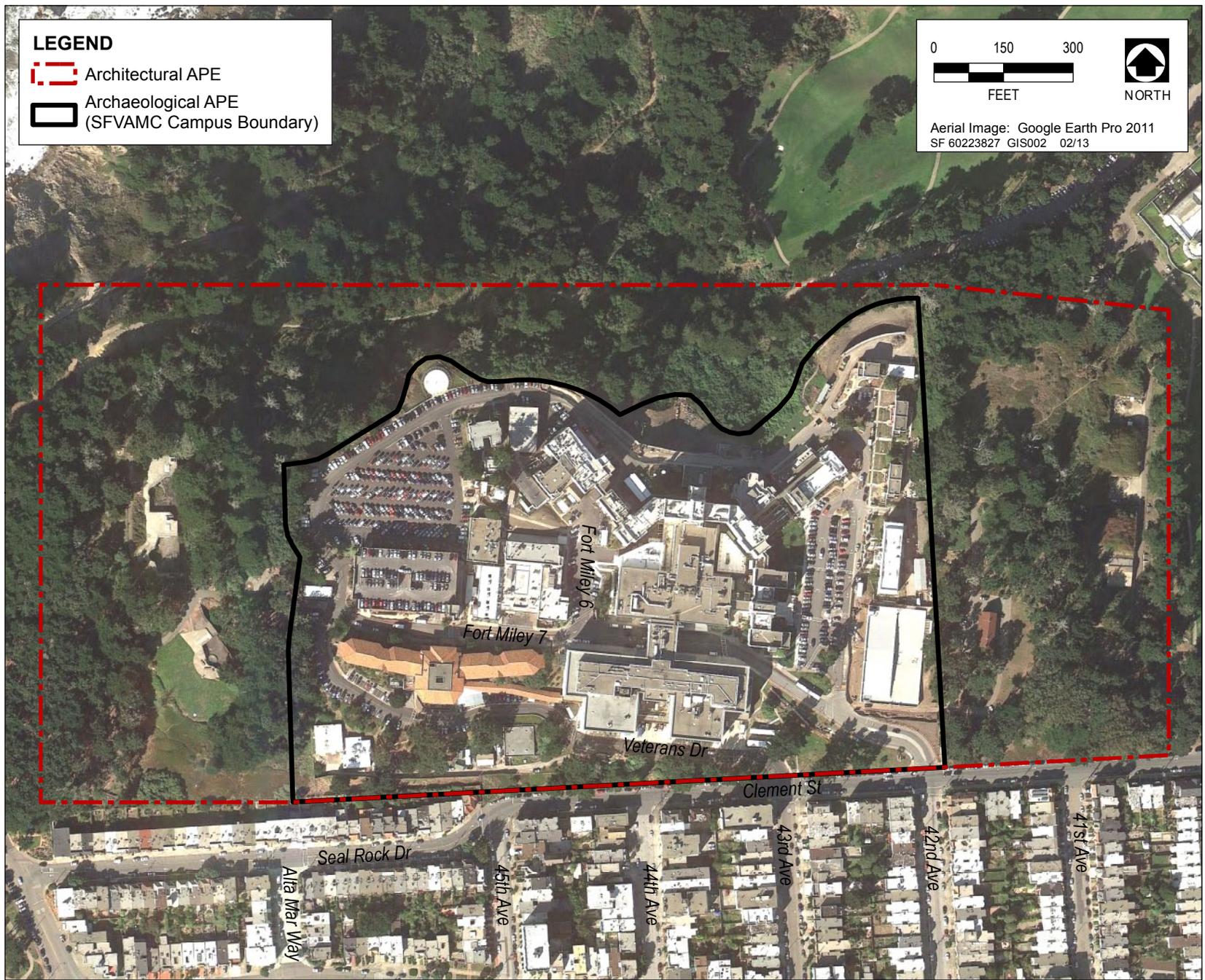
Source: SFVAMC Engineering Department

# San Francisco VA Medical Center



## LEGEND

- Site Boundary
- National Register Historic District Boundary
- New Construction
- Expansion
- Retrofit
- No Action
- Demolition/ Removal



Source: compiled by AECOM 2013

construction of a new Veterans hospital and diagnostic center to provide healthcare options to the San Francisco Bay Area Veteran population. In 1934, this area became the SFVAMC and was included in VA's VHA system.

SFVAMC is the only VA medical center in San Francisco County, and serves Veterans throughout northern California. The SFVAMC is an approximately 1 million-square foot facility that includes a 124-bed tertiary care hospital, primary and specialty care services, and a 120-bed Community Living Center. The SFVAMC has a long history of conducting cutting-edge research, establishing innovative medical programs, and providing compassionate care to Veterans. The SFVAMC has several National Centers of Excellence in the areas of epilepsy treatment, cardiac surgery, post-traumatic stress disorder, human immunodeficiency virus, and renal dialysis. It has many other nationally recognized programs; is one of the few medical centers in the world equipped for studies using both whole-body magnetic resonance imaging and spectroscopy; and is the site of VA's National Center for the Imaging of Neurodegenerative Diseases.

The SFVAMC is considered an aged facility with the need for retrofitting and expansion. The SFVAMC is severely deficient in space and has identified a deficiency of 589,000 square feet of building space to adequately serve San Francisco Bay Area and northern California coast Veterans through the year 2030.

## **2.4 DESCRIPTION OF PROPOSED UNDERTAKING**

The purpose of the LRDP is to establish the road map for the SFVAMC facility development projects necessary to meet the mission of VHA. SFVAMC has determined that to meet the needs of all San Francisco Bay Area and northern California coast Veterans over the next 20 years, some of the existing buildings need to be retrofitted to the most recent seismic safety requirements, and an additional 589,000 square feet of building space must be constructed.

SFVAMC has major space and parking deficiencies at the Fort Miley Campus. The mission of the SFVAMC is to continue to be a major primary and tertiary healthcare center that provides cost-effective and high-quality care to eligible Veterans in the San Francisco Bay Area and northern California coast. The SFVAMC strives to deliver necessary care to Veterans while contributing to healthcare knowledge through research and education. SFVAMC is also a ready resource for Department of Defense backup, serving as a Federal Coordinating Center in the event of a national emergency. New major construction initiatives would transform the SFVAMC, providing seismic improvements and additional facility space over the next 20 years. The proposed LRDP is needed for the SFVAMC to continue to serve the ever-changing needs of the growing Veteran population and to provide appropriate space and facilities to conduct important research.

The overarching goals of the LRDP include:

- Enhance the SFVAMC's function as a vital medical center for Veterans in need.
- Continue to be a state-of-the-art medical facility to serve Veterans well into the future.
- Provide appropriate space to conduct/manage research, clinical, administrative, and educational programs.

The specific objectives of the LRDP are to:

- Address the space deficiency at the SFVAMC Fort Miley Campus.
- Retrofit existing buildings to the most recent seismic safety requirements to meet current VA Seismic Design Requirements (VA Directive H-18-8), in compliance with Executive Order 12941.
- Provide appropriate space to conduct research.
- Strengthen clinical inpatient and outpatient primary and specialty care for San Francisco Bay Area and northern California coast Veterans.
- Improve the efficiency of clinical and administrative space through renovation and reconstruction.
- Meet patient privacy standards and resolve Americans with Disability Act deficiencies.
- Increase parking supply to meet current and future demands.
- Improve internal and external campus circulation, utilities, and infrastructure.
- Maintain/improve public transit access to the SFVAMC Fort Miley Campus.

## 2.5 PROJECT ALTERNATIVES

In parallel with coordination of Section 106 review, VA has conducted review under NEPA with preparation of an EIS. NEPA regulations require that an EIS contain a description of a proposed action and the alternatives considered. Agencies are directed to use the NEPA process “to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the environment” (40 CFR 1500.2[e]).

The NEPA proposed action is the renovation, expansion, and operation of the SFVAMC to serve Veterans in the San Francisco Bay Area and northern California coast counties. After consideration of a variety of alternatives through the planning process and eliminating alternatives determined to be infeasible, three alternatives were derived that would allow for continued operation of the SFVAMC over the next 20 years:

*Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative*

*Alternative 2: SFVAMC Fort Miley Campus Plus Mission Bay Campus Alternative*

*Alternative 3: No Action Alternative*

There is no preferred alternative at this time. VA will use the input from the public and coordinating agencies (including Section 106 consulting parties) through the NEPA and Section 106 public processes to update the LRDP, as necessary, select a preferred alternative, and prepare and sign a Final EIS and Record of Decision.

To facilitate Section 106 consultation concurrent with the NEPA process, this FOE discusses effects on historic properties located within the APE at the SFVAMC Fort Miley Campus and adjacent Fort Miley Military Reservation Historic District. It also discusses the Section 106 implications of LRDP alternatives that consider off-site development at an as-yet-unknown specific location. Because Section 106 does not require analysis of a “no action” alternative, only NEPA Alternatives 1 and 2 are discussed in the Section 106 FOE.

## **2.5.1 Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative**

### **Near-Term Projects**

Alternative 1 near-term project components (Phase 1)<sup>3</sup> would involve new development and/or retrofit of patient care, research, administrative, hoptel, and parking structures on the existing 29-acre SFVAMC Fort Miley Campus through mid-2015. The Alternative 1 (Phase 1) development area would total under 1.5 net new acres within the previously developed areas of the existing 29-acre SFVAMC Fort Miley Campus (see Exhibit 3, “Summary Site Plan”).

Alternative 1 near-term projects include:

- Phase 1.1: Building 41 Research (requires demolition of Building T-17)
- Phase 1.2: Emergency Operations Center and Building 211 Parking Garage Expansion (477 spaces; 295 net new)
- Phase 1.3: Building 22 Hoptel and Seismic Retrofit of Buildings 5, 7, 9, 10, 11, and 13, in accordance with VA Seismic Design Requirements (VA Directive H-18-8), in compliance with Executive Order 12941
- Phase 1.4: Patient Welcome Center and Drop-Off Area
- Phase 1.5: Building 24 Mental Health Clinic Expansion (requires demolition of Building 20)

### **Long-Term Projects**

The Alternative 1 long-term project components (Phase 2) would involve new development and/or retrofit of patient care, research, administrative, and ambulatory care structures on the 29-acre SFVAMC Fort Miley Campus through 2023. The Alternative 1 (Phase 2) development area would total approximately 0.5 net new acre within the previously developed areas of the existing 29-acre SFVAMC Fort Miley Campus.

Furthermore, there would be a need to add approximately 24,000 square feet of modular building swing space into the northwest parking lot of the SFVAMC Fort Miley Campus. This modular swing space would be temporary, as it would be removed from the northwest parking lot after approximately 13 months. The use of this modular swing space would not require any construction or demolition of buildings because it would be located on a previously developed parking lot which can accommodate the use.

---

<sup>3</sup> LRDP Phase 1 spans the 2013 through 2015 timeframe. LRDP Phase 2 spans the 2015 through 2023 timeframe.

Alternative 1 long-term projects include:

- Phase 2.1: Operating Room Expansion (D-Wing)
- Phase 2.2: IT Support Space Expansion (Building 207)
- Phase 2.3: Building 23 (Mental Health Research Expansion)
- Phase 2.4: Building 40 Research (requires demolition of Buildings 12, 18, 21, and T-23, and removal of Building 14) and Seismic Retrofit of Buildings 1, 6, and 8, in accordance with VA Seismic Design Requirements (VA Directive H-18-8), in compliance with Executive Order 12941
- Phase 2.5: Ambulatory Care Center (ACC)

## **2.5.2 Alternative 2: SFVAMC Fort Miley Campus Plus Mission Bay Campus Alternative**

### **Near-Term Projects**

Alternative 2 near-term project components (Phase 1) would be the same as Alternative 1 near-term project components (Phase 1). Thus, all Alternative 2 near-term project components (Phases 1.1 through 1.5) would be located at the SFVAMC Fort Miley Campus.

### **Long-Term Projects**

The Alternative 2 long-term project components (Phase 2) would primarily involve new development and/or retrofit of patient care, research, and administrative structures at the SFVAMC Fort Miley Campus as well as ambulatory care, research, and parking structures at a potential new SFVAMC Mission Bay Campus.

For purposes of the Section 106 analysis, it is assumed that a new SFVAMC Mission Bay Campus would be constructed somewhere within an approximately 2.5-square-mile area bounded by Interstate 80 on the north, 2nd Street and San Francisco Bay on the east, Cesar Chavez Street on the south, and 7th/Brannan/Potrero Streets on the west. See Exhibit 5, “Alternative 2 Mission Bay Campus Location,” for the location of the off-site portion of Alternative 2. In addition, it is assumed that all off-site space in Mission Bay would be four stories, with the proposed off-site new development area totaling approximately 3.5 acres. The actual footprint, concept plan, and site location within Mission Bay have not been determined at this time.

Alternative 2 long-term project components (Phase 2) at the SFVAMC Fort Miley Campus would be constructed between late 2015 and early 2023, while a new SFVAMC Mission Bay Campus would be constructed roughly between mid-2023 and late 2027.



Source: SFVAMC Facilities Planning Department

**Alternative 2 Mission Bay Campus Location**

### **3. CONSULTATION AND PUBLIC PARTICIPATION**

---

#### **3.1 CONSULTATION AND PUBLIC INVOLVEMENT PROCESS**

In accordance with VA's responsibilities under both Section 106 and NEPA, VA is required to solicit public comments on the environmental review documents that will, in turn, facilitate the incorporation of comments into the Final LRDP and Final LRDP EIS. This process includes coordination with agencies and organizations with a demonstrated interest in heritage resources or in the SFVAMC Fort Miley Campus. This process also includes providing members of the public with similar interests an opportunity to comment on the identification of historic properties and finding of effect. In August 2012, VA released the FOE along with the Draft LRDP and Draft LRDP EIS for comments by the public and consulting parties.

##### **3.1.1 Consulting Parties**

During the early stages of the development of the LRDP, VA identified organizations that have a demonstrated interest in the treatment of historic properties in San Francisco. These early efforts include the NEPA scoping meetings held in late 2010 and early 2011 and individual meetings held with NPS (GGNRA) and the City and County of San Francisco in late 2011. Based on these meetings, as well as input provided by SHPO, VA submitted letters to the following parties on June 15, 2012, notifying them of their opportunity to participate in the Section 106 process:

- City and County of San Francisco (Certified Local Government)
- San Francisco Veterans Affairs Commission
- NPS, Western Regional Office
- GGNRA
- Planning Association for the Richmond
- Friends of Lands End
- California Preservation Foundation
- National Trust for Historic Preservation, Western Regional Office
- Board of Directors of NCIRE – The Veterans Health Research Institute
- University of California at San Francisco (UCSF) Medical School
- Palace of the Legion of Honor
- Presidio Trust
- San Francisco County Veterans Service Officers

Responses to these letters led to the identification of the consulting parties listed below. In consultation with SHPO, it was determined that the GGNRA would likely be included as a signatory consulting party if Section 106 consultation were to lead to the execution of an agreement document, by virtue of NPS's status as a federal agency and the GGNRA's proximity to the SFVAMC Fort Miley Campus. The following organizations are recognized as consulting parties:

- UCSF School of Medicine
- Palace of the Legion of Honor
- City and County of San Francisco
- Planning Association for the Richmond

- California Preservation Foundation
- GGNRA
- NCIRE Board of Directors

### **3.1.2 Public Involvement**

VA solicited input from the general public through the standard NEPA public involvement process. Opportunities for public comment were initially provided through the posting of a Notice of Intent to Prepare an EIS in the Federal Register and the EIS public scoping meetings. The Draft EIS was circulated for a 60-day public review period (longer than the standard 45-day period) during August and September 2012, and a Draft EIS public meeting was held during that review period. The Section 106 Baseline Documentation package and Draft FOE are available via the SFVAMC website, and VA had copies available for review at the Draft EIS public meeting. Members of the public were invited to comment on the Section 106 documentation, and their comments have been taken into account during preparation of this version of the FOE.

## **3.2 CONSIDERATION OF ISSUES RAISED THROUGH CONSULTATION AND PUBLIC INVOLVEMENT**

VA received public comments on the Section 106 review process from three organizations: NPS (GGNRA), Friends of Lands End, and People for a Golden Gate National Recreation Area. VA has taken those comments into consideration while preparing this version of the FOE for use in consultation with SHPO under Section 106. In addition, the comments from the public and consulting parties have been compiled and provided to SHPO for consideration during SHPO's review of the FOE.

## **4. DESCRIPTION OF HISTORIC PROPERTIES**

---

### **4.1 HISTORIC CONTEXTS**

This section provides a brief overview of the prehistoric and historic period context of the SFVAMC, reviews investigations that were previously conducted on the SFVAMC, and summarizes previously identified cultural resources.

#### **4.1.1 Prehistoric Archaeological Context**

Few archaeological sites have been found in the San Francisco Bay Area that date to the Paleo-Indian Period or the subsequent Lower Archaic (8000 to 5000 years before present [B.P.]) time period, probably due to high sedimentation rates and sea level rises. Archaeologists have, however, recovered a great deal of information from sites occupied during the Middle Archaic Period (5000 to 2500 B.P.). By this time, broad regional subsistence patterns gave way to more intensive procurement practices. Economies were more diversified, possibly including the introduction of acorn processing technology. Populations were growing and occupying more diverse settings.

Permanent villages that were occupied throughout the year were established, primarily along major waterways. The onset of status distinctions and other indicators of growing sociopolitical complexity mark the Upper Archaic Period (2500 to 1300 B.P.). Exchange systems became more

complex and formalized, and evidence of regular sustained trade between groups was seen for the first time.

Several technological and social changes characterized the Emergent Period (1300 to 200 B.P.). Territorial boundaries between groups became well established. It became increasingly common that distinctions in an individual's social status could be linked to acquired wealth. In the latter portion of this period (500 to 200 B.P.), exchange relations became highly regularized and sophisticated. The clamshell disk bead became a monetary unit, and specialists arose to govern various aspects of production and material exchange.

The Middle Archaic, Upper Archaic, and Emergent periods can be further broken down according to additional cultural manifestations that are well represented in archaeological assemblages in the San Francisco Bay Area:

- The Windmill Pattern (5000 to 1500 B.P.) peoples placed an increased emphasis on acorn use as well as a continuation of hunting and fishing activities. Ground and polished charmstones, twined basketry, baked-clay artifacts, and worked shell and bone were hallmarks of Windmill culture. Widely ranging trade patterns brought goods in from the Coast Ranges and trans-Sierran sources, as well as closer trading partners.
- The Berkeley Pattern (2200 to 1300 B.P.) exhibited an increase in the use of acorns as a food source than was seen previously in the archaeological record. Distinctive stone and shell artifacts differentiated it from earlier or later cultural expressions. Burials were predominantly placed in a tightly flexed position and frequently included red ochre.
- The Augustine Pattern (1300 to 200 B.P.) reflected increasing populations resulting from more intensive food procurement strategies, as well as a marked change in burial practices and increased trade activities. Intensive fishing, hunting and gathering, complex exchange systems, and a wider variety in mortuary patterns were all hallmarks of this period.

#### **4.1.2 Historic Period Context**

The earliest documented Euro-American incursions into what is now the City and County of San Francisco occurred in 1776, when a Spanish exploring party led by Juan Bautista de Anza arrived in the area to locate sites for a presidio (military base) and Mission Dolores. By 1836, the small settlement of Yerba Buena sprang up between the presidio and the mission. In 1847, Yerba Buena became known as San Francisco, and its primary function served as a shipping and transportation hub.

The Gold Rush of 1849 transformed the small shipping community, virtually overnight, into a booming city. Within 1 year, the population exploded from 500 to 25,000. The city continued to grow at a brisk pace over the next few decades, as the population steadily increased from less than 150,000 in 1870 to 342,000 by 1900. By the early 1900s, despite a devastating earthquake and fire, San Francisco boasted a population of 350,000 and served as a major port and financial center on the west coast, a position it enjoys well into the 21st century (Kyle et al. 1990).

In 1850, after California's entry into the United States, President Millard Fillmore reserved the land composing Fort Miley for strategic value because it overlooked the entrance to San

Francisco Bay. It remained relatively unused until the 1860s, when the City of San Francisco purchased 200 acres—including the site of the future Fort Miley—for the municipal Golden Gate Cemetery (also known as the City Cemetery Reservation). In 1893, the U.S. Army obtained 54 acres of the Golden Gate Cemetery land from the city to construct a military reservation and coastal artillery batteries. In 1900, the reservation was named Fort Miley after Lieutenant Colonel John D. Miley, one of the planners of San Francisco's coastal battery network. The Fort Miley post was developed between 1902 and 1906, and included a U-shaped parade ground surrounded by wood-frame barracks and other post buildings, between the east and west batteries (the current site of the SFVAMC Fort Miley Campus). See Images 1–10 for historic photographs of the Fort Miley post.

During World War I the Fort Miley batteries were quickly outdated with the advent of aerial bombardment, although they remained in place through—and in some cases beyond—World War II. Fort Miley is now part of the GGNRA, which is managed by NPS (VA 2003). Bordered by Lands End to the west and Lincoln Park to the north and east, the natural setting of the original military reservation has remained largely intact.

In 1932, VA acquired 29 acres of Fort Miley and began construction of the SFVAMC. When completed, the SFVAMC consisted of a complex of Art Deco buildings that were primarily located in the northern and eastern portions of the present-day SFVAMC Fort Miley Campus. Few changes occurred at the site until the 1960s, when VA undertook efforts to modernize the SFVAMC through the addition of several new buildings and parking lots, and the modification of existing buildings. See Images 11–16 for historic photographs of the SFVAMC Fort Miley Campus.

## 4.2 PREVIOUS INVESTIGATIONS

In 1980, VA conducted a survey of its potential historic properties at the SFVAMC to fulfill the requirements of Section 110 of the NRHP, and concluded that there was an NRHP-eligible historic district in the northeastern portion of the SFVAMC Fort Miley Campus. The district boundaries were altered in 1982 because of the significant construction and renovation work that occurred since the original facility was built. In 1987, the Keeper of the NRHP issued a Determination of Eligibility Notification for the SFVAMC. In 2005, a formal NRHP nomination was submitted to the SHPO and the Keeper of the NRHP. In May 2005, the SHPO concurred with the finding that the SFVAMC Historic District was eligible for the NRHP under Criterion A in the areas of health and medicine for its association with early 20th century innovative and comprehensive health care for American Veterans, and Criterion C in the areas of architecture and engineering as an early example of a federal complex designed with seismic-resistant building technologies.

In 2008, VA withdrew the original nomination because of physical changes to the SFVAMC Fort Miley Campus, and resubmitted a modified version to the Keeper of the NRHP. The updated documentation recommended that the SFVAMC Historic District is eligible under NRHP Criterion A as a site of an early standardized VA hospital, and under Criterion C as an early example of a federal building designed with seismic-resistant buildings technologies and for its Mayan Art Deco-inspired design. The period of significance for the updated district is 1934–1941. The SFVAMC Historic District was listed in the NRHP in April 2009.

