

Appendix A

EIS Public Involvement

- Notice of Intent (NOI) to Prepare EIS
- Public Comments Received in Response to NOI and During 1st and 2nd EIS Scoping Public Meetings
- Notice of Availability (NOA) of Draft EIS and Announcing Draft EIS Public Meeting
- Second NOA of Draft EIS Extending Public Comment Period
- Public Comments Received on Draft EIS and During Draft EIS Public Meeting

collection should be addressed to the OMB reviewer listed and to the Treasury Department Clearance Officer, Department of the Treasury, 1750 Pennsylvania Avenue, NW., Suite 11010, Washington, DC 20220.

DATES: Written comments should be received on or before April 29, 2011 to be assured of consideration.

Departmental Offices

OMB Number: 1505–0224.

Type of Review: Extension without change of a currently approved collection.

Title: New Issue Bond Program and Temporary Credit and Liquidity Program.

Description: Authorized under section 304(g) of the Federal National Mortgage Association Charter Act (12 U.S.C. 1719(g)) and Section 306(l) of the Federal Home Loan Mortgage Corporation Act (12 U.S.C. 1455(l)), as amended by the Housing and Economic Recovery Act (HERA) of 2008 (Pub. L. 110–289; approved July 30, 2008) the Department of the Treasury (Treasury) is implementing two programs under the HFA (Housing Finance Agency) Initiative. The statute provides the Secretary authority to purchase securities and obligations of Fannie Mae and Freddie Mac (the GSEs) as he determines necessary to stabilize the financial markets, prevent disruptions in the availability of mortgage finance, and to protect the taxpayer. On December 4, 2009, the Secretary made the appropriate determination to authorize the two programs of the HFA Initiative: the New Issue Bond Program (NIBP) and the Temporary Credit and Liquidity Program (TCLP). Under the NIBP, Treasury has purchased securities from the GSEs backed by mortgage revenue bonds issued by participating state and local HFAs. Under the TCLP, Treasury has purchased a participation interest from the GSEs in temporary credit and liquidity facilities provided to participating HFAs as a liquidity backstop on their variable-rate debt. In order to properly manage the two programs of the initiative, continue to protect the taxpayer, and assure compliance with the Programs' provisions, Treasury is instituting a series of data collection requirements to be completed by participating HFAs and furnished to Treasury through the GSEs.

Respondents: Businesses or other for-profit institutions, and not-for-profit institutions.

Estimated Total Reporting Burden: 26,170 hours.

Agency Contact: Theo Polan, Department of the Treasury, 1500 Pennsylvania Ave., NW., Room

2054MT, Washington, DC 20220; (202) 622–8085.

OMB Reviewer: Shagufta Ahmed, Office of Management and Budget, New Executive Office Building, Room 10235, Washington, DC 20503; (202) 395–7873.

Dawn D. Wolfgang,

Treasury PRA Clearance Officer.

[FR Doc. 2011–7374 Filed 3–29–11; 8:45 am]

BILLING CODE 4810–25–P

DEPARTMENT OF VETERANS AFFAIRS

Notice of Intent To Prepare an Environmental Impact Statement for the San Francisco Veterans Affairs Medical Center (SFVAMC) Institutional Master Plan

AGENCY: Department of Veterans Affairs (VA).

ACTION: Notice of intent.

SUMMARY: Pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended, (42 U.S.C. 4331 *et seq.*), the Council on Environmental Quality Regulations for Implementing the Procedural Requirements of NEPA (40 CFR parts 1500–1508), VA's Implementing Regulations (38 CFR part 26), as well as the settlement agreement resulting from Planning Association for Richmond, *et al v. U.S. Department of Veterans Affairs*, C–06–02321–SBA (filed 6 June 2008), VA intends to prepare an environmental impact statement (EIS) for the proposed implementation of the SFVAMC Institutional Master Plan (IMP) in San Francisco, California. The SFVAMC IMP involves development and construction of patient care buildings, research buildings, business occupancy buildings, and parking structures, as well as retrofitting seismically deficient buildings. The EIS will address environmental issues associated with 945,000 square feet of new construction and approximately 500,000 square feet of retrofitted development to upgrade the SFVAMC for purposes of meeting the needs of Veterans of the North Coast and San Francisco Bay Area over the next 20 years.

DATES: Interested parties are invited to submit comments on or before April 29, 2011 to ensure full consideration during the scoping process.

ADDRESSES: Comments should be addressed to John Pechman, Facility Planner, San Francisco VA Medical Center (001), 4150 Clement Street, San Francisco, California 94121, or sent electronically to John.Pechman@va.gov.

FOR FURTHER INFORMATION CONTACT: John Pechman, Facility Planner, SFVAMC at the address above or by telephone, (415) 221–4810. The SFVAMC IMP is available for viewing on the SFVAMC Web site: <http://www.sanfrancisco.va.gov/visitors/noi.asp>.

SUPPLEMENTARY INFORMATION: VA operates the SFVAMC, located at Fort Miley in San Francisco, California. It is the only VA medical center in the City and County of San Francisco and is considered an aging facility with need for retrofitting and expansion. The SFVAMC has identified a need for retrofitting existing buildings to the most recent seismic safety requirements and for an additional 945,000 square feet of medical facility space (in addition to the existing 1.02 million square feet of medical facility space) to meet the needs of San Francisco Bay Area and northern California coast Veterans over the next 20 years.

VA has identified four reasonable alternatives for evaluation in the EIS:

Alternative 1 involves the existing SFVAMC site, which is a 29-acre site located at Fort Miley in the northwestern portion of the City of San Francisco. The site is bounded by Clement Street on the south, Lincoln Park on the north and east, and the National Park Service on the west. Implementation of the SFVAMC Institutional Master Plan Alternative 1 at this site would include approximately 939,200 square feet of new and/or retrofitted development. This alternative would involve development or retrofitting of buildings for patient care, research, business occupancy, residential and parking structures.

Alternative 2 involves a combination of new development and renovation of existing buildings within the existing SFVAMC campus, and relocation of some aspects of the medical center to an alternate site within the City of San Francisco. This alternative may involve retrofit and development of clinical, research, and administrative buildings at the existing SFVAMC site and the construction of a new clinical ambulatory care center, medical research buildings, and parking structures at the new alternate site.

Alternative 3 involves construction and relocation of the entire medical center campus to an alternate site within the City of San Francisco. This alternative would include construction of approximately 1.9 million square feet of new health care, clinical, research, and administrative facilities, including a new ambulatory care center, inpatient and outpatient care, research, business

occupancy buildings, and parking structures.

In addition to the three aforementioned action alternatives, the EIS will evaluate potential environmental effects associated with the no action alternative (Alternative 4). Potential issues to be addressed in the EIS include, but are not limited to biological resources, historic and archaeological resources, geology and soils, hazards, hydrology and water quality, air quality, and transportation.

Relevant and reasonable measures that could alleviate environmental effects will be considered.

VA will undertake necessary consultations with regulatory entities pursuant to the Endangered Species Act, Clean Water Act, National Historic Preservation Act, and any other applicable law or regulation. Consultation will include but is not limited to the following Federal, state, and local agencies: State Historic Preservation Officer; U.S. Fish and

Wildlife Service; U.S. Environmental Protection Agency; and the National Park Service.

Information related to the EIS process, including notices of public meetings, will be available for viewing on the SFVAMC Web site: <http://www.sanfrancisco.va.gov/>.

Approved: March 18, 2011.

John R. Gingrich,

Chief of Staff, Department of Veterans Affairs.

[FR Doc. 2011-7435 Filed 3-29-11; 8:45 am]

BILLING CODE 8320-01-P



SFVAMC Institutional Master Plan
Environmental Impact Statement

SIGN-IN SHEET

NAME	ORGANIZATION	MAILING ADDRESS	E-MAIL & PHONE NO.	ADD NAME TO MAILING LIST? (Y/N)
Raymond Holland	Planning Association for the Richmond (PAR)	3145 Geary Blvd., Box #205 San Francisco, CA 94118	president@sfpar.org raymondslf@aol.com	Y
KATHY LASSSEN- HAHNE	Neighbor	400 42nd Ave	KATHY @ CHELHEL VETCA.COM	
Floyd DEVENBECK CHIEF ENGR	VAMC			
SARON SWAGER	PAR, SOLO, LSOB/FRP	527 4th Ave. 94121	SARONSWAGER@SFGRAZ.ORG	Y
Brian Aviles	GENRA National Park Service	Building 201 Fort Mason SF, CA 94123	brian-aviles @nps.gov	Y
Jackson Jee		427 33rd Ave 94121	jee-jee@john.com	Y



SFVAMC Institutional Master Plan
Environmental Impact Statement

SIGN-IN SHEET

NAME	ORGANIZATION	MAILING ADDRESS	E-MAIL & PHONE NO.	ADD NAME TO MAILING LIST? (Y/N)
David Burns	Friends of Lands End	16 Seal Rock Dr SE 94421	dburns@ sealrock.com	Y
Julie Burns	"	"	Julieburns@ sealrock.com	Y on 158
C. KIN WAH		10 SRD.	chi.kinwah@gmail.	Y
Steve Ortega	NPS	Bldg 201 Fort Mason	steve-ortega@ NPS.gov	Y
Charles Cheraman	neighbor	400 40th Ave SE 94421	ctgherman @msn.com	



SFVAMC Institutional Master Plan
Environmental Impact Statement

SIGN-IN SHEET

NAME	ORGANIZATION	MAILING ADDRESS	E-MAIL & PHONE NO.	ADD NAME TO MAILING LIST? (Y/N)
Amy Meyer	People For a GONRA	3627 Clement	a7w2m@earthlink.net 221-8427	y
Charles Galatti	VET.	343 Valley St. S.F. Ca. 94131	Charles Galatti @yale00.cal. 415-317-1107	y
Beverly Ghuman	Neighborhood	400 40th Ave	415-752-6171	
Tom Kuhn	Friends of SUTRO HEIGHTS PARK	751 48th Ave 546	751-6925 TOM@TOMKUHN.COM	y



SFVAMC Institutional Master Plan
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NAME	ORGANIZATION	MAILING ADDRESS	E-MAIL & PHONE NO.	ADD NAME TO MAILING LIST? (Y/N)
Eugene A Brodsky	PAR	7919 Geary Blvd	287 3691	
Justina Mignea				
MARC SCHWEITZER	DESIGN PARTNERSHIP	1412 VAN NESS AVE SF, CA 94109	MARCDPOST.COM 415.345.3014	X

**San Francisco VA Medical Center Institutional Master Plan Environmental Impact Statement
(SFVAMC IMP EIS) Scoping Meeting Verbal Public Comments**

SFVAMC Auditorium at 6 p.m. on October 26th, 2010

Speaker No. 1

Brian Aviles, Senior Planner, National Park Service - Golden Gate National Recreation Area (GGNRA)
- accompanied by Steve Ortega of GGNRA NEPA compliance team

- We share three sides with the VA and want to work to make sure SFVAMC growth has minimal effect on the edges of GGNRA lands.
- Issues we see that you need to address, some of which are already identified in the NOI, include: slope stability, visual impacts to/from GGNRA lands, traffic/parking, historic properties, stormwater runoff, light impacts, and noise.
- National Park Service has a policy that protects dark skies and natural soundscapes, especially related to construction and staging.
- Interested in seeing how the VA intends to develop the other Alternatives. We would like to participate and see Alternatives 2 and 3.

Speaker No. 2

Raymond Holland

- You plan on putting a lot of development on this campus. The size of the SFVAMC campus is 80% of the size of the Public Health Service campus 2 miles west. We went through negotiations with the Presidio and thought that was compact. But that was 36 acres versus the smaller 29 acres here – so there would be much going in here that raises concerns. Hope to get planning assistance for the Richmond.
- Parking is an issue. There's no data to support the parking issue. There are 1,200 parking spaces on the SFVAMC campus, but I'm interested in knowing where parking spaces will be on our side of the campus [[pointed towards southern end by Richmond neighborhood]]. There's nothing in the IMP to support that. We want to see that addressed in EIS.
- What is the parking deficit currently? When you get up to 3,440 parking spaces at buildout of the final phase (Phase 4), will that mitigate the current deficit? One way to look at it is that the parking deficit would go up three times, because campus size would go up three times in size. I know there is a lot of VA-related parking along El Camino between East Fort Miley and Legion of Honor.
- In the IMP, you account for what 50% of the campus is or will be used for (30% for research/affiliated functions and 20% medical needs), but you don't say anything about how the other 50% will be used. This is an awful lot of purely administrative functions that I think should

be moved off campus. UCSF is the largest employer in San Francisco, and they are crying for occupants at Mission Bay.

- There would be four phases of construction, but the real concern is how to interrelate this. There is nothing in the IMP about the interrelationship of construction phases. Also, how will the Alternatives be interrelated, especially in the EIS?
- Alternative 1 is what is in IMP. This reads like trying to put a cabbage in keyhole. Somewhere along the line, our suspicion is you're not going to be able to do that. How is that going to happen with the 4 phases of construction? The 4 phases of construction seems to be prioritized based on 50%. In terms of moving stuff off campus – the land use intensity of the campus is too dense.
- Historic preservation. We would like to see Buildings 8, 9, 10 preserved. I hope this doesn't continue to happen [[pointing to central portion of campus – 203 area]]. This is not a good testament of what's been done to preserve historic portions. District in northeast.

Speaker No. 3

Amy Meyer

- Thank you for the handsome and easily-read IMP. I support and respect the job the VA is doing.
- I believe the VA has reached the limits of what is possible to do here. I would like to compare with the Presidio. There, they have ancient infrastructure, but they have swing space. There if you have a change, you can move it to another building to make things work. Schools have been able to use space in the Presidio while improvements are made. Since there is no swing space at the SFVAMC campus, I believe that the disruption will be fierce and needs to be accounted for.
- Judy, you mentioned the interesting and hopeful sign of how people will get to the campus via shuttles. When talking about another few hundred thousand square feet of development, the increased amount of traffic is a concern, especially considering that 3 sides of the campus don't allow traffic access and all traffic funnels through the neighborhood to the south. In residential neighborhoods, traffic patterns and speeds are very important. Get into the nature of that relationship of project with neighborhoods.
- Don't forget about what the City requires to keep neighborhoods livable, also with respect to the amount of noise. Chief thing that strikes me is the amount of noise made with the ENCIR building.
- The idea of 7- or 10-story buildings in the Richmond, where the height limit is 40 feet, is unacceptable. This is not an area that lends itself to that kind of development.
- The VA needs to consider what the City code requirements are and how that relates to effects on the surrounding neighborhood.

Speaker No. 4

Charles Galatti

- I'm a native of San Francisco, a retired Project Coordinator, and a Korean vet of '52 and '56. I'm in favor of this project. I don't know much about the IMP to speak about it in detail, but these vets need it. If you've been in a war zone for even 10 minutes, you should support this project.
- I have heard all the issues brought up – too much parking, too much traffic, too much, move it somewhere else, not in my neighborhood, put it somewhere else – but the thing is, when you look at it and the fact that those guys are in the war zone and will be coming home, you should be ashamed of yourself.

Speaker No. 5

Julie Burns, Friends of Lands End

- Thank you for this opportunity to speak. Our goal is to make City land in this area a better place.
- We welcome the IMP. We think it's a thoughtful and good progression from the draft plan that was submitted around 2004. There are similarities. We will also be submitting written comments.
- First and foremost, we support the medical and research goals of the VA. We think this is an immense plan with a lot to digest here. We urge a 30-day extension of the scoping period.
- Some comments regarding procedures: there is some logical disconnect between the ability to do an EIS without actual plans for Alternatives 2 and 3. We want you to evaluate the impacts of Alternatives 2 and 3 as well as Alternative 1.
- We would like EIS to actually study in some detail the permeable borders of the institution (i.e. borders with Lincoln Park, GGNRA, and the neighborhood).
- We would like the EIS to speak in more detail to site profile and impact on coastal sight views, both from south of the institution and from the north and Marin headlands.
- Given the increased density proposed at the campus, we are concerned for disaster planning in the event of disaster, especially related to getting people on/off the campus in the case of a major emergency. One of the things from the IMP was that there are gas pipes that are rusted (corrosion from sea air) between Buildings 7 and 8. Therefore, look at not just natural disasters, but also look at hazardous spills disaster response as well.
- Finally, my hope is that the VA works not just with GGNRA but also with San Francisco Recreation and Parks Department.

