3.4 CULTURAL RESOURCES

This section describes the historical setting and the physical and regulatory framework related to cultural resources and addresses the potential effects of the EIS Alternatives on such resources. *VA Handbook 7545: Cultural Resource Management Procedures* defines cultural resources as "all aspects of the human environment that have historical, architectural, archaeological, or cultural significance, including, but not limited to, historic properties, archaeological resources and data, Native American ancestral remains and cultural items, religious places and practices, historical objects and artifacts, historical documents, and community identity" (VA, 2011a).

3.4.1 Affected Environment

Methodology for Assessment of Existing Conditions

SFVAMC held NEPA scoping meetings in October 2010 and March 2011 as well as public meeting NEPA/ National Historic Preservation Act (NHPA) Section 106 Meeting in September 2012, to gather information about issues of concern or about cultural resources located within the project area. Cultural resources studies for the project area included pre-field research, a review of cultural resources documentation on file at the Northwest Information Center (NWIC), an information request of the Native American Heritage Commission (NAHC) regarding sacred sites and sensitive areas, review of geotechnical reports, and a built-environment field reconnaissance visit of the SFVAMC Fort Miley Campus. The results of these studies were summarized in a baseline documentation report that was used for consultation with the California State Historic Preservation Officer (SHPO) in December 2011 (VA, 2011b).

In early 2012, SFVAMC developed a plan for soliciting comments from the public and interested parties on the cultural resources section of environmental review documents[1] being prepared in compliance with both NEPA and Section 106 of the NHPA.[2] This plan was outlined in the March 2012 Section 106 initiation letter to the SHPO, who concurred with the approach in May 2012. In June 2012, SFVAMC sent letters to the following organizations, inviting them to participate in the Section 106 process as consulting parties:[3]

- City and County of San Francisco
- San Francisco Veterans Affairs Commission
- National Park Service (Pacific Region)
- Golden Gate National Recreation Area (GGNRA)
- Planning Association for the Richmond
- Friends of Lands End

[1] Specifically, this refers to the Cultural Resources section of the August 2012 Draft EIS (for NEPA purposes) and the August 2012 Draft Finding of Effect (for Section 106 purposes).

[2] In this EIS, NHPA Section 106 is referred to as "Section 106."

[3] Section 106 requirements for public involvement include outreach to the general public, consultation with SHPOs and Tribal Historic Preservation Officers (for federally recognized tribes), and outreach to "other parties entitled to be consulting parties" by virtue of their demonstrated interest in historic properties or the proposed undertaking. These requirements also encourage federal agencies to coordinate the steps of the Section 106 process with reviews conducted under other authority, such as NEPA. 36 Code of Federal Regulations (CFR) 800.3.

- California Preservation Foundation
- National Trust for Historic Preservation
- NCIRE–The Veterans Health Research Institute, Board of Directors
- University of California, San Francisco (UCSF) School of Medicine
- Legion of Honor
- Presidio Trust
- San Francisco County Veterans Service Officers

In July 2012, AECOM sent a request to the NAHC for a search of its Sacred Lands Database and other information regarding the presence of cultural resources in the project area, as well as a list of tribal representatives who may have information or concerns about traditional, religious, or cultural resources in the project area. The NAHC did not identify any known traditional, religious, or cultural resources. In addition, based on the list of federally recognized tribes published in the *Federal Register* by the U.S. Bureau of Indian Affairs (2012), SFVAMC determined that there are no federally recognized tribes that may attach religious and cultural significance to properties under SFVAMC's administrative jurisdiction, or with which SFVAMC could consult under the Native American Graves Protection and Repatriation Act (NAGPRA). However, the NAHC provided a list of State-recognized tribes in its response to the 2012 AECOM request. These included the Amah/Mutsun Tribal Band, Costanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Costanoan, Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, and Ohlone Indian Tribe, all of which were added to the list used during the NEPA and Section 106 process to notify the public of NEPA public meetings, availability of documents for review and comment, and all other public involvement in the environmental review processes. Several local and State organizations with a general interest in history and historic preservation, as well as the organizations that declined or did not respond to the invitation for consulting party status, were also added to this contact list. No input has been received from these parties.

Several of the organizations that served as consulting parties to the Section 106 process identified a concern for the historic, landscape, aesthetic, and recreational character of the former Fort Miley Military Reservation. These concerns were addressed in the Cultural Resources section of the Draft EIS through analysis of the LRDP's impacts on the Fort Miley Military Reservation Historic District (Fort Miley Historic District), which is listed in the National Register of Historic Places (NRHP). In October 2012, following the public comment period on the Draft EIS, SFVAMC met with representatives from the National Park Service's GGNRA and requested any further information available about the historical significance and integrity of the Fort Miley Historic District. GGNRA personnel subsequently provided SFVAMC with a copy of GGNRA's July 2013 *Cultural Landscape Report for Fort Miley and the Marine Exchange Lookout* (GGNRA, 2013).

To conclude the Section 106 process for the LRDP, SFVAMC negotiated a programmatic agreement with consulting parties. In December 2013 and March 2014, SFVAMC held meetings with the consulting parties to solicit feedback on a draft agreement. The *Programmatic Agreement Among the U.S. Department of Veterans Affairs, Veterans Health Administration, San Francisco Veterans Affairs Medical Center, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer Regarding the Long Range Development Plan for the San Francisco Veterans Affairs Medical Center* (PA) was executed on January 9, 2015, with SFVAMC, the Advisory Council on Historic Preservation (ACHP), and SHPO as signatories (VA, 2015).

Cultural and Historical Contexts

Prehistoric[4] Cultural Context

Regional

The Middle Archaic Period (5000– 2500 years Before Present [B.P.]) in the San Francisco Bay Area was characterized by more diversified economies than previous periods. Site-specific and intensive resource procurement, possible increased reliance on acorn harvesting and processing, and population growth help define this time. During the Upper Archaic Period (2500–1300 B.P.), permanent villages began to develop (particularly near principal waterways), and social status distinctions were more pronounced. Formalized and sustained trade between recognized groups also developed during this period. In the Emergent Period (1300–200 B.P.), populations increased as a result of intensive localized resource procurement and territorial boundaries became better established. Social status was often based on individual wealth, and exchange systems between individuals and groups were more complex (Fredrickson, 1974; Moratto, 1984).

SFVAMC Fort Miley Campus

No archaeological sites have been identified within the SFVAMC Fort Miley Campus.

Mission Bay Area

The preceding description of the regional archaeological setting also applies to the Mission Bay area.

Ethnographic[5] Context

Regional

At the time of European contact, the San Francisco Bay Area was home to as many as eight cultural groups and subgroups combined into the larger Costanoan (Ohlone) cultural unit. These included the Chochenyo, Ramaytush, Karkin, Tamyen, Awaswas, Coast Miwok, Bay Miwok, and Patwin. They occupied a variety of terrain, such as shorelines, salt marshes, hills, and valleys, and despite speaking different languages, they practiced a similar subsistence strategy focused primarily on seasonal resource exploitation and acorn usage (Bennyhoff, 1977; Arnold and Walsh, 2010). Populations are estimated to have exceeded 10,000, with the number of individuals residing in the San Francisco Bay area as high as 1,200. However, the combined effects of missionization and European-borne diseases nearly decimated the population and traditional practices of these groups (Bennyhoff, 1977).