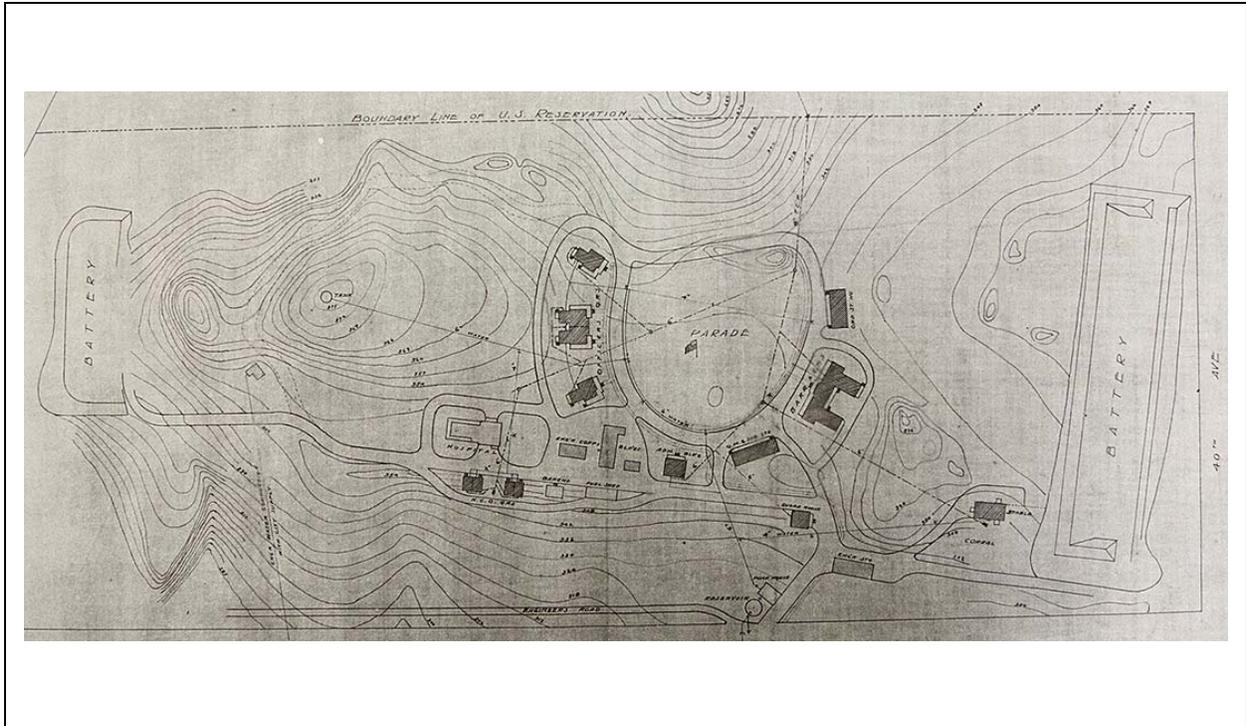


Image 1: Early site plan of Fort Miley Military Reservation, ca. 1902. (San Francisco Public Library)

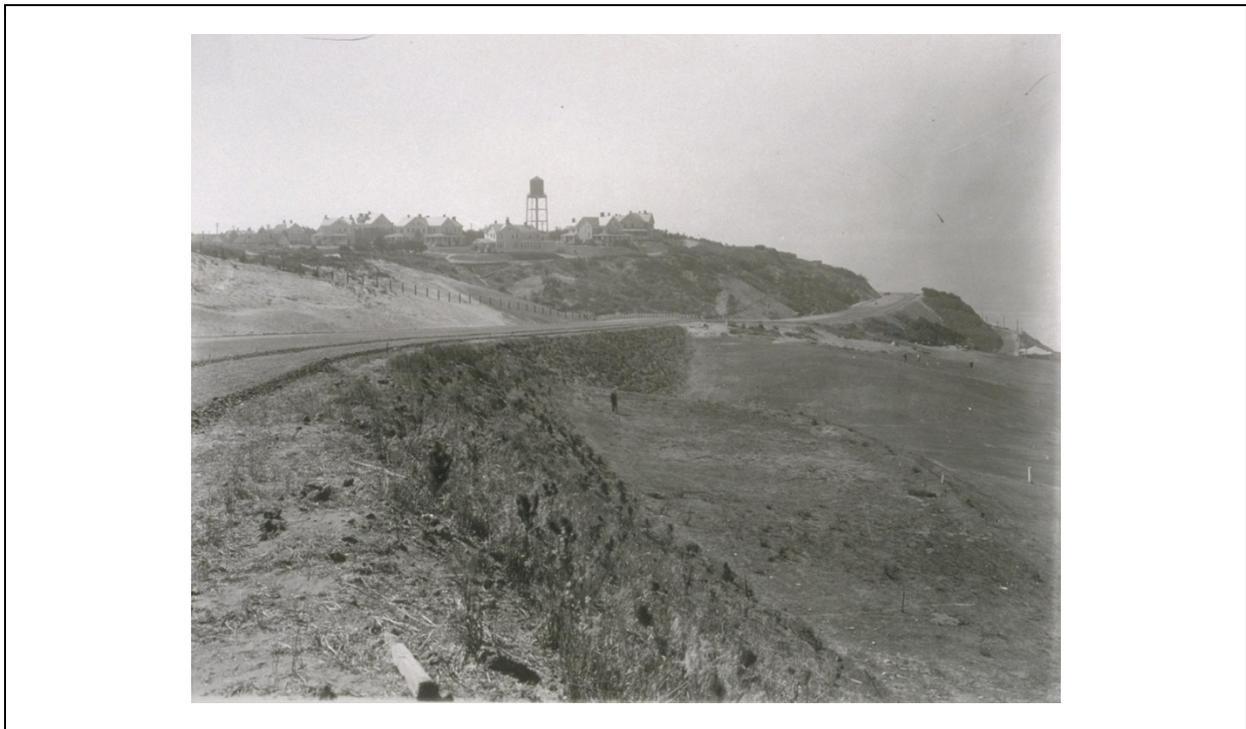


Image 2: Early photograph of Fort Miley Military Reservation, 1905. (San Francisco Public Library)

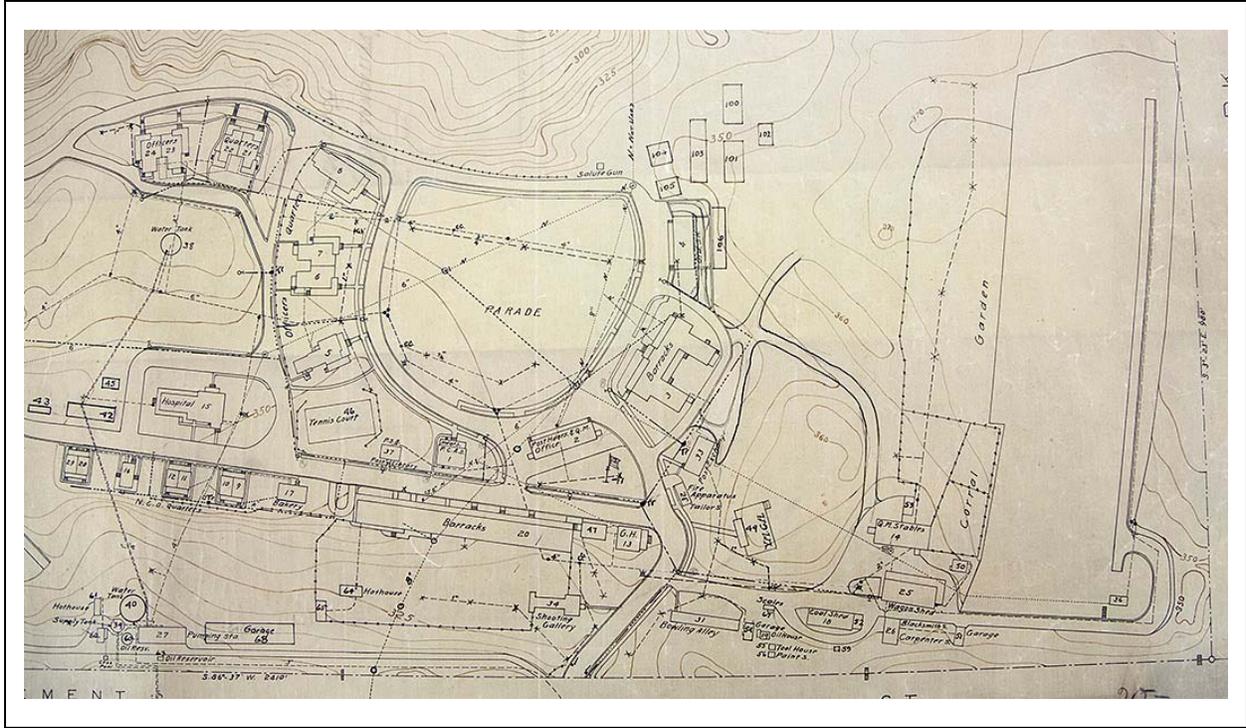


Image 3: Site plan of Fort Miley Military Reservation, 1916. (San Francisco Public Library)



Image 4: Demolition of barracks buildings at Fort Miley Military Reservation, 1933. The building at left is likely the Ordnance Storehouse. View looking northeast toward the Palace of the Legion of Honor in the background. (San Francisco Public Library)

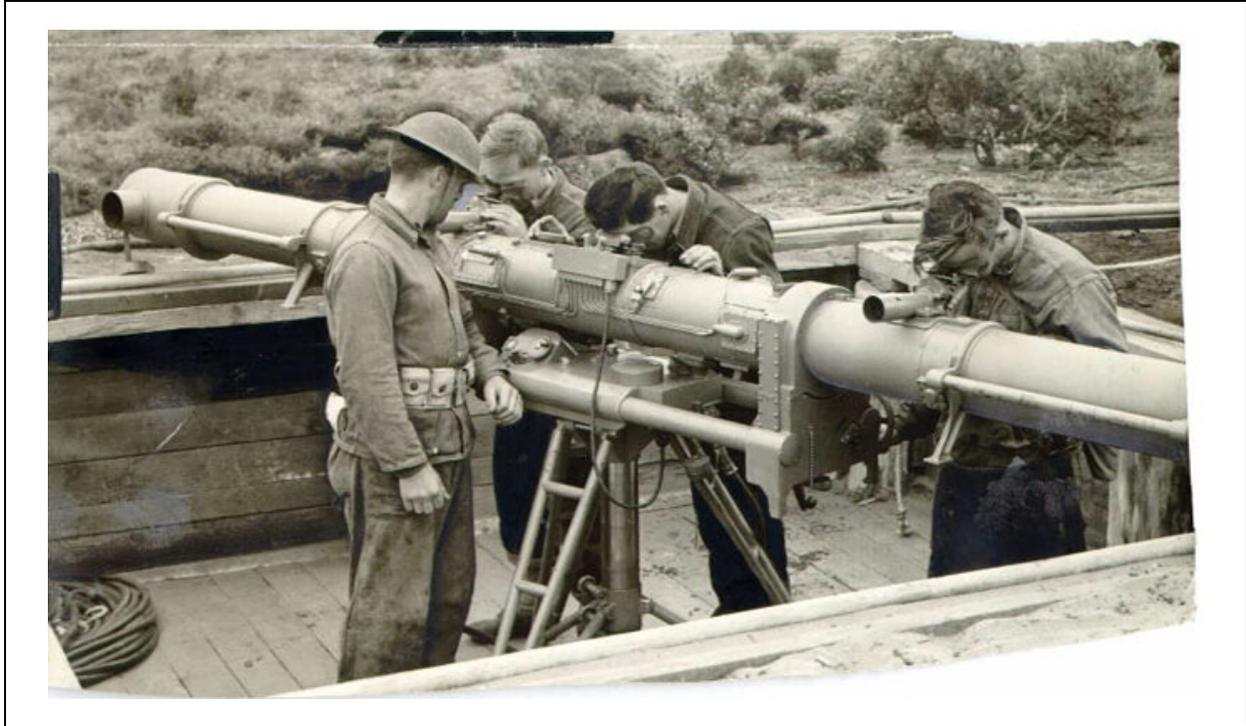


Image 5: Soldiers testing range finder at Fort Miley, 1941. (San Francisco Public Library)



Image 6: Aerial photograph of the SFVAMC and Fort Miley Military Reservation during World War II, February 1942. (San Francisco Public Library)



Image 7: Aerial photograph of West Fort Miley during World War II, February 1942. (San Francisco Public Library)

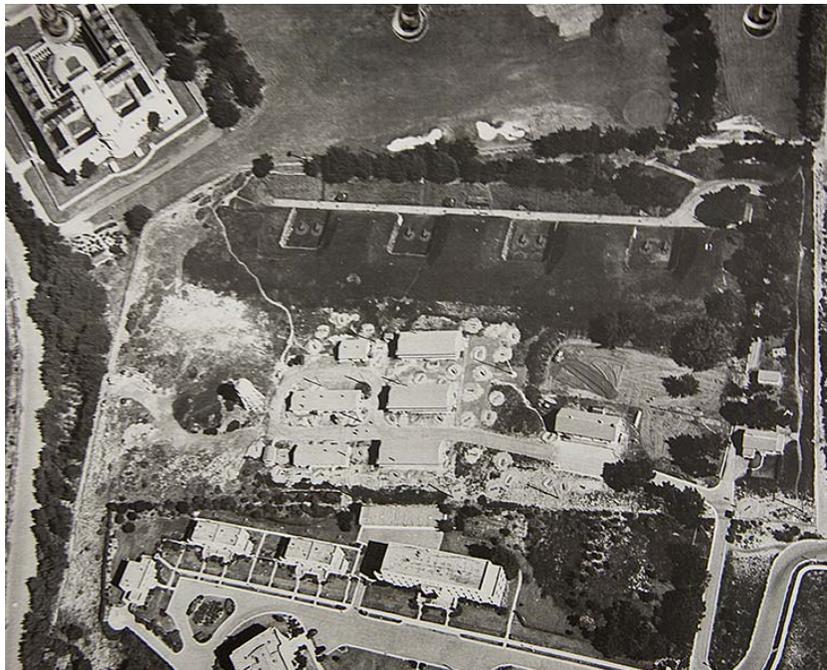


Image 8: Aerial photograph of East Fort Miley during World War II, February 1942. (San Francisco Public Library)

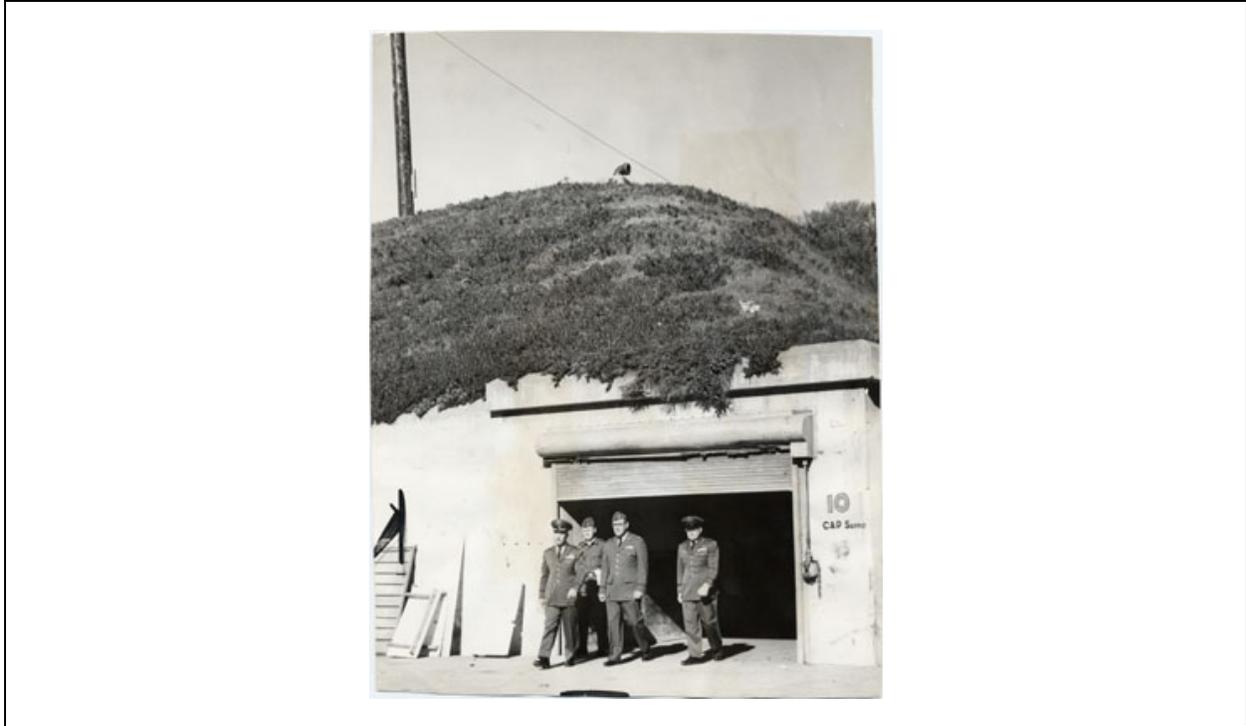


Image 9: Soldiers in front of battery at Fort Miley, 1963. (San Francisco Public Library)

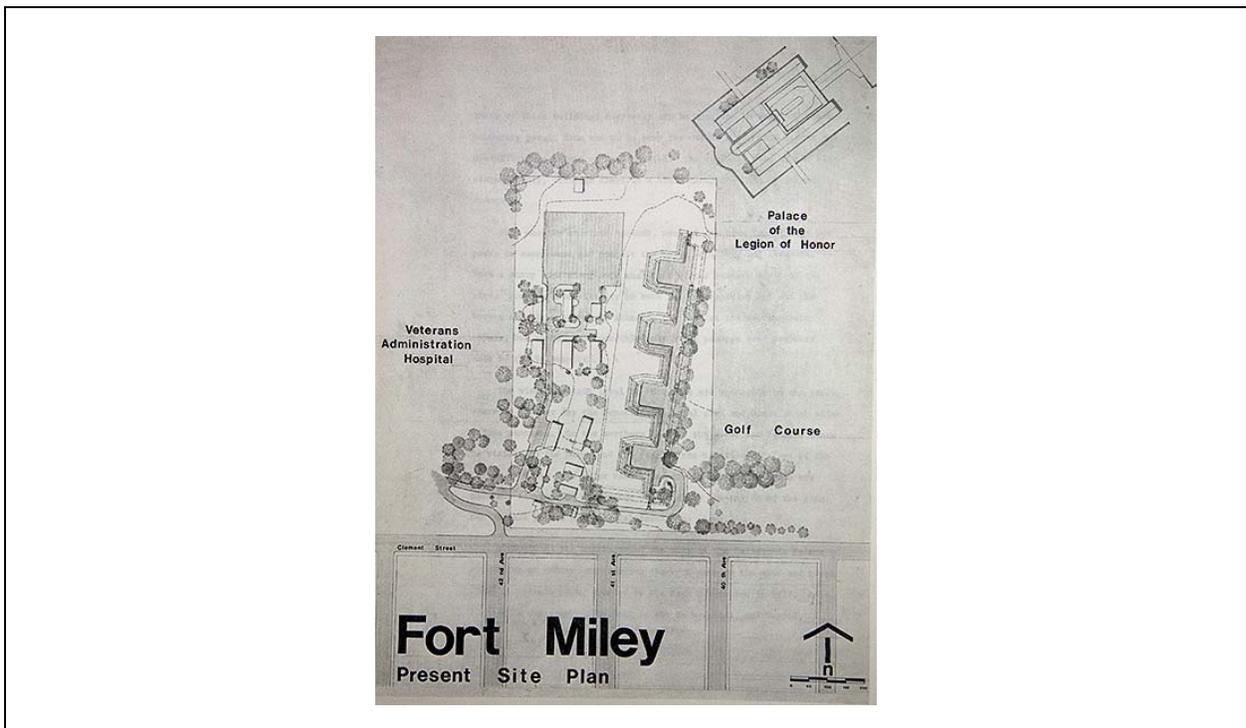


Image 10: Site plan of East Fort Miley, 1968. (San Francisco Public Library)

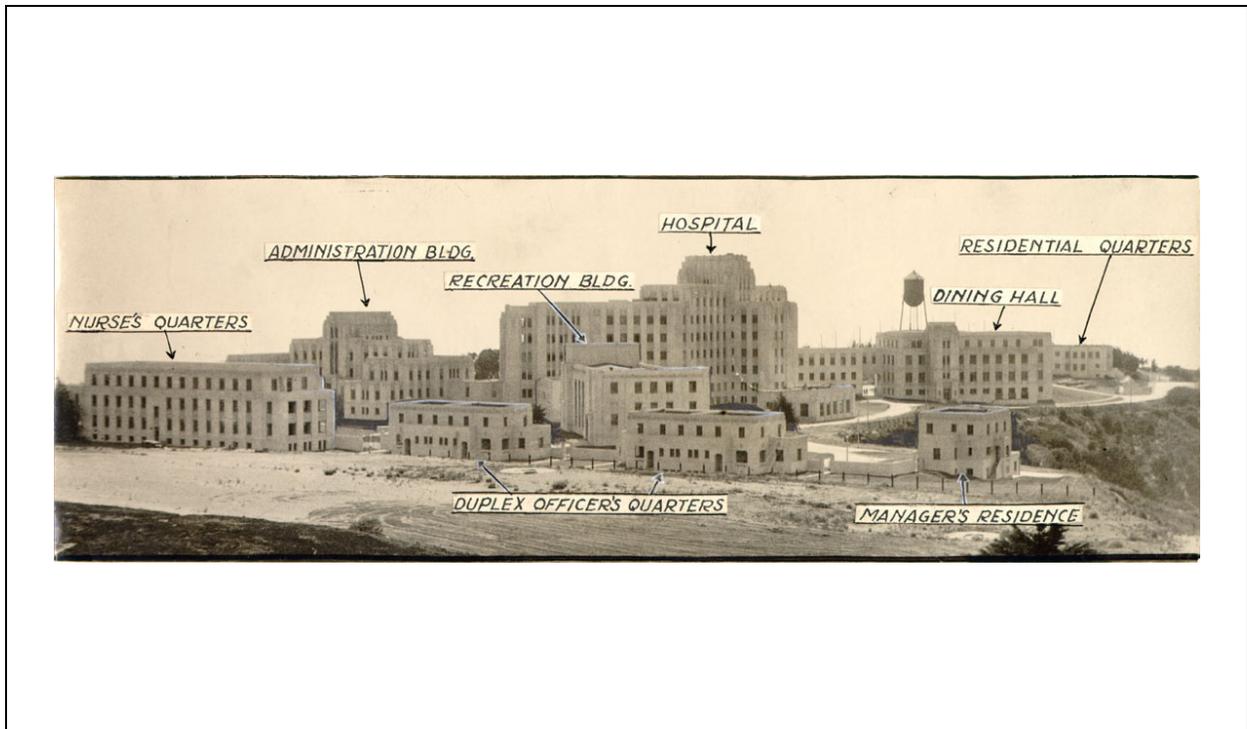


Image 11: The SFVAMC, 1934, view looking southwest. (San Francisco Public Library)



Image 12: Aerial view looking north of the SFVAMC, 1935. (San Francisco Public Library)



Image 13: The SFVAMC, 1934, view of Building 2 looking northwest. (San Francisco Public Library)



Image 14: An SFVAMC building (number unknown), 1948, showing original window details. (San Francisco Public Library)

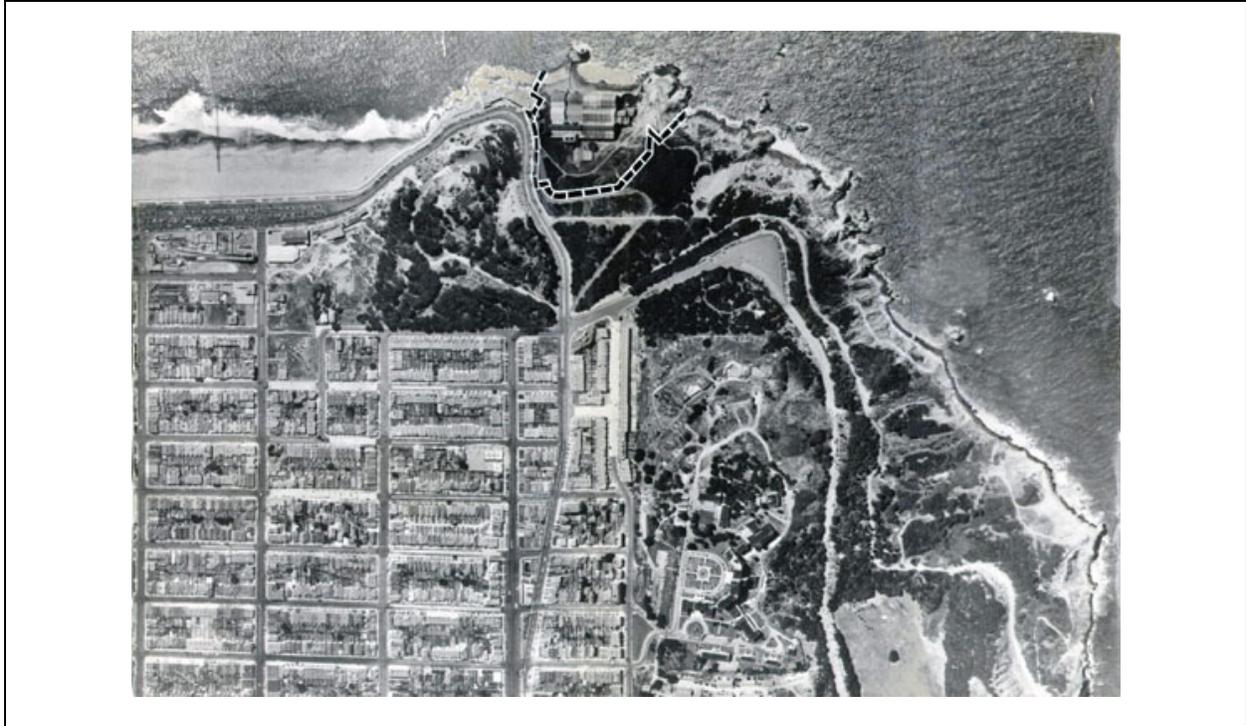


Image 15: Aerial photograph of the SFVAMC, 1951. (San Francisco Public Library)

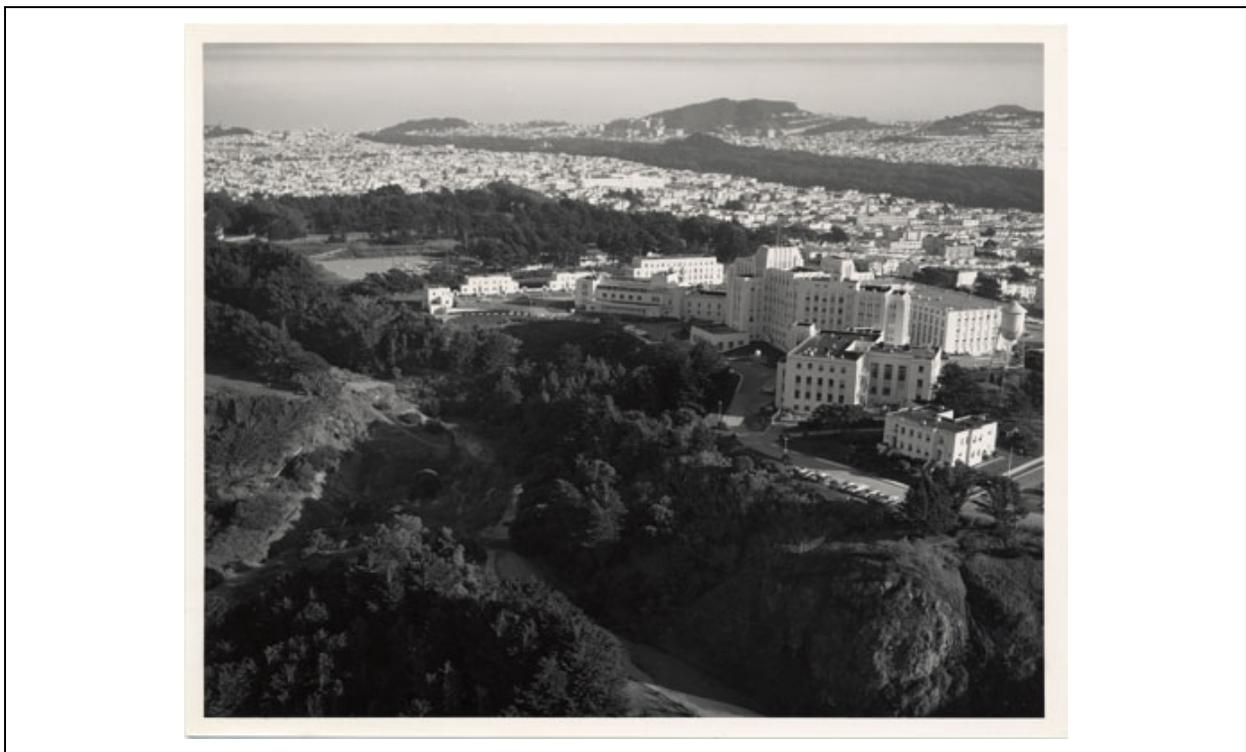


Image 16: Aerial photograph of the SFVAMC, looking southeast, 1971. (San Francisco Public Library)

A records search was conducted at the Northwest Information Center (NWIC) in June 2010. The NWIC records search indicated that no archaeological resources, sites, or features of Native American cultural importance have been identified at the SFVAMC. Four prehistoric midden sites have been identified and recorded within approximately 0.25 mile of the SFVAMC Fort Miley Campus. The Campus is within the area that was originally the site of the City Cemetery Reservation. The City Cemetery Reservation included a large portion of present-day Fort Miley, Lincoln Park, and the SFVAMC. Records indicate that the burials were removed in 1908; however, construction activities at the Palace of the Legion of Honor (located approximately 0.25 mile to the northeast) uncovered human remains in 1921 and 1993.