Speaker No. 6

David Burns

- Issue of light pollution and loss of dark sky is crucial in this neighborhood. There is a Dark Sky Monthly Group that meets on lands end, which is the darkest place available in San Francisco. I think the VA has done a poor job regarding light pollution.
- Parking and congestion issues are severe. In the last two weeks, I have called in regarding four different cars blocking crosswalks at Seal Rock Drive and 45th Avenue. This affects people's lives. Congestion is getting worse. With the amount of access proposed, I have difficulty envisioning how all the parking needs will be accommodated.



NAME	ORGANIZATION	MAILING ADDRESS	E-MAIL & PHONE NO.	ADD NAME TO MAILING LIST? (Y/N)
JASON SWARGERS	PAR, FOLG, CSOB/FSP	527 47 th AV SF 94121	JASON.SWARGERS@GMAIL.COM	Y
Amy Meyer	People for a GENRA	on record	on record	✓
WILIE BURNS	FRIENDS OF LANDS END	16 Seal Rock Dr SF	wilieb@sealrock.com	
DAVID BURNS	F.O.C.E.	16 Seal Rock Dr SF	dburns@sealrock.com	✓

13 total signed in



SFVAMC Institutional Master Plan
Environmental Impact Statement

SIGN-IN SHEET

NAME	ORGANIZATION	MAILING ADDRESS	E-MAIL & PHONE NO.	ADD NAME TO MAILING LIST? (Y/N)
Ron Miguel	Planning Commission	000 DeHoff St. SF CA 94107	rm@well.com	
KATHY CASSEN-HAHN	Neighbor	400 42ND AVE		
JOAN R. KELLER	PAR	515-42ND AVE S.F., CA 94121-2530		
EDUARDO RAMIREZ	EMPLOYEE VETERAN	HENDERSON ST SF. CA 94110	415 244 7100	
Dave Goggin		920 Van Ness #103 SF CA 94109	DG2222@MISH.com 415 567-6773	
C. K. WAL		10 SRD.	415 757 9043	



SFVAMC Institutional Master Plan
Environmental Impact Statement

SIGN-IN SHEET

NAME	ORGANIZATION	MAILING ADDRESS	E-MAIL & PHONE NO.	ADD NAME TO MAILING LIST? (Y/N)
Gene Brodsky	PHR	7219 Geary	SFS14@pacbell.net	
JOHN FRYKMAN	CTSOB	751-47th Ave STE, CA 94121-3205	john.frykman@comcast.net	y
Janice Bessler				

**San Francisco VA Medical Center Institutional Master Plan Environmental Impact Statement
(SFVAMC IMP EIS) Scoping Meeting Verbal Public Comments**

SFVAMC Auditorium at 6 p.m. on April 26, 2011

Speaker No. 1

Jason Jungreis

- First and foremost, the one document we have received is the IMP. The burden should not be on the public to comment on and determine what the environmental impacts will be.
- Nothing is provided regarding alternatives. How can the public comment on the alternatives when there's only one paragraph in the IMP?
- There's a lot of flux and a lot of development going on. The carrying capacity needs to be understood; the vision needs to be complete. The cart is going before the horse. You need to provide us all the information; the IMP needs to be complete. Once this is understood and the IMP is completed, then you can move ahead. You should not be moving forward with the EIS.
- Fundamentally, we need to understand that this proposal is doubling the size and impact of the Campus. It's an insult to the community.

Speaker No. 2

Julie Burns, on behalf of Janet Fiore

- I will read an email comment from Janet, who has her MS, is a nurse, and retired US Army. The email comment is for the scoping meeting regarding SFVAMC's desire to expand. "I got my MS degree and could have done many other things with it, but I decided to work in conservation. SFVA's destruction of the Campus and conservation lands, through expansion, is abhorrent." I will submit this email to John Pechman.

Speaker No. 3

David Burns

- All I have to say is that I haven't heard what metrics will be used in the course of evaluating the environmental impacts, and they need to be carefully chosen.
- Choosing them is not just about increasing the burden or absolute amount of impact. Metrics need to be measured against goals of not only this institution but also the surrounding neighbors (NPS and its natural resources as well as state and local government and their goals for reducing congestion and pollution).
- We need to measure VA in making changes in context of improving the situation here. The point is to improve and not just limit the damage to what we can deal with.

Speaker No. 4

Kathy Lassen-Hayne

I have four questions:

- There was an article in the paper, the San Francisco Business Times, regarding SFVAMC moving to Mission Bay. Is that still an option and when will that decision be made?
- What is the level of incentive for employees to take public transit?
- What is the animal house?
- New buildings with more parking. How deep underneath are you planning to dig for those? It was previously discussed that it can't go more than one level because of cost.

Speaker No.5

Ron Miguel

- Following the October meeting, I sent a letter. I specifically mentioned that the SFVAMC should interface with the City (the Planning Commission, Mayor's Office, etc.). None of them have heard from VA. You include reference to urban context in the IMP on pages 2.2 and 2.3. I strongly encourage you to interface with San Francisco government.
- I have worked with EDAW in the past. I have every faith in the work that they do. However when I hear that the idea of putting parking underground, how can you do a transportation study when you don't know how many parking facilities, what the routes will be, etc? How can you evaluate impacts when you don't have this information? I don't know how you can do an EIS with the current information.
- You say you have four alternatives, one of which is no action. I'm not sure how you're going to deal with anything in the EIS related to the Mission Bay Alternative. If you don't know where future facilities will be, how are you going to deal with what impacts they have? You can't do a full EIS when all that square footage is sitting outside in space. So what are the impacts? As far as I'm concerned, you don't have three action alternatives, because you can't study them.

Speaker No. 6

John Frykman

- There should be training sessions for VA staff about public meetings.
- I didn't receive notice regarding tonight's meeting. I have tried to find someone who has received notice about this meeting but can't find anyone who has received it. Pelosi's office didn't receive notice.
- I didn't receive notice regarding the October meeting either.

- I live three blocks from SFVAMC. I used to be SFVA's substitute chaplain and used to speak with the former SFVA director. This is not an open process. It's a disregard of public comment. VA is not asking for public comment, and it is not keeping faith with people in this community. I'm also in the Coalition to Save Ocean Beach and Friends of Lands End.

Speaker No. 7 (note that no speaker card was received)

Maria Souza (spelling?)

- I live in the neighborhood and grew up here. I'm a member of the Planning Association for the Richmond. The attitude and culture of contempt is the same as years ago, irrespective of who is now representing the VA. The VA has a bunker mentality when it comes to communication.
- I'm listening to the rationale for public notice and cannot believe the lack of integrity.

Speaker No. 8

David Goggin

- Aesthetics and air quality. In recent years people have been more conscious of light pollution - glare and trespass of overhead lighting. These are important issues that should be addressed in environmental document. Residents here in the western neighborhoods have lower nighttime light levels, but we can do a lot better. Include analysis of lighting impacts in the EIS. Any building projects of this magnitude should produce zero up-light. Should aim for zero direct light crossing lines of the property.
- Transportation. San Francisco has a transit first policy. Any projects that build parking are basically subsidizing and encouraging driving. You are un-subsidizing and disadvantaging those taking public transit. Developing parking is not neutral; it's subsidizing parking. It's important to subsidize transit.

Speaker No. 9

Julie Burns, Friends of Lands End

- I'm speaking on behalf of Friends of Lands End and will also be submitting written comments.
- Judi has done a good job reaching out to me and Friends of Lands End and providing official notification.
- I am limiting comments to two areas: process and cost.
- Process – there are some disturbing aspects. Scoping is asking for comments before the facility options study is complete. This is a violation of sense and being able to evaluate the impacts.
- Relocation to Mission Bay and Pier 70 - those efforts are well known and publicized and should be part of EIS.

- It's troubling that the EIS is being prepared when Phase 1 is already under construction. This is a violation of due process.
- In terms of outreach to the City, several City agencies (for example, the fine arts museum at border- spoke to director who had not heard of the plans; Recreation and Parks – not aware of scale and scope of this project; SFPUC – they need to be involved). Lincoln Park – this project would increase people/traffic, which will impact the experience there, including GGNRA. City Planning Commission and City Attorney need to be part of the process.
- Cost – cover the cost-benefit of all these options.
- Who will bear cost on impacts to City? For example, with increased transportation, wear and tear on City streets? How will it be funded?
- Who will bear cost of infrastructure in terms of sewage and waste? This facility will be connecting to and using these systems.
- What is the cost-benefit of retrofitting versus relocating to other buildings? Does it make sense to retrofit if it's more cost effective to move to a more convenient location for veterans and clinical research?
- Impact on cost to the City and City rate payers - increased water and power costs.
- Air emissions – what emissions come from SFVAMC?
- Noise – during and after construction - not only sleeping residents but wildlife and those people visiting.
- Geological impacts too. I'm concerned about underground parking.
- I'm concerned that the IMP wants to be an integral part of San Francisco but doesn't understand the scope of project.

Speaker No. 10

Amy Meyer

- Who at the City is aware of this project? I have concerns about building and the scoping process.
- I went to the regional office of national trust of historic properties today. NEPA establishes a forum for public content. Section 106 gives further opportunity. SFVA should start the Section 106 consultation process immediately.
- SFVA is something that serves veterans all over the region, not just the local area. People are affected more than those that live in neighborhood.
- I have heard considerable reference to a Facility Options Study. What is the Facility Options Study? Where does this fit into the project? How can the impacts be assessed if we don't have the background information?
- There are National Register historic properties in this area of Campus and nearby. How will buildout of the Campus affect these historic properties and the National Park Service visitor experience next door?

- In accordance with the National Historic Preservation Act, VA cannot spend funds on National Register historic properties (which are a large part of the Campus) unless they comply with Section 106.

Speaker No. 11

Eddie Ramirez

- I'm a native San Franciscan from this area and retired US Air Force with 22 years active duty. As a veteran, this is not ideal, but when comrades come back from war, they want a place to call home. This VA is their home. Is this ideal? No, but when my son came back from Afghanistan, he found a home here.

Bennett, Kelsey

From: Pechman, John J. [John.Pechman@va.gov]
Sent: Monday, January 03, 2011 8:36 AM
To: Allsep, Jayni; Bennett, Kelsey
Subject: FW: Scoping Process,VAMC Institutional Master Plan: Input for EIS

Follow Up Flag: Follow up
Flag Status: Flagged

FYI.

John Pechman

Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Sreet
San Francisco, CA 94121
415-221-4810 x4600

From: David Burns [<mailto:dburns@sealrock.com>]
Sent: Monday, December 13, 2010 12:00 AM
To: Pechman, John J.
Cc: Cheary, Judi A.; Julie Burns
Subject: Scoping Process,VAMC Institutional Master Plan: Input for EIS

This is a response to the request for input in the process of creating an institutional master plan for the San Francisco VA Medical Center.

In addition to the issues addressed by others in the scoping meeting, it is crucial that the VA Institutional Master Plan address the following:

1. What is the acceptable and sustainable size of the VA presence on this site, in terms of
 - a. number of people entering/exiting daily
 - b. number of automobiles and other vehicles transiting and/or parking

These factors should be evaluated in the context of the burden they place on residential neighbors and on the use of the area as a cultural, recreational, and natural resource by visitors. It is my opinion that the VAMC site is already overcrowded and overutilized, and that it already creates an unacceptable burden on the local environment. For example, VAMC employees and visitors frequently occupy parking spaces provided by NPS and intended for GGNRA visitors. As current trends show an increase in NPS visitors, at what point will use by VAMC employees and visitors conflict with the purpose of the NPS and degrade the experience of GGNRA visitors?

2. What burden does each option place on the local environment in terms of air and water pollution, effect on local soundscape, light trespass and light pollution?
3. Which option provides the best access to VAMC services for patients and others receiving services? What is the environmental impact of the travel modes that patients,visitors, and others will use to access services?
4. Which option creates the best environment for advancing the research which is now a major component of the VA mission? It is well established that innovation benefits from proximity to other centers of research and

innovation. Which option creates the optimal climate for the advancement of science by placing scientists near other centers of research and innovation?

5. Which option creates the optimal balance between the interests of
- a. the value of the area as a natural, cultural, and historical resource
 - b. the character of the area as a residential neighborhood
 - c. the mission of the VA "To care for him who shall have borne the battle, and for his widow, and his orphan".

Sincerely,
David Burns
16 Seal Rock Drive
San Francisco, CA 94121

Bennett, Kelsey

From: Pechman, John J. [John.Pechman@va.gov]
Sent: Monday, January 03, 2011 8:36 AM
To: Allsep, Jayni; Bennett, Kelsey
Subject: FW: Scoping Process,VAMC Institutional Master Plan: Input for EIS

FYI.

John Pechman

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San Francisco, CA 94121
415-221-4810 x4600

From: Julie Burns [<mailto:julieburns@sealrock.com>]
Sent: Sunday, December 12, 2010 9:49 PM
To: Pechman, John J.
Cc: Cheary, Judi A.; Raymondsnf@aol.com; Ron Miguel; Amy Meyer; John Frykman; David Burns
Subject: Scoping Process,VAMC Institutional Master Plan: Input for EIS

December 12, 2010

Submitted via email

John Pechman, Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Street
San Francisco, CA 94121
John.Pechman@va.gov

This communication responds to the Department of Veterans Affairs (VA) and the San Francisco VA Medical Center (SFVAMC) intention to prepare an environmental impact statement (EIS) for the proposed implementation of the SFVAMC Institutional Master Plan (IMP) at the Clement Street campus in San Francisco, California.

Friends of Lands End (FOLE) supports the mission of the SFVAMC to serve the health care needs of our veterans. We also support the research initiatives undertaken by the SFVAMC, UCSF, and NCIRE that may lead to scientific discoveries that will improve the health of our veterans. We have, however, serious reservations regarding the feasibility of the approximately 924,200 square feet of proposed new construction to upgrade the SFVAMC to meet demand for services over the next 20 years. We urge that a full Environmental Impact Study be conducted and that the EIS address the following issues in detail:

- The IMP outlines in general four alternatives. We urge that the environmental impact of **all four alternatives** be addressed – which may require the VAMCSF to develop these alternatives in sufficient detail so that a realistic EIS can be prepared. We are especially concerned with the possibility of continuing piecemeal development under alternatives two, three and four.
- We believe that total **carrying capacity** of the campus should be addressed, to determine the **feasibility** of dramatically increasing the number of individuals working or receiving services on site. Among other issues that the EIS should address include

- Social/cultural impacts
- Infrastructure – streets, sewage and wastewater, drainage, power generation
- Emergency response -- especially with respect to evacuation of on-site patients and workers, as well as the ability for SF municipal entities to support the emergency response needs of a vastly increased SFVAMC campus
- Public safety
- **Parking and transit.** The VAMCSF has acknowledged its current parking deficit. What impact will the future campus, envisioned by the IMP, have on
 - Demands on MUNI or other public/private transit
 - Increased need for parking and impact on neighborhood
- Impact on adjacent **parklands** (GGNRA, Lincoln Park) resources, include
 - Wildlife (including CA quail, fox, coyote)
 - Lighting, including the impact of increased lighting parks, residences and the Outer Richmond/GGNRA Dark Sky resource
 - Site profile and view-scape (e.g., profile as seen from Marin Headlands)
 - Access to recreational resources (including West and East Fort Miley)
- Impact on **historical** resources, both within and adjacent to the SFVAMC campus
- **Environmental** impacts, both **short term** (during construction) and **long-term** (2025 and beyond), including
 - Air quality
 - Toxics
 - Noise
 - Hydrogeological (earthquakes, erosion, run-off)

We anticipate continuing to work with the SFVAMC to determine the most appropriate scale of activities on the existing and future Clement Street campus.