SFVAMC Fort Miley Campus

Ethnographic and archaeological research indicates that the SFVAMC Fort Miley Campus falls within the traditional boundaries of the Ramaytush Costanoan, whose surrounding area was characterized by a variety of environments on which they could depend for resources. These included sandy slopes, salt marshes, the ocean,

[4] Of, relating to, or denoting the period before written records.
[5] The systematic study of people and cultures.

and small areas of forest habitat (Presidio Trust, 2002). The primary social organization of this group was centered around the patrilineal[6] family unit, with a focus on patrilocality[7] and tribelets[8] typically consisting of 200 to 250 people defined by territorial holdings, with intercommunity trade common (Bennyhoff, 1977).

Mission Bay Area

The preceding description of the regional ethnographic setting also applies to the Mission Bay area.

Historical Context

Regional

The earliest documented Euro-American arrived in 1776 in what is now San Francisco when a Spanish exploring party led by Fernando Rivera Moncado visited the area. A subsequent party led by Juan Bautista de Anza located sites for a presidio (military base) and the Mission Dolores. By 1836, the small settlement of Yerba Buena sprang up between the Presidio of San Francisco and the Mission Dolores. 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 into a booming city virtually overnight. Within 1 year San Francisco's population exploded from 500 to 25,000. The population steadily increased from less than 150,000 in 1870 to 342,000 by 1900. A few years later, 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 its strategic value overlooking the entrance of the San Francisco Bay. It remained relatively unused until the 1860s, when the City purchased 200 acres (including the site of the future Fort Miley) for the municipal Golden Gate Cemetery (also known as the City Cemetery Reservation). The original City Cemetery Reservation included portions of Fort Miley, Lincoln Park, and the Campus, and was predominantly used as a paupers' cemetery. Records indicate that human remains were removed from the site in 1908, but there is some disagreement in the historical record, and the discovery of a 19th-century burial during the 1993 renovation and expansion at the Legion of Honor suggests that not all remains were removed.

As the prominence of San Francisco grew, so did the need to defend it and the surrounding region. In 1893, the U.S. Army appropriated 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 horseshoe-shaped Parade Ground and several frame barracks and quarters in the center of the reservation (the current site of the SFVAMC Fort Miley Campus) between the east and west batteries. During World War I, the Fort Miley batteries quickly became outdated with the advent of aerial bombardment. Fort Miley was deactivated in 1945, as modern technologies such as radar, Air Corps, and

[6] Descending through the male line of the family.
[7] A family unit residing with or near the husband's family.
[8] Within a larger tribe, each tribelet was an independent and sovereign nation having a defined and bounded territory, exercising control over the natural resources contained therein.

eventually guided missile defense systems replaced the 19th-century technologies of artillery-equipped defensive fortifications. A 2.4-acre portion of West Fort Miley became part of GGNRA in 1972, with the remainder of West and East Fort Miley added to GGNRA within a few years (GGNRA, 2013).

SFVAMC Fort Miley Campus

The SFVAMC Fort Miley Campus was originally part of U.S. Army Fort Miley. In 1932, the Veterans Administration[9] acquired 29 acres of Fort Miley and began construction of the medical center. The hospital, dedicated in November 1934, initially consisted of 21 buildings located primarily in the northern and eastern parts of the Campus. The original Campus was designed by VA architects in an Art Deco style with Mayan-inspired ornamentation and was built by the Herbert M. Baruch Corporation. By 1942, 11 additional buildings were added to the Campus. Few changes occurred at the site until the 1960s, when VA undertook efforts to modernize the SFVAMC by adding several new buildings and parking lots and modifying and renovating existing facilities. Construction projects occurred at the Campus sporadically over the next few decades (VA, 2013 and 2011b).

Mission Bay Area

The Mission Bay area was originally an open bay and marshy area. Starting in the late 19th century, the area was filled in to allow for development as an industrial tract. Southern Pacific Railroad used the site for several decades and constructed several tracks and spurs in the immediate area. It remained industrial until into the late 20th century, when it was redeveloped to include more dense mixed-use buildings, consisting of high-end residences, retail establishments, offices, studios, and research facilities. Currently, this area is being developed with a 43-acre UCSF Research Campus and a 14.5-acre UCSF Medical Center (Gebhard et al., 1973; UCSF, 2008).

Cultural Resources Identified in the Project Area

The cultural resources identified in the project area are the SFVAMC Historic District (NRID 05001112) and the Fort Miley Military Historic District (NRID 80000371/CA-SFR-98H). These and other nearby cultural resources are described below. No cultural resources were identified in the Mission Bay area.

Archaeological Resources, Data, and Historical Objects, Sites, or Artifacts

Archaeological resources may include sites, artifacts, features, or other indications of past human activities. Historical objects or artifacts are portable and semiportable objects that may have historical, archaeological, or cultural value, including but not limited to portable archaeological artifacts.

SFVAMC Fort Miley Campus

A record search conducted through the Northwest Information Center of the California Historical Resources Information System concluded that no Native American archaeological sites have been documented within the SFVAMC Fort Miley Campus (NWIC, 2011). Recent investigations on the SFVAMC Fort Miley Campus not included in the NWIC records consist of work conducted for the Mental Health Patient Parking Addition (also

[9] The Veterans Administration was created in 1930 by Executive Order 5398 signed by President Herbert Hoover. Legislation passed in 1988 elevated VA to Cabinet status, and on March 15, 1989, the Department of Veterans Affairs became the 14th department in the President's Cabinet. (VA, 2009.)

known as Building 212) (VA, 2010a) and the North Slope Seismic/Geologic Stabilization Project (VA, 2010b). These investigations found no archaeological resources.

No archaeological field survey was conducted for the LRDP because most of the SFVAMC Fort Miley Campus is previously developed with paving or covered in structures, open areas are landscaped, and the recent studies indicated a low likelihood of the presence of subsurface archaeological remains. The geotechnical report conducted by Treadwell & Rollo (2010) indicated that most of the Campus has a layer of fill material 1–6 feet deep overlying bedrock, although there are still areas of natural soil overlying bedrock. A search of the U.S. Department of Agriculture's Web soil survey (USDA, 2012) also indicates that most of the Campus surface (approximately 70 percent) has been developed (Appendix C).

Five archaeological sites have been identified within 0.5 mile of the SFVAMC Fort Miley Campus. The Campus is located on a ridge above San Francisco Bay, and the shoreline below appears to have been the focus of intensive prehistoric activity. Two prehistoric archaeological sites (CA-SFR-5 and CA-SFR-20) and one multicomponent site (CA-SFR-21) have been recorded on the present-day shoreline. In addition, two historic archaeological resources (CA-SFR-164H and CA-SFR-174H) have been reported.

- *CA-SFR-5:* The site (Nelson 397) was originally documented in 1949 at the site of the Sutro Baths. A surface survey found that this site contained a prehistoric lithic scatter, shell midden, and habitation debris. An unspecified amount of bone was also suggested. No subsurface excavation was performed, and little information is available about the site's size, constituents, or integrity. The site record was subsequently updated in 1967 and 1975 to provide additional data regarding location and condition. This resource is located west of the SFVAMC Fort Miley Campus.