Recent investigations on the SFVAMC Fort Miley Campus that were not identified in the NWIC records search include work conducted for the Mental Health Patient Parking Addition (Winzler & Kelly 2010a) and the North Slope Seismic/Geologic Stabilization Project (Winzler & Kelly 2010b).

### **4.3 PREVIOUSLY IDENTIFIED HISTORIC PROPERTIES**

#### **4.3.1 Archaeological Resources**

No archaeological resources have been identified directly within the SFVAMC Fort Miley Campus, and as such, the prehistory of the specific Campus location is not known. However, archaeological sites that reflect the character and nature of early Native American occupation of the Campus and surrounding region have been found in the immediate area.

Because most of the SFVAMC Fort Miley Campus is paved or covered in structures or landscaping, assessments have been based on record searches alone, and there have been no specific archaeological investigations. Although prehistoric archaeological sites may once have been present within and near the lands now occupied by the Campus, heavy urban development has likely destroyed or substantially damaged such evidence. In addition, the geotechnical report prepared by Treadwell & Rollo (2010) indicates that most of the SFVAMC Fort Miley Campus has a layer of fill material, 1–6 feet deep, overlaying bedrock. For these reasons, the SFVAMC Fort Miley Campus has an overall low sensitivity for the presence of intact prehistoric archaeological sites.

The SFVAMC is sensitive for historic-era archaeological resources because a portion of Fort Miley once stood on the SFVAMC Fort Miley Campus. The SFVAMC is also sensitive for the presence of human remains. Fort Miley once contained the City Cemetery Reservation, which covered present-day Fort Miley, the SFVAMC, and a large portion of Lincoln Park. The burials were removed in 1908, but construction activities at the Palace of the Legion of Honor discovered human remains in 1921 and 1993, indicating that perhaps not all of the human remains were removed.

Although the SFVAMC Fort Miley Campus may have an elevated sensitivity for the presence of historic-era archaeological remains and burials and could also contain prehistoric archaeological remains (although the Campus has low sensitivity for the presence of prehistoric archaeological resources), no historic-era or prehistoric archaeological resources have been identified within the APE.

### 4.3.2 Fort Miley Military Reservation Historic District

#### Background

The Fort Miley Military Reservation was first conceived in 1850, when President Millard Fillmore set aside Point Lobos for military purposes, but the land was not officially acquired from the City and County of San Francisco until 1893. Construction began on the defense fortifications at Fort Miley in 1899 and continued through 1948, when two 6-inch guns were installed at Battery 243. The gun batteries at Fort Miley, along with Fort Barry on the north side of the Golden Gate Bridge, represent the last phase of the Endicott period of seacoast defense—a modernization and construction program for coastal fortification that began in 1890.

Fort Miley was constructed around the same time as Forts Baker and Barry in Marin County, but was smaller in scale. Rectangular in plan, the Fort Miley Military Reservation historically consisted of three complexes of structures: three gun batteries, searchlight facilities, fire control stations, and earthworks on the west side; a gun battery on the east side; and the Fort Miley post in the middle. An early site plan from ca. 1902 shows wood-frame post buildings generally sited in a U shape surrounding a central parade ground (Images 1 and 2). Two-story officers' quarters lined the west side of the parade ground, the administration building was located to the south, and a large barracks and an ordnance storehouse lined the parade at the east. Buildings located off the parade ground included a hospital, noncommissioned officers' quarters, Engineering Corps buildings, and a stable near Batteries LaRhett Livingston and Anton Springer at the east. The Fort Miley post nearly doubled in size before the United States entered World War I in 1914, adding officers' quarters, barracks, and recreation facilities (Image 3). The post continued to grow through the 1920s, although it was reduced to caretaker status in 1922 (Thompson 1980).

In 1932, the Fort Miley Military Reservation was divided into two parts when 25 acres (eventually 29 total acres) of land was transferred to VA for the SFVAMC. By 1934, most of the buildings and structures that composed the post of Fort Miley had been demolished (Image 4). The exceptions were Officers' Quarters 23/24 (now Building 18), Noncommissioned Officers' Quarters 28/29 (removed sometime after 1960), and the Ordnance Storehouse (now FI-304). Most of the major defense fortifications at East and West Fort Miley remained in place after 1934.

During World War II, the area of East Fort Miley between the SFVAMC and Batteries LaRhett Livingston and Anton Springer was filled with temporary buildings and a 20,000-gallon water tank (Image 8). The temporary post was divided between noncommissioned officers and officers and included two administration buildings; two mess halls; two recreation buildings; four barracks buildings, at least two of which were two stories; a pump, tower, and tank; and a radio station. The Ordnance Storehouse (FI-304) was also part of this grouping. By the late 1960s, most of the temporary buildings still existed at East Fort Miley, and VA leased some of them from the U.S. Army (Image 10). VA also leased 6.34 acres of land at East for Miley for a 650-car parking lot. The temporary buildings and parking lot were demolished in the late 1960s or early 1970s. West Fort Miley remained largely unchanged during World War II and succeeding decades (Image 7). Fort Miley Military Reservation Historic District became part of the National Park Service's Golden Gate National Recreation Area in 1972.

## Significance, Character-Defining Features, and Integrity

The Fort Miley Military Reservation Historic District was listed in the NRHP in 1980, under Criterion A, for its significance at the national level as part of the military defense system of San Francisco. The period of significance is 1892 to 1950. Extant structures and buildings within the Historic District include battery emplacements, fire control stations, searchlight facilities, and an ordnance storehouse, as described further below.

In general, the Fort Miley Military Reservation Historic District retains moderate integrity. Issues that have diminished the Historic District's integrity over time include the demolition of the original post buildings and the addition of the SFVAMC in the early 1930s. (Integrity issues related to individual buildings and structures are described below.) Buildings and structures that have been removed include the following:

- The Fort Miley Military Reservation Post, demolished between 1932 and 1934 (except for three buildings, two of which survive today)
- Battery Call, constructed in 1915 in West Fort Miley and salvaged in 1921
- Searchlights 5 and 6, constructed in 1937 in West Fort Miley (removal date unknown)
- Four of the original seven fire control stations, all located in West Fort Miley and built by World War II (removal date unknown)
- Two 3-inch anti-aircraft gun emplacements located near Batteries LaRhett Livingston and Anton Springer, constructed in the 1920s (removal date unknown)

The NRHP nomination describes the overall condition of the Fort Miley Military Reservation Historic District in 1979 as “good,” and the integrity of most extant features in the Historic District as moderate to high. A report by Winzler & Kelly notes that the integrity of the Fort Miley Military Reservation Historic District was high in 2010 (Winzler & Kelly 2010a).

### 4.3.3 Contributors to the Fort Miley Military Reservation Historic District

#### Battery James Chester

##### *Background*

The first structure constructed at Fort Miley was Battery James Chester in West Fort Miley, started in 1899. When completed in 1903, Battery Chester had three gun emplacements and associated structures, all constructed of reinforced concrete. The northernmost gun emplacement at Battery Chester (FI-2) featured two 12-inch rifles on disappearing carriages, set side by side, with magazines and service rooms located underneath it. The third gun emplacement at Battery Chester (FI-1) was located southeast of FI-2 and featured one 12-inch gun on a non-disappearing barbette carriage. The gun emplacements at Battery Chester faced the Pacific Ocean (west) and were concealed from views from offshore by thick concrete parapets and human-made earthen embankments camouflaged by ground cover. Constructed during an era predating air travel, Battery Chester was intended to protect the coastline from enemy ships and was exposed from above and to the rear (east). The battery structures were two to three stories in height, and had

steel doors and window bars. Edges were protected by metal railings. The guns at Battery Chester were declared obsolete and dismantled in 1942 (FI-1) and 1943 (FI-2).

### ***Significance, Character-Defining Features, and Integrity***

Battery Chester was listed in the NRHP as a contributor to the Fort Miley Military Reservation Historic District, significant at the national level as one of the first defense structures constructed within the boundaries of Fort Miley. The significance of Battery Chester lies in its association with seacoast defense of the strategic harbor of San Francisco, “long regarded by army engineers and strategists as the most important harbor on the West Coast of the United States” (Thompson 1980). The defense system guarding San Francisco Bay was composed of fortifications and gun batteries in San Francisco (at the Presidio, Fort Mason, Fort Winfield Scott, and Fort Funston) and Marin County (at Fort Baker, Fort Barry, Fort Cronkhite, and Fort McDowell). Battery Chester’s specific role in the larger seacoast defense system was to destroy enemy ships coming from the south, west, and north by firing its large-caliber guns; Battery Chester’s design and 12-inch guns (almost the largest available at the time) were cutting edge, noted in the NRHP nomination as the “latest in design and engineering of the Endicott works as of 1900” (Thompson 1980).

The NRHP nomination for Fort Miley does not specifically address character-defining features of the buildings, structures, or landscape, but the nomination notes that Battery Chester’s “simple, but impressive architectural lines, its massiveness, and its unique aspect of having gun platforms designed for both ‘disappearing’ (2) and barbette (1) carriages” contribute to the significance of Fort Miley (Thompson 1980).

The NRHP nomination lists the issues that diminished Battery Chester’s integrity in 1980: removal of the guns in 1943; overgrown vegetation and trees in front of the gun emplacements, which “interfered with their fields of fire at the time they were armed and in service”; inappropriate pipe railing replacement and placement (e.g., at parapets); removal of electrical equipment at the battery interiors; and addition of recreation equipment, including picnic tables (Thompson 1980).

In 2013, Battery Chester’s integrity continues to be diminished and its condition is deteriorating in certain areas. The removal of Battery Chester’s 12-inch guns and the introduction of overgrown trees and vegetation within the gun emplacements’ fields of fire significantly reduce Battery Chester’s ability to convey its significance as gun emplacements. Other issues that contribute to Battery Chester’s diminished integrity include the presence of overgrown vegetation within the mortar pits and inappropriate pipe railing replacement and placement. Battery Chester is in fair to poor condition, with severe concrete and steel deterioration in some areas. Despite its diminished integrity and condition issues, Battery Chester continues to be able to convey its significance as a seacoast defense structure.

## **Battery LaRhett Livingston and Battery Anton Springer**

### ***Background***

Battery LaRhett Livingston (FI-329) was completed in 1901. Located at the easternmost side of East Fort Miley, Battery Livingston was oriented generally north to south, with its guns facing toward the Pacific Coast (west) and San Francisco Bay (north). The enormous battery structure

was constructed of reinforced concrete and surrounded on all four sides by high human-made embankments camouflaged with ground cover. The central, sunken section of the battery contained a series of four large mortar pits and a road running along the east side. Each mortar pit contained four 12-inch mortar guns, set side by side. The mortar pits were enclosed on three sides by service rooms built underneath the earthen embankments. Across the road from the mortar pits, built underneath the eastern embankment, were four concrete firing or plotting booths where gun operators controlled the guns. Another room located underneath the eastern embankment was likely used as a latrine. Underneath the western embankment, adjacent to the mortar pits, the interior of the battery featured a narrow-gauge rail tramway built into the concrete floor and an elaborate communication system based on speaking tubes.

In 1906, Battery Livingston was divided administratively into Battery Livingston Pits A and B at the north (FI-329) and Battery Anton Springer Pits C and D (FI-330) at the south; the physical structure of the entire battery did not change. In 1917, metal roll-up doors were added to some entrances. Between 1918 and 1920, the U.S. Army decided that four 12-inch mortar guns crammed into each mortar pit created crowded conditions, and consequently removed two mortars from each of the four pits. Batteries Livingston and Springer were declared obsolete in 1943 and the mortar guns were salvaged.

### ***Significance, Character-Defining Features, and Integrity***

Batteries Livingston and Springer were listed in the NRHP as contributors to the Fort Miley Military Reservation Historic District, significant at the national level as some of the first defense structures constructed within the boundaries of Fort Miley. The significance of Batteries Livingston and Springer lies in their association with seacoast defense of the strategic harbor of San Francisco, “long regarded by army engineers and strategists as the most important harbor on the West Coast of the United States” (Thompson 1980). The defense system guarding San Francisco Bay was composed of fortifications and gun batteries in San Francisco (at the Presidio, Fort Mason, Fort Winfield Scott, and Fort Funston) and Marin County (at Fort Baker, Fort Barry, Fort Cronkhite, and Fort McDowell). The mortar guns at Batteries Livingston and Springer had a 360-degree field of fire and were intended to protect the surrounding area from enemies arriving by sea, shore, and land. The batteries were cutting edge at the time, noted in the NRHP nomination as the “latest in design and engineering of the Endicott works as of 1900” (Thompson 1980).

The NRHP mentions that Batteries Livingston and Springer are notable for their “simpl[e] and functional lines, and the massiveness of [their] earthworks” (Thompson 1980), although the features are not called out as character-defining.

The NRHP nomination lists issues that diminished the integrity of Batteries Livingston and Springer in 1980: removal of the mortar guns; construction of a police stable in Pit C; construction of a horse paddock in Pit B; addition of a concrete manure shed in one of the mortar pits; demolition of a small concrete retaining wall at one of the four firing booths; addition of a parcourse jogging trail over the top of the earthen embankment; and addition of a jogging trail with exercise structures on the top, front, and back of the earthen embankment. The NRHP notes that, because of their location, “Batteries Livingston and Springer do not at present readily lend themselves to interpretive uses. They are presently accommodating such adaptive uses as a park maintenance facility and a park police office and stable” (Thompson 1980).

In 2013, the integrity of Batteries Livingston and Springer continues to be diminished. The removal of the batteries' 12-inch mortars and the introduction of overgrown trees and vegetation within the gun emplacements' fields of fire significantly reduce the batteries' ability to convey their significance as gun emplacements. Other issues that contribute to the batteries' diminished integrity include the use of the mortar pits for storage, resulting in clutter that disguises the mortar-emplacement circles in the concrete; the addition of a new wall within at least one mortar pit, dividing it in half; and the presence of temporary storage and debris containers within the mortar pits and along the road within the batteries. Battery Chester appears to be in fair condition. Because of existing and longstanding integrity issues, exacerbated by the batteries' current use as a storage area for landscaping equipment, the ability of Batteries Livingston and Springer to convey their significance has been reduced substantially. However, it is worth noting that most of the issues causing diminished integrity are reversible.

## **Ordnance Storehouse**

### ***Background***

Constructed in 1902 at a cost of \$3,520, the Ordnance Storehouse was one of many buildings located within the original Fort Miley post, and one of a collection of buildings forming a solid row of buildings running north-south near what is now the eastern boundary of the SFVAMC. Measuring 30 feet by 75 feet, this wood-frame building was covered by a gabled roof and clad in narrow horizontal-board siding.

In the early 1930s, after VA took over the land between East and West Fort Miley, nearly all the Fort Miley post buildings were demolished; the Ordnance Storehouse (FI-304) was one of a few buildings to remain. Originally located at the northeast corner of the Fort Miley post parade ground, the Ordnance Storehouse was moved south to its current location sometime between 1934 and 1942. During World War II, more than a dozen temporary buildings were constructed at East Fort Miley, forming a temporary post that included the Ordnance Storehouse (Image 8). All post buildings except the Ordnance Storehouse were demolished in the late 1960s or early 1970s.

### ***Significance, Character-Defining Features, and Integrity***

The Ordnance Storehouse was listed in the NRHP as a contributor to the Fort Miley Military Reservation Historic District, significant at the local level as the sole survivor of the Fort Miley Post buildings. However, the NRHP significance statement should be amended to include Quarters 23/24 (now Building 18) as an extant building from the Fort Miley post, although it was heavily modified in the 1930s when it was absorbed into the SFVAMC.

The NRHP nomination does not list any character-defining features of the Ordnance Storehouse. The nomination also does not address the Ordnance Storehouse's integrity, even in light of its relocation; the Ordnance Storehouse was moved during the period of significance, so integrity of location is not diminished by the move. The NRHP does note that the building "apparently" continued to serve the same use after it was moved. The building's integrity of setting and association were diminished significantly when the rest of the Fort Miley post buildings were demolished and the physical link between the Ordnance Storehouse and the surrounding post buildings was broken. During World War II, the Ordnance Storehouse was once again part of a military post, when more than a dozen temporary buildings were constructed in East Fort Miley.

The temporary buildings were demolished in the late 1960s or early 1970s, and the Ordnance Storehouse was again the sole survivor of the second post. This cyclical demolition and construction of buildings surrounding the Ordnance Storehouse has diminished its integrity of setting.

In 2013, the Ordnance Storehouse appears to retain certain aspects of its integrity, although integrity of setting and association continue to be diminished by the demolition of the Fort Miley post buildings in 1934 and the temporary World War II post buildings in the late 1960s or early 1970s. The asphalt driveway and parking lot to the west, north, and east of the Ordnance Storehouse add to the diminished integrity of setting. The Ordnance Storehouse appears to be in good condition.

### **Coast Defense Searchlight Power Plant (FI-3) and Fire Control Stations (FI-350, FI-351, and FI-352)**

#### ***Background***

In 1905, the U.S. Congress ordered the formation of a board (later known as the Taft Board) to discuss modernization ideas for military batteries and fortifications constructed during the Endicott Period of defense. The Taft Board was responsible for major improvements in military construction and engineering, such as electrification of coastal batteries, updates to fire control facilities and techniques, and implementation of a coast defense searchlight project. The Coast Defense Searchlight Power Plant (FI-3), constructed in 1913 near the northeast corner of Battery Chester, is a remnant of the Taft Period of seacoast defense. The two searchlights powered by the Searchlight Power Plant (Searchlights 5 and 6) have been removed.

At one time Fort Miley had seven reinforced-concrete fire control stations, which were also constructed during the Taft Period. The fire control stations were installed to support range-finding activities for batteries located across San Francisco Bay and farther south along the coast. Three of the fire control stations still exist, one east of Battery Chester (FI-350) and two down the steep slope west of Battery Chester (FI-351 and F-352). Fire control station FI-350 was associated with the guns at Battery Wallace at Fort Barry; fire control station FI-351 helped guide the 16-inch guns at Battery Townsley at Fort Cronkhite; and fire control station FI-35 served the 16-inch guns of Battery Davis at Fort Funston. At the time that the NRHP nomination was prepared, three fire control stations still existed, all within the vicinity of Battery Chester.

#### ***Significance, Character-Defining Features, and Integrity***

The Coast Defense Searchlight Power Plant (FI-3) and three fire control stations (FI-350, FI-351, and FI-352) were listed in the NRHP as contributors to the Fort Miley Military Reservation Historic District, significant at the national level as “representative of the continued improvements of harbor defense down through World War II” (Thompson 1980). Although the NRHP does not mention it specifically, the significance of the three fire control stations is tied to seacoast defense at forts outside Fort Miley, namely Forts Barry, Cronkhite, and Funston.

The NRHP nomination does not list any character-defining features of the Coast Defense Searchlight Power Plant and three fire control stations, nor does it address their integrity. The NRHP does note, however, that two of the fire control stations did not “lend themselves to interpretation” because they were inaccessible and hidden by overgrown vegetation.

## **Battery 243 (FI-4)**

### ***Background***

Out of all the extant batteries at Fort Miley, Battery 243 was the last constructed. Completed in 1944, the battery was located west of Battery Chester and consisted of a reinforced concrete magazine structure and two circular, concrete gun emplacements to the north and south. The magazine structure was concealed by a human-made earthen embankment and contained a mine control command center at the interior. Two 6-inch rapid-fire guns were added to the emplacements in 1948. Unlike the concrete parapets protecting the other guns at Fort Miley, the guns at Battery 243 were protected by steel shields. The guns at Battery 243 were deemed obsolete and dismantled by 1950. The guns at Battery 243 protected the mine fields off the coast from enemy mine-sweepers.

### ***Significance, Character-Defining Features, and Integrity***

Battery 243 is listed in the NRHP as a contributor to the Fort Miley Military Reservation Historic District, significant at the national level because it represents the last phase of the “traditional concept” of coastal defense (Thompson 1980). Additionally, Battery 243 was the only 6-inch gun battery of its kind in the GGNRA.

The NRHP nomination does not list any character-defining features of Battery 243. The NRHP nomination notes that the southernmost gun emplacement at Battery 243 was modified to serve as a decorative platform for a flagpole.

In 2013, the integrity of Battery 243 is diminished by overgrown trees and vegetation within the gun emplacements’ fields of fire, reducing the structure’s ability to convey its significance as gun emplacements. Other issues that contribute to the diminished integrity of Battery 243 include inappropriate modification of the southernmost gun emplacement into a decorative flag platform. Battery 243 appears to be in fair condition. Despite its diminished integrity, Battery 243 continues to be able to convey its significance as a seacoast defense structure.

## **Earthworks**

### ***Background***

The NRHP nomination mentions an area southwest of Battery 243 that contained earthworks reinforced by sandbags of concrete. The history of the earthworks is unknown, although the NRHP nomination surmises that they may have been associated with the post–Pearl Harbor emergency buildup of coast fortifications.

### ***Significance, Character-Defining Features, and Integrity***

The NRHP nomination does not call out the earthworks as being significant.

## **4.3.4 SFVAMC Historic District**

The NHPA Baseline Documentation package includes the 2009 NRHP nomination, 2011 photo survey, previous Section 106 consultation materials, and an expanded discussion of the character and integrity of the SFVAMC Historic District (AECOM 2011). The following discussion of the

district was adapted from the Baseline Documentation, which can be consulted for additional detail.

Construction of the SFVAMC hospital and diagnostic center began in 1933, and the hospital was dedicated in November of 1934. In 1934, the SFVAMC consisted of 21 concrete buildings, designed in the Art Deco style with Mayan-inspired ornamentation. The original SFVAMC Fort Miley Campus was designed by VA architects and built by the Herbert M. Baruch Corporation. The buildings were clustered in the northern and eastern sections of the lushly landscaped Campus to lessen the impact on the adjacent neighborhood, as well as to provide space for patient convalescence and recreation.

A considerable amount of the original SFVAMC budget was devoted to creating lawn areas and semiformal landscaping around the principal buildings. Other, less ornamental expanses of grass were planted adjacent to most of the other original SFVAMC Fort Miley Campus buildings that were constructed in 1934 or shortly thereafter. These served as buffers between the buildings and the internal circulation system of roads and walkways. The lawns also performed the function of softening the impact of the rather large concrete buildings on the surrounding landscape. Lawns still exist adjacent to Buildings 2, 3, 5, 7, 8, 9, 10, 11, and 18.

The SFVAMC Historic District was determined eligible for listing in the NRHP under Criteria A and C in 1980 by the VA Historic Preservation Officer, which was corroborated by the Keeper of the NRHP with a formal Determination of Eligibility Notification, signed in May 1987. The Historic District was listed in the NRHP under Criteria A and C in April 2009. The 2009 listing states that the district “qualifies under Criteria [*sic*] C due to its integrity as a very early example of a federal building designed with seismic-resistant building technologies and for the design of its Mayan Art Deco ornamentation. It demonstrates integrity under Criteria [*sic*] A due to its significance as a site of one of the early standardized VA hospitals” (Bright and Bamburg 2009).

The Historic District contains 14 contributing buildings and structures (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 18, 20, and the flag pole and base) and nine noncontributing buildings or structures (14, 25, 26, 31, 32, 33, 202, 210, and 212) set on 12 acres of the overall 29-acre SFVAMC Fort Miley Campus (see Exhibit 6, “SFVAMC Historic District”). The nomination is not explicit about which physical or intangible qualities of the district compose the character-defining features of the district; however, extrapolating from the statement of significance, the three character-defining features of the Historic District are described in the following paragraphs.

- The Historic District’s ongoing operations as a VA medical facility would be a key character-defining feature that conveys its significance as an early VA hospital.
- The structural system of each of the contributing buildings constructed during the 1934 building campaign would be a seldom seen but critically important quality that allows the Historic District to represent an early example of seismic-resistant building technologies.
- The architectural qualities that convey the Historic District’s significance as an example of Mayan Art Deco design include the “play between horizontal and vertical [that] is balanced with bold, horizontal podiums and thick concrete walls playing off delicate terra cotta ornament and strong vertical lines” (NRHP Nomination Section 7, Page 1 of 13). Dramatic



Source: AECOM

- massing and proportions, centrally located entrances that are embellished with terra cotta design motifs, towers with stepped parapets projecting above rooflines, and molded and inscribed terra cotta ornamentation that is inspired by historic Mayan designs are all mentioned in the nomination’s description of the architectural significance of the Historic District.