Sincerely,

Julie Burns
Friends of Lands End
 3755 Balboa Street, Suite 201
 San Francisco, CA 94121
 +1.415.666.3092 direct +1.415.341.6060 mobile +1.415.666.3060 main +1.415.666.0141 fax
www.sealrock.com

Bennett, Kelsey

From: Pechman, John J. [John.Pechman@va.gov]
Sent: Friday, November 12, 2010 8:27 AM
To: Allsep, Jayni; Bennett, Kelsey
Subject: FW: PAR's Response to the SFVAMC's October 12th IMP and Notice to Prepare an EIS

From: margie brown [mailto:royalmargie@sbcglobal.net]
Sent: Thursday, November 11, 2010 12:21 PM
To: Pechman, John J.; Raymondsnf@aol.com
Cc: Brendalaw@earthlink.net; faltshuler@igc.org; faltshuler@altshulerberzon.com; Laasf@aol.com; sfsky1@pacbell.net; RHPINSFO@aol.com; julieburns@sealrock.com; herbertelliott@sbcglobal.net; paulsfo@gmail.com; rfries@carterfries.com; raymondsnf@aol.com; jasonjungreis@gmail.com; lawoffices-jek@att.net; jim_lazarus@yahoo.com; rm@well.com; phfromtherichmond@gmail.com; wsheplaw@aol.com; maria@komensf.org; mdstratton@att.net; mntuchow@yahoo.com; prose38@pacbell.net; pwinkelstein@gmail.com; daniel_baroni@gensler.com; jcheever@igc.org; brian@brianjlarkin.com; Nbelloni@swpsf.com; sharongadberry@yahoo.com; hirschlow@comcast.net; diane@defraser.com; l.jacoby714@gmail.com; a7w2m@earthlink.com; zerocut@aol.com; tom@tomkuhn.com; Frank.Dean@va.gov; gavin.newsom@sfgov.org; dennis.herrera@sfgov.org; cityattorney@sfgov.org; Michela.Alioto-Pier@sfgov.org; Catherin.Stefani@sfgov.org; Eric.L.Mar@sfgov.org; linshao.chin@sfgov.org; David.Campos@sfgov.org; Linnette.Peralta-Haynes@sfgov.org; Nathaniel.Ford@sfgov.org; john.rahaim@sfgov.org; phil.ginsburg@sfgov.org
Subject: Re: PAR's Response to the SFVAMC's October 12th IMP and Notice to Prepare an EIS

Ray, PAR's response on the SFVAMC is comprehensive and excellent and I support PAR's involvement throughout the process. I also agree with your observation that the research component may possibly be coordinated with other research facilities in the City to minimize the need for more buildings, if at all feasible. Does the master plan delineate the type of research planned for the SFVAMC? Are there other VA facilities in the country that could assume the research component? If VA moves forward on the Master Plan (regardless of which option), I don't see how the parking issue can be resolved, both in terms of additional personnel and visitors as well.

Margie Hom-Brown

--- On Tue, 11/9/10, Raymondsnf@aol.com <Raymondsnf@aol.com> wrote:

From: Raymondsnf@aol.com <Raymondsnf@aol.com>
Subject: PAR's Response to the SFVAMC's October 12th IMP and Notice to Prepare an EIS
To: John.Pechman@va.gov
Cc: Brendalaw@earthlink.net, faltshuler@igc.org, faltshuler@altshulerberzon.com, Laasf@aol.com, sfsky1@pacbell.net, RHPINSFO@aol.com, julieburns@sealrock.com, herbertelliott@sbcglobal.net, paulsfo@gmail.com, rfries@carterfries.com, raymondsnf@aol.com, jasonjungreis@gmail.com, lawoffices-jek@att.net, jim_lazarus@yahoo.com, rm@well.com, phfromtherichmond@gmail.com, wsheplaw@aol.com, maria@komensf.org, mdstratton@att.net, mntuchow@yahoo.com, prose38@pacbell.net, pwinkelstein@gmail.com, daniel_baroni@gensler.com, jcheever@igc.org, brian@brianjlarkin.com, Nbelloni@swpsf.com, royalmargie@sbcglobal.net, sharongadberry@yahoo.com, hirschlow@comcast.net, diane@defraser.com, l.jacoby714@gmail.com, a7w2m@earthlink.com, zerocut@aol.com, tom@tomkuhn.com, Frank.Dean@va.gov, gavin.newsom@sfgov.org, dennis.herrera@sfgov.org, cityattorney@sfgov.org, Michela.Alioto-Pier@sfgov.org, Catherin.Stefani@sfgov.org, Eric.L.Mar@sfgov.org, linshao.chin@sfgov.org, David.Campos@sfgov.org, Linnette.Peralta-Haynes@sfgov.org, Nathaniel.Ford@sfgov.org, john.rahaim@sfgov.org, phil.ginsburg@sfgov.org

Date: Tuesday, November 9, 2010, 5:19 PM

Hi John:

Attached, as a separate PDF for each of three pages (antique scanner or operator!), are PAR's comments and suggestions with respect to the San Francisco Veterans Affairs Medical Center's (SFVAMC's) October 12th "Institutional Master Plan" (IMP) and "Notice of Intent to Prepare an Environmental Impact Statement" with regard to it.

A hard copy of the attached letter is being deposited at the Richmond District U.S. Post Office tonight. It should arrive at your office on or before the current deadline of this coming Friday, November 12th.

Please note we are requesting an extension of that deadline by at least thirty days so that others can compose and submit their comments and suggestions as well..

Please let me know if you have any questions about our attached comments or suggestions.

Ray

Raymond Holland, President
Planning Association for the Richmond (PAR)
3145 Geary Boulevard, Box 205
San Francisco, CA 94118-3316
Direct Line: 415-668-8914
president@sfpar.org or raymondsnf@aol.com

1243 42nd Avenue
San Francisco, CA 94122
December 7, 2010

Mr. John Pechman
Facility Planner
SF VA Medical Center (001)
4150 Clement Street
San Francisco, CA 94121

Re: VAMC IMP Scoping Comments

Dear Mr. Pechman,

I was surprised to learn of the plans to develop the area around the VAMC . However, I understand the need to serve our veterans and to provide for their health care. These needs must be balanced against other issues. Therefore, I encourage the EIS process to evaluate all four of the alternatives that have been discussed to date.

I am particularly concerned about the impact on the surrounding parks, GGNRA, and Lincoln Park. The construction of this enormous complex next to a wildlife area and prime parkland should be evaluated very closely. This parkland is very precious and provides a home for many species that are struggling to survive -- the California quail, the red fox, the coyote and many other species that need a range of habitat to thrive.

The addition of such a large complex will also involve a great deal of night lighting. The Lands End area is San Francisco's premier night sky viewing area. A serious study must be made of the impact that this 24-hour complex will have on degrading the quality of that area. The lighting will also compromise the wildlife in the area, by introducing more light where currently there is very little.

In addition to the veterans themselves, there is the fact that many employees will work in this complex and the patients will have visitors. Without adequate transit, all will feel compelled to drive to an area that is currently on the edge of San Francisco's public transit system. Although you may plan for more transit, the fact is that public transit operations are under-funded for even basic commuter and resident services. Operational funds are predicted to be lacking well into the foreseeable future. This is especially true for outer areas such as the current VAMC site. Locating this complex closer to major public transit, such as BART, would seem a better alternative both in terms of funding and in terms of convenience for employees, patients, and visitors.

I also have concerns about the aesthetic and quality of life impact on the western part of San Francisco. This area has been traditionally less urbanized and more residential, even suburban, in character. Most people who have chosen to live in this area have done so because of this neighborhood character. A complex of this size will have an outsized impact on the quality of life in this area.

Please consider all of these factors in your analyses of this project. Thank you.

Sincerely,



Katherine Howard

Bennett, Kelsey

From: Pechman, John J. [John.Pechman@va.gov]
Sent: Tuesday, April 26, 2011 7:22 AM
To: Allsep, Jayni; Bennett, Kelsey
Cc: Cheary, Judi A.
Subject: FW: VAMC Scoping Comments

Please see EIS scoping comment from Ms. Howard.

John Pechman

Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Street
San Francisco, CA 94121
415-221-4810 x4600

From: Kathy Howard [<mailto:kathyhoward@earthlink.net>]
Sent: Tuesday, April 26, 2011 4:43 AM
To: Pechman, John J.
Cc: 'Julie Burns'
Subject: VAMC Scoping Comments

Mr. John Pechman
Facility Planner
SF VA Medical Center (001)
4150 Clement Street
San Francisco, CA 94121

Re: VAMC IMP Scoping Comments

Dear Mr. Pechman,

I cannot attend the meeting on April 26th; however I would like to reiterate comments that I submitted earlier and add some new ideas. I find that oftentimes open space is regarded only as a vacant building site, not as the valued resource it truly is. It seems that this project takes this view.

I was surprised to learn of the plans to develop the area around the VAMC. I understand the need to serve our veterans and to provide for their health care; however, these needs must be balanced against other issues. The environmental impact of all four alternatives must be given serious study. Too often, EIR's are slanted to one particular result. This must not happen in this case.

I am particularly concerned about the impact on the surrounding parks, GGNRA, and Lincoln Park. The construction of this enormous complex next to a wildlife area and prime parkland should be evaluated very closely. This parkland is very precious and provides a home for many species that are struggling to survive -- the California quail, the red fox, the coyote and many other species that need a range of habitat to thrive.

The addition of such a large complex will also involve a great deal of night lighting. The Lands End area is San Francisco's premier night sky viewing area. A serious study must be made of the impact that this 24-hour complex will have on degrading the quality of that area. The lighting will also compromise the wildlife in the area, by introducing more light where currently there is very little.

In addition to the veterans themselves, there is the fact that many employees will work in this complex and the patients will have visitors. Without adequate transit, all will feel compelled to drive to an area that is currently on the edge of San Francisco's public transit system. Although you may plan for more transit, the fact is that public transit operations are under-funded for even basic commuter and resident services. Operational funds are predicted to be lacking well into the foreseeable future. This is especially true for outer areas such as the current VAMC site. Locating this complex closer to major public transit, such as BART, would be a better alternative both in terms of funding and in terms of convenience for employees, patients, and visitors.

I also have concerns about the aesthetic and quality of life impact on the western part of San Francisco. This area has been traditionally less urbanized and more residential, even suburban, in character. Most people who have chosen to live in this area have done so because of this neighborhood character. A complex of this size will have an outsized impact on the quality of life in this area.

Please consider all of these factors in your analyses of this project. Thank you.

Sincerely,

Katherine Howard
1243 42nd Avenue
San Francisco, CA 94122

Bennett, Kelsey

From: Pechman, John J. [John.Pechman@va.gov]
Sent: Wednesday, November 10, 2010 9:49 AM
To: Allsep, Jayni; Bennett, Kelsey
Subject: FW: IMP EIS Comment

FYI.

John Pechman

Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Sreet
San Francisco, CA 94121
415-221-4810 x4600

From: jason jungreis [mailto:jasonjungreis@gmail.com]
Sent: Wednesday, November 10, 2010 9:44 AM
To: Pechman, John J.
Subject: IMP EIS Comment

Mr. Pechman,

Thank you for your careful review and address of the following SFVAMC IMP EIS comments:

1. The EIS format presented herein is fundamentally flawed for failure to provide a complete set of alternatives: while 4 alternatives are mentioned, none are articulated except for alternative number 1, and therefore the entire EIS process is flawed under the law. To correct, all (or, at a minimum, 2) alternatives must be equally developed for analysis in the manner of alternative 1.
2. The EIS format presented herein is fundamentally flawed for failure to provide an "environmental" assessment of the two major study components which most directly impact the environment through the life of the project: transportation and parking. There is a considerable present parking deficit (1214 existing spaces, resulting in a shortfall of over 700 spaces) and the IMP suggests that there will be several thousands of new employees (and also patients) but only 3440 total parking spaces: this not only perpetuates the parking space deficit, but appears to exacerbate it. Further, these thousands of new commuting employee and patients will cause considerable deterioration of the air quality in the adjacent community. It is necessary for the EIS to analyze and take into consideration parking and commuting impacts.
3. The mission of the SFVAMC is not properly considered by the IMP. The VA system is expressly intended to treat our nation's veterans. However, treatment is far from the IMP's express intent in growth: only 20% of growth is for "traditional medical treatment": the remainder is for research and administration. These components are better served in the nearby Mission Bay area which is expressly dedicated to the provision of medical research and attendant administration. Therefore, I reject the IMP to the extent that it provides for anything other than traditional medical treatment and advise that the SFVAMC blend this objection with the EIS' failure to pursue alternatives 2-4 in order to move all research and administrative efforts to Mission Bay.

Thank you for your careful consideration of these comments.

Jason Jungreis
527 47th Avenue

San Francisco, CA 94121
415-750-0830

RON MIGUEL

600 De Haro St., San Francisco, CA 94107

T-415/285/0808 F-415/641/8621 E-rm@well.com C-415-601-0708

27 April 2011

John Pechman, Facility Planner
San Francisco VAMC
4150 Clement St.
San Francisco, CA 94121

RE: SFVAMC Institutional Master Plan
SFVAMC Environmental Impact Statement

Dear Mr. Pechman:

This is to inform you that you have not held a legal IMP/EIS Scoping meeting.

Your meeting of 26 October 2010, for which you distributed 400 notices, was not, by admission of VAMC management on 26 April 27, 2011, published in the required timely manner by the Federal Register – ergo, it was not a legal public Scoping meeting under your own regulations. Your meeting of April 26, 2011 was not, by admission of your management, correctly noticed to the affected public – ergo, it was not a legal public Scoping meeting. Your closure date for the IMP/EIS Scoping process cannot occur until you have held at least one legal public Scoping meeting – obviously, this has yet to take place. Please correctly inform the public when a properly noticed legal public Scoping meeting will take place, and the correct ending date for that process.

I suggest you review the above analysis with the US Attorney's office inasmuch as they will be tasked with defending your actions. Even though you failed to have recording equipment available at the 26 April 27, 2011 meeting, I presume the notes taken will correctly reflect the admissions referenced above which render your public scoping attempts legally flawed.

In my communication of 29 October 2011, I commented on the need for you to actively interface with the City and County of San Francisco as required by VA regulations and noted in the IMP under *Urban Context* and *Local Regulations* (2.2 & 2.3). In particular, I listed the Mayor's Office, the Planning Department, the Health Commission, the Recreation & Park Department, and the Supervisors of District 1 and District 2. Although a copy of the IMP was mailed to the Planning Department, no active interface has been made by VAMC staff to any San Francisco department (a simple mailing is a passive activity). This too, is a failure of your management to follow federally required guidelines and regulations. This inter-governmental outreach must become a major scoping activity. Without full input from the multiple government entities that have oversight of the surrounding area, your outreach will be legally deficient. This must include all alternatives.

There has been vague discussion of four Alternatives:

- The required No Action alternative.
- Doubling (approximately) the capacity at your present campus.
- Splitting the future capacity between your present campus and one or more other sites.
- Moving most or all of the VAMC activities to one or more other sites.

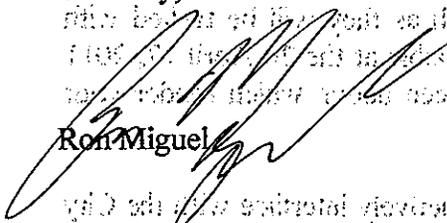
It is difficult, if not impossible, for the public to even attempt cogent scoping input with nothing more than vague, undefined, completely nebulous references to "one or more other sites". Specific details as to sites, including size, location, anticipated uses, etc. are absolutely required – without these factors the IMP is flawed and incomplete; the EIS is incapable of properly examining all environmental factors; and the public is constrained from intelligent and informative comment.