- *CA-SFR-20:* Identified during a surface survey, the site (Nelson 396) is a prehistoric site originally mapped by Nels Nelson in 1908. Although few additional data are available regarding the site's type, a subsequent (1979) record from the Cabrillo College Archaeological Site Survey indicates that it was likely a shell midden. This resource is located northwest of the SFVAMC Fort Miley Campus boundaries.

- *CA-SFR-21:* The site (Sutro Baths), first recorded in 1901 (and updated in 2008) during a surface survey, was described as a multicomponent site with prehistoric attributes including a lithic scatter, evidence of hearths or fire pits, and habitation debris. It has been suggested that a large concentration of shell was almost completely removed as part of the Sutro Baths' construction. Historic attributes identified include structural foundations, landscaping features, historic trash/debris, machinery, and some walls/fences. This resource is located west of the SFVAMC Fort Miley Campus.

- *CA-SFR-164H:* Recorded in 2006, the site (Land's End Ocean Terrace) is described as a historic-period resource. Surface survey and excavation resulted in the identification of structural foundations and trash/debris scatters. This resource is located southwest of the SFVAMC Fort Miley Campus.

- *CA-SFR-174H:* Recorded in 2010, the site (Merrie Way/Sutro's Pleasure Grounds) is described as a historic-period resource. Surface survey and excavation resulted in the identification of historic trash/debris scatters, a water conveyance system, and enclosures (such as walls and fences). This resource is located southwest of the SFVAMC Fort Miley Campus.

Although no archaeological resources have been identified on-site, the SFVAMC Fort Miley Campus is sensitive for the presence of archaeological resources because a portion of Fort Miley once stood on the present-day Campus. It is also sensitive for the presence of human remains because the City Cemetery Reservation covered the site. The burials were removed in 1908, but human remains were discovered in 1921 and 1993 during construction activities at the Legion of Honor, indicating that perhaps not all remains were removed.

Mission Bay Area

An environmental impact report (EIR) prepared for the UCSF Hospital Replacement Program in Mission Bay assessed the potential for archaeological resources to be present in that UCSF project area, and the EIR provides insight into the archaeological sensitivity of the nearby site of the potential new Campus (UCSF, 2005). The EIR identified no archaeological sites in the program's project area. The EIR further noted that the area had been highly disturbed from previous development and that large amounts of fill had been imported; the EIR concluded that it was highly unlikely that archaeological resources were located within the program's project area (UCSF, 2005). Therefore, an NWIC record search was not conducted, nor were local inventories reviewed or archaeological surveys of the Mission Bay area conducted.

Historic Properties

A historic property is any district, site, building, structure, or object included in or eligible for the NRHP. Historical documents are documents preserved in any medium (e.g., paper, film, and electronic media) that may be of historical, archaeological, or cultural value, or that must be maintained by VA in accordance with the requirements of the Federal Records Act (VA 2011a:7-8).

SFVAMC Fort Miley Campus

The *National Historic Preservation Act Baseline Documentation* for the SFVAMC Fort Miley Campus (VA, 2011b) and the PA (VA, 2015) identified two historic properties: the SFVAMC Historic District on Campus and the Fort Miley Military Reservation Historic District to the east and west of the Campus.

Fort Miley Military Reservation Historic District

The Fort Miley Military Reservation Historic District surrounds the SFVAMC Fort Miley Campus on the east and west and 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 1892–1950. Extant structures and buildings within the district include battery emplacements, fire control stations, searchlight facilities, and an ordnance storehouse (Thompson, 1979).

GGNRA's recent cultural landscape report seeks to consolidate information about the Fort Miley Military Reservation Historic District, including site history, existing conditions, and further analysis of significance and integrity, and concludes with recommendations for future treatment. According to this study (GGNRA, 2013):

> East Fort Miley has always been considered a back space for GGNRA and has been utilized for operations by several park divisions. In addition, it has supported a variety of uses, most importantly serving as an informal connection between the SFVAMC, the Legion of Honor, and the surrounding

> neighborhood. With its views of the Golden Gate, grassy picnic area, and accessible concrete batteries, West Fort Miley has been more suited to recreation and the interpretation of cultural resources.

Changes over time have modified the military landscape, but the remaining buildings, structures, circulation patterns, and topography continue to convey the significant history of this defensive military location. As further stated by the study (GGNRA, 2013):

> In many ways, Fort Miley has remained essentially unchanged since becoming a part of GGNRA. In terms of landscape, significant alterations occurred with the removal of World War II–era post buildings and ground structures [at East Fort Miley] and the rehabilitation of much of East Fort Miley by the Roads & Trails Division. Beyond that, the remaining historic structures still stand much as they did in 1972, affected only by the decaying influence of weather, occasional graffiti, and vegetation that has been allowed to grow unchecked in certain areas.

SFVAMC Historic District

The northern and eastern sections of the SFVAMC Fort Miley Campus compose a historic district listed in the NRHP in April 2009 under Criteria A and C (Bright and Bamburg, 2008). The SFVAMC Historic District has a period of significance from 1934 to 1941; it contains 14 contributing buildings and structures (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 18, 20, and a flagpole and base) and nine noncontributing buildings or structures (14, 25, 26, 31, 32, 33, 202, 210, and 212) on 12 acres of the overall 29-acre Campus. The facility is significant as an early example of federal construction using seismic-resistance technologies, for its Mayan Art Deco ornamentation, and as an early standardized VA hospital.

The NRHP nomination for the SFVAMC Historic District is not explicit about which physical or intangible qualities of the Historic District compose its character-defining features. Extrapolating from the statement of significance, however, the following are the three character-defining features of the SFVAMC Historic District:

- The SFVAMC 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 major 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 (early-20th-century) seismically resistant building technologies.
- The architectural qualities that convey the SFVAMC 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" (Bright and Bamburg, 2008:Section 7, Page 1). Dramatic 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 SFVAMC Historic District.

The nomination also recognizes the following (Bright and Bamburg, 2008):

- Several major building campaigns since 1934 have dramatically altered the semi-pastoral character of the SFVAMC Fort Miley Campus by adding more than 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.

- Some historic landscaping features had been removed by the time that the SFVAMC 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," of the 2009 NRHP Nomination for the SFVAMC Historic District [Bright and Bamburg, 2008]). A secondary landscaped area to the 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 SFVAMC 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 nonbuildable sections. After 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 SFVAMC, it forms a green buffer between the institution, the Outer Richmond District neighborhood, GGNRA, and the Fort Miley Historic District.

Two areas within the SFVAMC Historic District retain a high degree of integrity: the eastern portion of the SFVAMC Fort Miley Campus, including Buildings 1, 8, 9, 10, and 11, and the northern portion of the Campus, including Buildings 2 (north-facing elevations), 3, 4, 6, and 18. To date, these two areas have undergone the fewest permanent alterations and retain a sufficient level of integrity of character and design to the Historic District's period of significance.

Select contributors to the SFVAMC Historic District are described below. This discussion of contributors is limited to Buildings 1, 5, 6, 7, 8, 9, 10, 18, and 20, because they would be physically altered by the EIS Alternatives and changes to these buildings could affect the Historic District as a whole. For additional information about each contributor and the SFVAMC Historic District, see the 2009 NRHP Nomination for the SFVAMC Historic District (Bright and Bamburg, 2008).