The nomination also recognizes that “Several major building campaigns since 1934 have dramatically altered the semi-pastoral character of the SFVAMC Fort Miley Campus by adding over a dozen buildings whose design and locations do not support the design plan of the original Campus. The large size of many of these new buildings, combined with their awkward siting and incompatible materials and design, have harmed the overall integrity of the original Campus. In addition, many of the original 1934 buildings have been unsympathetically altered, particularly those that have received large additions” (Bright and Bamburg 2009).

Some historic landscaping features were removed by the time that the Historic District was listed, including the large garden and horseshoe-shaped driveway for patient drop off located south of Building 2, which had served as the primary landscaped feature on the SFVAMC Fort Miley Campus (see Exhibits 7 A–D, “Historic Development”).

A secondary landscaped area east of Building 1 was replaced by surface parking in 1964, and all that remains is the memorial flagpole structure. The triangular patch of lawn fronting Clement Street between 42nd and 43rd Avenues and the strips of lawn buffering Buildings 2, 3, 5, 7, 8, 9, 10, 11, and 18 (all of which are contributors to the Historic District) are all that remain from a once extensively landscaped campus.

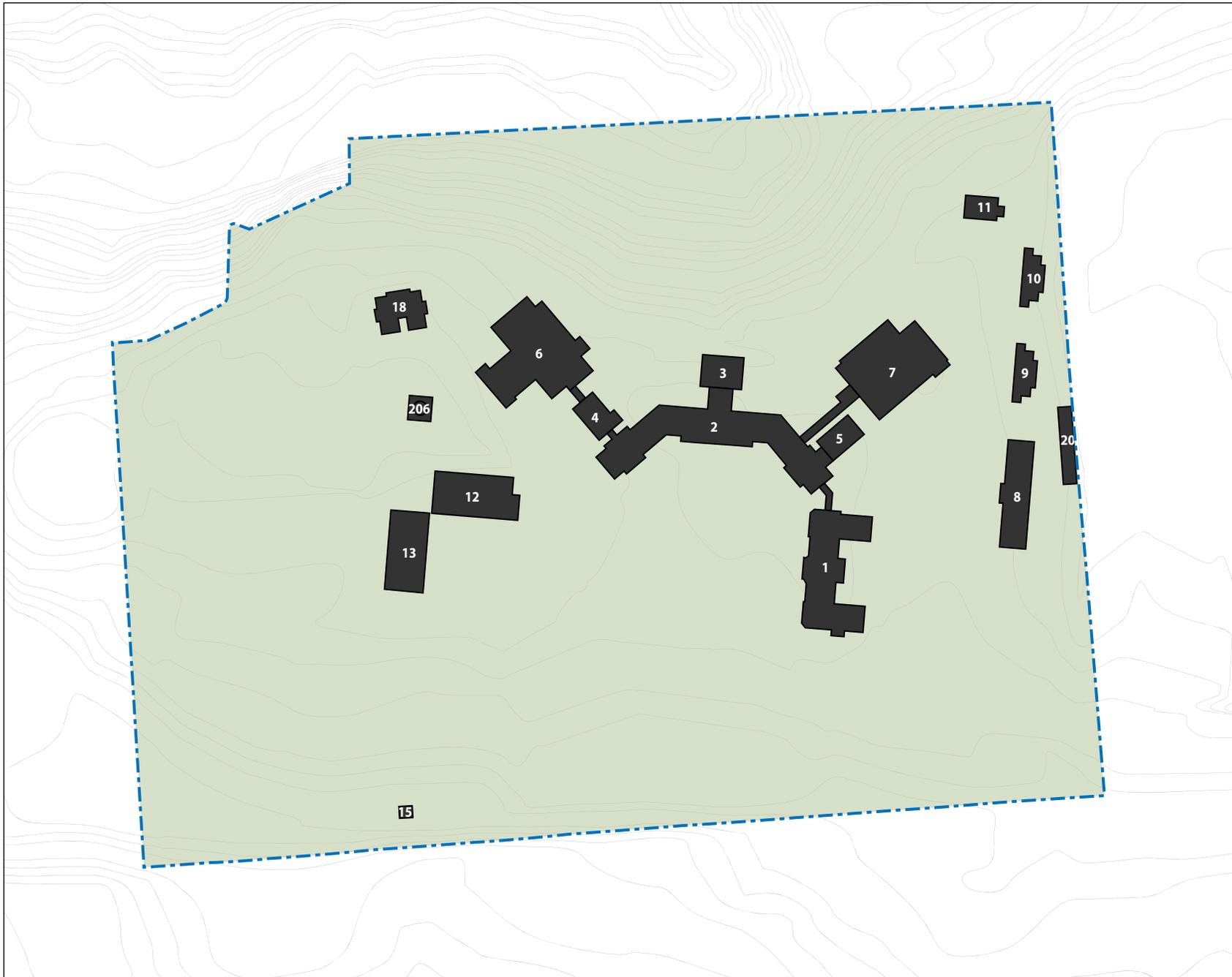
There are also several sections of the current SFVAMC Fort Miley Campus that, while not landscaped, feature stands of trees and scrub. These areas are largely confined to the edges of the Campus, on steep slopes or other non-buildable sections. Following the SFVAMC hospital dedication in 1934, all sections of the Campus that were not developed or formally landscaped—including much of the western part of the Campus, the northern slope, and a patch near the water tower—were allowed to grow wild. Although this semi-wild vegetation was not formally planted and does not contribute to the understanding of the historic uses of Fort Miley or the SFVAMC, it forms a green buffer between the institution, the Outer Richmond neighborhood, GGNRA, and Fort Miley Military Reservation Historic District.

The SFVAMC Historic District is most easily understood when viewed from the open area located between the east side of Building 1, the south side of Building 2, the west sides of Buildings 8 and 9, and from the picnic area and portion of Veterans Drive that borders the north slope between Building 10 and Building 18. From these locations, the viewer primarily sees the historic buildings and how they interrelate, which in turn conveys the facility’s significance as a 1930s Veteran’s hospital. When viewed from the entry to the SFVAMC Fort Miley Campus, or from the remainder of Veterans Drive (the western and southern segments), the buildings introduced during the 1964 construction campaign are visually dominant, to the point where the historic facility is completely obscured.

# San Francisco VA Medical Center

## LEGEND

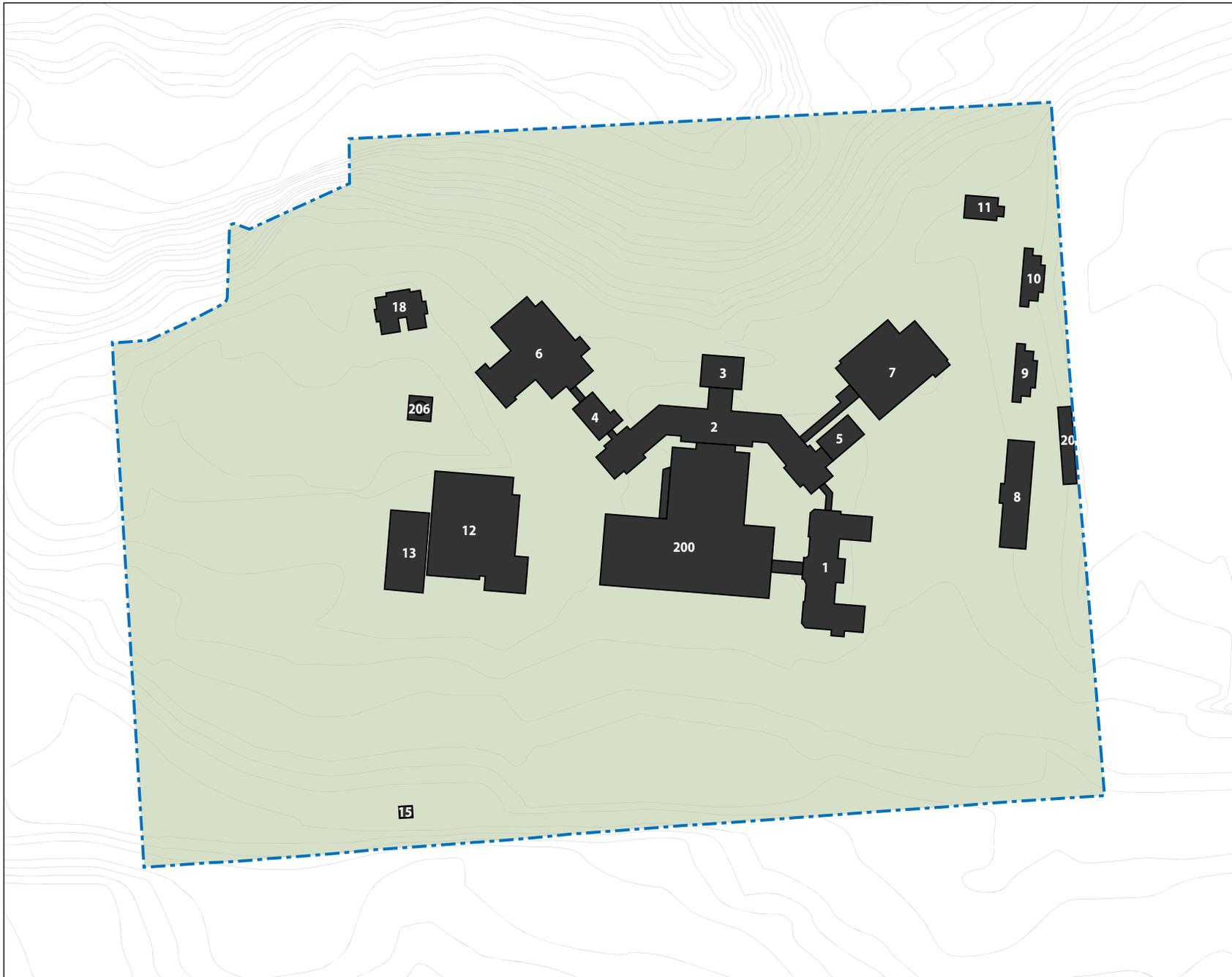
— Site Boundary



# San Francisco VA Medical Center

## LEGEND

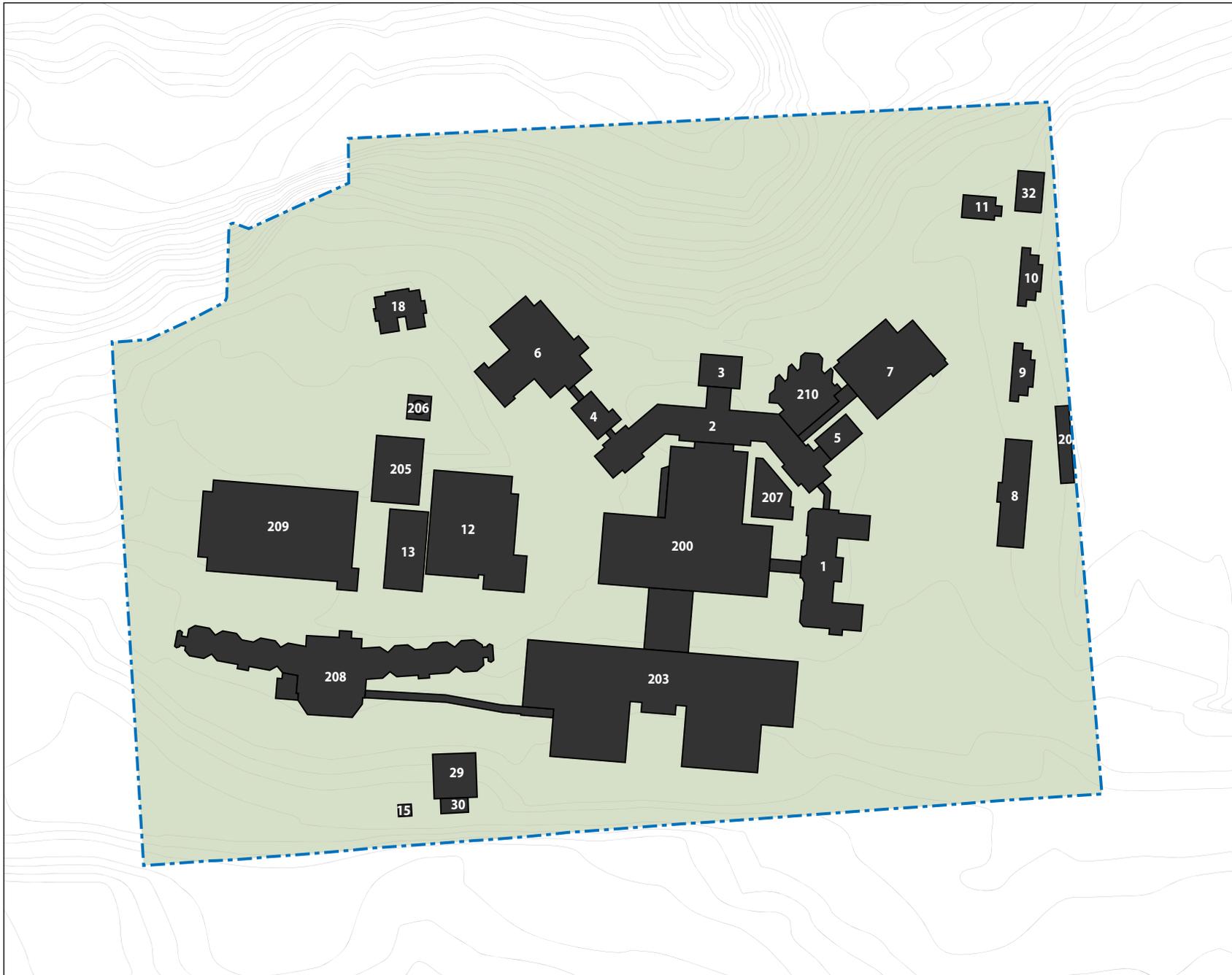
--- Site Boundary



# San Francisco VA Medical Center

## LEGEND

--- Site Boundary



# San Francisco VA Medical Center

## LEGEND

--- Site Boundary



## **5. APPLICATION OF THE CRITERIA OF ADVERSE EFFECT**

---

### **5.1 CRITERIA FOR ASSESSING PROJECT EFFECTS**

#### **5.1.1 Regulatory Framework**

##### **National Historic Preservation Act of 1966**

The NHPA established the Advisory Council on Historic Preservation (ACHP), authorized the Secretary of the Interior to maintain the NRHP, directed the Secretary of the Interior to approve state historic preservation programs that provide for a SHPO, established a National Historic Preservation Fund program, and codified the National Historic Landmarks program.

Section 106 of the NHPA requires that federal agencies take into account the effects of their actions (referred to as “undertakings” under Section 106) on properties that may be eligible for or listed in the NRHP, and afford the ACHP a reasonable opportunity to comment.

##### **Section 106 of the National Historic Preservation Act of 1966**

Section 106 of the NHPA and its implementing regulations (36 CFR 800, as amended in 1999) requires federal agencies to consider the effects of their undertakings, or those they fund or permit, on properties that may be eligible for listing, or are listed in the NRHP.

The regulations implementing Section 106 call for considerable consultation with the SHPO, Indian tribes, and interested members of the public throughout the process. The four principal steps are as follows:

1. Initiate the Section 106 process, including a plan for public involvement. (36 CFR 800.3)
2. Identify historic properties, consisting of those resources within an APE that are eligible for inclusion in the NRHP. (36 CFR 800.4)
3. Assess the effects of the undertaking to historic properties in the APE. (36 CFR 800.5)
4. Resolve adverse effects. (36 CFR 800.6)

Adverse effects on historic properties often are resolved through preparation of a memorandum of agreement (MOA) or a programmatic agreement developed in consultation between the lead federal agency, the SHPO, Indian tribes, and interested members of the public. The ACHP is also invited to participate.

The LRDP is an undertaking that is subject to Section 106 of the NHPA because implementation of this proposed undertaking would be a federal action with the potential to affect NRHP-eligible properties. VA is the lead federal agency responsible for compliance with Section 106 of the NHPA. Section 106 requirements are being met in accordance with the VA Cultural Resource Management Checklist, which outlines the regulatory requirements and documentation standards for project review (VA 2009).

Per the requirements of the NHPA, VA has initiated consultation under Section 106 of the NHPA with the SHPO to solicit comments on the proposed undertaking.

## 5.2 EFFECTS ASSESSMENT

### 5.2.1 Assessment Methods

The NHPA Section 106 criteria for assessing adverse effects provide the framework for assessing how projects affect the historic properties located within the APE. According to 36 CFR 800.5, undertakings would have an adverse effect on historic properties if the project impairs the characteristics that qualify a property for inclusion in the NRHP.

Thus, there is a direct relationship between understanding why a resource is eligible for listing in the NRHP, which physical characteristics are important in conveying that historical significance, and the assessment of project effects. This relationship is typically discussed in terms of historical integrity, which is a historic property's ability to convey its significance to a viewer by virtue of retaining those aspects of location, design, materials, workmanship, feeling, setting, and association that are necessary for the viewer to understand the property's historically significant role.

When considering a historic district, the integrity of the whole is considered paramount to the individual integrity of any one component (unless there are individually eligible buildings, structures, or objects present). Thus, in some cases, actions that would result in an impairment of the integrity of an individually eligible building or structure may not be considered actions that would impair the integrity of a historic district, depending on the reasons that the district is eligible in the first place.

Although by no means comprehensive, the following is a list of actions that typically result in a finding of adverse effect on a historic property:

- Physical destruction of or damage to all or part of the property.
- Alteration of the property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (36 CFR 68) and applicable guidelines.
- Removal of the property from its historic location.
- Changing the character of the property's use or of physical features within the property's setting that contribute to its historic significance.
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features.
- Neglect of the property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization.

- Transfer, lease, or sale of the property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

## **5.2.2 Archaeology**

### **Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative**

#### *Near-Term Projects*

Alternative 1 near-term projects would include the LRDP Phase 1 projects located at the SFVAMC Fort Miley Campus. The archaeological research conducted indicates that no prehistoric or historic-era archaeological sites, features, artifacts, or human remains have been documented within the existing SFVAMC Fort Miley Campus and no archaeological resources are known within the Campus. Therefore, no archaeological historic properties would be affected. Although no documented archaeological resources or human remains are known to be present within the existing Campus, buried or otherwise obscured and undocumented significant prehistoric and historic-era archaeological resources or human burials may be present within the Campus, and thus, could be affected by construction activities.

It is recommended that if an MOA is prepared to resolve adverse effects on non-archaeological properties, that stipulations should be included to specify procedures for the identification and treatment of archaeological resources and burials in the event that such resources are discovered during construction activities. An archaeological treatment plan that describes archaeological procedures, notification and consultation requirements, professional qualifications requirements, and procedures for the disposition of artifacts if any are discovered, should be appended to the MOA.

#### *Long-Term Projects*

Alternative 1 long-term projects would include the LRDP Phase 2 projects located at the SFVAMC Fort Miley Campus. Archaeological research conducted indicates that no prehistoric or historic-era archaeological sites, features, artifacts, or human remains have been documented within the existing Campus, and no archaeological resources are known within the Campus. Therefore, no archaeological historic properties would be affected. Although no documented archaeological resources or human remains are known to be present within the existing Campus, buried or otherwise obscured and undocumented significant prehistoric and historic-era archaeological resources or human burials may be present within the Campus, and thus, could be affected by construction activities.

The stipulations in an MOA (if prepared) and an archaeological treatment plan recommended for the near-term projects should also be applied to the long-term projects.

### **Alternative 2: SFVAMC Fort Miley Campus Plus Mission Bay Campus Alternative**

#### *Near-Term Projects*

Alternative 2 near-term projects would be the same as Alternative 1 near-term projects. Therefore, the Alternative 2 near-term project effects are the same as those described under Alternative 1 near-term project effects.

### ***Long-Term Projects***

Alternative 2 long-term projects would include the LRDP Phase 2 projects located at the SFVAMC Fort Miley Campus (with the exception of the proposed ACC) as well as a new SFVAMC Mission Bay Campus. The Alternative 2 long-term project effects at the SFVAMC Fort Miley Campus would be similar to those described under Alternative 1 long-term project effects at the SFVAMC Fort Miley Campus, with the exception of those related to the proposed ACC. It is currently unknown if any archaeological historic properties are located within the area of the proposed new SFVAMC Mission Bay Campus. Given the highly developed nature of the Mission Bay area, it likely has low sensitivity for subsurface prehistoric resources, but this has not been demonstrated. No archaeological records search, pedestrian survey, or test excavations have been conducted in the area of Mission Bay, where a new campus would possibly be constructed. The Mission Bay area's sensitivity for historic-era archaeological resources is unknown. Project-related ground-disturbing activities could have an adverse effect on both prehistoric and historic-era archaeological properties; however, there is not enough evidence available to determine if specific properties would be affected. Therefore, no finding of effect is possible at this time.

### **5.2.3 Fort Miley Military Reservation Historic District**

#### **Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative**

Implementation of the proposed LRDP would not result in any physical changes to the Fort Miley Military Reservation Historic District. Although the LRDP proposes development along the border between West and East Fort Miley and the SFVAMC Fort Miley Campus, buildings have been located along this border since the Fort Miley post was constructed in 1902; hospital facilities have been located along this border since 1934; and temporary military buildings and a large parking lot were located within the boundaries of East Fort Miley from the early 1940s to the late 1960s or early 1970s. Thus, the setting and association of the Fort Miley Military Reservation Historic District would not be substantively changed from historic or current conditions. As such, implementation of the LRDP would result in no adverse effect on the Fort Miley Military Reservation Historic District.

### ***Near-Term Projects***

Alternative 1 near-term projects correspond to the LRDP Phase 1 projects. Construction activities would occur outside of and adjacent to the boundaries of the Fort Miley Military Reservation Historic District, including the construction of two new buildings during Phases 1.3 (Building 22 Hoptel) and 1.5 (Building 24 Mental Health Clinic Expansion). These projects would introduce atmospheric and visual changes; however, even after these changes, the Fort Miley Military Reservation Historic District would retain its integrity of location, design, materials, workmanship, association, character, and setting, and the Historic District would continue to convey its significance as part of the military defense system of San Francisco. Therefore, there would be no adverse effect on the Fort Miley Military Reservation Historic District.

Section 6 discusses how individual LRDP phases would affect individual contributing features and other characteristics of the Historic District.

### ***Long-Term Projects***

Alternative 1 long-term projects would include the LRDP Phase 2 projects located at the SFVAMC Fort Miley Campus. Construction activities would occur outside of Fort Miley Military Reservation Historic District boundaries, including the construction of one new building during Phase 2.3 (Mental Health Research Expansion). This project would introduce atmospheric and visual changes; however, even after these changes, the Fort Miley Military Reservation Historic District would retain its character-defining features and would continue to convey its significance as part of the military defense system of San Francisco. Therefore, there would be no adverse effect on the Fort Miley Military Reservation Historic District.

### **Alternative 2: SFVAMC Fort Miley Campus Plus Mission Bay Campus Alternative**

#### ***Near-Term Projects***

Alternative 2 near-term projects would be the same as Alternative 1 near-term projects. Therefore, the Alternative 2 near-term project effects are the same as those described under Alternative 1 near-term project effects. Alternative 2 near-term projects would have no adverse effect on the Fort Miley Military Reservation Historic District.

#### ***Long-Term Projects***

The Alternative 2 long-term projects and associated effects at the SFVAMC Fort Miley Campus would be similar to the Alternative 1 long-term projects, except that the proposed ambulatory care center would not be constructed and construction activities would occur in the Mission Bay area, which is far removed from the Fort Miley Military Reservation Historic District. This alternative would have no adverse effect on the Fort Miley Military Reservation Historic District.

### **5.2.4 SFVAMC Historic District**

The projects included in the LRDP are planned projects, and design details have not been developed. Section 106 review of planned projects necessarily focuses on how project activity types may affect historic properties based on an understanding of the type of project and the character of the historic property. As project details are developed, further Section 106 review will be necessary to determine whether adverse effects have been avoided through application of the *Secretary of the Interior's Standards for the Treatment of Historic Properties* or similar preservation treatment guidance.

Overall, projects that do not change the characteristics that qualified the SFVAMC Historic District for listing in 2009 will be assessed as having minimal or no effect on the integrity of the Historic District. More specifically, projects that diminish a viewer's ability to understand the Historic District's significance as defined in the NRHP nomination—as a medical facility for American Veterans, as a 1930s seismically resistant structural design, or as an example of Mayan Art Deco stylistic influences—would be deemed as having a negative effect on the integrity of the Historic District.

### **Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative**

Implementation of the LRDP would result in an adverse effect on the SFVAMC Fort Miley Campus Historic District because of the cumulative impairment of the integrity of materials, design, feeling, and setting of the Historic District. Although no single LRDP project would result

in an adverse effect on its own, the future state of the Historic District will have been impaired by the combination of physical changes to individual contributing buildings, introduction of new facilities within the Historic District, and changes to the setting of the Historic District resulting from the densification of the Campus (see Exhibit 8, “Massing Comparison”).

The LRDP includes seismic retrofit of Buildings 1, 5, 6, 7, 8, 9, 10, 11, and 13. With the exception of Building 13, the other eight buildings are SFVAMC Historic District contributors, and proposed activities would be within the SFVAMC Historic District. The seismic retrofit would physically alter the contributors and may require changes to the original design, materials, and workmanship of the buildings and affect their ability to convey their historical significance. Alteration or loss of character-defining elements of contributing buildings during seismic upgrade activities would contribute to the LRDP’s adverse effect on the Historic District.

The LRDP also includes new construction within the SFVAMC Historic District, and new construction immediately adjacent to the Historic District. New construction has the potential to introduce design elements, building materials, and massing that would be out of character with the qualities that qualify the Historic District for listing in the NRHP. Disrupting the character of the Historic District with new, incompatible construction would impair the Historic District and contribute to the LRDP’s adverse effect on the Historic District.