Considering their integral and growing participation in both medical services and research at the VAMC, I am completely baffled by the complete and obviously orchestrated absence of UCSF personnel from all community meetings. The inability of the public to interface and dialogue with those directly responsible for major activities and space requirements places everyone at a gross disadvantage – particularly within the IMP/EIS process. My only presumption is that the VAMC is conducting a non-public dialogue with UCSF and purposely excluding the community from any knowledge of these negotiations.

To date the VAMC has not sufficiently delineated the actual breakdown of direct veteran medical care – including present and future space requirements, from the present and future medical research space requirements of UCSF. If it has done so, that information has not been made available to the public. UCSF maintains many campuses in San Francisco – Parnassus, inner-Mission, Divisadero St., Mission Bay, and several others. Each of these engages in varying degrees of medical research. They also provide direct medical care at San Francisco General Hospital in a somewhat similar manner to that provided at the VAMC. In other words, they are completely familiar with dividing their medical and research activities among multiple San Francisco locations. To do so with the VAMC would constitute a standard situation for them. This should not be a deterrent to a multiple-campus solution.

I look forward to participating in a legally scheduled IMP/EIS Scoping meeting in the near future.

Sincerely,



Ron Miguel

- CC: Raymond Holland, PAR
- Julie Burns, FOLE
- Amy Meyer, People for the GGNRA
- John Frykman, Friends of Sùtro Park
- Paul Kozakiewicz, Editor, Richmond ReView
- Eric Mar, Supervisor – District 1
- Mark Farrell, Supervisor – District 2
- John Rahaim, Planning Director
- Jim Illig, SF Health Commission
- Kate Stacy, Deputy City Attorney
- Sarah Karlinsky, SPUR
- Alex Doniach, Senator Leland Yee
- Dan Bernal, Senator Nancy Pelosi



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason # 201
San Francisco, California 94123

IN REPLY REFER TO:

L76 (GOGA-PLAN)

NOV - 1 2010

John Pechman
Facility Planner
San Francisco VA Medical Center
4150 Clement Street
San Francisco, CA 94121

Subject: Institutional Master Plan Public Scoping – Request for Extension and Presentation

Dear Mr. Pechman:

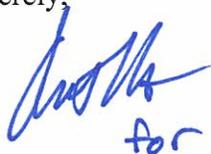
Thank you for hosting the Institutional Master Plan (IMP) public scoping meeting on October 26, 2010. As presented at the scoping meeting, this IMP is being considered as the proposed action (Alternative 1) in a future Environmental Impact Statement. We commend the effort that has gone into developing the plan; however, we are somewhat surprised that it has been developed to this degree for initial scoping. As mentioned in previous letters, we find value in conducting scoping early in the planning process in order to define the scope of the issues.

The IMP is lengthy, proposes a broad range of actions over a considerable period of time, and has substantial new construction being considered. Because the plan has been developed to this degree, the 30 day period for review and comment seems inadequate. We respectfully request that the scoping period be extended another 30 days, or 60 days in total. For a plan of this scope we feel it is reasonable to conduct a 60 day scoping period. Others at the public meeting, for the same reasons, made a similar request. Golden Gate National Recreation Area's (GGNRA) on-going General Management Plan (GMP) process, analogous to your master planning efforts, accepted scoping comments for several months as we developed the proposed action.

As an adjacent landowner and managers of National Park land surrounding the San Francisco Veterans Affairs Medical Center (SFVAMC) campus on three sides, we are very interested in participating in this major planning effort. We feel we can be most effective and efficient in our participation if we engage the SFVAMC planning team through agency-to-agency meetings. The National Park Service (NPS) proposes the first such meeting be a presentation of this proposed action by the SFVAMC planning leader/team to the NPS. This will allow the SFVAMC to describe the proposed action in greater depth, and allow NPS to interact with the planning team regarding issues and concerns. We suggest this initial meeting be scheduled for 1.5 hours, and be done before the scoping comment period expires.

In summary, the NPS requests: 1) a 30 day extension of the scoping comment period; and 2) a presentation from the SFVAMC planning team on the IMP proposed action. Thank you for your consideration of these requests. At your earliest convenience please contact Katharine Arrow (415) 561-4971 with your response.

Sincerely,



Frank Dean
General Superintendent



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)

DEC 13 2010

John Pechman, Facility Planner
San Francisco Veterans Affairs Medical Center
4150 Clement Street
San Francisco, CA 94121

Re: National Park Service Scoping Comments on the Institutional Master Plan Notice of Intent to Prepare an Environmental Impact Statement

Dear Mr. ^{John}Pechman:

The National Park Service (NPS) appreciates the opportunity to comment on the conceptual Institutional Master Plan (IMP), a plan that will guide future development at the San Francisco Veterans Affairs Medical Center (SFVAMC) for the next 20 years. We commend SFVAMC for assembling the Conceptual Master Plan Summary Report (CMPSR), as this document provides necessary background information, existing conditions, and future development concepts for this campus-wide planning effort. As the report consistently and forthrightly portrays, the SFVAMC is landlocked by a developed urban neighborhood and NPS land. As such, these site restrictions will require extensive and meaningful coordination with affected stakeholders who value this site and the surrounding parkland. As an adjacent landowner we expect to engage in active and collaborative coordination with SFVAMC as this planning effort moves forward. The NPS offers the following preliminary comments and recommendations in order to assist SFVAMC in this planning effort.

Purpose/Need/Objectives: The foundation of a planning effort is derived in a project's 'Purpose and Need'. The summary report, although providing essential information about the project, the setting, and context, does not explicitly state what the IMP must accomplish for it to be considered a success (Purpose). Also, the summary report does not list any project objectives (Need). A planning effort of this magnitude requires objectives to guide the planning effort. Without project objectives it is difficult to know whether the proposed phased development will adequately move the project towards meeting its purpose.

Alternatives: As required under the National Environmental Policy Act, the SFVAMC must consider reasonable alternatives that would meet the Purpose and Need of the SFVAMC IMP. We encourage the SFVAMC to make available the Facility Options Study that will serve as the basis for an off-site alternative. The study will 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. We encourage development of all alternatives to an equivalent level of detail, and have some concern that this may be difficult to achieve given the considerable level of detail in the IMP. However, without this parity, fair comparisons among the alternatives may not be possible.

Vision: We are intrigued by the core design principle to integrate the site into the surrounding park and pedestrian systems. The adjacent parklands offer outstanding visitor experience opportunities and these public lands could be therapeutic for patients and families. At this conceptual level it is not clear where this design

principle has been integrated into the master plan; our NPS landscape architects are available to explore with you these opportunities for connection and integration to NPS lands. We also request that the Study Area boundary be extended to include East and West Fort Miley and other surrounding NPS lands to ensure that park resources and impacts, including traffic, transit, and parking are adequately addressed.

Planning Process: The CMPSR states that the primary driver of the report is to “...coordinate the location and massing of the buildings and underlying infrastructure critical to the continued development of the Veterans Affairs complex with the surrounding parks and city so that the amenities the newly-created urban spaces for public use will transform a Hospital into an Urban Campus, an integral part of the City of San Francisco”. The NPS values this statement and commits to working with SFVAMC on developing appropriate programmatic design (setbacks, location, massing, and infrastructure) guidance that would better integrate development to surrounding NPS land. However, because no process was defined in the CMPSR, the NPS is concerned that there is not a collaborative process being contemplated. Although the CMPSR incorporated some renderings of what the proposed development would look like from different areas, we encourage these visual simulations, continuing through conceptual design, to have defined and established viewpoints. We recommend the following viewpoints be studied: the view of the project from Hawk Hill across the Golden Gate, the trail below the proposed development, and the view from the Presidio’s coast. These will be helpful in understanding the potential impacts to the neighboring parkland.

Landscape and Open Space: Most of this section deals with hazardous tree treatment and does not speak to the desired future landscape (themes or concepts). We encourage SFVAMC to obtain professional landscape architecture services to provide guidance for this part of the IMP. It may also be helpful to conduct a Cultural Landscape Report to help guide landscape treatments.

Urban Context: Although Section 2.2 discusses land and development management guidance of local and state jurisdictions, it does not discuss, or place in context, the land management planning guidance of the Golden Gate National Recreation Area (GGNRA). As an adjacent landowner sharing boundaries on three sides of the SFVAMC, the planning team should understand GGNRA land management objectives.

Campus Growth Projections: Campus growth projections focus on square footage development needs from a programmatic perspective; however, the CMPSR does not provide an estimate of the associated growth of staff and patients based on this development. The plan needs to provide a summary of the existing and projected campus population and an associated transportation demand study to understand how people arrive and leave the campus. Knowing the number of people that will need to be accommodated is necessary to plan appropriate transportation systems and infrastructure. Although Table 2 (Section 5.1) programmatically attempts to estimate campus needs for parking, a broader understanding of the campus transportation patterns is necessary. Because the campus is landlocked with limited area for parking and roadways, public transit and shuttle service will need to play an important role in bringing people to the campus. Unfortunately, the plan does not discuss any concepts for changing, expanding, or creating public transit or shuttle services to accommodate growth. The plan needs to outline a transit program that reduces single-occupancy vehicle trips to the campus, including but not limited to, public transit and shuttle programs.

Sustainable Design: The NPS supports the commitment the SFVAMC is placing on sustainable design, but the discussion seems restricted to new construction. The NPS encourages the SFVAMC to include ‘greening’ of their existing buildings as part of this plan.

Solar and Wind: The NPS encourages that building and project renderings include proposed locations of proposed solar arrays. Additionally, the NPS is concerned about the effect wind turbines will have on local bird and bat populations. We encourage the project team to consult with local wildlife groups such as Audubon to understand bird population and migration patterns. Moreover, wind turbines can create excessive noise or be

considered visually unappealing, and these concerns might be addressed by contemplating the use of vertical axis wind turbines.

Historic Preservation: Because the SFVAMC campus is listed on the National Register of Historic Places as a historic district, we anticipate that the SFVAMC will be carrying out a Section 106 review on the master plan in consultation with the California State Historic Preservation Officer. As a neighboring federal agency and owner of an adjacent National Register-Listed Historic Property (Fort Miley), we would like to participate in this consultation. Furthermore, it is important to initiate this consultation early in the planning process in order to understand the implications of development within a National Register Historic Property.

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Infrastructure: The plan makes a commitment to address parking in the earliest phases of the development. We agree that this is critical to address early. Past development on the campus has disrupted parking availability and has caused the need to utilize short-term parking on NPS lands. Please disclose if swing-space parking would still be necessary for any of phases of development.

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Sincerely,



Frank Dean
General Superintendent

Enclosures (1)
Dark Skies Letter

John - we had a good discussion on this topic and think a 14-person meeting between the NPS and VA will help a lot in our understanding of this plan, and could result in revised comments
Thanks! Aaron

RE: Dark Skies

From: Concerned Citizen

I am concerned about the effects of both outdoor and indoor lighting that may be included in the build-out of VAMC as part of the Institutional Master Plan on the dark-sky resource along the San Francisco ocean coast, in particular on the sky quality of the Sutro Historic District and Sutro Heights Park properties located in close proximity to the VAMC. These two parks units of the Golden Gate National Parks -- comprise the city's premier publicly-accessible astronomical observing sites.

I believe that the visual, ecological, cultural, and aesthetic impacts of both exterior and interior lighting associated with the build-out of the Institutional Master Plan should be included within the scope of the Environmental Impact Statement to be prepared. In particular, the following actions should be undertaken in the development of the EIS:

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Considering the value of the adjacent dark-sky and ecological resources, the configuration and design of the lighting for the VAMC Institutional Master Plan should strive to project no direct light beyond the VAMC property lines in any direction, should omit all types of vanity, wall-wash, and façade lighting, and should include curfews after which non-essential lighting would be switched off or activated by motion or proximity sensors.

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A fortuitous characteristic of the locations noted above is the darkness of the southwestern and western sky, since many galaxies, nebulas, and star clusters are only visible in the low southern sky as seen from San Francisco's latitude. Sufficient darkness in these sections of the sky is very rare elsewhere in the heavily light-polluted inner bay area.

Bennett, Kelsey

From: Pechman, John J. [John.Pechman@va.gov]
Sent: Wednesday, April 27, 2011 8:25 AM
To: Allsep, Jayni; Bennett, Kelsey
Subject: FW: ER-11/0273:San Francisco Veterans Affairs Medical Center (SFVAMC) Institutional Master Plan

Comments on the EIS.

John Pechman
Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Sreet
San Francisco, CA 94121
415-221-4810 x4600

-----Original Message-----

From: Debbie_Allen@nps.gov [mailto:Debbie_Allen@nps.gov]
Sent: Tuesday, April 26, 2011 7:16 PM
To: Pechman, John J.
Cc: Alan_Schmierer@nps.gov; waso_eqd_extrev@nps.gov; lisa_treicher@ios.doi.gov
Subject: Re: ER-11/0273:San Francisco Veterans Affairs Medical Center (SFVAMC) Institutional Master Plan

PWR has no comment regarding subject document.

Debbie Allen
National Park Service
Partnerships Programs, PWR
1111 Jackson Street #700
Oakland, CA 94607
510/817-1446
510/817-1505 Fax

"Don't dwell on what went wrong. Instead, focus on what to do next. Spend your energies on moving forward toward finding the answer." -- Denis Waitley

Marchelle_Dickey@
contractor.nps.go
v

03/30/2011 05:27
PM

Debbie_Allen@nps.gov

To

cc

Subject

ER-11/0273:San Francisco Veterans
Affairs Medical Center (SFVAMC)
Institutional Master Plan

NPS External Affairs Program: ER2000 Program Email Instruction Sheet
United States Department of the Interior
National Park Service Environmental Quality Division
7333 W. Jefferson Avenue
Lakewood, CO 80235-2017

EIS/Related Document Review: Detail View
<http://er2000/detail.cfm?ernum=15427>

Document Information

Record #15427

ER Document Number

ER-11/0273

Document Title

San Francisco Veterans Affairs Medical Center (SFVAMC)
Institutional Master Plan

Location

State

California

County

San Francisco County

Document Type

Notice of Intent, Prepare Environmental Impact Statement

Doc. Classification

Other Types of Project

Applicant

Department of Veterans Affairs

Web Review Address

<http://www.sanfrancisco.va.gov/visitors/noi.asp>

<http://www.sanfrancisco.va.gov/>

Document Uploads

Documents Uploaded

	File Name	Description	File Size Bytes
	FR_273.pdf	Federal Register notice	47647
	OEPC_273.pdf	OEPC memo	39743

Document Reviewers

WASO Lead Reviewer

WASO Reviewers

Joe Carriero(2310), Daniel Odess(2255), Jennifer Lee(2340), Kerry Moss(2360), Pat Gillespie(2225), Fred Sturniolo(2420), Carl Wang(2420), David Vana-Miller(2380), Patricia F Brewer(2350), Marchelle Dickey(2310), Sandy Lardinois(2310), Lelaina Marin(2390)

Regional Lead Reviewer

Alan Schmierer (PWR-0)

Regional Reviewers

Alan Schmierer(PWR-0), Debbie Allen(PWR-0)

OEPC Contact

Lisa Chetnik Treichel

Action

Lead Bureau

Response Type Directly
Regional Response
Instructions Comments sent directly to Applicant. NPS Lead consolidates comments, prepares and sends comment/no comment letter directly to Applicant with copy to EQD (WASO-2310), OEPC, and (if applicable) appropriate REO. See DI Remarks Section below for specifics.

Topic Context

The SFVAMC IMP (Institutional Master Plan) would include approximately 924,200 square feet of new construction, including new buildings/structures for patient care, research, administration, and parking, as well as retrofitting of seismically deficient buildings to meet the needs of Veterans of the North Coast and San Francisco Bay Area over the next 20 years.

DI Remarks

Reviewers: Please email comments, if any, to NPS Lead (Alan Schmierer, PWR-0) by April 20, 2011.