- *Building 1* was constructed in 1934. The prominent building has an E-shaped plan with a central bar and two wings intersecting at right angles. The central pavilion rises to four stories, with the wings dropping to three stories and further to two stories. It also features granite stairs, a tower, and a central bay that is the focal point of the façade. Building 1 displays a high level of architectural detailing including an elaborate entrance,

ornate terra cotta ornament, and concrete grills. The concrete exterior is finished with smooth stucco. The building has undergone several interior alterations, but the east-facing exterior retains a high level of integrity, having undergone few changes. The west side has linkage to the newer Building 200. The original metal casements have been replaced with anodized aluminum windows and the original Art Deco doors replaced with steel doors. The building's visual prominence and architecture lend it significance.

- *Building 5* is located between Buildings 2 and 7 and was constructed in 1934. The building features a restrained front façade that is six bays wide and features few architectural embellishments. The building's concrete exterior is finished in stucco. Building 5 has undergone several major alterations, including the filling in of the window indentations, closure of some window openings, the replacement of remaining windows, and the addition of external stairs. The interior has been heavily modified. The building retains a good level of integrity.

- *Building 6* is a three-story building located between Buildings 4 and 14 and is attached to Building 4 by a skybridge. Constructed in 1934, Building 6 is composed of reinforced concrete with a T-shaped plan. The building has an asymmetrically massed façade with a four-story tower placed east of the central axis. The exterior features a highly embellished entry pavilion flanked by elaborate terra cotta ornament, sculpted terra cotta spandrel panels, and incised vertical speed lines. The concrete exterior is finished in a thin layer of stucco. Significant exterior changes to Building 6 include the 1980s construction of an enclosed external stairwell on the northeast wall, the replacement of the original metal casements with anodized aluminum windows, and the replacement of the original Art Deco doors with steel doors. The interior has also undergone substantial alterations. The exterior otherwise has a high level of integrity.

- *Building 7* was constructed in 1934. It is a three-story reinforced-concrete building with basically a rectangular plan and a flat roof. The façade is seven bays wide with projecting corner pavilions. The pavilion on the west side of the building rises a full floor level. Mayan-inspired terra cotta designs decorate the spandrels at midpoint in the lower vertical window bays and in a band just below the cornice. The concrete exterior is finished in a thin layer of stucco. The exterior has undergone a series of alterations that have resulted in the removal of much of the building's original ornate detailing, especially on the north elevation where a "greenhouse" style canteen addition was constructed with glass sections within a metal frame. Another important alteration was the replacement of the original windows with new sash and the filling in of the lower sections of each window bay. The original Art Deco doors have been replaced. The interior theater was subsequently removed and a modern mezzanine constructed in its place. Building 7 has undergone many alterations that compromise its overall level of individual integrity.

- *Building 8* is a three-story-over-basement, reinforced-concrete building with a flat roof. It was constructed in 1934. The front elevation features a prominent entrance with a suspended metal canopy and terra cotta surrounds. Additional features include stepped pilasters and recessed window bays with terra cotta spandrel panels. The interior has been altered; however, the exterior of the building is relatively unchanged. Alterations include the replacement of original aluminum casement windows with aluminum-framed units, replacement of the original Art Deco door, the widening of exterior stairs, and addition of wheelchair access. Two rooms have also been added on the north and south ends above the first floor. The building's visual prominence, architectural quality, and exterior integrity are significant to the building.

- *Building 9* is adjacent to Building 8 and identical to Building 10 to the north and, like Building 8, was constructed in 1934. It is a two-story-over-basement reinforced-concrete building with an irregularly shaped plan, with side façades that step back to a smaller rear façade and a stepped parapet roof. Although not as heavily detailed as others within the SFVAMC Historic District, the façade of Building 9 is elaborated to a relatively high degree with a sculpted terra cotta frieze, pylon-shaped door hoods, and other Mayan-inspired ornament. Overall, the exterior has undergone few changes. Modifications include the replacement of the original casements with double-hung wood windows. The former open bay patio was closed in and converted into rooms. Building 9 retains a high degree of integrity.

- *Building 10*, like Building 9, is part of a cluster of buildings that were originally built in 1934. It is a two-story-over-basement reinforced-concrete building with an irregularly shaped plan and a stepped parapet roof. The façade of Building 10 is architecturally significant with its sculpted terra cotta frieze, pylon-shaped door hoods, and Mayan-inspired ornament. The exterior has undergone few changes aside from the replacement of the original metal casements with double-hung wood windows and the addition of awnings at the entrances. The open bay patios were also closed in and converted into rooms. Building 10 also retains a high degree of integrity and is a contributor to the Historic District.

- *Building 18* was constructed in 1897 and remodeled in 1934 to complement the rest of the then-new SFVAMC Fort Miley Campus. It is a two-story-over-basement wood-frame building with a U-shaped plan and a flat roof. The façade faces the former Fort Miley Circle (now Veterans Drive) and a central pavilion projects forward beyond the rest of the stucco-finished façade. The twin main entrances to the building flank this pavilion on either side. Building 18 has been incrementally remodeled, resulting in the replacement of many of the double-hung wood windows with aluminum casements. Nevertheless, the building retains a moderate level of architectural integrity from the substantial 1934 remodeling.

- Building 20 is east of Building 8 and was constructed in 1934 as a garage. The building is a one-story, wood-frame rectangular structure with a shallow pitched roof. The building is designed with Craftsman elements, with its most notable feature being its regularly spaced exposed wood rafters with decorative cut ends. The vehicular openings are fronted by contemporary garage doors. The interior walls are composed of hollow clay tile. The building has eight original garage bays, and three were added at some point during the 1950s or 1960s. Alterations to Building 20 include the replacement of the garage doors and the construction of an addition on the southwest corner of the building. Overall, the building retains a good level of integrity.

Mission Bay Area

The Mission Bay area is populated with modern development dating to the late 20th century, with pockets of historical development dating to the area's maritime industrial history. Building types include multifamily flats, commercial buildings, and industrial complexes. Common uses in the area, in addition to residential dwellings, are light industrial, commercial, and warehouse. The area features various architectural styles including contemporary residential, brick commercial, and converted warehouses, some of which are listed in the NRHP (Gebhard et al., 1973; UCSF, 2008).

Native American Ancestral Remains and Cultural Items

Ancestral remains are physical remains such as bones of deceased human beings, including those that must be given special consideration under NAGPRA (described further in Section 3.4.2, "Regulatory Framework"). Cultural items, as defined at Section 2(3) of NAGPRA with regard to Native Americans, include ancestral human remains, associated and unassociated funerary objects, sacred objects, and objects of cultural patrimony. Communities that are not of Native American ancestry may also have cultural items, and concerns regarding such items should be respected, even if they do not specifically meet NAGPRA criteria (VA, 2011c).

SFVAMC Fort Miley Campus

NAHC search results indicate that no known traditional, religious, or cultural resources are present on the SFVAMC Fort Miley Campus or in the immediate vicinity. No previous projects have resulted in the identification of Native American ancestral remains or cultural items at the SFVAMC Fort Miley Campus. Likewise, no information was provided by tribal representatives regarding cultural associations.