Two of the projects in the LRDP would require demolition of contributing buildings within the SFVAMC Historic District. The historical Campus has already endured the loss of many of the original buildings, making each of the remaining buildings critical to the Historic District’s ability to convey its historical significance. Loss of contributing buildings would contribute to the LRDP’s adverse effect on the Historic District.

Section 6 discusses how LRDP activities would result in impairment of individual contributing buildings and other characteristics of the Historic District.

### ***Near-Term Projects***

This section includes a description of the Alternative 1 near-term (Phase 1) project components that are proposed under the LRDP. A discussion of effects on individual contributors is provided in Section 6.

#### ***Phase 1.1 Building 41 Research***

Phase 1.1 would construct a large two-story building adjacent to the SFVAMC Historic District, to the south and slightly west of Building 6. This would introduce a new visual element in close vicinity to the SFVAMC Historic District, but outside of the Historic District boundaries. This phase also includes the demolition of Building T-17, a noncontributor to the Historic District.

#### ***Phase 1.2 Emergency Operations Center and Building 211 Parking Garage Expansion***

Phase 1.2 would construct a five-story parking structure west of Building 18, a contributor. The Emergency Operations Center would be incorporated into the parking garage building. Construction would take place on the western end of the SFVAMC Fort Miley Campus, outside of and to the rear of the SFVAMC Historic District, which is oriented more to the north and

# San Francisco VA Medical Center

## LEGEND

- - - Site Boundary
- - - National Register Historic District Boundary
- New Construction
- Expansion
- Retrofit
- No Action



Existing Condition



LRDP Buildout

facing the San Francisco Bay. The proposed development would occur outside of the Historic District and would introduce new visual elements to the district.

*Phase 1.3 Building 22 Hoptel and Seismic Retrofit of Buildings 5, 7, 9, 10, 11, and 13*

Phase 1.3 would construct a two-story building behind Buildings 9 and 10 (both contributors) as well as seismically retrofit Buildings 5, 7, 9, 10, 11, and 13. With the exception of Building 13, these buildings are contributors to the SFVAMC Historic District. Also with the exception of Building 13—which is outside of Historic District boundaries—all proposed activities would be conducted within the Historic District. (See Images 17–20 for views of Buildings 5, 7, 9, and 10.)

*Phase 1.4 Patient Welcome Center and Drop-Off Area*

Phase 1.4 would introduce a traffic circle southwest of the south elevation of Building 1, and permanently close through traffic on Veterans Drive. A one-story pavilion would also be constructed on the ground level between Buildings 200 and 203, extending out toward Building 1. A traffic circle and drop-off area that would be introduced in the front would require taking out part of the roadway and replacing it with a garden.

The planned construction would take place inside the SFVAMC Historic District boundaries and would introduce new visual elements to the Historic District. The location of the planned construction within the Historic District has already been altered in recent years through the construction of Buildings 200 and 203, and the parking lot near Building 1. (See Image 21 for a view of Building 1.)

*Phase 1.5 Building 24 Mental Health Clinic Expansion*

Phase 1.5 would construct a three-story building behind Building 8 (a contributor). Building 20 (a contributor) would be demolished as part of this phase. All proposed construction would occur within the SFVAMC Historic District boundaries. The planned development would alter the look and feel of the Historic District by removing a contributing resource and introducing modern elements into a part of the Historic District that is mostly intact and features a high level of integrity of setting and design. (See Images 22–23 for views of Buildings 8 and 20.)

*Landscaping and Open Space Areas*

As part of this alternative, several trees would be removed and replaced with trees that are more adaptable to the climate. None of the individual trees within the Historic District are contributors.

The LRDP includes a Landscape Concept to provide guidance for future landscape improvements throughout the existing SFVAMC Fort Miley Campus, within and outside of the SFVAMC Historic District boundaries. The goals of the Landscape Concept are to:

- Reinststate a landscape character of dignity, quality, and professionalism that honors America’s Veterans and communicates the excellent standards of the Campus.
- Create a landscape that supports health and healing.
- Promote good relations with Campus neighbors.
- Create a welcoming environment.

Integrate sustainability.



Image 17: Building 5, looking southwest from the East Entrance between Buildings 5 and 7. Building 5 will undergo a seismic upgrade during Phase 1.3. (AECOM 2011)



Image 18: Building 7, looking northeast from surface parking lot between Buildings 1 and 9. Building 7 will undergo a seismic upgrade during Phase 1.3. (AECOM 2011)



Image 19: Building 9, looking east from the parking lot. Building 9 will undergo a seismic upgrade during Phase 1.3. Introduction of Building 22 to the east may impair the integrity of Building 9. (AECOM 2011)



Image 20: Building 10, looking north from the sidewalk to the west of Building 9. Building 10 will undergo a seismic upgrade during Phase 1.3. Introduction of Building 22 to the southeast may impair the integrity of Building 10. (AECOM 2011)

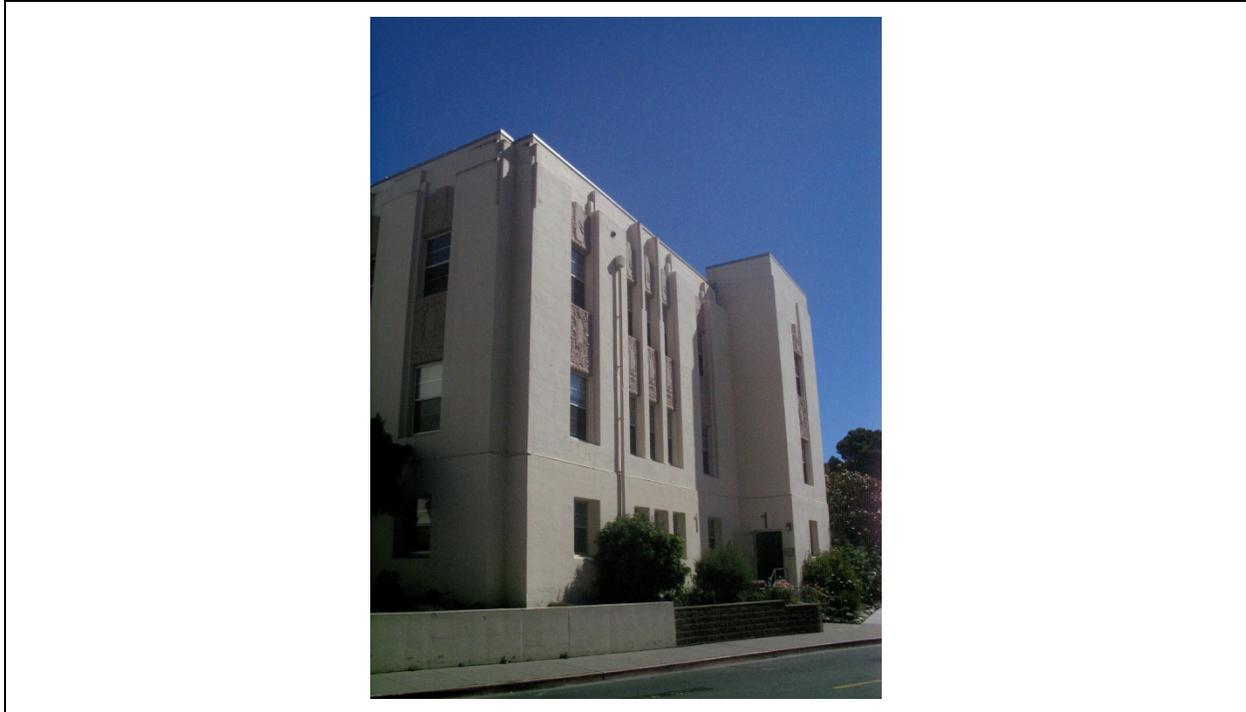


Image 21: Building 1, looking east from the future location of the Welcome Center. During Phase 1.4, a traffic circle will be introduced southwest of Building 1. Building 1 will undergo a seismic upgrade during Phase 2.4. (Photograph taken by AECOM in 2010)



Image 22: Building 8, looking southeast from the parking lot. Building 8 will undergo a seismic upgrade during Phase 2.4. Introduction of Buildings 23 and 24 to the east may impair the integrity of Building 8. (AECOM 2011)

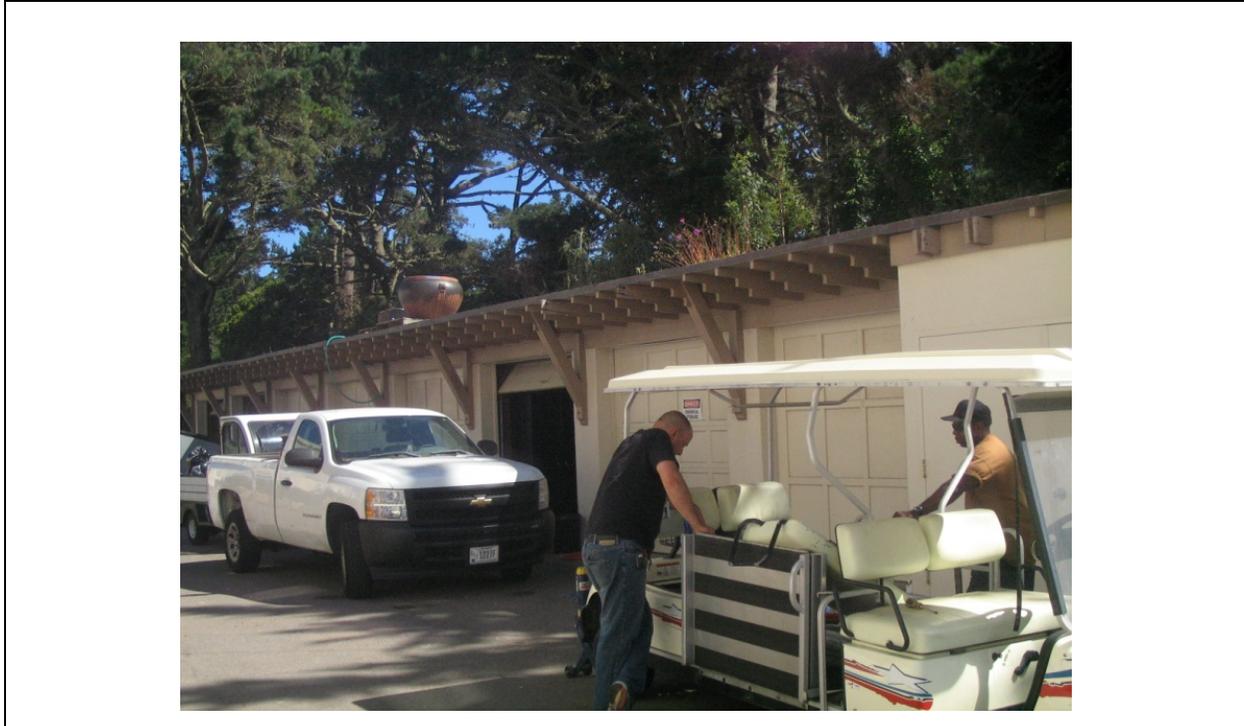


Image 23: Building 20, looking northeast from driveway behind (east of) Building 8. Building 20 will be demolished during Phase 1.5. (Photograph taken by AECOM in 2010)

According to the NRHP nomination, the SFVAMC Fort Miley Campus originally included extensive and semiformal landscaping throughout the site. Major landscaping included a large garden and horseshoe-shaped patient drop-off driveway near the entry to Building 2, and landscaping east of Building 1 (Bright 2008). Most of the original Campus landscaping has been removed, and currently, only remnants of the original hardscape and vegetation remain in place, including patches of lawn and some individual trees that are not character-defining features. The removal of this formal landscaping has resulted in an overall loss of integrity to the SFVAMC Historic District's landscaping, and any sense of cohesion involving the original Campus landscaping has been lost.

The goals of the Landscape Concept are consistent with the design intent of the historical landscaping plan for the Campus, which included a formal layout that welcomed patients and visitors and that encouraged healing through enjoyment of the gardens and grounds. Future landscape treatments that adhere to these goals are likely to benefit the overall integrity of the Historic District by reintroducing a more cohesive and formal landscape plan that supports health and healing and establishes a welcoming environment.

### **Long-Term Projects**

This section includes a discussion of the Alternative 1 long-term projects (Phase 2) that are proposed under the LRDP. A discussion of effects on individual contributors is provided in Section 6.

***Phase 2.1 Operating Room Expansion (D-Wing)***

This phase would include an addition of a D-wing on Building 200, which is located outside of the Historic District. The planned construction would occur outside and to the south of the SFVAMC Historic District boundaries. The proposed development would occur outside of the Historic District and would introduce new visual elements adjacent to the district; however, the construction would not substantially alter the existing scale and character of the SFVAMC Fort Miley Campus.

***Phase 2.2 IT Support Space Expansion (Building 207)***

This phase would construct an addition on Building 207, located outside of the Historic District. The planned construction would occur outside and to the south of the SFVAMC Historic District boundaries.

***Phase 2.3 Building 23 Mental Health Research Expansion***

Phase 2.3 would construct a three-story building behind Building 8 (a contributor). The planned development would alter the look and feel of the SFVAMC Historic District by introducing modern elements into a part of the Historic District that is mostly intact and features a high level of integrity of setting and design. (See Image 22 for a view of Building 8.)

***Phase 2.4 Building 40 Research***

Phase 2.4 would construct a 5-story building and would involve the demolition of Buildings 12, 14, 18, 21, and T-23. With the exception of Building 18, these are all noncontributors to the SFVAMC Historic District. It would also include the seismic retrofit of Buildings 1, 6, and 8, which are contributors to the Historic District. The planned construction would take place on the west side of the existing SFVAMC Fort Miley Campus, both within and immediately outside of the SFVAMC Historic District boundaries. (See Image 24 for a view of Building 18.)

***Phase 2.5 Ambulatory Care Center***

This phase would include the construction of a five-story building, with a basement, in the northwestern part of the SFVAMC Fort Miley Campus. This would introduce a new visual element in close vicinity to the SFVAMC Historic District, but outside of the Historic District boundaries.

***Swing Space (Temporary)***

Phase 2 would entail bringing temporary, modular units into the northwest parking lot of the SFVAMC Fort Miley Campus, outside of and to the rear of the SFVAMC Historic District. No permanent changes would be made to the Historic District or to its setting.

**Alternative 2: SFVAMC Fort Miley Campus Plus Mission Bay Campus Alternative*****Near-Term Projects***

Alternative 2 near-term projects would be the same as Alternative 1 near-term projects. Therefore, the Alternative 2 near-term project effects are the same as those described under Alternative 1 near-term project effects.



Image 24: Building 18, looking southwest. Building 18 will be demolished during Phase 2.4. (Photograph taken by AECOM in 2010)

### ***Long-Term Projects***

The Alternative 2 long-term projects and associated effects at the SFVAMC Fort Miley Campus would be similar to the Alternative 1 long-term projects, except that the proposed ACC would not be constructed.

The Alternative 2 long-term projects would also involve the development of a new SFVAMC Mission Bay Campus at an as-yet-unknown specific location. The eligibility status of buildings in the Mission Bay area is not currently known. Historic resources surveys for a new Mission Bay Campus site would be completed in conjunction with any future, project-level environmental review at the time a specific site or sites are identified.

Depending on where the project is located and the results of the historic resources surveys conducted for project-level review, proposed development associated with a new SFVAMC Mission Bay Campus could occur in close proximity to historic resources that are 50 years old or older. Given the age of these resources, it is possible they are historically significant and eligible for listing in the NRHP. Proposed development could lead to physical demolition, destruction, relocation, or alteration of potentially significant historic resources. Because the significance of historic resources and their eligibility for listing in the NRHP is not currently known, it is possible that this alternative may impair historic properties and result in an adverse effect.

To minimize adverse effects on significant historic properties, avoidance would be first attempted. However, appropriate mitigation measures for this alternative would need to be

developed upon further consultation with SHPO and in conjunction with any future, project-level environmental review.

## **6. CONCLUSIONS**

---

VA has determined that the proposed undertaking (LRDP) will have an adverse effect on the following historic properties:

- SFVAMC Historic District

See Table 2, “Historic Properties Affected,” for a detailed list of properties and associated effects.

Pursuant to 36 CFR 800.6(a) and 800.6(b)(1), VA will consult with SHPO and Section 106 signatory consulting parties to resolve adverse effects.

The LRDP FOE serves only to obtain SHPO concurrence that the proposed undertaking (LRDP) will have an adverse effect on historic properties. Mitigation measures will be discussed in a separate consultation document along with a draft agreement document. The agreement document will stipulate the terms under which the proposed undertaking will be implemented in order to take into account its effects on historic properties.

**Table 2: Historic Properties Affected**

Property	LRDP Planned Activities	Effect Analysis
Archaeological Sites		No historic properties affected.
No known archaeological sites present in the APE		The potential to encounter buried resources will be addressed through consultation with the SHPO.
Fort Miley Military Reservation Historic District		The LRDP will have no adverse effect on the qualities that make the Fort Miley Military Reservation Historic District eligible for the NRHP. The Fort Miley Military Reservation Historic District is significant for its association with seacoast defense of the strategic harbor of San Francisco; the Historic District will continue to convey this significance after the proposed new construction is completed.
West Fort Miley—Battery James Chester (FI-1, FI-2)		<p>The LRDP will have no adverse effect on the qualities that make Battery Chester eligible as a contributor to the Fort Miley Military Reservation Historic District:</p> <ul style="list-style-type: none"> <li>- Battery Chester is significant for its association with the seacoast defense of the strategic harbor of San Francisco. Battery Chester will continue to convey this significance after the proposed new construction is completed.</li> <li>- As a gun battery intended to defend the coast, Battery Chester has always been oriented toward the coast, away from the SFVAMC. Construction of new buildings behind (east of) Battery Chester will have no effect on the ability of Battery Chester to convey its significance as gun emplacements facing the coast.</li> <li>- Battery Chester has always had its back to buildings, starting with the Fort Miley Garrison in 1902 and the SFVAMC from 1934 to the present. Demolition of existing buildings and construction of new buildings at</li> </ul>

Property	LRDP Planned Activities	Effect Analysis
		<p>the SFVAMC location has been occurring consistently over the last 111 years; there is very little possibility that proposed new construction behind (east of) Battery Chester will have an effect on its ability to convey its significance.</p> <ul style="list-style-type: none"> <li>- There is a significant difference in height between the SFVAMC campus above and Battery Chester below; even without tree cover, only existing buildings (209 and 208) are visible from Battery Chester to the SFVAMC, and there is very little chance that new construction on the westernmost side of the campus (Building 211) will be within the viewshed of Battery Chester.</li> </ul>
<p>East Fort Miley—Batteries LaRhett Livingston (FI-329) and Anton Springer (FI-330)</p>	<p>Phase 1.3 (Building 22) Phase 1.5 (Building 24 Mental Health Clinic Expansion)</p>	<p>There is very little possibility that the LRDP will have an adverse effect on the qualities that make Batteries Livingston and Springer eligible as contributors to the Fort Miley Military Reservation Historic District:</p> <ul style="list-style-type: none"> <li>- Batteries Livingston and Springer are significant for their association with seacoast defense of the strategic harbor of San Francisco. Batteries Livingston and Springer will continue to convey this significance after the proposed new construction is completed.</li> <li>- Buildings have always been located in the area that is now the boundary between the SFVAMC and East Fort Miley, starting with the Fort Miley Garrison in 1902; the SFVAMC from 1934 to the present; and temporary military buildings between World War II and the late 1960s or early 1970s. Construction of new buildings at the SFVAMC, in locations where buildings once existed at the Fort Miley post, or exist today at SFVAMC, will have no effect on the ability of Batteries Livingston and Springer to convey their</li> </ul>

Property	LRDP Planned Activities	Effect Analysis
		<p>significance.</p> <ul style="list-style-type: none"> <li>- Batteries Livingston and Springer were intentionally concealed from the coast and the east by earthen embankments, with the mortar pits sunken in the middle. The only location at Fort Miley in which one can get a sense of the function and use of Batteries Livingston and Springer is in the sunken mortar area, where the SFVAMC, including proposed new construction, is not visible. Thus, there is very little chance that proposed construction at the SFVAMC will have an effect on the ability of Batteries Livingston and Springer to convey their significance.</li> </ul>
<p>East Fort Miley—Ordnance Storehouse (FI-304)</p>	<p>Phase 1.3 (Building 22) Phase 1.5 (Building 24 Mental Health Clinic Expansion)</p>	<p>There is very little possibility that proposed new construction at the SFVAMC will have an adverse effect on the qualities that make the Ordnance Storehouse eligible as a contributor to the Fort Miley Military Reservation Historic District.</p> <ul style="list-style-type: none"> <li>- Because of the narrow scope of significance defined for the building—the Ordnance Storehouse is listed in the NRHP as a contributor to the Historic District for its significance as the sole survivor of the Fort Miley post buildings—proposed new construction will not have an effect on this significance, and the Ordnance Storehouse will continue to convey its significance as the only <i>intact</i> extant example of an original Fort Miley post building. If the Ordnance Storehouse were the only example of an Endicott-era garrison building in the entire GGNRA, there would be a possibility for adverse effect. However, intact examples of Endicott-era garrisons exist, such as the largely intact grouping of garrison buildings at the Endicott-era Fort Baker near Sausalito, constructed at nearly the same time as Fort Miley. Although the current setting of the</li> </ul>

Property	LRDP Planned Activities	Effect Analysis
		<p>Ordnance Storehouse will change, this does not impair the qualities that qualify it for listing in the NRHP as a contributor to the Historic District, and thus this does not meet the threshold of adverse effect.</p>
<p>West Fort Miley—Searchlight Powerhouse (FI-3), Fire Control Station (FI-350), Fire Control Station (FI-351), Fire Control Station (FI-352)</p>		<p>The LRDP will have no adverse effect on the qualities that make the Coast Defense Searchlight Power Plant and three fire control stations contributors to the Fort Miley Military Reservation Historic District:</p> <ul style="list-style-type: none"> <li>- The Coast Defense Searchlight Power Plant and three fire control stations are significant as “representative of the continued improvements of harbor defense down through World War II” (Thompson 1980). The Coast Defense Searchlight Power Plant and three fire control stations will continue to convey this significance after the proposed new construction is completed.</li> <li>- There is a significant difference in height between the SFVAMC campus above and the Coast Defense Searchlight Power Plant and three fire control stations below. Even without tree cover, only existing buildings (209 and 208) are visible from the Coast Defense Searchlight Power Plant to the SFVAMC, and there is very little chance that new construction on the westernmost side of the campus (Building 211) will be within the viewshed of the power plant. The fire control stations—especially the two located down slope from Battery Chester—are too far downhill to be affected by proposed construction at the SFVAMC.</li> </ul>
<p>West Fort Miley—Battery 243 (FI-4)</p>		<p>The LRDP will have no adverse effect on the qualities that make Battery 243 eligible as a contributor to the Fort Miley Military Reservation Historic District.</p> <ul style="list-style-type: none"> <li>- Battery 243 is significant for its association with the seacoast defense of the strategic harbor of</li> </ul>

Property	LRDP Planned Activities	Effect Analysis
		<p>San Francisco during World War II, specifically as the last phase of the “traditional concept” of coastal defense, and as the only 6-inch gun battery of its kind in the GGNRA. Battery 243 will continue to convey this significance after the proposed new construction is completed.</p> <ul style="list-style-type: none"> <li>- As a gun battery intended to defend the coast, Battery 243 has always been oriented toward the coast, away from the SFVAMC. Construction of new buildings behind (east of) Battery 243 will have no effect on the ability of Battery 243 to convey its significance as gun emplacements facing the coast.</li> <li>- Battery 243 has had its back to the SFVAMC from 1934 to the present. Demolition of existing and construction of new buildings at the SFVAMC location has been occurring consistently since Battery 243 was introduced in 1944; there is very little possibility that proposed new construction behind Battery 243 will have an effect on its significance.</li> </ul>
West Fort Miley—Unidentified earthworks		The LRDP will have no effect on the earthworks because they do not qualify as contributors to the Fort Miley Military Reservation Historic District, nor are the individually eligible for listing in the NRHP.

Property	LRDP Planned Activities	Effect Analysis
SFVAMC Historic District		Adverse effects would occur due to the introduction of new visual elements, demolition of contributing elements of the District, and physical alteration of contributing elements (unless projects are designed in accordance with the <i>Secretary of the Interior’s Standards for the Treatment of Historic Properties</i> ).
Building 1 (Administration, Research)	Phase 1.4 (Patient Welcome Center and Drop-Off Area)  Phase 2.4 (Seismic Retrofit of Buildings 1, 6, 8)	Physical alteration of the building (seismic upgrade). The feeling and setting of Building 1 would be changed by the introduction of the patient drop-off and closure of Veterans Drive to through traffic. However, this is likely to result in an improvement to the historical integrity of setting and feeling by reintroducing a formal landscape element evocative of those that were lost with the 1965 building campaign.
Building 2 (Administration, Clinics, Research)	Phase 2.1 (Operating Room expansion D-wing)  Phase 2.2 (IT Support Space expansion-Building 207)	Vertical expansion of the buildings currently located south of Building 2 would cause a minimal change to the integrity of setting and feeling in comparison with the introduction of massive Building 200 in the original landscaped entry to Building 2.
Building 3 (Engineering)	None	The LRDP does not include physical alterations of Building 3, or any project activities in the vicinity that would affect the setting, feeling, or association of Building 3.
Building 4 (Research)	Phase 1.1 (Building 41 Research)  Phase 2.4 (Demolition of Buildings 12, 18, 21, T-23 and removal of Building 14)  Phase 2.5 (Ambulatory Care Center)	The introduction of Building 41 and the replacement of Building 12 with the Ambulatory Care Center will alter the setting of Building 4 by introducing a concentration of building masses where currently, there is visual and pedestrian openness. This change in setting would not impair the architectural qualities of the Historic District, but would contribute to the overall impairment of the District’s integrity of feeling and setting.