NPS Lead: Alan, please consolidate NPS comments in letter format (or no comment in email) and send directly to the VA Medical Center by April 27, 2011 with copy to: waso_eqd_extrev@nps.gov, Lisa_Treichel@ios.doi.gov

Applicant Address for Alan Schmierer:
Comments: John Pechman, Facility Planner, San Francisco VA Medical Center (001), 4150 Clement Street, San Francisco, California 94121, or electronically to John.Pechman@va.gov

Workflow

Send Comments to Lead Office: PWR-0
Send to: Alan Schmierer (PWR-0) by 04/20/11

Lead DOI Bureau: Directly
DUE TO: Lead Bureau by 04/27/11
DATE DUE OUT: 04/27/11

OEPC Memo to EQD: 03/30/11
Comments Due To Lead WASO Div:
Comments Due Out to
OEPC/Wash or Applicant: 04/27/11

Comments Due To Lead Region: 04/20/11
Comments Due in EQD:

Comments Due to REO:

Tracking Dates

Rcvd. Region Comments:
Comments Sent to OEPC, REO, or Applicant:
New Instructions:
Rcvd. Ext. Letter:
Reg. Cmts. to Bureau:
Cmts. Called In:

Comments Sent to EQD Chief:
Comment Letter/Memo Signed:
Rcvd. Extension:
Sent Add. Info:
Reg. Cmts. Listed:
Rcvd. Bureau Cmts:

Tracking Notes

Reviewer Notes

Documentation

Document Last Modified: 03/30/2011
Complete: False

Date Created: 03/30/2011
Date Last Email Sent:



United States Department of the Interior

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

IN REPLY REFER TO:

L 76 (GOGA - PLAN)

APR 29 2011

John Pechman, Facility Planner
San Francisco VA Medical Center
4150 Clement Street
San Francisco, CA 94121

Re: Additional National Park Service Scoping Comments on the Institutional Master Plan Notice of Intent to Prepare an Environmental Impact Statement

Dear Mr. Pechman:

The National Park Service (NPS) understands that the San Francisco Veterans Affairs Medical Center (SFVAMC) has reopened scoping for the Institutional Master Plan and Environmental Impact Statement (IMP/EIS). We would like to take this opportunity to resubmit our initial comments which were provided to you by letter dated 13 December 2010 (enclosed), and to emphasize some concerns that are more reflective of our working relationship at this time.

First, the series of projects currently under development on campus, most of which have substantial impacts on the surrounding park, suggests that the SFVAMC may have already reached the capacity of the site. We agree that there is an urgent need to complete the IMP/EIS. Consideration of a moderate alternative that does not seek to double the size of the operation or require relocation of the entire center seems highly desirable and we are eager to assist you with this in any way. The NPS reiterates its need and earlier request for an in-depth meeting about the plan which should help us understand and advance our compatible federal missions in San Francisco.

Furthermore, we believe that continuing to implement projects that will be evaluated as alternatives in the IMP is contrary to federal environmental policy. We strongly recommend completing the IMP/EIS prior to implementing individual projects that should be informed by its outcome. The current course of action could undermine the credibility of the IMP/EIS and is compromising the good relationship our agencies seek with our neighbors.

We look forward to your cooperation with us on this important project. If you have questions about our comments please contact Katharine Arrow (NPS Liaison to the SFVAMC) at (415) 561-4971.

Sincerely,

Frank Dean
General Superintendent

cc: Lawrence Carroll, Executive Director, SFVAMC and Judi Cheary, Director of Public Affairs, SFVAMC

Enclosure (1) Initial NPS scoping comment letter, 13 December 2010



United States Department of the Interior

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

COPY

7/14

IN REPLY REFER TO:

L76 (GOGA-PLAN)

DEC 13 2010

John Pechman, Facility Planner
San Francisco Veterans Affairs Medical Center
4150 Clement Street
San Francisco, CA 94121

Re: National Park Service Scoping Comments on the Institutional Master Plan Notice of Intent to Prepare an Environmental Impact Statement

Dear Mr. ^{John} Pechman:

The National Park Service (NPS) appreciates the opportunity to comment on the conceptual Institutional Master Plan (IMP), a plan that will guide future development at the San Francisco Veterans Affairs Medical Center (SFVAMC) for the next 20 years. We commend SFVAMC for assembling the Conceptual Master Plan Summary Report (CMPSR), as this document provides necessary background information, existing conditions, and future development concepts for this campus-wide planning effort. As the report consistently and forthrightly portrays, the SFVAMC is landlocked by a developed urban neighborhood and NPS land. As such, these site restrictions will require extensive and meaningful coordination with affected stakeholders who value this site and the surrounding parkland. As an adjacent landowner we expect to engage in active and collaborative coordination with SFVAMC as this planning effort moves forward. The NPS offers the following preliminary comments and recommendations in order to assist SFVAMC in this planning effort.

Purpose/Need/Objectives: The foundation of a planning effort is derived in a project's 'Purpose and Need'. The summary report, although providing essential information about the project, the setting, and context, does not explicitly state what the IMP must accomplish for it to be considered a success (Purpose). Also, the summary report does not list any project objectives (Need). A planning effort of this magnitude requires objectives to guide the planning effort. Without project objectives it is difficult to know whether the proposed phased development will adequately move the project towards meeting its purpose.

Alternatives: As required under the National Environmental Policy Act, the SFVAMC must consider reasonable alternatives that would meet the Purpose and Need of the SFVAMC IMP. We encourage the SFVAMC to make available the Facility Options Study that will serve as the basis for an off-site alternative. The study will 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. We encourage development of all alternatives to an equivalent level of detail, and have some concern that this may be difficult to achieve given the considerable level of detail in the IMP. However, without this parity, fair comparisons among the alternatives may not be possible.

Vision: We are intrigued by the core design principle to integrate the site into the surrounding park and pedestrian systems. The adjacent parklands offer outstanding visitor experience opportunities and these public lands could be therapeutic for patients and families. At this conceptual level it is not clear where this design

principle has been integrated into the master plan; our NPS landscape architects are available to explore with you these opportunities for connection and integration to NPS lands. We also request that the Study Area boundary be extended to include East and West Fort Miley and other surrounding NPS lands to ensure that park resources and impacts, including traffic, transit, and parking are adequately addressed.

Planning Process: The CMPSR states that the primary driver of the report is to “...coordinate the location and massing of the buildings and underlying infrastructure critical to the continued development of the Veterans Affairs complex with the surrounding parks and city so that the amenities the newly-created urban spaces for public use will transform a Hospital into an Urban Campus, an integral part of the City of San Francisco”. The NPS values this statement and commits to working with SFVAMC on developing appropriate programmatic design (setbacks, location, massing, and infrastructure) guidance that would better integrate development to surrounding NPS land. However, because no process was defined in the CMPSR, the NPS is concerned that there is not a collaborative process being contemplated. Although the CMPSR incorporated some renderings of what the proposed development would look like from different areas, we encourage these visual simulations, continuing through conceptual design, to have defined and established viewpoints. We recommend the following viewpoints be studied: the view of the project from Hawk Hill across the Golden Gate, the trail below the proposed development, and the view from the Presidio’s coast. These will be helpful in understanding the potential impacts to the neighboring parkland.

Landscape and Open Space: Most of this section deals with hazardous tree treatment and does not speak to the desired future landscape (themes or concepts). We encourage SFVAMC to obtain professional landscape architecture services to provide guidance for this part of the IMP. It may also be helpful to conduct a Cultural Landscape Report to help guide landscape treatments.

Urban Context: Although Section 2.2 discusses land and development management guidance of local and state jurisdictions, it does not discuss, or place in context, the land management planning guidance of the Golden Gate National Recreation Area (GGNRA). As an adjacent landowner sharing boundaries on three sides of the SFVAMC, the planning team should understand GGNRA land management objectives.

Campus Growth Projections: Campus growth projections focus on square footage development needs from a programmatic perspective; however, the CMPSR does not provide an estimate of the associated growth of staff and patients based on this development. The plan needs to provide a summary of the existing and projected campus population and an associated transportation demand study to understand how people arrive and leave the campus. Knowing the number of people that will need to be accommodated is necessary to plan appropriate transportation systems and infrastructure. Although Table 2 (Section 5.1) programmatically attempts to estimate campus needs for parking, a broader understanding of the campus transportation patterns is necessary. Because the campus is landlocked with limited area for parking and roadways, public transit and shuttle service will need to play an important role in bringing people to the campus. Unfortunately, the plan does not discuss any concepts for changing, expanding, or creating public transit or shuttle services to accommodate growth. The plan needs to outline a transit program that reduces single-occupancy vehicle trips to the campus, including but not limited to, public transit and shuttle programs.

Sustainable Design: The NPS supports the commitment the SFVAMC is placing on sustainable design, but the discussion seems restricted to new construction. The NPS encourages the SFVAMC to include ‘greening’ of their existing buildings as part of this plan.

Solar and Wind: The NPS encourages that building and project renderings include proposed locations of proposed solar arrays. Additionally, the NPS is concerned about the effect wind turbines will have on local bird and bat populations. We encourage the project team to consult with local wildlife groups such as Audubon to understand bird population and migration patterns. Moreover, wind turbines can create excessive noise or be

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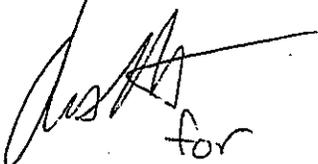
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Katharine Arrow

RE: Dark Skies

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RON MIGUEL

600 De Haro St., San Francisco, CA 94107
T-415/285/0808 F-415/641/8621 E-rm@well.com C-415-601-0708

29 October 2010

John Pechman, Facility Planner
Veterans Administration Medical Center
4150 Clement Street
San Francisco, CA 94121

RE: SFVAMC Institutional Master Plan (IMP) – Comments
and
SFVAMC Environmental Impact Statement (EIS) -Scoping

Dear Mr. Pechman:

I am submitting these comments in my capacity as the Planning Association for the Richmond's (PAR) signatory to the Settlement Agreement of a legal action filed against the VAMC for non-compliance with NEPA. PAR will submit the association's comments separately. One of the major provisions of this Agreement required the SFVAMC to produce, after many years of unexplained inaction, an IMP. These statements also should be viewed in light of my family's involvement in the Richmond District for over eighty years, and experience of reviewing such documents in my current position as President of the San Francisco Planning Commission.

I am pleased that the IMP has finally been prepared and distributed. I believe it somewhat fulfills the requirements of an IMP – although, it is written in a tone which more closely resembles a real estate blurb or a public relations position paper. In my opinion, a simple, factual document would not only have been far more preferable, but more forthright and immensely simpler for the public to digest and use as the background material for scoping comments on your EIS. What it does not do, and what I trust will be remedied in the EIS, is proceed past mere verbiage as to campus alternatives, and actually engage with specific physical sites for SFVAMC's services.

The IMP properly includes references to URBAN CONTEXT and to LOCAL REGULATIONS (2.2 & 2.3), as this is required by VA regulations and, obviously, is important to both the government and residents of San Francisco. In this vein, I strongly urge you to actively interface with the City and County of San Francisco during the EIS Scoping process and at all times going forward. A continuing dialogue will be beneficial to all parties. This should include the Mayor's Office, the Planning Department, the Health Commission, the Recreation & Park Department, and the Supervisors of District 1 and District 2 – each of these entities has been involved with VAMC activities in recent years and each has been made aware of your IMP and the impending EIS. (Please keep in mind that some individuals in these positions may change following the November elections.)

During this entire process, you must continue to take into account that the SFVAMC does not exist in isolation – its physical location in relationship to the residential Richmond District creates an obligation to include those impacts which reach beyond the borders of your present campus and, indeed, any additional areas which may be considered in alternative projections. In fact, some of the proposed Alternatives could have major impacts on our entire City. I also urge you to contact District 9 Supervisor David Campos’ office in view of his current proposed legislation regarding a San Francisco Health Services Master Plan recently endorsed by the Planning Commission. Certainly the SFVAMC would be a major participant facility in the event of any large city-wide medical emergency situation, i.e. earthquake

That being said – I submit the following to be used principally in relation to Scoping the forthcoming EIS:

IMP 0.01 Alternatives – “Therefore, the SFVAMC is considering the feasibility of relocation and reconstruction of the medical center campus.” This is undoubtedly the sentence which serves as the ‘control’ for the EIS.

The following paragraph sets forth the Alternatives concept which is integral to the EIS: “To achieve this goal, the SFVAMC is currently completing a Facility Options Study that will research and address the current space, infrastructure, and physical restrictions of the Fort Miley site for the purpose of evaluating the feasibility of reconstruction of some or all of the medical center operations to a different location in the City (and County) of San Francisco. This study will provide the SFVAMC and the Department of Veterans Affairs with a document that analyzes all aspects of the current medical center operation and determines a cost effective alternative solution for achieving the vision of an efficient, technologically superior medical facility to serve Veterans well into the future.”

Then we come to *IMP1.1 Destination* “A primary driver of this Working Document is to coordinate the location and massing of the buildings and underlying infrastructure critical to the continued development of the Veterans Affairs complex, with the surrounding parks and city so that the amenities of the newly-created urban spaces for public use will transform a Hospital into an Urban Campus, as integral part of the City of San Francisco (underlining for emphasis). This concept must be observed for each of the alternatives.

The Study must investigate and factually demonstrate the Impacts and Mitigation Measures for the three alternative scenarios under consideration (also, note the penultimate paragraph): Full SFVAMC Campus Rebuild, Split Campus Alternative, and Complete Campus Relocation. The latter two should have preferred and alternate site selections – at least two, possibly three each.

Your EIS, must, at a minimum, cover:

- Overview – for each alternative
- Objective(s) – for each alternative
- Existing land uses and impacts - both onsite and surrounding - for each alternative
- Historic preservation – buildings and landscape - for each alternative
- Development plan(s) and phasing including dynamic changes in medical research and medical services delivery - for each alternative
- Transportation, circulation and parking impacts - for each alternative
- Utility implications, Green power generation and waste-water concepts - for each alternative
- Geotechnical implications with particular reference to fault lines – for each alternative
- Environmental sustainability design; air quality; greenhouse gas emissions – for each alternative

- Demolition and construction implications – for each alternative
- Noise implications – for each alternative
- Aesthetics and interface with surrounding built environment – for each alternative

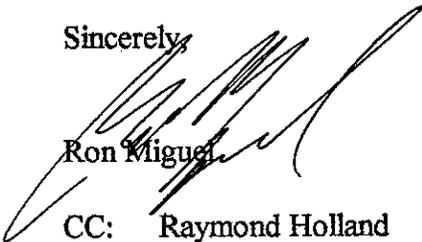
Although federal funding projections are generally not considered more than five years out, infrastructure and construction should be expected to last well over fifty years – thus EIR projections should be through at least 2035 - 2050 – a reasonable concept.

The EIS must take into consideration the two somewhat divided – yet linked, endeavors of the SFVAMC, i.e. medical research and Veterans' medical care. Although the SFVAMC management has previously proffered an argument that the two cannot/should not be physically separated, the University of California at San Francisco (UCSF), which is responsible for much/all of the medical research and staffing at SFVAMC, separates those two within its own physical structure as do many major institutions. UCSF maintains a major Parnassus Campus and a growing Mission Bay Campus, as well as long-standing facilities at Laurel Heights and in the Mission District.

There is another factor which conceivably could enter into the discussion and certainly should be addressed – perhaps as an additional Alternative. This is the dispersion of smaller, geographically distributed clinics for Veterans' medical care. The SFVAMC already has at least one such facility in the South of Market. It is in close proximity to the recently approved Veterans Housing project on Otis Street – a fortuitous coincident which was commented upon during planning and hearings for the housing facility. Due to the total geographic area which the SFVAMC is required to serve, the dispersion of services might conceivably result in delivering a higher degree of Veterans' health and medical services, a lessening of the pressure on current and/or future Campus', as well as lowering of the total environmental impacts.

I look forward to the completion of the EIS; wish to be included on the distribution list; and will comment again when appropriate. Please let me know if I can be of assistance in any phase of your endeavor.