Mission Bay Area

NAHC search results indicate that no known traditional, religious, or cultural resources are present in the Mission Bay area or the immediate vicinity. No previous projects have resulted in the identification of Native American ancestral remains or cultural items in Mission Bay. Likewise, no information was provided by tribal representatives regarding cultural associations.

Religious Places and Practices

A religious place is a location where a group of people practice their beliefs. A religious practice is any activity carried out by a group of people expressing its religious beliefs. Impacts on such practices must be considered under the Religious Freedom Restoration Act and sometimes American Indian Religious Freedom Act (AIRFA) (VA, 2011c).

SFVAMC Fort Miley Campus

No information or concerns about religious places and/or practices were identified through the NEPA public involvement process, and neither the NWIC nor NAHC research has resulted in the identification of such properties.

Mission Bay Area

No information or concerns about religious places and/or practices were identified through the NEPA public involvement process, and neither the NWIC nor NAHC research has resulted in the identification of such properties.

Community Identity

Community identity is a human community's sense of itself, typically expressed in and reinforced by social institutions, beliefs, forms of expression, arts, crafts, means of subsistence, and patterns of interaction

(VA, 2011c). To use this definition of a type of cultural resource when determining the NEPA impacts of a proposed project, it is necessary to first identify whether such defined communities exist, and then to associate physical places, remains, structures, or objects with the community's expression of itself and determine whether such places are historically significant.

SFVAMC Fort Miley Campus

Veterans are a distinct community associated with the SFVAMC Historic District. Because the Campus would be enhanced to continue to serve Veterans, the impact would be beneficial.

Mission Bay Area

There is no indication of traditional, cultural, or historic communities in the Mission Bay project area.

3.4.2 Regulatory Framework

National Historic Preservation Act of 1966

The NHPA established the ACHP; authorized the Secretary of the Interior to maintain an NRHP; directed the Secretary to approve State historic preservation programs that provided for a SHPO; and established the requirement for federal use of historic properties.

Section 106 of the NHPA requires that federal agencies take into account the effects of their actions (undertakings) on properties that may be eligible for or listed on the NRHP, and afford the ACHP a reasonable opportunity to comment. The SFVAMC LRDP is an undertaking that is subject to Section 106.

VA initiated consultation under Section 106 with the California SHPO in March 2012 and invited parties with a demonstrated interest in historic preservation to consult in July 2012. SFVAMC prepared a finding of effect that was circulated for comments by the consulting parties and, as an appendix to the Draft EIS, by the public from August 12 through October 31, 2012. The finding of effect was revised based on comments received and was submitted to the SHPO, and the SHPO concurred with SFVAMC's findings of adverse effect in July 2013 (Appendix C).

National Register of Historic Places Evaluation Criteria

The NRHP is a register of districts, sites, buildings, structures, and objects of significance in American history, architecture, archaeology, engineering, and culture. The NRHP is maintained by the Secretary of the Interior. A property may be listed in the NRHP if it meets criteria for evaluation defined in 36 CFR 60.4:

> The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:
>
> (A) That are associated with events that have made a significant contribution to the broad patterns of our history; or

(B) That are associated with the lives of persons significant in our past; or

(C) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(D) That have yielded, or may be likely to yield, information important in prehistory or history.

One of the types of cultural resources considered under NEPA is historic properties, which are further defined by VA Handbook 7545 as those resources that are eligible for or listed in the NRHP. Thus, the affected environment presented below includes those properties eligible for or listed in the NRHP.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) amended the Antiquities Act of 1906 (16 U.S. Code 431–433) and set a broad policy that archaeological resources are important to the nation and should be protected, and required special permits before the excavation or removal of archaeological resources from public or Indian lands. The purpose of ARPA was to secure, for the present and future benefit of the American people, the protection of archaeological resources and sites that are on public lands and Indian lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals having collections of archaeological resources and data that were obtained before October 31, 1979.

Compliance with ARPA is required for the EIS Alternatives because the project site is located on public (federal) land. However, no actions are needed to comply with ARPA unless excavation of archaeological resources becomes necessary; no archaeological resources were identified for any EIS Alternative.

American Indian Religious Freedom Act

AIRFA established federal policy to protect and preserve the inherent rights of freedom for Native groups to believe, express, and exercise their traditional religions. These rights include but are not limited to access to sites, use and possession of sacred objects, and freedom to worship through ceremonials and traditional rites. AIRFA would be applicable to the EIS Alternatives if actions were to result in limits to the expression of Native American beliefs or restrict access to sites important to religious practice.

Native American Graves Protection and Repatriation Act

NAGPRA requires federal agencies and certain recipients of federal funds to document Native American human remains and cultural items within their collections, notify Native groups of their holdings, and provide an opportunity for repatriation of these materials. This law also requires planning for dealing with potential future collections of Native American human remains and associated funerary objects, sacred objects, and objects of cultural patrimony. NAGPRA is applicable to the EIS Alternatives because the project site is located on federal land. No actions are needed to comply with NAGPRA unless human remains of Native American origin are discovered on federal land.

VA Directive 7545, Cultural Resources Management, and VA Handbook 7545, Cultural Resource Management Procedures

In December 2011 VA issued Directive 7545 to establish direction for VA medical centers, cemeteries, regional offices, and staff offices to comply with historic preservation laws, regulations, and guidelines. The corollary Handbook 7545 provides procedures for complying with legal requirements for historic preservation and other aspects of cultural resource management in the conduct of VA projects and programs. It provides guidance in implementing the policies contained in VA Directive 7545.

VA Directive 7545 requires that direct, indirect, and cumulative impacts on cultural resources of all kinds be addressed when considering the environmental impacts of VA activities under NEPA. Consultation with federally recognized Indian tribal governments about cultural resource–related matters is guided by VA Directives 7545 and 8603. The consideration of impacts on cultural resources under NEPA, as presented in this EIS section, follows the policies and guidance established in VA Directive and Handbook 7545.

3.4.3 Environmental Consequences

Significance Criteria

A NEPA evaluation must consider the context and intensity of the environmental effects that would be caused by, or result from, the EIS Alternatives.

An Alternative analyzed in this EIS is considered to result in an adverse impact related to cultural resources if it would:

- damage or destroy an archaeological resource or site;
- disturb any human remains, including those interred outside of formal cemeteries;
- cause a substantial change to character-defining features of a historic property; or
- cause substantial change to a community's identity.

Assessment Methods

Cultural Resources

Of the types of cultural resources defined in VA Handbook 7545, those identified in the project area are historic properties (specifically, two historic districts), community identity, and the potential for archaeological resources and data or human remains. The assessment of NEPA impacts on cultural resources therefore focuses on the potential impacts on those resources.

Direct impacts on the SFVAMC and Fort Miley Historic Districts could occur if district components were physically altered in a way that would diminish their overall integrity. Indirect impacts could occur if visual and/or atmospheric intrusions outside the boundaries of the SFVAMC and Fort Miley Historic Districts would be introduced that would diminish the resources' ability to convey their significance. Direct impacts on archaeological data and human remains physically damage or destroy those resources.