Property	LRDP Planned Activities	Effect Analysis
Building 5 (Clinic, Research)	Phase 1.3 (Seismic Retrofit of Buildings 5, 7, 9, 10, 11, and 13)	Physical alteration of the building (seismic upgrade).
Building 6 (Research, Library)	Phase 1.1 (Building 41 Research) Phase 1.1 (Removal of Building T-17) Phase 2.4 (Seismic Retrofit of Buildings 1, 6, 8) Phase 2.4 (Building 40 Research) Phase 2.4 (Removal of Buildings 14, 18, 21, T-23, and 12) Phase 2.5 (Ambulatory Care Center)	Physical alteration of the building (seismic upgrade).  The integrity of feeling and setting would be improved through the removal of Buildings 14, T-17, 21, and 23. However, the integrity of feeling and setting would be impaired by the introduction of Buildings 40 and 41, which would introduce a concentration of building masses to an area that is less densely developed. Currently, Building 6 is the most prominent building at the western end of the Historic District. Buildings 40 and 41 would change the scale, massing, and site plan rhythm of the western end of the Historic District.
Building 7 (Various)	Phase 1.3 (Seismic Retrofit of Buildings 5, 7, 9, 10, 11, and 13)	Physical alteration of the building (seismic upgrade).
Building 8 (Mental Health Clinic)	Phase 1.5 (Building 24 Mental Health Clinic Expansion) Phase 1.5 (Removal of Building 20) Phase 2.3 (Building 23 Mental Health Research Expansion) Phase 2.4 (Seismic Retrofit of Buildings 1, 6, 8)	Physical alteration of the building (seismic upgrade). Demolition of Building 20, a contributor to the Historic District, would alter the setting and association of the building. Introduction of two buildings behind Building 8 may impair the design, workmanship, feeling, and setting of Building 8 if the new designs visually overpower the historic building or if connections between the buildings are not designed sensitively.

Property	LRDP Planned Activities	Effect Analysis
Building 9 (Hoptel)	Phase 1.3 (Seismic Retrofit of Buildings 5, 7, 9, 10, 11, and 13) Phase 1.3 (Building 22 Hoptel)	Physical alteration of the building (seismic upgrade). Building 22 would be built immediately adjacent to Buildings 9 and 10 and had the potential to affect the design, workmanship, feeling and setting of those two buildings or the Historic District. However, Building 22 has been designed in accordance with the Secretary of the Interior’s treatment standards. Previous project-level Section 106 consultation concluded that Building 22 would have no adverse effect on the Historic District.
Building 10 (Hoptel)	Phase 1.3 (Seismic Retrofit of Buildings 5, 7, 9, 10, 11, and 13) Phase 1.3 (Building 22 Hoptel)	Physical alteration of the building (seismic upgrade). Building 22 would be built immediately adjacent to Buildings 9 and 10 and had the potential to affect the design, workmanship, feeling and setting of those two buildings or the Historic District. However, Building 22 has been designed in accordance with the Secretary of the Interior’s treatment standards. Previous project-level Section 106 consultation concluded that Building 22 would have no adverse effect on the Historic District.
Building 11 (Research/Offices)	Phase 1.3 (Seismic Retrofit of Buildings 5, 7, 9, 10, 11, and 13) Phase 1.3 (Building 22 Hoptel)	Physical alteration of the building (seismic upgrade).
Building 18 (Office)	Phase 2.4 (Removal of Buildings 14, 18, 21, T-23, 12)	Demolition of the building, which is a contributor to the Historic District.
Building 20 (Storage)	Phase 1.5 (Removal of Building 20)	Demolition of the building, which is a contributor to the Historic District.
Flag Pole and Base	None	This object would remain in its original location and continue to be maintained and used.

## 7. REFERENCES

---

- AECOM. 2011. *National Historic Preservation Act Baseline Documentation*. San Francisco, CA.
- Bright, D. 2008. *National Register of Historic Places Resubmitted Nomination for San Francisco Veterans Affairs Medical Center*. Submitted to San Francisco Veterans Affairs Medical Center by Urban Programmers, San Jose, CA.
- Bright, D., and B. Bamberg. 2009. *National Register of Historic Places Registration Form for San Francisco Veterans Affairs Medical Center*. Submitted to San Francisco Veterans Affairs Medical Center by Urban Programmers, San Jose, CA. Executed by the Keeper of the National Register of Historic Places, National Park Service, on April 20, 2009.
- Kyle, D. E., M. B. Hoover, H. E. Rensch, E. G. Rensch, and W. N. Abeloe. 1990. *Historic Spots in California*. Stanford, CA: Stanford University Press.
- Thompson, E. 1980. *National Register of Historic Places Registration Form for Fort Miley Military Reservation Historic District*. Executed by the Keeper of the National Register of Historic Places, National Park Service, on January 29, 1980.
- Treadwell & Rollo. 2010 (September). *Geotechnical Investigation, VMU Replacement and Expansion Project, San Francisco VA Medical Center (SFVAMC), San Francisco, California*.
- U.S. Department of Veterans Affairs (VA). 2003. *National Register of Historic Places Registration Nomination, Veteran Affairs Medical Center, San Francisco, CA (662)*. On file with the Keeper of the National Register of Historic Places, National Park Service, Washington, DC.
- . 2009 (December). *VA Cultural Resources Management Checklist*. Washington, DC.
- Winzler & Kelly. 2010a. *Finding of No Significant Impact: San Francisco VA Medical Center Mental Health Patient Parking Addition Project No. 662-CSI-612*. Santa Rosa, CA. Submitted to U.S. Department of Veterans Affairs.
- . 2010b. *Environmental Assessment: San Francisco VA Medical Center: North Slope Seismic/Geologic Stabilization Project No. 662-609*. Santa Rosa, CA. Submitted to U.S. Department of Veterans Affairs.



## **APPENDIX A: CONSULTING PARTIES CORRESPONDENCE**

Correspondence with SHPO, Native Americans, and any other consulting parties or the public (e.g., local governments)





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

In Reply Refer To: 662/001

March 20, 2012

Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer  
Office of Historic Preservation  
Department of Parks & Recreation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816

**RE: Section 106 Initiation for the San Francisco Veterans Affairs Medical Center Long Range Development Plan**

Dear Mr. Donaldson:

The U.S. Department of Veterans Affairs (VA) is preparing a Long Range Development Plan (LRDP) for the San Francisco Veterans Affairs Medical Center (SFVAMC) at Fort Miley in San Francisco, California. The SFVAMC is located on a 29-acre site in northwest San Francisco (see Exhibits 1 and 2) and is a major tertiary care facility that serves as a VA regional referral center for specialized medical and surgical programs. The SFVAMC serves Veterans of the San Francisco Bay Area and northern California's coastal counties. The 12-acre SFVAMC National Register Historic District lies within the boundaries of the SFVAMC Fort Miley Campus.

Per the requirements of the National Historic Preservation Act (NHPA), VA is contacting you to initiate consultation under Section 106 of the NHPA and to solicit your comments on the development of the LRDP. VA intends to seek concurrence with the Finding of Effect (FOE) on the LRDP following public input during the NEPA process.

#### **Previous Coordination**

VA contacted the California Office of Historic Preservation (OHP) on April 22, 2011 to initiate Section 106 consultation for the SFVAMC Institutional Master Plan (IMP). The OHP responded with a letter on June 16, 2011 requesting the following information: a map depicting recent, current, and future project areas and descriptions of each project; copies of the most recent master plan and National Register nomination for the SFVAMC Historic District; updated photographs of all contributing buildings; and an assessment addressing effects of recent, current, and future projects on the Historic District's contributors and overall integrity.

VA delivered copies of the IMP and the National Register nomination to the State Historic Preservation Officer (SHPO) in September 2011. In December 2011, VA hand delivered copies of baseline documentation for the SFVAMC, which included the rest of the information requested by the SHPO in June 2011. Also in December, VA met with OHP personnel at the SFVAMC to review the baseline documentation and tour the site. Following the meeting on site, VA submitted a summary of the December meeting to the SHPO and announced its intent to initiate Section 106 consultation for the LRDP. This letter fulfills the last of the requested items, which was to initiate formal consultation under Section 106 for the master plan, which is moving forward as the LRDP in place of the previous IMP.

## Proposed Undertaking

The mission of the Veterans Health Administration (VHA) branch of VA is to "Honor America's Veterans by providing exceptional health care that improves their health and well-being." In fulfillment of this mission, VHA provides comprehensive, integrated healthcare services to Veterans and other eligible persons pursuant to the provisions of the Veteran's Health Care Eligibility Reform Act of 1996 (Public Law 104-262) and other related statutory authority and regulations. VA health care facilities provide a broad spectrum of medical, surgical, and rehabilitative care. The SFVAMC Campus carries out the mission of VHA by providing for care of military Veterans in the San Francisco Bay Area and Northern California by providing necessary medical center and research space.

Since 1930, the VA healthcare system has grown from 54 hospitals to include 152 medical centers, more than 1,400 outpatient clinics; 135 Community Living Centers (nursing home care units); and 48 domiciliaries.<sup>1</sup> The number of Veterans requiring VA health benefits has grown during the last decade. The upward trend in Veterans (both wounded and non-wounded) results in a corresponding increase in the demand for medical facilities, including research space, on VA medical center campuses.

VA constructed and continues to operate the SFVAMC, located at Fort Miley in San Francisco, California (see Exhibit 1). Fort Miley was established as a Coastal Defense Battery in the 1893. Approximately 29 acres of land were transferred from U.S. Army to VA in 1932 for construction of a new veterans hospital and diagnostic center to provide health care options to the San Francisco Bay Area Veteran population. This area became the SFVAMC in 1934.

SFVAMC is the only VA Medical Center in San Francisco County and also serves Veterans of the North Coast of California. The SFVAMC is currently a 1.2 million-square-foot facility that includes a 124-bed tertiary care hospital, Primary and Specialty Care services, and a 120-bed Community Living Center. The SFVAMC is considered an aged facility with the need for retrofitting and expansion. The most recent third party Facility Condition Assessment details needed physical and structural improvements. The SFVAMC is also severely deficient in space, according to standard VA Space Criteria. According to the VHA Space Calculator, the SFVAMC the current estimated need is for an additional 600,000 square feet of medical facility space in order to adequately serve San Francisco Bay Area and North Coast Veterans through the year 2030.

The San Francisco VA Medical Center serves a Veteran population of more than 179,000 Veterans in Marin, Napa, Sonoma, Lake, Mendocino, Humboldt, San Francisco and San Mateo Counties. In fiscal year 2011, the Medical Center treated over 37,000 unique patients with over 326,000 outpatient visits and 5,600 inpatient stays. The San Francisco VA Medical Center has a long history of conducting cutting edge research, establishing innovative medical programs, and providing compassionate care to Veterans. SFVAMC has National Centers of Excellence in the areas of Epilepsy Treatment; Cardiac Surgery; Post Traumatic Stress Disorder; HIV; and Renal Dialysis. It has many other nationally recognized programs including: the Parkinson's Disease Research, Education, and Clinical Center; the Hepatitis C Research and Education Center; the Mental Illness Research & Education Clinical Center; and the Western Pacemaker and AICD Surveillance Program. The Medical Center was selected to head the Southwest Regional Epilepsy Center of Excellence. This Center provides epilepsy care, supports the training and educational needs of the network, and manages a VA epilepsy registry. It has been designated as one of only five VA Centers of Excellence in Primary Care Education and selected as a Community Resource and Referral Center, one of only 12 locations designed to serve homeless and at-risk for homeless Veterans and their families.

The Medical Center has been affiliated with the University of California, San Francisco (UCSF), School of Medicine for over 50 years. All physicians are dually accredited by SFVAMC and UCSF School of Medicine. SFVAMC currently has 189.2 residency and fellow positions and 40 allied health care

<sup>1</sup> A domiciliary provides residential rehabilitation treatment programs for a wide range of problems including: medical, psychiatric, vocational, educational, and social.

professionals. Annually, more than 700 UCSF School of Medical School Students from 36 programs receives training at the Medical Center.

SFVAMC has the largest funded research program in the Veterans Health Administration with \$79 million in research expenditures in fiscal year 2011. Areas of particular interest are: prostate cancer, aging, oncology, cardiovascular disease, Hepatitis C, breast cancer, PTSD, substance abuse, neurological diseases, health services research, and advanced medical imaging. The Medical Center is one of the few medical centers in the world equipped for studies using both whole-body magnetic resonance imaging (MRI) and spectroscopy, and is the site of VA's National Center for the Imaging of Neurodegenerative Diseases.

#### ***Summary of Proposed Undertaking***

The proposed undertaking is an LRDP that supports the mission of SFVAMC and provides for the health care needs of Bay Area and North Coast Veterans. The LRDP includes new development as well as retrofitting existing buildings and structures that house patient care, research, administrative, and hoptel<sup>2</sup> functions, as well as parking. Implementation of the LRDP would occur in phases over a 20-year timeframe through the year 2030. For a more detailed description of the LRDP alternatives, including information regarding square footage and phasing, see enclosures.

Based on the extensive input from the public and interested agencies, we have determined that an LRDP is the more appropriate planning tool for our purposes. As such, we will supplant the previous Institutional Master Plan, and we are in the process of preparing the LRDP. The first public review of the LRDP is scheduled to take place at the same time as the public Draft EIS. Input from your office provided through the Section 106 consultation process will also be incorporated into the LRDP.

#### ***Purpose of and Need for the Undertaking***

The purpose of the LRDP is to establish the road map for the facility development projects necessary to meet the mission of VHA. VHA has identified a need for retrofitting existing buildings to the most recent seismic safety requirements and for an additional currently estimated 600,000 square feet of medical facility space to meet the needs of all San Francisco Bay Area and North Coast Veterans over the next 20 years.

SFVAMC, the only VA medical center in San Francisco County, has major space and parking deficiencies at the Fort Miley Campus. The mission of the SFVAMC is to be a major primary and tertiary health care center providing cost-effective and high-quality care to eligible Veterans in the San Francisco Bay Area and North Coast. The SFVAMC strives to deliver needed care to Veterans while contributing to health care knowledge through research. In addition, the SFVAMC is designated as the Bay Area's Federal Coordinating Center (FCC) and a ready resource for Department of Defense (DOD) backup in the event of a national emergency. New major construction initiatives would transform the SFVAMC, providing seismic improvements and additional facility space over the next 20 years. The LRDP is needed in order for VA to adequately serve the greater San Francisco Bay Area and North Coast.

The overarching goals of the LRDP include:

- Enhance the SFVAMC Campus' function as a vital medical center for the Veterans in need;
- Construct a state-of-the-art medical facility to serve Veterans well into the future; and
- Provide appropriate space for research, clinical, administrative, and educational programs.

The specific objectives of the LRDP are to:

- Address the estimated 600,000 square foot space deficiency at the SFVAMC;

---

<sup>2</sup> A hoptel is an overnight, shared lodging facility for eligible Veterans receiving health care services. This temporary lodging is available to Veterans that need to travel 50 or more miles from their home to the SFVAMC Fort Miley Campus.

- Retrofit existing buildings to the most recent seismic safety requirements to meet current VA Seismic Design Requirements (VA Directive H-18-8), in compliance with Executive Order 12941;
- Provide appropriate space to conduct research;
- Expand clinical inpatient and outpatient primary & specialty care for San Francisco Bay Area and North Coast Veterans;
- Improve the efficiency of clinical and administrative space through renovation and reconstruction;
- Meet patient privacy standards and Americans with Disability Act (ADA) requirements;
- Expand parking to meet current and future demand;
- Improve internal and external Campus circulation, utilities, and infrastructure; and
- Maintain/improve public transit access to the SFVAMC Campus.

### **Project Alternatives**

In parallel with coordination of Section 106 review, the VA is conducting review under the National Environmental Policy Act (NEPA) with preparation of an Environmental Impact Statement (EIS). NEPA regulations require that an EIS contain a description of a proposed action and the alternatives considered. Agencies are directed to use the NEPA process "to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the environment" (40 Code of Federal Regulations [CFR] 1500.2[e]). Alternatives found to be unreasonable do not need to be evaluated in an EIS.

The proposed action assessed in the EIS for SFVAMC is the renovation, expansion, and operation of the SFVAMC Fort Miley Campus to serve Veterans in the San Francisco Bay Area and the North Coast. After consideration of a variety of alternatives through the planning process and eliminating alternatives determined to be infeasible, three alternatives were derived that would allow for continued operation of SFVAMC over the next 20 years:

- Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative
- Alternative 2: SFVAMC Fort Miley Campus Plus Mission Bay Campus Alternative (see Exhibit 3)
- Alternative 3: No Action Alternative

At this time there is no preferred alternative. The VA will select a preferred alternative and finalize the LRDP once it has gained input from the public and coordinating agencies through the NEPA and Section 106 processes. The December 2011 Baseline Documentation provided an overview of recent, current, and future projects; those tables are enclosed with this letter for reference.

### **Area of Potential Effects**

The LRDP will include planned improvements within and adjacent to the SFVAMC Historic District and adjacent to the Fort Miley Historic District, a listed NRHP district that is administered by the Golden Gate National Recreational Area (GGNRA). The proposed archaeological and architectural areas of potential effects (APEs) have been drawn to include the entire SFVAMC Fort Miley Campus, which encompasses the construction footprint and all construction areas and any buildings or structures adjacent to those areas where potential LRDP-related effects may occur (see Exhibit 4).

Due to the close proximity of the Fort Miley Historic District boundary, there is some potential to indirectly affect setting, feeling, or association of the Historic District through implementation of the LRDP at the SFVAMC. This potential is significantly reduced on the north and northwest sides of the SFVAMC Fort Miley Campus, due to a dramatic drop in topography that renders the Campus difficult to see from that

portion of the adjacent Fort Miley Military Reservation Historic District. Thus, the architectural APE extends into a portion of Fort Miley to the northeast and east of the SFVAMC Fort Miley Campus. The architectural APE also extends southwest of the Campus to include residential buildings immediately adjacent to the SFVAMC boundary to account for potential effects to setting, feeling, and association of these buildings.

### Plan for Public Involvement

In accordance with our responsibilities under both Section 106 and NEPA, the VA has identified a process for soliciting public comments on the environmental review documents that will, in turn, facilitate the incorporation of comments into the LRDP and the LRDP EIS. This process includes coordination with agencies and organizations with a demonstrated interest in heritage resources or in the SFVAMC Fort Miley Campus. It also includes providing members of the public with similar interests an opportunity to comment on the identification of historic properties and finding of effect, and taking those comments into consideration during consultation with the SHPO under Section 106.

During the early stages of this project, the VA identified organizations that have a demonstrated interest in the treatment of historic properties in San Francisco. These early efforts included NEPA scoping meetings held in October 2010 and again in April 2011, and individual meetings held with the GGNRA and the City/County of San Francisco in late 2011. Based on these meetings, as well as input previously provided by your office and by our consultants, the following parties will be notified of their opportunity to participate in the Section 106 process. At a minimum, the following organizations will be notified:

- City and County of San Francisco (Certified Local Government)
- San Francisco Veterans Affairs Commission
- National Park Service, Western Regional Office
- Golden Gate National Recreational Area
- Planning Association for the Richmond
- Friends of Lands End
- California Preservation Foundation
- National Trust for Historic Preservation, Western Regional Office
- NCIRE (The Veterans Health Research Institute) Board of Directors
- UCSF Medical School
- California Palace of the Legion of Honor
- Presidio Trust
- San Francisco County Veterans Service Officers

The VA will solicit input from the general public through our standard NEPA public involvement process. Opportunities for public comment have already been provided through the posting a Notice of Intent to Prepare an EIS and the EIS public scoping meetings. We plan to circulate the public Draft EIS for a 60-day review period (longer than the standard 45 day period) and hold a draft EIS public meeting during that review period. During that period, the Section 106 Baseline Documentation package and draft Finding of Effect will be available via our website, and we will have copies available for review at the draft EIS public meeting. At the public meeting, members of the public will be invited to comment on the Section 106 documentation, and their comments will be compiled and provided to SHPO for consideration during your review the Finding of Effect report.

These activities may lead to the identification of consulting parties who would become signatories to the agreement document that may be developed during the resolution of adverse effects (if warranted). There are no known federally recognized tribes affiliated with the Fort Miley area, and so there are no Tribal Historic Preservation Officers to consult. The Native American Heritage Commission will be contacted to request a list of tribal representatives who may have an interest in this location; these representatives will be included in the notification of the NEPA draft EIS public meeting. At this time, we assume that the GGNRA would be a consulting/signatory party by virtue of their proximity to the Campus and their status as a federal agency.

## Identification of Historic Properties

The SFVAMC Fort Miley Campus was originally part of U.S. Army, Fort Miley. Fort Miley was a coastal artillery battery that the U.S. Army constructed in the late 19th century to protect the City of San Francisco from potential naval attacks. In 1932, the VA acquired 29 acres of Fort Miley and began construction of the SFVAMC. When completed, the SFVAMC consisted of several Art Deco buildings primarily located in the northern and eastern part of the SFVAMC site. Few changes occurred at the site until the 1960s, when the VA undertook efforts to modernize the SFVAMC through the addition of several new buildings and parking lots and the modification of existing buildings.

### Previous Studies

Several previous studies have been prepared for the SFVAMC Fort Miley Campus, including an initial determination of eligibility in 1981 and National Register of Historic Places (NRHP) nominations in 2005 and 2008. The SFVAMC Historic District was listed in the National Register in April 2009 as significant under NRHP Criterion A as a site of an early standardized VA hospital and under Criterion C as an early example of a federal building designed with seismic-resistant buildings technologies and for its Mayan Art Deco design. The period of significance for the updated district is 1934-1941. In December 2011, VA Consultants AECOM prepared NHPA baseline documentation for the SFVAMC, including descriptions of recent, current, and future projects and documentation of historic properties. (A baseline documentation report was provided to the SHPO in December 2011.)

A facilities-wide survey of archeological resources has not been conducted at the existing SFVAMC Fort Miley Campus, and, as such, the prehistoric nature of the specific Campus location is not known. The SFVAMC has conducted archeological surveys for project-level reviews and found no archeological resources within the project areas; the SHPO concurred with each of those findings. Archeological sites have been found in the immediate area of the SFVAMC Fort Miley Campus and reflect the character and nature of early Native American occupation of the Campus and surrounding region.

### SFVAMC Historic District

Construction of the SFVAMC hospital and diagnostic center began in 1933, and the hospital was dedicated in November 1934. In 1934, the SFVAMC consisted of twenty-one concrete buildings designed in the Art Deco style with Mayan inspired ornamentation. The original campus was designed by VA architects and built by the Herbert M. Baruch Corporation. The buildings were clustered in the northern and eastern sections of the campus in order to lessen the impact on the adjacent neighborhood, as well as to provide space for patient convalescence and recreation. Several major building campaigns since 1934 have dramatically altered the semi-pastoral character of the campus by adding over a dozen buildings whose design and locations do not support the design plan of the original campus. The large size of many of these new buildings, combined with their awkward siting and incompatible materials and design, have affected the overall integrity of the original campus. In addition, many of the original 1934 buildings have been unsympathetically altered, particularly those that have received large additions. The boundaries of the Historic District do not include most of the latter non-significant buildings.

Projects proposed under the LRDP will affect buildings and structures within the SFVAMC Historic District. The Historic District contains 14 contributing buildings and structures (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 18, 20 and 27) and 8 non-contributing buildings or structures (14, 25, 26, 31, 32, 33, 210, and 202) set on 12 acres of the overall 29-acre Campus.

### Fort Miley Military Reservation Historic District

There is another historic district adjacent to the existing SFVAMC Fort Miley Campus that is considered part of the affected environment for historic resources. The Fort Miley Military Reservation Historic District surrounds the Campus to the east and the west. Fort Miley was listed on the National Register in 1980 as part of the Golden Gate National Recreation Area. The NRHP Historic District is divided into two parts as a result of the 1932 transfer of 25 acres (eventually 29 acres total) of land to VA for construction of the Campus. Despite being divided by the site of the former post of Fort Miley, the surviving batteries still

remain in a historic district located in two parts: East Fort Miley and West Fort Miley. A growth of thick vegetation obscures some views from both portions of the Historic District. Fort Miley is significant for its association with the early 20th century coastal defense system on the West Coast. Fort Miley Military Reservation retains a high level of integrity, particularly around its battery walls.

### **Finding of Effect**

The VA has contracted with AECOM to assist with the preparation of Section 106 coordination materials and public involvement tasks for the undertaking (the LRDP). At this time, we anticipate that the Baseline Documentation previously provided to your office will serve as the technical studies supporting the identification of historic properties. Our next submittal to your office will be a Finding of Effect (FOE) report that discusses previous historic properties identification efforts at SFVAMC, and analyzes the effects of the LRDP on historic properties (both archeological and architectural). Section 106 criteria for adverse effect will be applied to determine whether the LRDP has adequately provided for the protection of historic properties as part of the LRDP's goals, guidelines, and phased development plans, or whether there are aspects of the LRDP that, if implemented, could impair the integrity of historic properties within the APE.

This analysis will be based on a thorough review of the LRDP. As mentioned previously, based on the extensive input from the public and interested agencies, we have determined that an LRDP is the more appropriate planning tool for our purposes. As such, we are shelving the previous Institutional Master Plan and are in the process of preparing the LRDP. The first public review of the LRDP is scheduled to be released at the same time as the public Draft EIS.