Sincerely,



Ron Miguel

CC: Raymond Holland
Julie Burns
Amy Meyer
Supervisor Eric Mar
Supervisor Michele Alioto-Pier
Supervisor David Campos
Planning Director John Rahaim
Jim Illig, President, SF Health Commission
Michael Yarne, MOEWD

PAR Planning Association for the Richmond

3145 Geary Blvd., # 205 - San Francisco CA 94118-3316
Voice Mail and Facsimile (415) 541-5652 --- www.sfpar.org

November 9, 2010

Mr. John Pechman, Facility Planner
San Francisco Veterans Affairs Medical Center (SFVAMC 001)
4150 Clement Street
San Francisco, CA 94121

In Re: Response to Notice of Intent to Prepare an EIS for the SFVAMC's Institutional Master Plan (IMP, VA Project No.662-08-306) Dated 10/12/2010

Dear Mr. Pechman:

PAR is delighted to have received the SFVAMC's draft 20-Year Institutional (or Conceptual?) Master Plan (IMP). We appreciate the efforts and thoughts that went into its production.

The density and scale of construction that is being contemplated in the IMP are really quite extraordinary. Not only would every square inch of the 29 acres be used intensively, a significant portion of the air space above the campus would be occupied by new high-rise buildings.

This intensification of building mass on the campus is attributed to the facts that the SFVAMC is being asked to conduct more research and to provide state-of-art healthcare services to more veterans in the Greater Bay Area and along the Northern California coast.

For purposes of identifying the scope of potential environmental impacts from this plan that should be examined, the SFVAMC offers the following "four potential alternatives" without a preference for any of them. As we understand them, they are:

1. "Alternative 1", which is the IMP as it is now being proposed.
2. "Alternative 2 involves a combination of new construction within the existing SFVAMC, as well as relocation of some aspects of the medical center to an alternate site within the City of San Francisco" as a result of negotiations that will continue with unidentified parties for that alternate site. This alternative would change the IMP into a "contingency plan". No details of the conditions or of their potential timing are indicated.
3. "Alternative 3 involves the relocation of the entire medical center campus to an alternate site within the City of San Francisco". This alternative would also change the IMP into a "contingency plan". While the condition that would precipitate that change is specified, its timing is not.
4. Alternative 4 is a "no action option" under which environmental effects would be evaluated based solely on the current conditions and location of the campus.

Please clarify any of these alternatives that may be misstated. Since the environmental impacts under current conditions were and still are the basis of the declaratory and injunctive relief sought by PAR and FOLE in March of 2006, Alternative 4 would certainly not appear to be among the "alternatives" that anyone would prefer.

That leaves the IMP and the first three alternatives on the table. In those contexts, the IMP examines some of the current conditions on the campus, proposes some guidelines for changing them, proposes four five-year phases for implementing them over the next twenty years and proposes detailed plans for the parking and traffic systems and for each of four utility systems (i.e., sewers, water, steam/natural gas and electrical). Similar details are not provided for either the proposed new buildings or the rationales for them.

While sections 2.2-2.5 and 5.0-5.5 of the IMP acknowledge there have been persistent and significant problems of SFVAMC-related vehicles being parked in neighborhoods and parks next to the campus, no data are presented. Instead, it is reported there are now 1,214 parking spaces on the campus and there will eventually be 3,440 spaces on it after the IMP is fully implemented.

Because PAR's surveys have consistently shown there to be about 700 SFVAMC-related vehicles currently parked in adjacent neighborhoods and parks on a regular basis, that implies that a total of between 1,900 and 2,000 of on-campus parking spaces are currently needed, that the 1,214 current spaces represent less than two-thirds of the on-campus parking spaces that are currently needed and that, when the IMP has been fully implemented, that deficit in on-campus parking spaces may increase from 700 to almost 2,000!

Therefore PAR urges that the EIS provide “the total numbers of current and projected on-campus parking spaces that are currently and projected to be needed, describe any differences between them and the corresponding numbers in the IMP as “deficits” and provide for the elimination of those deficits.

Section 5.0 of the IMP summarizes the SFVAMC's Circulation and Parking Master Plan for the campus. As just noted, it does not explain how current and future parking demands were determined and used to establish the number of parking spaces needed. Similarly, the analysis and recommendations regarding traffic circulation are limited to intra-campus traffic. There is no attention paid to whether the adjacent public streets have the capacity to carry the increased traffic that should be expected after the IMP has been fully implemented.

As a result, PAR also urges that the EIS provide an analysis of the capacity of neighboring streets to carry the increased traffic that should be expected after the IMP has been fully implemented. and recommendations, completed by or in collaboration with the San Francisco Municipal Transportation Agency (SFMTA), regarding the elimination or mitigation of any congestion that should be reasonably expected.

Section 3.0 of the IMP explains that approximately 30% of the proposed new construction will be devoted to “research or its affiliated functions”, another 20% will devoted to “traditional medical needs” but it does not explain what the projected end use would be of the remaining 50% of proposed new construction.

PAR recommends the EIS identify the anticipated end uses for that remaining 50% of new construction and, unless its continued location on the campus is determined to be essential, to consider all such space for possible relocation to an alternate site.

As described in Section 2.0 of the IMP, piecemeal additions to the campus over the last 75 years have resulted in a “chaotic (architectural) fabric” and some “complicated, short-sighted solutions” that have adversely affected the historical integrity of various parts of the campus and of some of the buildings on it. For example, the construction of Building 200, an essential component of the campus, completely obscures the historic south-facing façade of Building 2.

Given the current density of buildings on the campus and the proposed exacerbation of it in the IMP, it is inevitable that additional views of other historic buildings on the campus will be similarly and inadvertently imperiled as implementation of the IMP proceeds.

As a further consequence, Section 6.0 notes that the IMP is by necessity malleable in nature and that, because seemingly insignificant departures from it can have consequences that can severely compromise the integrity of the original plan, it is critical that all proposed departures from the plan be thoroughly reviewed. Unfortunately the IMP fails to identify by whom those proposed actions should be reviewed or through what kind of a review process.

PAR therefore urges that the EIS establish:

- **periodic reviews throughout the period of construction;**
- **that the review meetings be scheduled at least once every three months;**
- **that the periodic meetings involve representatives of the SFVAMC, its construction contractors and representatives of all immediate neighbors (i.e., residents and representatives of neighborhood organizations, of San Francisco City and County Departments, of the National Park Service, etc.); and that**
- **the process be as open and transparent as if it were governed by California's Ralph M. Brown Act and San Francisco's Sunshine Ordinance.**

Thank you for the opportunity to review the IMP and to offer these suggestions for the scope of the EIS with respect to it.

In light of the complexity of the IMP, we urge you to extend the November 12th deadline for these comments and suggestions by at least thirty days.

Please let me know if you have questions about any of these comments or suggestions.

Sincerely,



Raymond R. Holland
President

Cc: PAR Directors and Members
David and Julie Burns, FOLE
Sharon Duggan, Esq.
Tom Kuhn, CSOB/FOSP
Superintendent Frank Dean, GGNRA
S.F. Mayor Gavin Newsom
S.F. City Attorney Dennis Herrera
S.F. Supervisor Michela Alioto-Pier
S.F. Supervisor-Elect, District 2
Catherine Stefani, Leg. Aide
Office Supervisor Alioto-Pier

S.F. Supervisor Eric Mar
LinShao Chin, Leg. Aide
Office of Supervisor Mar
S.F. Supervisor David Campos
Linnette Haynes, Leg. Aide
Office of Supervisor. Campos
Nathaniel Ford, General Manager,
S.F. Municipal Transportation Agency
John Rahaim, General Manager,
S.F. Planning Department
Phil Ginsburg, General Manager,
SF Recreation and Parks Department

**Planning Association for the Richmond
Friends of Lands End
People for a Golden Gate National Recreation Area
Coalition to Save Ocean Beach
Friends of Sutro Heights Park**

April 29, 2011

John Pechman, Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Street
San Francisco, CA 94121

Submitted via e-mail: John.Pechman@va.gov

Re: Scoping for the SF SFVAMC Institutional Master Plan (IMP) and Environmental Impact Statement (EIS)

Dear Mr. Pechman:

This submission is in response to the NOI to Prepare an EIS for the SFVAMC draft Institutional Master Plan (IMP) (*Federal Register Vol. 76, No. 61*) and request for scoping input for the preparation of that EIS. It is submitted by representatives of the following organizations: Planning Association for the Richmond (PAR), Friends of Lands End (FOLE), People for a Golden Gate National Recreation Area (PFGGNRA), Friends of Sutro Heights Park (FSHP), and the Coalition to Save Ocean Beach (CSOB). It is additive and is not intended to replace scoping comments provided at not intended to replace scoping comments provided in earlier letters and at the October 2010 or April 2011 scoping meetings with the SFVAMC.

Altogether, these organizations represent over **1,200 households**, businesses and individuals committed to ensuring the quality of life in San Francisco's Richmond District. Our members include **veterans and families of veterans**, including those who have made significant sacrifice in battle as part of our armed forces.

Our organizations **strongly support the SFVAMC mission** to provide the best medical care (including clinical research) to our veterans. We welcome the SFVAMC efforts to excel at research to improve the health of our veterans. We appreciate the opportunity to provide our input to this process.

Background. The 29-acre campus of the SFVAMC lies above Lands End and is surrounded on three sides by the national park land of the Golden Gate National Recreation Area (GGNRA). To the north is Lands End. East and West Fort Miley are listed on the National Register of Historic Places. There are also two small National Register districts within the SFVAMC campus. To the east and south, the SFVAMC abuts City and County of San Francisco's Lincoln Park and Palace of the Legion of Honor and the low-rise residential neighborhood of the Outer Richmond District.

For 40 years the SFVAMC has been growing, a building at a time, with more cars in evidence every few months. Finally, concerned residents and community organizations realized it was imperative that the SFVAMC have an IMP. For the last year, even without a finished IMP, the SFVAMC has been starting on a path to grow explosively. That growth is not only for service and care of veterans. The SFVAMC has become a major outpost of the University of California at San Francisco.

The SFVAMC states that its mission includes patient care, research, and education. The conceptual IMP states that in the next 20 years the institution wishes to increase built space by approximately 945,000 square feet, which would double its present size. It also wishes to provide parking space for over 3,400 cars. By their own admission at a meeting with neighborhood representatives, the SFVAMC staff says it knows the campus does not have the room for that kind of expansion.

In 2003, neighborhood representatives fought a huge building proposed under the Enhanced Use Lease agreement to house the Northern California Institute of Research and Education, in which the SFVAMC would collaborate with UCSF. That institute is now trying to locate in Sausalito.

On March 31, 2006, PAR and FOLE filed a Complaint related to the SFVAMC failure to comply with NEPA in the construction of Building 16 adjacent to homes on the southern edge of the campus. On June 6, 2008, Plaintiffs and the Defendant (US Department of Justice) reached a settlement agreement. Under terms of that agreement, the SFVAMC agreed to complete an Institutional Master Plan and EIS within 30 months of the settlement, as well as to comply with Section 106 of the National Historic Preservation Act in any alterations to Buildings 9, 10, 11 and 13, part of the registered historic properties on the SFVAMC campus.

The SFVAMC asked for an extension of that deadline, while at the same time releasing Environmental Assessments for construction of a five-story garage, a veterinary care building, and a mental health building and child care center – all of which comprise part of the IMP. Two of these would have **significant adverse effects** upon the Richmond District neighborhood and on the **national park**, as well as unnecessarily taking down a **National Register building** on the SFVAMC campus.

Scoping comments

- An announcement of scoping ought to have **wide and consistent distribution**, particularly when a plan of this magnitude is involved.
 - We have checked in the neighborhood. Not even all of the immediate neighbors of the project have been notified nor those along Clement Street who would be affected by the traffic and parking of the construction period, and affected permanently by the number of people going to work or visiting the enlarged SF SFVAMC.
 - Notice also did not go to the civic groups most responsible for future planning for San Francisco, notably SPUR, nor to the conservation organizations such as the Sierra Club, the National Trust for Historic Preservation, and the National Parks Conservation Association that are the major groups with offices in this city and broad membership, who have a vital interest in the national park lands that surround the SFVAMC campus and the historic National Register properties in the GGNRA and parts of the SFVAMC campus.
- The EIS must address the **carrying capacity** of the campus surrounded by national park, San Francisco arts and recreational facilities, and a residential neighborhood.
- The SFVAMC must finish its **Facilities Options Study** so all may evaluate what alternatives for what missions and goals can best be served on this campus—and which must go off this campus. No EIS can be completed until this study is finished and the alternatives considered in the full context of what is proposed. Until the Facilities Options Plan is seen and reviewed, there can be no meaningful analysis of the Purpose and Need for any new buildings.
- The EIS must show how the proposed build out of over 2 million square feet will fit on this 29 acre campus without **further urbanizing** or **denigrating the character of the neighborhood**.
- The EIS must show how nearly tripling the **number of cars** coming to the campus, **from 1,214 to 3,440** can be accommodated without severely degrading the character of all the areas the SFVAMC is leaning on even now: the **GGNRA, the California Palace of the Legion of Honor, Lincoln Park**, and the streets surrounding the SFVAMC—and also show how they propose to fit all those cars on their campus.
- EIS must analyze how an area with **two entry roads** will provide access for an additional 2,200 cars per day, and what the wear and tear on the adjacent City streets will be. Note the Clement Street is a designated **sharrow**, where bicycles and autos share common lanes. Also, the residential neighborhood adjacent to these entry roads is home to **children and the elderly**, who may be at risk

from increased traffic. Also, this section of Clement Street is part of the City's famous 49-mile drive, and will have potential aesthetic effects on this public resource.

- The EIS must show how **SF MUNI** could meet the **public transportation needs** of this institution at the edge of the city, and must evaluate whether the numbers of patients, staff, and visitors creates transportation needs that would be much better served by access to the several transportation agencies that serve the downtown area.
- The EIS must address issues of **public safety** with the proposed increases in **human and vehicular traffic**, including **security**, **traffic** impacts on a street already serving a high volume of combined **bicycle** and vehicular traffic, including the **trucks** of the construction periods.
- The EIS must fully analyze the effects of **borderline development** and increased **night lighting** on various ground wildlife and birds in the contiguous parkland from Lincoln Park through East and West Fort Miley into Lands End, as well as how it may conflict with the NPS commitment to fostering **Dark Sky resources**. It must also account for the cultural impact on educational public observing events ("star parties") that have been held regularly by The San Francisco Amateur Astronomers at Land's End since the early 1950's.
- The EIS must show how the proposed build out of over 2 **million square feet will fit** on this 29 acre campus without severely **damaging adjacent properties** in the national park listed on the **National Register** and also show how the effects of the proposed buildings on the national park boundary will affect the **visitor experience**.
- The EIS must evaluate the **socio-cultural impacts** on recreational park lands, the SFVAMC and NPS National Register properties, and the Palace of the Legion of Honor San Francisco Fine Arts Museum.
- The EIS must encompass all of the **non-visual environmental impacts**, both short term (during construction) and long-term (2025 and beyond), including but not limited to:
 - **Air quality and emissions**
 - **Noise**— during and after construction
 - **Hydrogeological** (seismic, run-off/wastewater, percolation/permeability of soils, leaching of contaminants)
- The EIS must address **infrastructure requirements and impacts**, including but not limited to **sewage** (VAMC wastewater flows directly into the City system), **waste management**, and **power requirements**.
 - This includes not only increased capacity requirements, but the associated estimated costs and plans to cover those **costs** and the direct impact on the **City and County of San Francisco and city rate payers**.
- The EIS must address **emergency response** (which falls to the **City and County of San Francisco**) — especially with respect to evacuation of on-site patients and workers, but also in such matters as access for **fire trucks** and **City police**.
- The claim is made in the conceptual IMP that the SFVAMC intends to be an **integral part of the City of San Francisco**.
- The EIS must show how the SFVAMC proposes to **preserve the local context** of the institution, to carry out **consultation with state and local government**, and to carry out the regulations of state and local government for this part of the City of San Francisco, including but not limited to the **California Coastal Commission, the Planning Department**— particularly with regard to zoning, height limits, and traffic, **the Recreation and Park Department, the Health**

Commission, the Public Utilities Commission, MTA, the Supervisors of Districts 1 and 2, and the Mayor's office.