To assess the potential cultural resources impacts associated with LRDP implementation, it was determined whether historic properties located in the project area would be subjected to any of the following:

- 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;
- change in 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[10] 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; and
- 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.

Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative

Short-Term Projects

Construction

Archaeological Resources

Alternative 1 short-term projects would have no direct or indirect impact on presently documented archaeological resources and human remains.

No archaeological resources have been documented within the SFVAMC Fort Miley Campus, and project-related impacts on previously unrecorded archaeological resources are not anticipated. Nonetheless, although it is remote, the potential remains for unrecorded resources to be present beneath the layers of fill on the Campus, thereby elevating the potential to encounter such resources during ground-disturbance activities extending beyond the fill layer. Construction activities at the Campus for Alternative 1 short-term projects could have a direct adverse impact on presently undocumented significant archaeological resources or human remains, if such resources are present.

[10] Visual, atmospheric, and audible elements are those elements that are nonphysical and relate to the setting, feeling, and historical association of a property.

Mitigation Measure CR-1: Implement Stipulation V of the PA, "Inadvertent Discoveries"

If archaeological deposits are discovered during implementation of the LRDP, all ground disturbance will immediately stop within 50 feet (15 meters) of the discovery, and the location of the discovery will be marked for avoidance. A qualified archaeologist will recommend to SFVAMC whether the discovery is NRHP eligible by evaluating it in accordance with 36 CFR 60.4. SFVAMC will submit its finding to the SHPO for review and concurrence via e-mail. If SFVAMC finds that the archaeological resource is not eligible for the NRHP, and if the SHPO concurs or does not comment within 7 days, construction may proceed at the discretion of SFVAMC. If SFVAMC finds that the archaeological resource is eligible for the NRHP, and if the SHPO concurs or does not comment within 7 days, SFVAMC will seek to avoid the historic property. If it cannot avoid the resource, SFVAMC will prepare and implement a data recovery plan. The SHPO will be afforded the opportunity to review reports describing the evaluation, finding of effect, and proposed treatment of inadvertent discoveries. However, these reports will not be posted to the LRDP Web site because of the protected and sensitive nature of archaeological information.

Implementation of Mitigation Measure CR-1 would reduce potentially adverse impacts resulting from inadvertent damage or destruction of presently undocumented significant archaeological resources and human remains during construction of Alternative 1 short-term projects to a minor level.

Historic Properties

Alternative 1 short-term projects would involve construction of new structures, demolition of structures, and/or retrofitting of buildings on the SFVAMC Fort Miley Campus (Table 2-1 and Figure 2-1). The Campus site includes the SFVAMC Historic District and is adjacent to the Fort Miley Historic District.

LRDP construction would be limited to the SFVAMC Fort Miley Campus, and thus, there would be no direct impacts on the Fort Miley Historic District. Construction would introduce visual and/or atmospheric changes to the Fort Miley Historic District; however, these changes would be obscured from view by existing trees and steep terrain that diminish the views from the Fort Miley Historic District in the GGNRA toward the SFVAMC Fort Miley Campus. The Fort Miley Historic District would retain its integrity of location, design, feeling, and setting and would continue to convey its significance. Therefore, there would be no direct or indirect adverse impacts on the Fort Miley Historic District from the future buildout of the SFVAMC LRDP under Alternative 1 short-term projects.

LRDP construction at the Fort Miley Campus under Alternative 1 short-term projects would result in a direct adverse impact on the SFVAMC Historic District, because of demolition of a contributor (Building 18) and the incremental impairment of the integrity of materials, design, feeling, and setting of the Historic District that would result from buildout of all projects. Although a single project component may not result in an adverse effect on the SFVAMC Historic District on its own, the future setting of the Historic District would be impaired by the combination of physical changes to individual contributing buildings, introduction of new facilities within the Historic District, and changes to the character of the Historic District, including densification of the Campus. This would result in both direct and indirect adverse impacts on the SFVAMC Historic District under Alternative 1 short-term projects.

Table 3.4-1 lists each short-term project for Alternative 1 and indicates whether that project would have a direct impact, indirect impact, or no impact on the SFVAMC and Fort Miley Historic Districts. Table 3.4-1 indicates whether these projects would directly (physically) affect the districts or their contributing features, or indirectly affect their feeling and setting through the introduction of auditory or visual elements.

Table 3.4-1: Impacts of Alternative 1 Short-Term Projects on the SFVAMC and Fort Miley Historic Districts

Phase	Project	Within SFVAMC District Boundary?	Impact on SFVAMC District?	Impact on Fort Miley District?
Short-Term Projects				
1.1	Bldg 211—Emergency Operations Center and Parking Garage (377 spaces)	No	Indirect	Indirect
1.2	Bldg 41—Research (requires removal of Trailer 17)	No	Indirect	No
1.3	Seismic Retrofit of Bldgs 5 and 7	Yes	Direct	No
1.4	Bldg 22 Hoptel and Seismic Retrofit of Bldgs 9 and 10	Yes	Direct	Indirect
1.5	Bldgs 209 and 211 Parking Garage Extensions (250 spaces)	No	No	Indirect
1.6	Bldg 203 C-Wing Extension (Ground-Floor Patient Welcome Center) and Drop-off Area with Canopy Structure	Partial	Indirect	No
1.7	Bldg 200 Expansion (Operating Room D-Wing)	No	Indirect	No
1.8	Bldg 24 Mental Health Clinic Expansion (requires demolition of Bldg 20)	Yes	Direct	Indirect
1.9	Bldg 40—Research (requires demolition of Bldgs 14, 18, and 21; removal of Trailer 23; and relocation of water tower)	Yes	Direct	No
1.10	Bldg 207 Expansion (IT Support Space)	No	No	No
1.11	Bldg 43—Research/Administration (requires removal of Trailer 31)	Yes	Direct	No
1.12	Trailer 36 (New Modular)	No	No	No
1.13	Bldg 23—Mental Health Research Expansion	Yes	Direct	Indirect
1.14	Bldg 203 Extension—Psychiatric Intensive Care Unit	No	No	No
1.15	Bldg 208 Extension—Community Living Center and National Cardiac Device Surveillance Center (requires removal of Trailer 24)	No	No	No
1.16 under Alternative 1 and 2.1 through 2.3 under Alternative 2	Seismic Retrofit of Bldgs 1, 6, and 8	Yes	Direct	No
1.17	Demolition of Bldg 12	No	No	No

Notes: Bldg = Building; SFVAMC = San Francisco Veterans Affairs Medical Center
Sources: VA, 2012 and 2014

Swing Space (Temporary)

Planned activities would take place on the west end of the SFVAMC Fort Miley Campus inside the boundary of the SFVAMC Historic District**.**

Impacts of Swing Space (Temporary) on the SFVAMC Historic District. The planned addition of modular buildings would detract from the Historic District's design, setting, and feeling. The SFVAMC Historic District would still be able to convey its significance as an early standardized VA hospital, and as an example of a federal building designed with seismically resistant buildings in the Mayan Art Deco style. However, implementation of this component of Alternative 1 short-term projects would result in an indirect and direct impact on the SFVAMC Historic District.