Recognizing that an historic district is more than just a sum of its buildings, the LRDP's proposed landscaping, traffic circulation, and construction plans will be assessed for their potential to adversely affect the SFVAMC Historic District or other historic properties in the APE. The FOE will also consider the potential for the proposed construction projects to disturb archaeological resources and the potential for visual impacts on adjacent historic properties such as the Fort Miley Military Reservation Historic District.

### **Summary**

The VA would like to initiate consultation on the SFVAMC LRDP in accordance with Section 106 requirements of the NHPA. We request your comments and concurrence with the definition of the undertaking, proposed approach for Section 106 coordination documents (Finding of Effect), and the delineation of the APEs. We are also interested in streamlining the Section 106 public involvement process with the NEPA process, as afforded by the Section 106 regulations, and would appreciate the opportunity to discuss this approach described above.

Should you have any questions about this project, please contact Ken Carrico, AIA, Chief, Engineering Service at [ken.carrico@va.gov](mailto:ken.carrico@va.gov) or (415) 725-4470.

Sincerely,



Lawrence H. Carroll  
Medical Center Director

Enclosures: Exhibit 1 (Location of SFVAMC Fort Miley Campus within Urban Context of San Francisco)  
Exhibit 2 (Existing SFVAMC Fort Miley Campus)  
Exhibit 3 (Location of Off-site Portion of EIS Alternative 2)  
Exhibit 4 (Archaeological and Architectural Areas of Potential Effect)  
Exhibit 5 (SFVAMC Historic District)  
Tables 2, 3, and 4 from the December 2012 Baseline Documentation

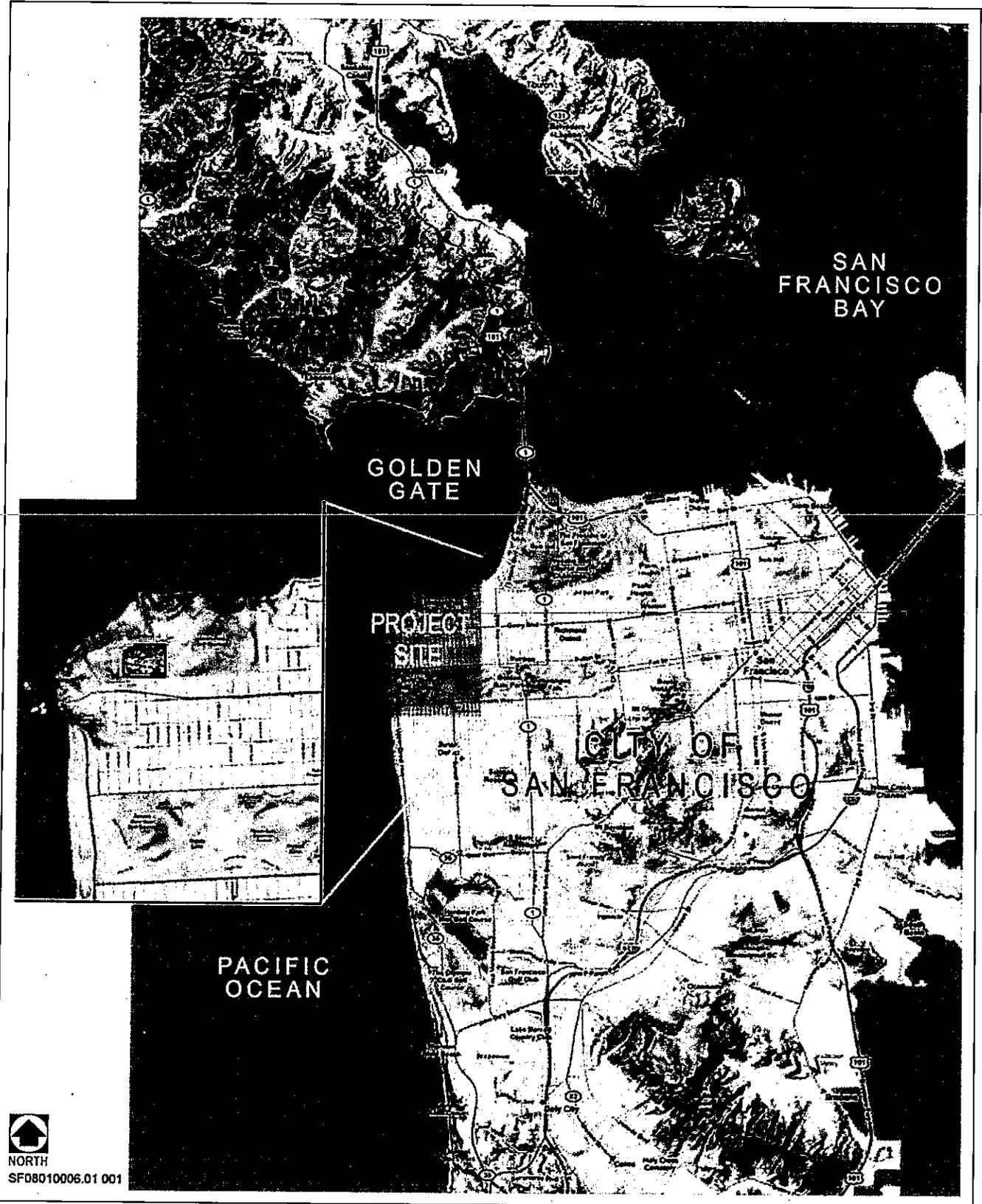
West Fort Point  
CC: Fort Point  
West Fort Point

Doug Pulak  
Deputy Federal Preservation Officer  
Historic Preservation Office (00CFM1)  
Office of Construction & Facilities Management  
Department of Veterans Affairs  
810 Vermont Avenue, NW  
Washington, DC 20420

Brian Lusher  
Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 803  
Washington, DC 20004

Paul Scolari, Ph.D., Historian and American Indian Liaison  
National Park Service, Golden Gate National Recreation Area  
Building 101, Fort Mason  
San Francisco, CA 94123

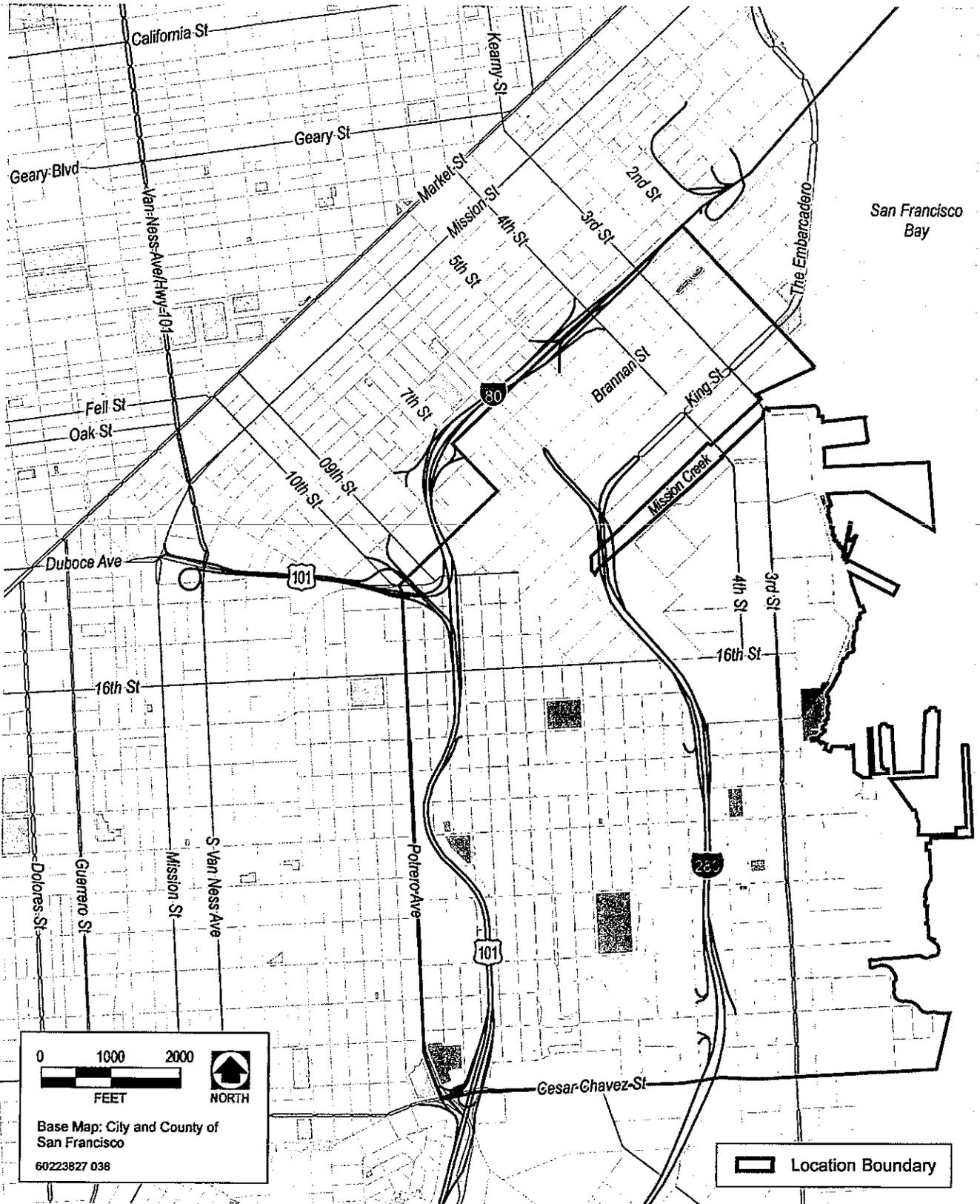
---



Source: USVA, 2010

**Exhibit 1:** Location of SFVAMC Fort Miley Campus within Urban Context of San Francisco

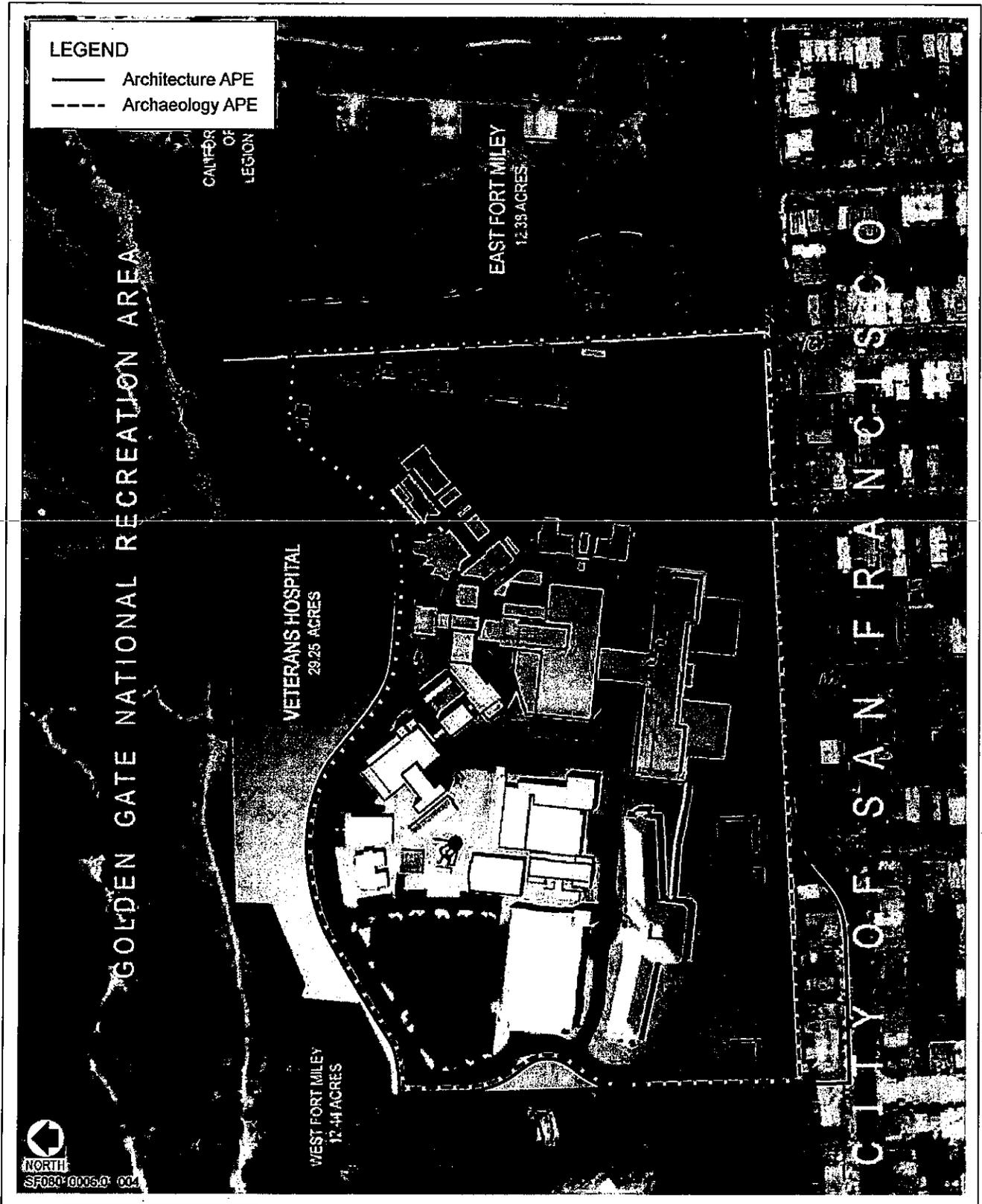




Source: AECOM, 2012

Exhibit 3:

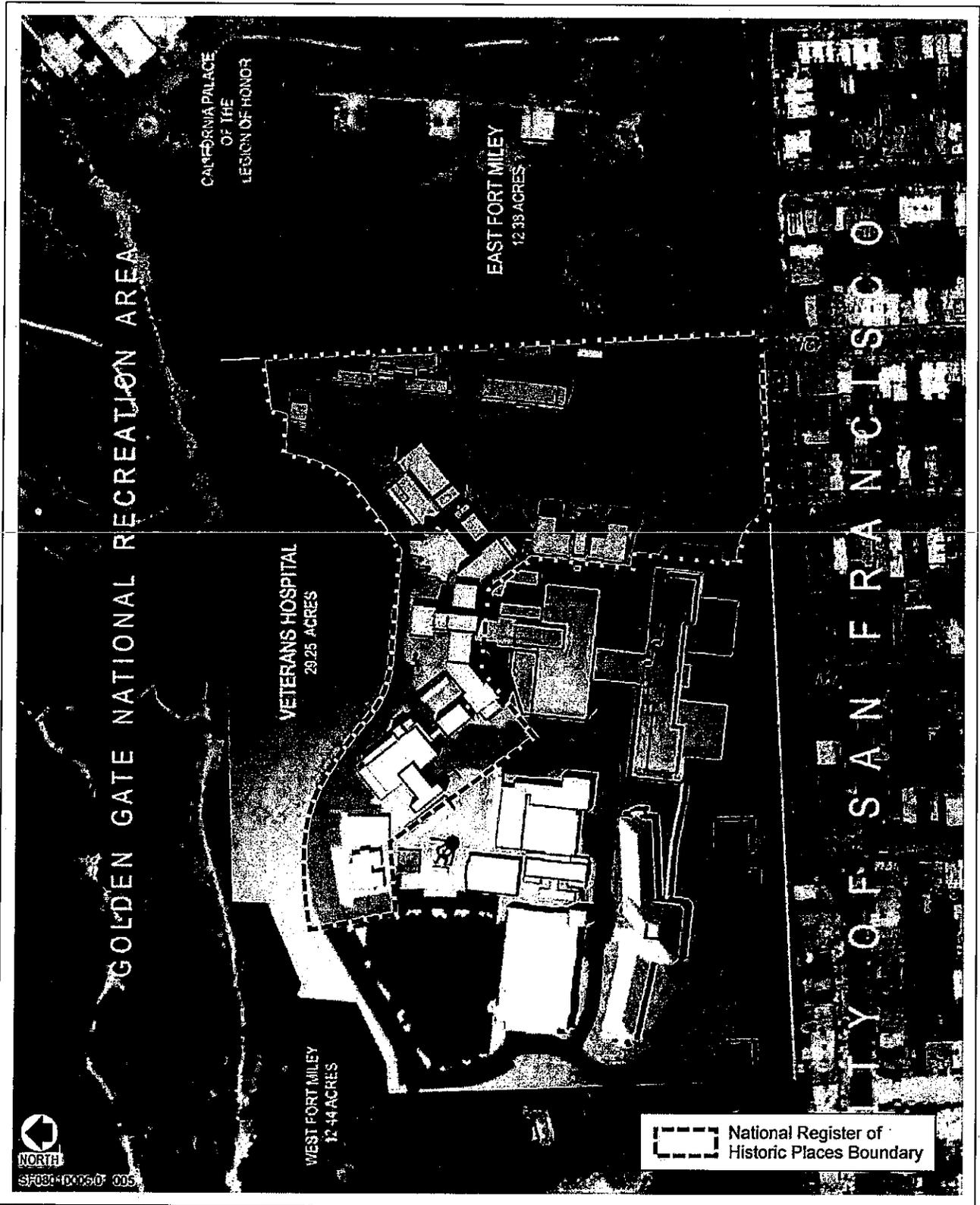
Location of Off-Site Portion of EIS Alternative 2



Source: SFVAMC Institutional Master Plan

Exhibit 4:

Archaeological and Architectural Areas of Potential Effect



Source: SFVAMC Institutional Master Plan

Exhibit 5:

SFVAMC Historic District

Table 1: Recent Projects

		NEPA				Section 106			
n/a	662-323	Emergency Room/E&A Renovation	July 2010 ribbon cutting/completion		Construction of 3-story wing (D) on Building 200. Was designed to accommodate a 4th floor in the future, which is now in preliminary planning.	Adjacent to HD			
n/a	662-06-116	Building 1, 8, 9, 10, and 11 Window Replacement	Started with 2005 contract for design	Replacement of all windows with aluminum frame windows	In HD				
n/a	662-09-601	Building 8 Window Replacement	Completed 11/10/2010	Replacement of all windows on the building with aluminum frame windows.	In HD				
n/a	662-08-215	Buildings 9 and 10 Window Replacement	Completed 11/19/2008	Replacement of all windows on the building with aluminum frame windows.	In HD				
n/a	662-08-222	Replace Windows Building 1	Completed 1/6/2010	Replacement of all windows on the building with aluminum frame windows.	In HD				
n/a	662-09-723	Water Tower (Building 206) Repainting and Minor Upgrades		Repainting, minor repair/upgrades	Adjacent to HD				

Table 2: Current Projects

		NEPA				Section 106					
1.1	662-401	Building 42 (Research/Lab Space)	Estimated buildout November 2011	9,450 BGSF, 2 stories.	Located in the southwest corner of the campus, this would not be visible from the HD.	No Proximity	7/28/2010	EA/ FONSI	Historic Districts: No Significant Impact (project design incorporates measures to avoid/mitigate impacts) Archeo: No impacts to known sites; Mitigation for unanticipated discoveries	6/30/2010	Concur-No Adverse Effect
1.2	662-CSI-12	Mental Health Parking Garage	100% design, construction completion estimate November 2011	Total 55,000 BGSF, 2 stories. Total 161 car spaces and 23 motorcycle spaces. Net 75 car spaces and 23 motorcycle spaces.	New construction of a 2-level, partially below grade parking structure. Realignment of Veterans Drive. Ground disturbance to a max of 20 feet below grade and 150 feet wide. South of Building 8, north of main entrance. Previously parking lot.	In HD	3/11/2011	Draft EA (public review)	Section 106 initiated for Building 20 demolition; based on SHPO conclusion of adverse effect for the demolition of Building 20, Draft EA incorporated a commitment to development of an MOA with mitigation measures including recordation and interpretive materials. Potential significant impacts associated with introduction of Building 24 were reduced to no significant impacts through the introduction of Project Measures to Minimize Effects to Historic District Resources	On-going	Section 106 initiated for Building 24 on August 27, 2010. SHPO responded with a letter requesting baseline documentation about past, present, and future projects in order to determine the collective effects of SFVAMC projects on the integrity of the Historic District. SFVAMC suspending project until the SHPO/Section 106 process is on track.
1.3	662-607	Building 24 Mental Health Clinical Expansion	At 35% design; originally estimated to go to construction fall 2012, being resubmitted for later funding pending Section 106 process	Construct new Mental Health Clinic building, 15,650 BGSF, 3 stories. Construct new Child Care Center to the north of Building 11.	Demolition of Buildings 20 and T-32. Building 20 is a contributor to the SFVAMC Historic District. Building 32 is a temporary modular building that is not a contributor to the Historic District. Construct new Building 24 behind (east of) Building 8. Introduces new T-32 east of Building 11. T-33 moves to parking area south of Building 11 for use as temporary construction trailer.	In HD	May-09	EA	Potential adverse effects to historic district buildings mitigated to "a level below significant" through incorporation of Sol Standards in the design and construction of the modifications.	8/27/2009	Concur-No Adverse Effect
1.4	662-501	Seismic Upgrade of Buildings 9, 10, & 13 and Building 22 Construction	Estimated buildout December 2012	BGSF 8,743, 2 stories	Perform seismic upgrades to Buildings 9, 10, and 13. Construct new Building 22 to the east of (behind) Buildings 9 and 10.	In HD					

		NEPA				Section 106			
1.5	662-608 Veterinary Medical Unit Facility Replacement and Expansion Project (formerly called "Vivarium")	100% design, 0% construction, Project <i>schedule</i> starts 12/1/2011 to 6/1/13 (likely March 2012 +14 months)	Proposed VMU facility is 9,638 BGSF distributed on 2 stories, plus 4,614 BGSF of mechanical penthouse (9,638+4,614 =14,252).	New construction of a 2-story building (Building 41). Adjacent to HD, between Buildings 6 and 12. Currently open space and Temporary Building 17, which would be removed as part of this project.	Adjacent to HD	6/3/2011 Final EA	Historic Districts: No significant impacts. Archeo: Low sensitivity for pre-historic. Sensitive for historic period and human remains. Construction monitoring recommended.	2/15/2011	Concur-No Adverse Effect (with conditions)
1.7	662-620 Phase 1 Patient Welcome Center-Phase 1	At 35% design; originally estimated to go to construction fall 2012, being resubmitted for later finding pending Section 106 process	1,350 BGSF	Introduction of a traffic circle to the southwest of Building 1. Permanently closes through traffic on Veterans Drive.	In HD		Design team under contract to do a NEPA document; could also be covered by the IMP EIS.		SFVAMC suspending project until SHPO/Section 106 process is on track
1.8	662-620 Phase 2 Patient Welcome Center-Phase 2	At 35% design; originally estimated to go to construction fall 2012, being resubmitted for later finding pending resolution of 106 process	13,500 BGSF	1-story pavilion on the ground level between Buildings 200 and 203 extending out towards Building 1 (east). Includes introducing a traffic circle and drop off area in front, and taking out roadway paving at rear and replace with garden.	In HD		Design team under contract to do a NEPA document; could also be covered by the IMP EIS.		SFVAMC suspending project until SHPO/Section 106 process is on track

		NEPA				Section 105				
n/a	Ground Source Heat Pump Systems	Construction anticipated December 2011 through June 2012	To reduce fossil fuel-based energy consumption and to increase the use of renewable energy sources through the installation and operation of ground source heat pump systems.	New GSHP systems proposed for HD contributing Buildings 8, 9, and 10, as well as non-contributor Building 210 within the HD. Construction would include drilling to a depth of 200 to 400 feet for the borings/wells, installing piping, installing system components within and adjacent to each involved building, and restoring the construction site to pre-project conditions. VA anticipates only minor modifications to each involved structure, generally within each structure's mechanical room(s).	In HD	9/2/2011	Public Draft EA	Document concludes that "effects would be maintained at acceptable levels and would not be considered an adverse effect under Section 106 of the NHPA." Each proposed heat pump would be installed within a new, 4' x 8' structure adjacent to and designed to blend with the served VAMC building, in terms of color and style to the extent possible. . . . "In addition, the majority of the 29-acre VAMC has been previously disturbed due to prior construction activities. As such, no . . . archeological resources are expected to be encountered or affected. . . ."	Concur-No Adverse Effect (with conditions)	
662-611	Parking and Emergency Response Structure - Design Phase	100% design 0% construction. Construction <i>scheduled</i> to start July 2012 to May 2013	To provide additional parking garage capacity; car bridge from old to new structure. EOC Center to be built within the new garage space. Plan for the EOC parking Garage is currently to build 155,000 SF with a 32,000 SF footprint and 477 total spaces-295 net spaces.	New construction of a 3-level parking structure (Building 211). West of Buildings 18, 21, 205; north of existing parking structure 209. In northwest corner of campus. Currently parking lot J.	Visible from HD	1/25/2011	EA	MI (Minimal)	3/21/2011	Concur-No Adverse Effect (with conditions)
662-609	North Slope Seismic/Geologic Stabilization	100% design 60% construction. Construction <i>scheduled</i> to be completed by January 2012	Stabilize the North Slope	Construction of two retaining walls and structural improvements to Buildings 25 and 3. Grading, landscaping, and paving.	Adjacent to HD	11/10/2010	EA/ FONSI	M (Moderate) Historic Districts: no adverse effect on SFVAMC district; no effect on East Fort Miley HD Archeo: no impacts to known resources; potential for unanticipated impacts.	11/4/2010	Concur-No Adverse Effect (with conditions)

		NEPA				Section 106	
662-11-186	Seismic retrofit of Building 205 (Central Plant)	Design 2%	Building 205 is 1973	No Proximity	Plan to CatEx		
662-11-507	Install cool roof on Building 200	Construction contract about to be let as of October 2011	Energy efficiency update per Agency goals per Executive Order.	Applying a white coating to Building 200, including its wings (D Wing already done as part of original construction).	Adjacent to HD	Plan to CatEx	

Table 3: Future Projects

		NEPA				Section 106
		7,000 BGSF	2nd floor addition to Building 207	Adjacent to HD		
2.1	IT Support Space Expansion	Estimated buildout December 2016		Adjacent to HD		
2.2	662-11-111 Hybrid Operating Room Expansion	Planned as a design-build contract; estimated buildout June 2017	Adding a 4th floor of Building 200 in D Wing	Adjacent to HD		
2.3	OCFM 11-201 Buildings 1, 6, 8 Seismic Upgrade and Construction of Building 40 (Major) - managed by CFM (VA office of construction and facilities management)	0% design 0% construction	Seismic retrofit of three buildings (Historic District contributors) and construction of a 100,000 BGSF replacement research facility. These (1, 6, 8, and 12) are the VA's last 4 buildings that are on the VA's list of extremely high risk buildings.	In HD and Adjacent to HD	TBD	Future
n/a	662-11-201 Ham Radio Room Renovation	No design; 0% construction	Building 1 renovation of the radio/communications center on the top floor. Need clarification about whether anything is being done to windows or on the roof.	In HD	none	
n/a	662-11-221 Building 8 Window Correction		Building 8 Replacement windows were the type that tilt down to clean; the clips on top of the lower sash led to operator error; will be made un-tiltable by replacing spring-loaded clips with	In HD	none	

NEPA										Section 106										
n/a	662-661	(EOC) Emergency Preparedness/Response Center - Construction Phase	99% design; 0% construction; up for FY12 funding groundbreaking scheduled for July 2012	To provide additional parking garage capacity; car bridge from old to new structure. EOC Center to be built within the new garage space.	Addition to existing parking garage building 209, taking the place of parking lot J	Visible from HD														
n/a	662-11-167	Battle of the Bulge trail paving	Awaiting NCA award	To pave the existing trail from the campus picnic area down to Legion of Honor parking area.	No buildings directly affected.	Adjacent to HD														
n/a	662-511	Seismic Retrofit Building 5 and Building 7	USACE Solicitation is out			In HD														

FOR OFFICIAL USE ONLY

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

1725 23<sup>rd</sup> Street, Suite 100  
SACRAMENTO, CA 95816-7100  
(916) 445-7000 Fax: (916) 445-7053  
calshpo@parks.ca.gov  
www.ohp.parks.ca.gov



May 11, 2012

Reply in Reference To: VA120323A

Lawrence Carroll, Director  
Department of Veterans Affairs Medical Center  
4150 Clement Street  
San Francisco, CA 94121

Re: Section 106 Consultation for San Francisco Department of Veterans Affairs Medical Center  
Draft Long Range Development Plan

Dear Director Carroll:

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

The VA has identified the undertaking as the preparation of a Long Range Development Plan (LRDP) for the San Francisco Medical Center campus (SFVAMC). This document is being prepared to address and support future campus construction, expansion, and preservation planning. Based on information acquired through meetings between the VA and my staff and as provided in your 20 March 2012 submittal, the VA intends to create an additional 600,000 square feet at the SFVAMC campus over the next 20 years. It is my understanding that upon analyzing the potential impacts on historic properties posed by proposed undertakings the VA will submit a finding of effect to my office. Importantly, the VA will continue to consult with my office, the public and interested parties including the National Park Service to assist with their planning process.