- In accordance with the **National Historic Preservation Act**, the EIS should show **how the SFVAMC plans to use federal funds or permits for the projects that would destroy or denigrate properties listed on the National Register**, whether in SFVAMC ownership or part of the National Park System. The EIS must address the apparent planned piecemeal **destruction of buildings listed on the National Register** within two areas of National Register buildings, and also a portion of the **NR-listed front lawn**.

We urge you to carefully consider these and all other environmental impacts of all four actions listed in the draft Institutional Master Plan. We look forward to continued dialogue to ensure that all stakeholders work to keep the SFVAMC an institution that is engaged and integrated into the community.

Respectfully yours,

Ray Holland, President, Planning Association for the Richmond

Gene Brodsky, ESQ, PAR Board Member

Julie Burns, Friends of Lands End

David Burns, Friends of Lands End

Amy Meyer, People for a Golden Gate National Recreation Area

John Frykman, Coalition to Save Ocean Beach

Cheryl Arnold, Coalition to Save Ocean Beach

Tom Kuhn, Friends of Sutro Heights Park

Jason Jungreis, Friends of Sutro Heights Park

CC:

Eric Mar, Supervisor – District 1

Mark Farrell, Supervisor – District 2

John Rahaim, Planning Director

Jim Illig, SF Health Commission

Kate Stacy, Deputy City Attorney

Sarah Karlinsky, SPUR

Alex Doniach, Senator Leland Yee

Dan Bernal, Senator Nancy Pelosi

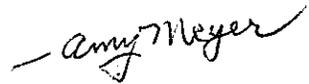
Sharon Duggan, ESQ.

Frank Dean, GGNRA

Brian Aviles, GGNRA

Brian Turner, National Trust for Historic Preservation

To: John Pechman, Facility Planner
SF VAMC

From: Amy Meyer 
People For a Golden Gate National Recreation Area
3627 Clement St.
San Francisco, CA 94121
phone: 221-8427 e-mail: a7w2m@earthlink.net (preferred contact)

These comments elaborate on those I made at the October 26 scoping meeting. I fully support the importance of the work done at the San Francisco VAMC and the pride of the institution in its contributions to California and to the nation.

The heart of the environmental process is the study of alternatives:

In the draft IMP, the VAMC successfully outlined its present missions, defined the nature of the present campus in the “do nothing” alternative, and showed its vision of keeping all of its present functions with expected additions for the next 30 years to create “a citadel”. However, neither the “relocate the entire campus” or the “partial relocation” alternatives are sufficiently discussed. They involve changes of mission and land use which must be described to be evaluated. For example, if the entire campus is relocated, what would the VA want to do with the present campus, their property? If the campus is partially relocated, what would be the focus of the realigned campus?

The VAMC does not exist in isolation:

The plan talks of enormous buildings should the VAMC in its entirety stay in the Clement Street location.

- 1) The VAMC is required to do everything practicable to adhere to local building regulations. The proposed height of several buildings, going up to ten stories, far exceeds the forty foot height limit (generally understood as four stories) of the Richmond district. Such buildings will also overshadow the national park.
- 2) For years Bay Area residents worked to protect the lands on both sides of the Golden Gate in a national park. They will not permit these lands to be spoiled by the massive construction of 945,000 square feet, nearly doubling the size of the present campus, that would have major visual impact on the Golden Gate, a national icon.
- 3) While the writing about context of the “citadel” alternative speaks of “a core design principle” being to break away from being divorced from the urban environment and fully integrating the site into the surrounding park and pedestrian systems, the unanalyzed traffic and parking as well as the density of the new buildings would have major negative impact on the city and on the national park lands.

4) The EIS should examine the “carrying capacity” of the campus. There is a limit as to how much built space, people, and cars it can hold. As described, the “citadel” seems to exceed a healthy limit in relation to its surroundings.

5) National park advocates and neighborhood residents fought to have a portion of the VAMC campus placed on the National Register for Historic Places. The density of the “citadel” plan does not appear to protect the integrity of the historic site.

These big impacts of proposed development for the two alternatives that call for further building, must be analyzed in full in the EIS. I am not sure of how this analysis will be affected by the as-yet-incomplete Facilities Options Study, and while I earnestly wish the IMP to proceed, it would appear this study must be fully integrated into analysis of the IMP. Mitigation measures must be shown for unavoidable impacts.

Funding and “swing space”

Having followed the financial fortunes of the SF VAMC for many years, it is hard to think that the “citadel” proposal would be fully funded in a timely way that during construction periods would minimize the effects on the national park and the neighborhood. Nor does the campus have the room for “swing space” for hospital and research needs and for parking displacements during construction periods. Having been through continuous rounds of the hospital’s needs for more acreage from 1974 -1991, and having in that year secured the boundary of the national park, local residents and park advocates will fight any attempt to use national park lands for any but the most minor assistance for a temporary hospital need.

Thank you for this opportunity to comment on the scoping for the EIS for the SF VAMC Institutional Master Plan.

Bennett, Kelsey

From: Pechman, John J. [John.Pechman@va.gov]
Sent: Monday, May 02, 2011 8:45 AM
To: Allsep, Jayni; Bennett, Kelsey
Cc: Cheary, Judi A.; Bressler, Janice
Subject: FW: SFVAMC IMP Comments

FYI in regards to the EIS.

John Pechman

Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Sreet
San Francisco, CA 94121
415-221-4810 x4600

From: Patty Lacson [<mailto:placson@famsf.org>]
Sent: Friday, April 29, 2011 4:47 PM
To: Pechman, John J.
Cc: 'Raymondsnf@aol.com'; 'Julie Burns'
Subject: SFVAMC IMP Comments

Dear Mr. Pechman:

I have reviewed the summary report of the VA's institutional master plan. I wish to comment specifically on sections 1.1.8, 2.2.6 and 2.2.7 which relate to parking.

- While existing inventory on land under VA jurisdiction is surveyed, it appears that adjacent parking supply is not addressed. The lack of a comprehensive evaluation of parking must be corrected in this draft Master Plan.
- There appear to be no studies offering data on modes of transportation used by VA staff. The assumptions for parking future parking requirements seem to assume the existing inventory is sufficient, which is clearly not the case. It is unclear how these assumptions were calculated, but real data is required.
- Currently, VA-provided parking is completely inadequate for the needs of the VA staff. This is evidenced by the staff's routine use of street parking in the adjacent Richmond district neighborhood and in the lots adjacent to the Legion of Honor.
- VA staff parking in the lots adjacent to the Legion of Honor have a negative impact on the visitors, staff, and volunteers of the Legion of Honor. The lots are nearly filled by 9 AM every day with VA staff, causing serious negative operational impacts to the Legion of Honor. It further puts a strain on DPT and the Recreation and Parks Department to handle parking and traffic problems.
- VA staff drive at unsafe speeds in the narrow lot on El Camino Del Mar. I have real safety concerns for our visitors, staff and volunteers. Many visitors and volunteers at the Legion and have mobility difficulties and I am concerned that one day we will have a serious accident.
- I have approached both Facility staff and Institutional Police at the SFVA to discuss the parking and safety situation and have been dismissed by SFVA administration.
- Given the current parking and traffic situations that can be attributed to impacts from the VA campus in its current configuration, expansion will only exacerbate these problems. Cumulative impacts of the proposed projects must also be studied.

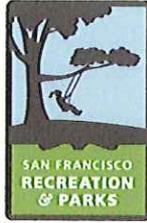
It does not appear that traffic to the VA campus is considered at all. While not a direct impact on the Legion of Honor, this will be a huge concern to the neighbors in the Richmond District. This is a relatively quiet corner of the City and any expansion must take traffic and transit impacts into consideration.

We cannot support this Master Plan as submitted. The VA must also reach out to its neighbors and work with us to mitigate the existing problems before even considering expansion of the campus in this location.

Patty Lacson

Director of Facilities
Fine Arts Museums of San Francisco
de Young/Legion of Honor
100 - 34th Avenue
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Mayor Gavin Newsom
Philip A. Ginsburg, General Manager

December 13, 2010
John Pechman
Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Street, San Francisco, CA 94121
John.Pechman@va.gov

Thank you for providing us the opportunity to comment on the Notice of Intent to Prepare an Environmental Impact Statement for the San Francisco Veterans Affairs Medical Center Institutional Master Plan. The future VAMC as proposed in the Conceptual Master Plan Summary Report for the SFVAMC Institutional Master Plan, may impact our nearby property, Lincoln Park and Golf Course.

First, the future circulation plan for the VAMC should be reviewed for its impacts on the adjacent properties. From the renderings presented in the conceptual plan, it appears that the current vehicular access to the Golden Gate National Area (GGNRA) property on the east side of VAMC will be rearranged through the ground level of the future parking structure. Also, as discussed in another report¹, the VA is planning on rearranging this access entirely so that the road access to Fort Miley would be redirected from Lincoln Park Golf Course. The VAMC Master Plan should address this proposed plan. Likewise, the Environmental Assessment of VAMC Master Plan should evaluate the possible impacts of this plan on our property, Lincoln Park Golf Course as well as GGNRA's property.

Second, the EIS report's scope should include aesthetic and habitat impacts of the project. Some of the proposed buildings in the plan might alter the views towards the southwest from our property. These buildings include but are not limited to the 10 level Clinical and Research Expansion (P2.2), the 10 level Research Expansion (P2.5), as well as the two and four level parking structures proposed in the Phase I on the east side of the campus. The EIS report should also provide evaluations of the impacts on the views from Lincoln Park and how they might adversely affect the habitat. We also recommend examining the possible shadows that the future buildings in the VAMC might cast on Lincoln Park subject to the Planning Code Section 295.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen", with a long horizontal line extending to the right.

Karen Mauney-Brodek
Deputy Director for Park Planning
City of San Francisco
Recreation and Parks
Karen.Mauney-Brodek@sfgov.org
(415) 831-2789

¹ Environmental Assessment: San Francisco VA Medical Center Mental Health Patient Parking Addition, Project NO. 662-CSI-612





Edwin M. Lee, Mayor
Philip A. Ginsburg, General Manager

April 28, 2011

John Pechman, Facility Planner
San Francisco VA Medical Center (001)
4150 Clement St.
San Francisco, CA 94121
John.Pechman@va.gov

Re: San Francisco Veterans Affairs Medical Center Institutional Master Plan

Dear Mr. Pechman,

Thank you for providing the City of San Francisco's Recreation and Parks Department (RPD) the opportunity to review the Notice of Intent to Prepare an Environmental Impact Statement for the San Francisco Veterans Affairs Medical Center Institutional Master Plan. As the Notice indicates, Lincoln Park (owned and managed by RPD) is in close proximity to the VA site, located to the north and east of the project. As a result, Lincoln Park may incur direct and/or indirect impacts as a result of the project.

First, the future circulation plan for the VAMC should be reviewed for parking and traffic circulation impacts on adjacent properties. In particular, please consider the impact of temporary off-site parking to users of Lincoln Park and the Palace of the Legion of Honor.

Second, as there are a large number of projects proposed for construction over the next twenty years, please also consider the cumulative impacts to parking, traffic circulation, and other resources in the area resulting from simultaneous construction of multiple projects. Please carefully consider how traffic is to be rerouted during each construction project, as well as the impacts of that rerouting to traffic and parking in Lincoln Park and the Palace of the Legion of Honor.

Third, the EIS report's scope should include cumulative aesthetic and habitat impacts of the project. The overall plan, as well as some of the proposed buildings in the plan, might alter views towards the southwest from Lincoln Park. The EIS report should provide building renderings, as well as evaluations of the impact of building massing on views from Lincoln Park. The EIS report should also evaluate how buildings and/or construction might adversely affect the habitat. We also recommend examining the possible shadows that future buildings in the VAMC might cast on Lincoln Park, subject to Planning Code Section 295.

Conducting thorough community outreach on the proposed work with nearby residents, concerned stakeholders, and park visitors is encouraged.

Thank you for taking these comments into consideration.

Sincerely,

Dawn Kamalanathan
Director of Planning and Capital Division
City of San Francisco, Recreation and Parks
Dawn.Kamalanathan@sfgov.org
(415) 581-2544



Bennett, Kelsey

From: Pechman, John J. [John.Pechman@va.gov]
Sent: Tuesday, April 26, 2011 2:52 PM
To: Allsep, Jayni; Bennett, Kelsey
Cc: Cheary, Judi A.
Subject: FW: VA Expansion

Comments on the EIS/IMP.

John Pechman

Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Sreet
San Francisco, CA 94121
415-221-4810 x4600

From: C.K. Wai [<mailto:chi.kinwai@gmail.com>]
Sent: Tuesday, April 26, 2011 2:49 PM
To: Pechman, John J.
Cc: Julie Burns
Subject: VA Expansion

Hello John. I am alarmed by the potential expansion and construction of the VA on Clement Street. The areas are mostly zoned residential and the future " growth " of VA is not consistent with the neighborhood. I am not certain if the zoning is compatible with further development. The debris and particle count in the air is rising because of the constructions. It can pose a health challenge if not hazard to neighbors , employees, and patients alike. The noise pollution is not conducive to better patient care either. If the development is mostly for research and administration functions, it is not direct patient care. It will have a negative impact to the flora and fauna additionally. It can upset the tranquil and natural environment of the areas, including but not limited to GGNRA, Lincoln Park, and the Legion of Honor. More " big boxes " will disrupt the aesthetics of the region. Furthermore, can the area manage the increasing stress of these expansions such as power consumption, traffic, and human interactions in a congested environment ? I respect VA 's property rights and I expect VA can consider my concerns too. I strongly oppose any future expansions. I urge VA to seek alternative sites other than Clement Street. Regards.

C.K. Wai

Bennett, Kelsey

From: Pechman, John J. [John.Pechman@va.gov]
Sent: Monday, May 02, 2011 9:19 AM
To: Allsep, Jayni; Bennett, Kelsey
Subject: FW: VA Expansion

FYI.

John Pechman

Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Sreet
San Francisco, CA 94121
415-221-4810 x4600

From: Julie Burns [<mailto:julieburns@sealrock.com>]
Sent: Friday, April 29, 2011 11:42 AM
To: Pechman, John J.; Cheary, Judi A.
Cc: Ray Holland; Ron Miguel; Amy Meyer; Eugene A. Brodsky; jason jungreis; FoxSDuggan@aol.com
Subject: FW: VA Expansion

Additional scoping comments on the IMP, from Mr. C.K. Wai, subsequent to the April 26th meeting and submitted on his behalf, as requested.

Julie Burns, Ph.D.
+1.415.666.3092 office
+1.415.341.6060 mobile
+1.415.666.0141 fax
julieburns@sealrock.com

From: C.K. Wai [<mailto:chi.kinwai@gmail.com>]
Sent: Wednesday, April 27, 2011 3:10 PM
To: Julie Burns
Subject: Re: VA Expansion

Hello Julie. I concur with David regarding reference points. I prefer that those variables and factors be quantified so we can measure and compare them more scientifically. There should be some legal ranges and limits if not baselines for the last 5, or even 10 years for delta comparison. The difference in the number of birds emigrated and the number of garter snakes displaced because of the past and current constructions come into my mind. The patients satisfaction surveys and employees satisfaction surveys may expose yet other negative impacts. If VA can supply those verifiable statistics and information, we can better assess the plans. Please add my 2 cents to future meeting if I am not back. I will be flying to China on May 4th to start an Asian cruise touching China, Korea, (skipping Japan), Russia, cross the Pacific and disembark in Alaska before returning on May 21st. Take care and see you soon.