Mitigation Measure CR-2: Remove the Temporary Modular Swing Space Following Completion of Short-Term Projects

To mitigate impacts on the SFVAMC Historic District, SFVAMC will remove the temporary modular swing space following completion of the short-term project phase or after approximately 35 months.

Implementation of Mitigation Measure CR-2 would reduce potentially adverse impacts resulting from the construction of modular (temporary) swing space within the SVAMC Historic District during Alternative 1 short-term projects to a minor level.

Impacts of Swing Space (Temporary) on the Fort Miley Historic District. Construction activities for temporary swing space would occur outside the boundaries of the Fort Miley Historic District; therefore, no direct impact would occur.

The Fort Miley Historic District would retain its character of location, design, feeling, and setting and continue to convey its significance. No direct impact on the Fort Miley Historic District would occur.

Mitigation Measure CR-3: Implement Stipulations III and IV of the PA to Reduce Impacts on the SFVAMC Historic District. This includes implementation of the following PA Mitigation Measures that are contained within Stipulation IV.

SFVAMC will mitigate for the LRDP's adverse effects on historic properties, including the effects of demolition of Buildings 18 and 20, new construction within the SFVAMC Historic District, and the cumulative effects of the LRDP as a whole, by creating the following:

a. ***Historic District Design Guidelines (HDDG):*** *SFVAMC will prepare design guidelines for the SFVAMC Historic District, interpreting the SOISTHP and applicable guidelines in the context of the significance, integrity, and character-defining features of the SFVAMC Historic District and, as applicable to Category C projects, the Fort Miley Military Reservation Historic District. SFVAMC will ensure that all exterior projects occurring within the SFVAMC Historic District apply the design guidelines beginning with project planning and design development. The HDDG will cover both the architectural and landscape qualities of the SFVAMC Historic District, as well as provide advice for designing projects in the context of the Fort Miley Military Reservation Historic District. The HDDG*

will also consider vegetative screening along the boundaries, and determine whether such screening would improve the historical integrity of the SFVAMC Historic District and/or the Fort Miley Military Reservation Historic District.

i. *SFVAMC will provide a draft of the HDDG to Consulting Parties by September 8, 2014.*

ii. *SFVAMC will post the draft HDDG to its LRDP website and will notify Consulting Parties of this posting and their 30-day comment period.*

iii. *SFVAMC will consider comments received during this period as it finalizes the HDDG.*

iv. *SFVAMC will post the final HDDG to its LRDP website by April 3, 2015, and will notify Consulting Parties of this posting.*

b. ***Historic Landscape Study (HLS):*** *SFVAMC will prepare a Historic Landscape Study for the SFVAMC Historic District to document its landscape qualities, including the original design concept, the historical evolution of landscape characteristics, the significance of the landscape design, and the way in which the current landscape contributes to the eligibility of the SFVAMC Historic District.*

i. *By or about April 30, 2015, SFVAMC will prepare a draft work plan for development of an HLS; specifying the content, methods and standards for preparation process for review by Consulting Parties, timeline for completion, and estimated cost.*

ii. *SFVAMC will post the draft HLS work plan to its LRDP website and will notify Consulting Parties of this posting and their 30-day comment period.*

iii. *SFVAMC will consider comments received during this period as it finalizes the HLS work plan.*

iv. *SFVAMC will post the final HLS work plan to its LRDP website by October 1, 2015, and will notify Consulting Parties of this posting. SFVAMC will prepare the HLS in accordance with the final HLS work plan.*

c. ***Public Interpretation Program (PIP):*** *SFVAMC will design and implement a public interpretation program related to its history. The PIP shall include, but not be limited to, a permanent display in a publicly accessible space at the Medical Center.*

i. *By or about March 1, 2015, SFVAMC will prepare a draft work plan for the PIP defining the objectives of the PIP, specifying the media with which the program will be developed (with consideration of typical media such as displays in publically accessible places, oral history recordation, traveling exhibits, popular publications, and/or websites), and defining themes that will be conveyed by the program. In addition, the PIP work plan will specify the timeline and milestones for implementation of the program and preparation of the individual media and will provide an estimate of associated costs. The PIP work plan will specify how individual interpretive media will be funded and prepared in tandem with LRDP sub-phases that contribute to the adverse effect on historic properties.*

ii. *SFVAMC will post the draft PIP work plan to its LRDP website and will notify Consulting Parties of this posting and their 30-day comment period.*

iii. *SFVAMC will consider comments received during this period as it finalizes the PIP work plan.*

iv. *SFVAMC will post the final PIP work plan to its LRDP website by October 1, 2015, or before demolishing Buildings 18 and 20 – whichever is earlier, and will notify the Consulting Parties of this posting. SFVAMC will implement the PIP in accordance with the final work plan.*

d. ***Historic Preservation Treatment and Maintenance Plan (HPTMP):*** *SFVAMC will prepare a historic preservation treatment and maintenance plan applicable to the resources that contribute to the SFVAMC Historic District. The HPTMP will include procedures for cyclical, routine, and emergency treatment and maintenance activities to ensure that such activities are performed in accordance with federal guidelines and current best practices in the historic preservation industry.*

i. *By or about March 1, 2015, SFVAMC will prepare a draft work plan for the HPTMP to define the objectives, milestones, and timeline for the HPTMP.*

ii. *SFVAMC will post the draft HPTMP work plan to its LRDP website and will notify Consulting Parties of this posting and their 30-day comment period.*

iii. *SFVAMC will consider comments received during this period as it finalizes the HPTMP work plan*

iv. *SFVAMC will post the final HPTMP work plan to its LRDP website by October 1, 2015, and will notify the Consulting Parties of this posting. SFVAMC will prepare and implement the HPTMP in accordance with the final work plan.*

e. *As Mitigation Measures a, b, c, and d are being developed, SFVAMC may continue to consult on individual LRDP sub-phases, in accordance with Stipulation III.*

(Demonstration of adherence to this mitigation measure will occur primarily through design review with the SHPO and consulting parties for each project, per the PA.)

Implementing Mitigation Measure CR-2 would help reduce the severity of impacts of Alternative 1 short-term projects on the SFVAMC Historic District; however, the impact would remain adverse, because proposed construction would still result in demolition of contributors and densification of the SFVAMC Historic District.

Operation

Because operation of Alternative 1 short-term projects would not involve ground disturbance, vibrations, or permanent visual changes, no direct or indirect impacts on archaeological or historic resources would occur.

Long-Term Projects

Construction

Archaeological Resources or Human Remains

Ground disturbance activities for the Alternative 1 long-term project would have the same potential to damage or destroy presently undocumented significant archaeological resources and human remains as the short-term projects for this alternative. Therefore, construction activities for the Alternative 1 long-term project would result in the same direct adverse impacts on archaeological resources as those for Alternative 1 short-term projects. With implementation of Mitigation Measure CR-1, above, impacts would be reduced to a minor level.

Historic Properties

Alternative 1 long-term projects would involve the development of a clinical care facility on the existing SFVAMC Fort Miley Campus through 2023 (Table 2-1 and Figure 2-1). Table 3.4-2 lists the Alternative 1 long-term project and the anticipated impact on the SFVAMC and Fort Miley Historic Districts.