In addition, I have the following comments:

- 1) I concur that the APE has been properly determined and documented pursuant to 36 CFR Parts 800.4 (a)(1) and 800.16(d).
- 2) I concur the VA has properly defined and established the undertaking pursuant to 36 CFR Part 800.3.
- 3) I agree with the VA's approach to the Section 106 process for this undertaking as described in your submittal and as discussed in meetings between my staff and the VA.

Thank you for seeking my comments and considering historic properties as part of your project planning. I look forward to working with the VA toward the effective management of their historic resources. If you have any questions or concerns, please contact Ed Carroll of my staff at (916) 445-7006 or at email at [ecarroll@parks.ca.gov](mailto:ecarroll@parks.ca.gov).

Sincerely,

A handwritten signature in cursive script that reads "Susan H. Stratton for".

Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer

CC:

Brian Lusher  
Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 803  
Washington, DC 20004

Kathleen Schamel  
Federal Preservation Officer  
Historic Preservation Office (00CFM)  
Office of Construction & Facilities Management  
Department of Veterans Affairs  
811 Vermont Avenue, NW  
Washington, DC 20420



June 14, 2012

Tim Frye  
Acting Preservation Coordinator  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**Subject: National Historic Preservation Act Section 106 Consultation on the San Francisco Veterans Affairs Medical Center, Long Range Development Plan**

Dear Mr. Frye:

The U.S. Department of Veterans Affairs (VA) is preparing a Long Range Development Plan (LRDP) for the San Francisco Veterans Affairs Medical Center (SFVAMC) at Fort Miley in San Francisco, California. The SFVAMC is located on a 29-acre site in northwest San Francisco and is a major tertiary care facility that serves as a VA regional referral center for specialized medical and surgical programs. The SFVAMC serves Veterans of the San Francisco Bay Area and northern California coast counties.

The 12-acre SFVAMC National Register Historic District lies within the boundaries of the SFVAMC Fort Miley Campus. The purpose of the LRDP is to establish the road map for the facility development projects necessary to meet the mission of VHA. VHA has identified a need for retrofitting existing buildings to the most recent seismic safety requirements and for an additional currently estimated 600,000 square feet of medical facility space to meet the needs of all San Francisco Bay Area and North Coast Veterans over the next 20 years. Maps depicting the project location and vicinity are attached.

**Introduction**

The purpose of this letter is to invite you to participate in the Section 106 Process as a consulting party.

**The Regulatory Process**

Section 106 of the National Historic Preservation Act (NHPA) requires the VA to identify historically significant resources that are located within a proposed project's area of potential effects and show that project planners and engineers have "taken into account" project effects on properties listed in or eligible for listing in the National Register of Historic Places. The Section 106 process also requires consultation between the VA, SHPO, and the interested public.

The VA has compiled a preliminary list of preservation contacts in compliance with 36 CFR 800.2(c)(3-5). The regulation states that the following shall be considered consulting parties: SHPO, federally recognized Indian Tribes, representatives of local governments, and "certain individuals and organizations with a demonstrated interest in the undertaking... due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties." The regulations also require that the VA "seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties." The VA must provide the interested public with information about the undertaking and its effects on historic properties and seek public comment and input. Members of the public may also provide views on their own initiative for officials to consider in decision making.

In response to these federal regulations, the VA has developed the following criteria for generating the candidate list of consulting parties.

- Individuals or groups who have a demonstrated interest in historic preservation in San Francisco;
- Neighborhood groups or associations whose area or boundary of jurisdictional interest include area within the APE;
- Local, state, or federal government agencies whose boundaries of jurisdictional interest include area within the APE;
- Individuals or organizations that have specifically requested "consulting party" status and have demonstrated a preservation interest.

Participation in this review will ensure that your interests in historic properties within the Area of Potential Effect are considered in the Section 106 process. Whether through public meetings, materials posted on our website, or through direct mailings to consulting parties, the following opportunities for input will be provided:

- VA will provide consulting parties the opportunity to comment on the National Register eligibility of properties located within the APE.
- VA will provide consulting parties the opportunity to comment on the effects the proposed undertaking may have to properties/districts listed or determined eligible for listing in the National Register.
- VA will provide consulting parties the opportunity to comment on proposed measures to minimize harm or proposed mitigation options for NRHP properties/district that would be adversely affected by the proposed undertaking.

If you would like to participate as a designated consulting party, please sign and date this letter (attached) and return it as indicated.

If you or your organization have any concerns regarding specific historic resources within the project area, please contact Susan Lassell at AECOM at [susan.lassell@aecom.com](mailto:susan.lassell@aecom.com) or telephone at 415.955.2963.

Sincerely,



Lawrence H. Carroll  
Medical Center Director

Enclosure

Please add me to the list of designated consulting parties:

Tim Frye  
Acting Preservation Coordinator  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Additional Contact Information (not required)

Telephone: \_\_\_\_\_

Email Address: \_\_\_\_\_

If any of this information needs updating, please make corrections to this page before returning the form to:

Susan Lassell  
AECOM  
150 Chestnut Street  
San Francisco, CA 94111



Source: SFVAMC Institutional Master Plan



Source: SFVAMC Institutional Master Plan

In June 2012, the VA submitted letters to the organizations and individuals listed below, inviting them to participate in the Section 106 process as consulting parties. The letter immediately preceding this page, addressed to Tim Frye, is a sample of the letter that was sent. Following this page are the six responses received, confirming acceptance of consulting party status.

Tim Frye  
San Francisco Planning Department

Stephen S. Noetzel  
S.F. Veterans Affairs Commission

Christine S. Lehnertz  
National Park Service

Paul Scolari  
National Park Service, Golden Gate National Recreation Area

Ray Holland  
Planning Association for the Richmond

Julie Burns  
Friends of Lands End

Cindy Heitzman  
California Preservation Foundation

Anthony Veerkamp  
National Trust for Historic Preservation

Robert Obana  
Northern California Institute for Research and Education

Sam Hawgood  
UCSF School of Medicine, Dean's Office

Diane B. Wilsey  
Palace of the Legion of Honor

Craig Middleton  
Presidio Trust

Cheryl Cook  
County Veterans Service Office

Brian Lusher  
Advisory Council on Historic Preservation

Please add me to the list of designated consulting parties:

Robert Obana  
Executive Director  
Northern California Institute for Research and Education  
4150 Clement Street 151NC  
San Francisco, CA 94121-1545

  
Signature \_\_\_\_\_  
Date September 14, 2012

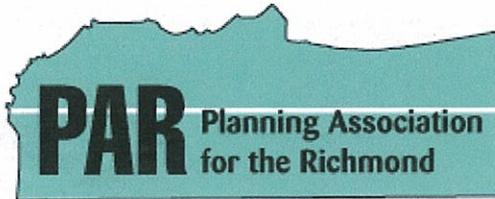
Additional Contact Information (not required)

Telephone: \_\_\_\_\_

Email Address: \_\_\_\_\_

If any of this information needs updating, please make corrections to this page before returning the form to:

Susan Lassell  
AECOM  
150 Chestnut Street  
San Francisco, CA 94111



5758 Geary Blvd., # 356 - San Francisco CA 94121-2112  
Voice Mails and Faxes-(415) 541-5652  
[www.sfpar.org](http://www.sfpar.org)

July 16, 2012

Ms. Susan Lassell  
AECOM  
150 Chesnut Street  
San Francisco, CA 94111

**In re: Reply to SFVAMC's Invitation to Be a Consulting Party Under NHPA Section 106**

Dear Ms. Lassell:

This replies to Lawrence Carroll's letter of June 14<sup>th</sup> inviting PAR to participate in the planning process for the San Francisco Veterans' Affairs Medical Center as a "consulting party" as provided in Section 106 of the *National Historic Preservation Act*.

I am pleased to accept that invitation on behalf of PAR. Please add me and, as my alternate, PAR Director Julie Burns to the list of representatives of designated "consulting parties".

Planning Association for the Richmond (PAR)  
C/o Raymond R. Holland, President  
747-23<sup>rd</sup> Avenue  
San Francisco, CA 94121-3736  
Direct and Voice Mail: 415-668-8914  
Email: [president@sfpar.org](mailto:president@sfpar.org) or [raymondsnf@aol.com](mailto:raymondsnf@aol.com)

Planning Association for the Richmond (PAR)  
C/o Julie Burns, Director  
16 Seal Rock Drive  
San Francisco, CA 94121  
Direct and Voice Mail: 415-341-6060  
Email: [julieburns@sealrock.com](mailto:julieburns@sealrock.com)

The information provided above for Ms. Burns and me are our home addresses and telephone numbers. The intent is to avoid any unnecessary delay in communicating with either of us. For example, Dr. Carroll's June 14<sup>th</sup> letter was not received until June 27<sup>th</sup>. Please let me know at the contact information above if you have any questions..

Sincerely,

A handwritten signature in blue ink, appearing to read "Raymond R. Holland".

Raymond R. Holland  
President

Cc: Julie Burns

Please add me to the list of designated consulting parties:

Tim Frye  
Acting Preservation Coordinator  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Smad for Tim Frye  
Signature  
7/6/2012  
Date

Additional Contact Information (not required)

Telephone: (415) 558-6325

Email Address: tina.tam@sfgov.org

If any of this information needs updating, please make corrections to this page before returning the form to:

Susan Lassell  
AECOM  
150 Chestnut Street  
San Francisco, CA 94111

## Watson, Shayne

---

**From:** Paul\_Scolari@nps.gov  
**Sent:** Monday, July 02, 2012 4:25 PM  
**To:** ken.carrico@va.gov; Lassell, Susan  
**Subject:** Section 106 Consultation on LRDP

Ken and Susan:

Following up from my phone calls to write that Golden Gate will accept your invitation to participate in the VA LRDP Section 106 review as a consulting party. A letter from the park will be forthcoming in the coming weeks once I get back from vacation.

Thanks.

Paul

Paul Scolari, Ph.D.  
Historian and American Indian Liaison  
[paul\\_scolari@nps.gov](mailto:paul_scolari@nps.gov)  
(415) 561-4963

Board of Trustees



Fine Arts  
Museums of  
San Francisco  
de Young  
Legion of Honor

June 26, 2012

Mr. Lawrence H. Carroll  
Medical Center Director  
San Francisco VA Medical Center  
4150 Clement Street  
San Francisco, CA 94121

Dear Mr. Carroll,

Thank you for your letter of June 14, 2012, inviting me to participate as a designated consulting party for the San Francisco Veterans Affairs Medical Center's Long Range Development Plan. As a neighbor and as a San Franciscan interested in historic preservation, I am pleased to accept your invitation.

The California Palace of the Legion of Honor and the San Francisco VA Medical Center are institutions with deep histories, and, as leaders of these institutions, we have many concerns in common. I look forward to participating as a designated consulting party, and I would like to designate Patty Lacson, Director of Facilities at the Museums, to represent me and the Museums whenever I am not available to participate in the Development Plan process. Patty can be reached at (415) 750-7655 or [placson@famsf.org](mailto:placson@famsf.org).

Sincerely,

Diane B. Wilsey  
President  
Board of Trustees

/mab

Enclosure: Designated Consulting Party signature page

cc: Susan Lassell

**de Young**

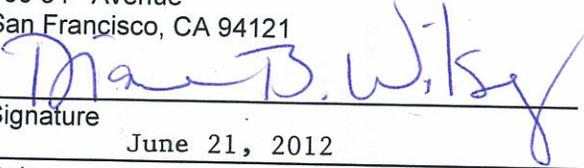
Golden Gate Park  
50 Hagiwara Tea Garden Drive  
San Francisco, CA 94118-4501

Tel 415.750.3669  
Fax 415.750.7686

[www.thinker.org](http://www.thinker.org)

Please add me to the list of designated consulting parties:

Diane B. Wilsey \*  
President, Board of Trustees  
Legion of Honor  
100 34<sup>th</sup> Avenue  
San Francisco, CA 94121

  
\_\_\_\_\_  
Signature

June 21, 2012

\_\_\_\_\_  
Date

Additional Contact Information (not required) Patty Lacson, Director of Facilities

Telephone: 415-750-7655

Email Address: placson@famsf.org

If any of this information needs updating, please make corrections to this page before returning the form to:

Susan Lassell  
AECOM  
150 Chestnut Street  
San Francisco, CA 94111

\*I designate Patty Lacson, Director of Facilities of the Fine Arts Museums of San Francisco, to represent the Fine Arts Museums of San Francisco and me as a designated consulting party.

Please add me to the list of designated consulting parties:

Sam Hawgood, MBBS  
Dean, School of Medicine  
Box 0410 , 513 Parnassus Ave, Med Sci S224  
University of California, San Francisco  
San Francisco, CA. 94143 - 0410

Sam Hawgood  
Signature  
6-20-12  
Date

Additional Contact Information (not required)

Telephone: (415) 476-2341

Email Address: sam.hawgood@ucsf.edu

If any of this information needs updating, please make corrections to this page before returning the form to:

Susan Lassell  
AECOM  
150 Chestnut Street  
San Francisco, CA 94111

## Conversation Record

<b>PROJECT NAME</b>	SFVAMC LRDP Section 106	<b>PROJECT NO</b>	60267807.001
<b>PARTICIPANTS</b>	Allan Federman, Project Engineer Dirk Minnema, Engineer Ed Carroll Susan Lassell	<b>ORGANIZATION:</b>	SFVAMC SFVAMC SHPO AECOM
<b>INITIATED BY:</b>	Susan Lassell	<b>ORGANIZATION:</b>	AECOM
<b>PHONE No.</b>	Teleconference	<b>DATE/TIME</b>	Tuesday July 31, 2012 10:00 a.m.
<b>SUBJECT:</b>	Status update on LRDP Section 106		

### Discussion Items

- 1) Summary of Consultation and Public Involvement process (invitation to CPs and responses; integration with NEPA public meeting; a summary attachment will accompany the FOE to SHPO)
  - a) Allan and Susan summarized VA's provision of a preliminary draft FOE to GGNRA and VA efforts to coordinate a meeting with GGNRA. Ed - a reasonable effort has been made, the burden isn't on VA to hound them for involvement. Sounds better than it was a year ago.
  - b) Ed question about whether there has been any interest from Native American representatives. Susan: no unsolicited interest; VA will include NAHC contacts in the notification of availability of the FOE and public meeting.
- 2) Status of the FOE (preview copy sent to GGNRA in June; public review with EIS in August/September)
- 3) Update on the individual project reviews that were discussed at Sacramento meeting:
  - a) Building 24 – remains on hold; will likely follow after the Welcome Center project-level Section 106 consultation.
  - b) Welcome Center – proceeding with design and will be initiating Section 106 review with a letter and 35% design for comment (early next week)

### Action Items

- 1) Send copy of Consultation & Public Involvement Plan to Ed for his files



# United States Department of the Interior

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

IN REPLY REFER TO:  
L76 (GOGA-PLAN)  
OCT 31 2012

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

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

Dear Mr. Federman:

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

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

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

It is unfortunate the analysis does not include an alternative approach for Phase I new construction that utilizes Mission Bay Campus. We feel the Mission Bay Campus is uniquely suited to meet the needs of SFVAMC and does not have the same campus confinement being experienced at the existing site, offering the potential to avoid many of the impacts associated with development at the existing campus. I encourage you to actively engage NPS in the remaining planning process, especially in the development of a reasonable alternative that avoids adverse impacts on NPS lands and resources. If you have any questions regarding our comments, please feel free to contact Katharine Arrow (Liaison to SFVAMC) of my staff at 415-561-4971 or [katharine\\_arrow@nps.gov](mailto:katharine_arrow@nps.gov) with any questions.

Sincerely,

Frank Dean  
General Superintendent

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

# NPS Comments

## SFVAMC LRDP Draft Environmental Impact Statement

---

### **SECTION 1 (INTRODUCTION)**

#### **1.7 Public Involvement Process**

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

### **SECTION 2 (ALTERNATIVES)**

Per NEPA (Sec. 1502.14), the analysis needs to consider a reasonable range of alternatives. A reasonable alternative to include in the analysis is an alternative for Phase I new construction that utilizes Mission Bay Campus. The IMP made reference to a completed Facility Options Study that served as the basis for an off-site alternative. Because there was so very little information available on the Mission Bay campus options, it is difficult to provide substantive comment. The Mission Bay Campus is uniquely situated to meet the needs of the SFVAMC and does not have the same campus boundary restrictions and environmental setting of the current SFVAMC. The study would be helpful in building public understanding of the advantages and disadvantages of keeping all SFVAMC programs and services together or pursuing other options to locate some or all functions off-site.

### **SECTION 3 (AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES)**

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

#### **3.1 – Aesthetics**

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

Historically, there has been a buffer area between SFVAMC and NPS parkland that did not include buildings of large stature. This development, as well as others being planned, is placing structures (buildings with vertical massing) within this buffer area that will forever change the character of adjacent NPS parklands. Building within this buffer area, close to NPS parklands, causes concern that the new facility will adversely impact certain park resources as a result of its location adjacent to East Fort Miley.

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

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

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

#### 3.4 - Cultural Resources

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

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

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

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

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

### 3.9 Land Use

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

### 3.13 Transportation and Parking

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

*East Fort Miley Access:* The Transportation and Parking section needs to recognize GGNRA’s only vehicle access route into East Fort Miley. Construction of the access lane was planned as mitigation for the construction of the two story garage referred to as the Mental Health Patient Parking Addition Project 662-CSI-612. The original plan was to have the SF VAMC construct an access driveway in the southeastern corner of East Fort Miley, separating GGNRA vehicles from SF VAMC vehicles. This eventually was determined by the SF VAMC to not be cost effective so the access lane was built on the south side of the Parking Addition.

The one-lane access route provides egress to GGNRA’s Trail Crews which include 17 Park employees, eight interns, dozens of volunteers, trucks, earth-moving equipment, and materials deliveries. East Fort Miley also serves as an operational facility for San Mateo, Ocean Beach, and Sutro Grounds Crews comprising approximately six to eight additional Park staff. Due to the reduced turning radius provided at the westerly end

of the lane, delivery vehicles and GGNRA trucks require multiple maneuvers to align with the road. Larger delivery vehicles have blocked the key intersection at Fort Miley Circle and Veteran's Drive for up to 30 minutes. NPS and SFVAMC staffs communicate to minimize traffic impacts. The Draft EIS needs to disclose this traffic and safety issue, as these will exacerbate with the implementation of any action alternative. The impact should include mitigation designed to resolve or minimize this impact. Although the proposed Patient Welcome Center drop-off circle is expected to reduce this impact, large delivery vehicles would continue to cross into oncoming cars and buses in order to make the hard right turn onto the access road.

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

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

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

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

### Cumulative Impacts

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

### 3.14 Utilities

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

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

October 31, 2012

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

**In Re: SFVAMC LRDP Draft EIS and Section 106**

Dear Mr. Federman:

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

General Comments

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

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

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

Comments on Historic Preservation in Regard to Both Historic Districts

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

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

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

*“Physical damage to all or part of the property.*

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

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

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

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

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

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

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

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

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

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

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

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

This should be entirely unacceptable to all concerned.

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

#### Effects on the Golden Gate National Recreation Area

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

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

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

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

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

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

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

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

#### Comments relating to Cumulative Impacts

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

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

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

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

Sincerely,

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

Amy Meyer, People for a GGNRA

**APPENDIX B: LRDP DEVELOPMENT PROGRAM BY PHASE**



**SFVAMC LRDP—Development Program by Phase (Revised June 2012)**

<b>Phase</b>	<b>Building</b>	<b>Building Gross Square Feet (GSF)</b>	<b>Stories</b>	<b>Construction Start</b>	<b>Construction End</b>
<b>Phase 1: 2013-2015</b>					
1.1	Building 41 (Research)	14,200	2	January 2013	December 2013
1.1	Building T-17	-1,700		January 2013	December 2013
1.2	Emergency Operations Center and Building 211 Parking Garage Expansion (477 spaces; 295 net new)	5,000 gsf (2,000 for EOC, 3,000 for storage space) <sup>4</sup> plus 150,000 square feet of new parking garage	5	January 2013	May 2014
1.3	Building 22 (Hoptel)	8,700	2	January 2013	January 2014
1.3	Seismic Retrofit Buildings 5, 7, 9, 10, 11, and 13	N/A		January 2013	January 2014
1.4	Patient Welcome Center and Drop Off Area	14,800 (1,350 is drop off area)	1	August 2013	August 2015
1.5	Building 24 (Mental Health Clinic Expansion)	15,600	3	May 2014	June 2015
1.5	Building 20	-2,300		May 2014	June 2015
<b>Phase 1 Total New Construction</b>		<b>58,300 (208,300 with parking garage)</b>			
<b>Phase 1 Total Demolition</b>		<b>-4,000</b>			
<b>Phase 1 Net New Construction</b>		<b>54,300 (204,300 with parking garage)</b>			
<b>Phase 2: 2015-2023</b>					
2.1	Operating Room Expansion (D-Wing)	5,300	1	October 2015	October 2016
2.2	IT Support Space Expansion	7,000	2	April 2016	October 2017

<sup>4</sup> The Emergency Operations Center and Building 211 Parking Garage square footage in this table reflects both the habitable (center and storage area) and the nonhabitable (parking garage) space planned for construction. Although the SFVAMC Long Range Development Plan discusses habitable square footage, the FOE evaluates the impacts associated with construction of the entire square footage, including nonhabitable space.

<b>Phase</b>	<b>Building</b>	<b>Building Gross Square Feet (GSF)</b>	<b>Stories</b>	<b>Construction Start</b>	<b>Construction End</b>
2.3	Building 23 (Mental Health Research Expansion)	15,000	3 (+basement)	June 2016	July 2017
2.4	Building 40 (Research)	100,000	5 (+basement)	October 2016	April 2023
2.4	Seismic Retrofit Buildings 1, 6, 8	N/A		October 2016	April 2023
2.4	Building 14 (Removal)	-9,700		October 2016	April 2023
2.4	Building 18	-6,400		October 2016	April 2023
2.4	Building 21	-1,700		October 2016	April 2023
2.4	Building T-23	-900		October 2016	April 2023
2.4	Building 12	-38,900		October 2016	April 2023
2.5	Ambulatory Care Center (ACC)	120,000	5 (+basement)	June 2021	January 2023
<b>Phase 2 Total New Construction</b>		<b>247,300</b>			
<b>Phase 2 Total Demolition</b>		<b>-57,600</b>			
<b>Phase 2 Net New Construction</b>		<b>189,700</b>			
Temporary Construction <sup>5</sup>					
	Swing Space (Temporary)	24,000	1	June 2015	June 2016

<sup>5</sup> Not included in total GSF, as it is temporary space