Table 3.4-2: Impacts of Alternative 1 Long-Term Projects on SFVAMC and Fort Miley Historic Districts

Phase	Project	Within SFVAMC District Boundary?	Impact on SFVAMC District?	Impact on Fort Miley District?
Long-Term Projects				
2.1 (under Alternative 1) and 2.4 (under Alternative 2)	Bldg 213 (Clinical Addition Building)	No	Indirect	No

Notes: Bldg = Building
Sources: VA, 2012 and 2014

Building 213 (Clinical Addition Building)

The planned construction of Building 213 would not occur within the boundary of the SFVAMC Historic District, but would occur adjacent to buildings that contribute to the SFVAMC Historic District. This would result in an indirect impact on the SFVAMC Historic District because it would introduce a new visual impact on the SFVAMC Historic District. This indirect impact would diminish the integrity of the district's setting, but the SFVAMC Historic District would continue to be able to convey its significance as an early standardized VA hospital, and as an example of a federal complex designed with seismically resistant buildings in the Mayan Art Deco style.

The Fort Miley Historic District would retain its character of location, design, feeling, and setting and continue to convey its significance. No indirect impact on the Fort Miley Historic District would occur.

Implementation of Mitigation Measure CR-3 would help reduce the severity of the adverse indirect impact of the Alternative 1 long-term project on the SFVAMC Historic District; however, the impact would remain adverse.

Operation

Operation of the Alternative 1 long-term project would not involve ground disturbance or vibration; therefore, no direct or indirect impacts on archaeological resources would occur. SFVAMC would seismically upgrade various historic buildings on the campus so they would be used and maintained. Through adoption of Alternative 1 and implementation of the PA, future planning at the Campus would take place in a manner that is sensitive to historic properties. The impact on historic properties would be beneficial.

Alternative 2: SFVAMC Fort Miley Campus Buildout Alternative

Short-Term Projects

Alternative 2 short-term projects at the SFVAMC Fort Miley Campus would be similar to short-term projects for Alternative 1, with one exception. Specifically, retrofitting of Buildings 1, 6, and 8 would not occur as part of Alternative 2 short-term projects (Table 2-3 and Figure 2-3), but would instead be accomplished in the long term. The difference in phasing does not change the potential for impairment of cultural resources. Therefore, the impacts of Alternative 2 short-term projects would be similar to the impacts anticipated for short-term projects under Alternative 1. These impacts would generally range in significance from beneficial to adverse with mitigation (Mitigation Measures CR-1 and CR-2).

Long-Term Projects

Alternative 2 long-term projects at the SFVAMC Fort Miley Campus would be similar to the Alternative 1 long-term project, with one exception. Specifically, three additional buildings—Buildings 1, 6, and 8— would be retrofitted as part of Alternative 2 long-term projects (Table 2-4 and Figure 2-4). The difference in phasing does not change the potential for impairment of cultural resources. Therefore, the impacts of Alternative 2 long-term projects would be similar to the impact anticipated for the long-term project under Alternative 1.

Alternative 3: SFVAMC Fort Miley Campus Plus Mission Bay Campus Alternative

Short-Term Projects

Alternative 3 short-term projects would be the same as the short-term projects of Alternative 1 (Table 2-1 and Figure 2-1). Therefore, the impacts of Alternative 3 short-term projects would be the same as the impacts of Alternative 1 short-term projects. These impacts would generally range in significance from minor to adverse with mitigation (Mitigation Measures CR-1 and CR-2).

Long-Term Projects

Alternative 3 long-term projects would be the same as the Alternative 1 long-term project, except that the ambulatory care center and an associated parking structure would be located at a potential new SFVAMC Mission Bay Campus under Alternative 3 (Table 2-5 and Figure 2-5).

Construction

Archaeological Resources or Human Remains

It is currently unknown whether any archaeological resources are located within the area of the potential new Mission Bay Campus. However, the NWIC records search, literature review, and consultation with the NAHC failed to indicate the presence of previously recorded archaeological resources within this area. Given the highly developed nature of this area, it is assumed to have a low sensitivity for subsurface prehistoric resources. The Mission Bay area's sensitivity for historic-era archaeological resources is also unknown. Should intact subsurface cultural deposits exist, project-related, ground-disturbing activities could result in direct adverse impacts.

The highly developed nature of the Mission Bay area makes pedestrian surveys and exploratory subsurface investigations difficult. To minimize effects on archaeological resources, Mitigation Measure CR-1 would be implemented. More specific mitigation measures would be developed in the future in consultation with the SHPO and other parties during site selection. Therefore, with implementation of Mitigation Measure CR-1 and (if necessary) other mitigation that may be developed during future consultation, the direct impact of construction activities at the potential new Campus on archaeological resources would be reduced to a minor level. No indirect impacts would occur.

Historic Properties

Alternative 3 long-term projects would involve developing a potential new SFVAMC Mission Bay Campus at an as-yet-unknown specific location. The NRHP eligibility of properties in the Mission Bay area is not currently known. Historic resources surveys of the site of a potential new Campus 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 site would be located and the results of the historic resources surveys conducted for project-level review, proposed development associated with a potential new SFVAMC Mission Bay Campus under Alternative 3 long-term projects could occur close to historic properties. Proposed development could lead to physical demolition, destruction, relocation, or alteration of historic properties. Because the presence of historic properties is not currently known, the impact of a new Campus on historic properties would be potentially adverse.

To minimize potentially adverse effects on historic properties, in accordance with NHPA Section 110, VA should attempt to use the historic property first. If VA cannot use the building, then mitigation measures would include steps required to adhere to the *Secretary of Interior's Standards for Rehabilitation*, documentation, or interpretive programs. However, appropriate mitigation measures would need to be developed upon further consultation with the SHPO and other parties, if necessary, and in conjunction with any future, project-level environmental review.

Operation

Operation of Alternative 3 long-term projects would not involve ground disturbance or vibration, so no direct or indirect impacts on archaeological resources would occur. SFVAMC would seismically upgrade various historic properties on the Campus so they would be used and maintained. Through implementation of Alternative 3 long-

term projects and following the PA process, future planning at the Campus would take place in a manner that is sensitive to historic properties. Therefore, the impact on historic properties would be beneficial.

Alternative 4: No Action Alternative

Short-Term and Long-Term Projects

Construction

Under Alternative 4, no ground-disturbing activities would occur in previously undisturbed locations. Therefore, no impacts on archaeological resources would occur under this alternative. Under Alternative 4, no new building construction or retrofitting of buildings would occur. Structures on the Campus would not be seismically upgraded, which could lead to the destruction or damage of buildings located within the SFVAMC Historic District during a seismic event. This would be a direct adverse impact on the Historic District. As there would be no visual or atmospheric intrusion to the buildings or to the SFVAMC Historic District, no indirect impact on historic resources impact would occur.

Operation

Under Alternative 4, the LRDP would not be implemented. No impacts on archaeological resources would occur. Buildings on the campus would not be seismically upgraded, which could lead to the destruction or damage of contributors in the SFVAMC Historic District during a seismic event, which could result in the need to demolish the buildings. This would be a direct adverse impact on the SFVAMC Historic District. As there would be no visual or atmospheric intrusion to the buildings or to the SFVAMC Historic District, no indirect impact on historic resources would occur.

3.4.4 References

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