Kin

From: C.K. Wai [<mailto:chi.kinwai@gmail.com>]
Sent: Tuesday, April 26, 2011 2:49 PM
To: John.Pechman@va.gov
Cc: Julie Burns
Subject: VA Expansion

Hello John. I am alarmed by the potential expansion and construction of the VA on Clement Street. The areas are mostly zoned residential and the future " growth " of VA is not consistent with the neighborhood. I am not certain if the zoning is compatible with further development. The debris and particle count in the air is rising because of the constructions. It can pose a health challenge if not hazard to neighbors , employees, and patients alike. The noise pollution is not conducive to better patient care either. If the development is mostly for research and administration functions, it is not direct patient care. It will have a negative impact to the flora and fauna additionally. It can upset the tranquil and natural environment of the areas, including but not limited to GGNRA, Lincoln Park, and the Legion of Honor. More " big boxes " will disrupt the aesthetics of the region. Furthermore, can the area manage the increasing stress of these expansions such as power consumption, traffic, and human interactions in a congested environment ? I respect VA 's property rights and I expect VA can consider my concerns too. I strongly oppose any future expansions. I urge VA to seek alternative sites other than Clement Street. Regards.

C.K. Wai

Bennett, Kelsey

From: Pechman, John J. [John.Pechman@va.gov]
Sent: Monday, April 25, 2011 12:43 PM
To: Allsep, Jayni; Bennett, Kelsey
Cc: Cheary, Judi A.
Subject: FW: SF VA Med Center expansion for offices

Comments regarding the IMP.

John Pechman

Facility Planner
San Francisco VA Medical Center (001)
4150 Clement Sreet
San Francisco, CA 94121
415-221-4810 x4600

From: Norma Wallace [<mailto:nwallace@questaec.com>]
Sent: Monday, April 25, 2011 12:39 PM
To: Pechman, John J.
Cc: julieburns@aol.com; Jack Gill
Subject: SF VA Med Center expansion for offices

Dear Mr. Pechman ~

I respectfully submit input related to the proposed enormous out of proportion expansion of the SF VA for reasons other than providing direct services to veterans.

I am opposed. This clearly reflects inappropriate "taking" of environmental public goods resources which are best left to the public to enjoy.

Since Andrew Hallidie engineered cable cars to save horses, San Francisco has led the way in public transit. It makes no sense to build a 1,000 space garage. The bus was fine for me my entire life growing up and living as an adult in San Francisco. I never owned a car until I was 25 and then it was mostly parked. For all the ill effects that private vehicle traffic has on public health, including killing pedestrians, it is unacceptable to me that this project would even consider proposing such a system. Better that you should budget to help MUNI provide bus service.

The visual impact alone of this project will have an effect that cannot be mitigated. It is one thing to build master architectural wonders which house magnificent pieces of art which all can enjoy. It is another to propose a huge complex for research or administration that will be an eyesore forever, AND greet all incoming traffic to San Francisco Bay. San Francisco and our visitors deserve much better.

The headlands to both north and south of the Golden Gate are beautiful and unique. The geography is one of a kind. Sailing under the Golden Gate itself is one of the most incredible sailing experiences *in the world*. This project would palpably ruin one of the most well known vistas in the world. Is this really the best idea the SF VA can propose?

People live in the adjacent neighborhood because it is QUIET. Why would you propose a project that would have such a huge impact as, basically, building a “Pier 39” in the middle of the Richmond district, with its 1000-car parking garage.

I respectfully request a response.

Norma Wallace

4th Generation San Franciscan

San Francisco Homeowner

Currently Residing Richmond California

[Federal Register Volume 77, Number 160 (Friday, August 17, 2012)]

[Notices]

[Page 49865]

From the Federal Register Online via the Government Printing Office [www.gpo.gov]

[FR Doc No: 2012-20243]

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DEPARTMENT OF VETERANS AFFAIRS

Notice of Availability of an Environmental Impact Statement (EIS)
for the San Francisco Veterans Affairs Medical Center (SFVAMC) Long
Range Development Plan (LRDP)

AGENCY: Department of Veterans Affairs (VA).

ACTION: Notice of availability.

SUMMARY: Pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended, (42 U.S.C. 4331 et seq.), the Council on Environmental Quality Regulations for Implementing the Procedural Requirements of NEPA (40 CFR parts 1500-1508), VA's Implementing Regulations (38 CFR part 26), as well as the settlement agreement resulting from Planning Association for Richmond, et al. v. U.S. Department of Veterans Affairs, C-06-02321-SBA (filed 6 June 2008), VA has prepared a Draft EIS for the proposed implementation of the SFVAMC LRDP in San Francisco, California. The SFVAMC LRDP involves development and construction of patient care buildings, research buildings, business occupancy buildings, and parking structures, as well as retrofitting seismically deficient buildings. The Draft EIS identifies and evaluates environmental factors associated with new construction, demolition, as well as seismic retrofit to upgrade the SFVAMC for purposes of meeting the needs of Veterans of the North Coast and San Francisco Bay Area over the next 20 years.

DATES: Interested parties are invited to submit comments in writing on the SFVAMC LRDP Draft EIS by October 16, 2012. Interested parties are also invited to participate in a public meeting regarding the SFVAMC LRDP Draft EIS on September 20, 2012 at SFVAMC (4150 Clement Street, San Francisco, CA 94121, Building 7, 1st Floor, Auditorium) at 5 p.m. At the public meeting, interested parties will also have the opportunity to comment regarding the National Historic Preservation Act Section 106 process.

ADDRESSES: Submit written comments on the SFVAMC LRDP Draft EIS through www.regulations.gov. Please refer to: ``SFVAMC LRDP Draft EIS'' in any correspondence.

FOR FURTHER INFORMATION CONTACT: Chief Engineer, Engineering Service (138), San Francisco Veterans Affairs Medical Center, 4150 Clement Street, San Francisco, CA 94121 or by telephone, (415) 221-4810, extension 2009. The SFVAMC LRDP and LRDP Draft EIS are available for viewing on the SFVAMC Web site: <http://www.sanfrancisco.va.gov/planning>.

SUPPLEMENTARY INFORMATION: VA operates the SFVAMC, located at Fort Miley in San Francisco, California. It is the only VAMC in the City and County of San Francisco and is considered an aging facility with need for retrofitting and expansion. The SFVAMC has identified a need for retrofitting existing buildings to the most recent seismic safety requirements and for an additional 589,000 square feet of building space (in addition to the existing nearly one million square feet of building space) to meet the needs of San Francisco Bay Area and northern California coast Veterans over the next 20 years.

Three alternatives were evaluated in the Draft EIS. Alternative 1

would include the addition of 244,000 square feet (or 394,000 square feet including parking structure space) of medical and research space and seismic retrofit of nine existing buildings at the existing SFVAMC site, a 29-acre site located at Fort Miley in the northwestern portion of San Francisco. Alternative 2 would include the addition of 124,000 square feet (or 274,000 square feet including parking structure space) of medical and research space and seismic retrofit of nine existing buildings at the existing SFVAMC site as well as the construction of 350,000 square feet (or 620,000 square feet including parking structure space) of new ambulatory care and research space at a new alternate site in the Mission Bay area of San Francisco. Alternative 3 is the No Action Alternative.

Environmental topics that have been addressed in the Draft EIS include: aesthetics, air quality, community services, cultural resources, coastal management, geology and soils, greenhouse gas emissions, hydrology and water quality, land use, noise, socioeconomics, hazards, transportation and parking, utilities, and biological resources. Relevant and reasonable measures that could alleviate environmental effects have been considered and are included where relevant within the Draft EIS.

Information related to the EIS process, including notices of public meetings, will be available for viewing on the SFVAMC Web site: <http://www.sanfrancisco.va.gov/>.

Approved: August 9, 2012.

John R. Gingrich,
Chief of Staff, Department of Veterans Affairs.
[FR Doc. 2012-20243 Filed 8-16-12; 8:45 am]
BILLING CODE 8320-01-P

DECLARATION OF PUBLICATION OF SAN FRANCISCO CHRONICLE

Lori Gomez

Declares that:

The annexed advertisement has been regularly published
In the

SAN FRANCISCO CHRONICLE

Which is an was at all times herein mentioned
established as newspaper of general circulation in the
City and County of San Francisco, State of California, as
the term is defined by Section 6000 of the Government
Code

SAN FRANCISCO CHRONICLE

(Name of Newspaper)

901 Mission Street

San Francisco, CA 94103

From

8/18/12

To

8/24/12

Namely on

8/18 8/19 8/20

8/21 8/22 8/23 8/24 2012

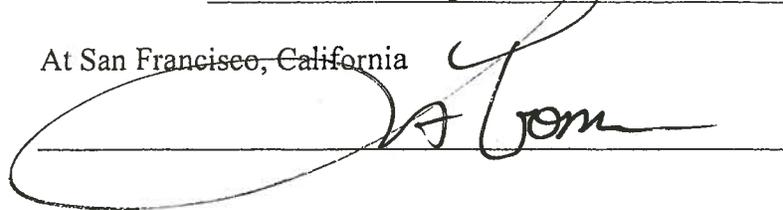
(Dates of Publication)

I declare under penalty of perjury that the foregoing is
true and correct.

Executed on

8/24/12

At San Francisco, California



The San Francisco VA Medical Center has prepared a draft Environmental Impact Statement (EIS) in tandem with our Long Range Development Plan (LRDP). In addition, a Finding of Effect (FOE) has been prepared to facilitate consultation with the State Historic Preservation Office and other consulting parties as required under Section 106 of the National Historic Preservation Act.
A 60-day public comment period is from August 17 - October 16, 2012. Comments must be received by October 16, 2012.

A public meeting will be held :
September 20, 2012 from 5-7 p.m.
San Francisco VA Medical Center
4150 Clement Street
Auditorium, Bldg. 7, 1st Floor,
Room 112

Written Comments can be provided
at:

E-Gov Web Site: www.regulations.gov.
Please reference "SFVAMC LRDP Draft
EIS" or "SFVAMC LRDP Section 106."

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

Copies of the draft EIS, as well as the
LRDP and FOE are available online at
www.sanfrancisco.va.gov/planning.

Copies are also available for review at:
San Francisco Public Library
Anza Branch
550 37th Avenue
San Francisco, CA 94121

San Francisco VA Medical Center
Engineering Office
4150 Clement Street, Building 3
San Francisco, CA 94121

PUBLIC NOTICE

The San Francisco VA Medical Center has prepared a draft **Environmental Impact Statement (EIS)** in tandem with our **Long Range Development Plan (LRDP)**. An EIS is required by the National Environmental Policy Act (NEPA) and is a tool for decision making. In addition, a Finding of Effect (FOE) has been prepared to facilitate consultation with the State Historic Preservation Office and other interested parties as required under Section 106 of the National Historic Preservation Act. The FOE will be made available for public review as an appendix of the EIS.

There will be a 60-day public comment period for the draft EIS from **August 17 - October 16, 2012**. For comments to be considered they must be received by October 16, 2012.

Comments may be provided:

1. At a **public meeting**:

September 20, 2012 from 5-7 p.m.
San Francisco VA Medical Center
Auditorium, Bldg. 7, 1st Floor, Room 112

2. **Written Comments:**

E-Gov Web Site: **www.regulations.gov**. This site allows the public to enter comments on any Federal Register notice issued by any agency.

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

Comments should reference "*SFVAMC LRDP Draft EIS*" or "*SFVAMC LRDP Section 106*" in any correspondence.

Copies of the draft EIS and LRDP are available online at **www.sanfrancisco.va.gov/planning**. Copies are also available for review at:

San Francisco Public Library
Anza Branch
550 37th Avenue

San Francisco VA Medical Center
Engineering Office
4150 Clement Street, Building 3

For more information please contact Judi Cheary, SFVAMC Director of Public Affairs, judi.cheary2@va.gov or (415) 750-2250.

ATTACHMENT C—NON-FUNCTIONAL REQUIREMENTS—Continued

NFR characteristic	NFR sub-characteristic	NFR Statement
3.3 Usability	3.3.1 Understandability	3.3.1.1 The Scheduling Solution shall be self-descriptive and explain itself through cues (e.g., screen, area, and group titles indicating the purpose of the respective interface element; on-screen instructions/diagrams; explanations/answers that are available on request; no implicit assumptions about how users are expected to behave that would contradict users' expectations; and feedback is given on user actions, system actions, and the system state. 3.3.3.2 The Scheduling Solution shall be usable across multiple operating systems, browsers, and platforms.
3.5 Maintainability	3.5.1 Analyzability	3.5.1.1 The Scheduling Solution shall be capable of providing transaction logs, error logs and audit trails for pertinent scheduling transactions.
	3.5.4 Testability	3.5.4.1 The Scheduling Solution shall provide criteria to enable the measurement to test pieces of code or functionality, or a provision added in software so that test plans and scripts can be executed systematically.

[FR Doc. 2012-25408 Filed 10-15-12; 8:45 am]

BILLING CODE 8320-01-P

DEPARTMENT OF VETERANS AFFAIRS

Notice of Extension of Public Comment Period for Environmental Impact Statement for the San Francisco Veterans Affairs Medical Center (SFVAMC) Long Range Development Plan (LRDP)

AGENCY: Department of Veterans Affairs (VA).

ACTION: Notice of Extension of Comment Period.

SUMMARY: The Department of Veterans Affairs (VA) is extending the public comment period for the Environmental Impact Statement for the San Francisco Veterans Affairs Medical Center (SFVAMC) Long Range Development Plan (LRDP). VA published a notice in the **Federal Register** on August 17, 2012 (77 FR 49865), that provided for a public comment period ending on October 16, 2012. This notice extends the public comment period to October 31, 2012.

DATES: Several individuals representing federal and community organizations have requested an extension of the public comment period. The Agency has decided to act in accordance with these requests; therefore, comments on the Draft Environmental Impact Statement (EIS) for the SFVAMC LRDP will now be accepted through October 31, 2012. Comments received or postmarked after October 31, 2012 will be considered to the extent practicable.

ADDRESSES: Submit written comments on the SFVAMC LRDP Draft EIS through www.regulations.gov. Please refer to: "SFVAMC LRDP Draft EIS" in any correspondence.

FOR FURTHER INFORMATION CONTACT: Chief Engineer, Engineering Service

(138), San Francisco Veterans Affairs Medical Center, 4150 Clement Street, San Francisco, CA 94121 or by telephone, (415) 221-4810, extension 2009. The SFVAMC LRDP and Draft EIS are available for viewing on the SFVAMC Web site: <http://www.sanfrancisco.va.gov/planning>.

Dated: October 11, 2012.

Robert C. McFetridge,
Director, Regulation Policy and Management (02REG), Office of the General Counsel.

[FR Doc. 2012-25409 Filed 10-15-12; 8:45 am]

BILLING CODE 8320-01-P

DEPARTMENT OF VETERANS AFFAIRS

Advisory Committee on Structural Safety of Department of Veterans Affairs Facilities, Notice of Meeting

The Department of Veterans Affairs (VA) gives notice under the Federal Advisory Committee Act, 5 U.S.C. App. 2, that a meeting of the Advisory Committee on Structural Safety of Department of Veterans Affairs Facilities will be held on October 29-30, 2012, in Room 6W405, 425 I Street NW., Washington, DC. The session on October 29 will be from 9 a.m. until 5 p.m., and the session on October 30 will be from 8:30 a.m. until 12:30 p.m. The meeting is open to the public.

The purpose of the Committee is to advise the Secretary of Veterans Affairs on matters of structural safety in the construction and remodeling of VA facilities and to recommend standards for use by VA in the construction and alteration of its facilities.

On October 29, the Committee will review developments in the fields of fire safety issues and structural design as they relate to seismic and other natural hazards impact on the safety of buildings. On October 30, the Committee will receive appropriate briefings and presentations on current

seismic, natural hazards, and fire safety issues that are particularly relevant to facilities owned and leased by the Department. The Committee will also discuss appropriate structural and fire safety recommendations for inclusion in VA's standards.

No time will be allocated for receiving oral presentations from the public. However, members of the public may submit written statements for review by the Committee to Krishna K. Banga, Senior Structural Engineer, Facilities Standard Service, Office of Construction & Facilities Management (003C2B), Department of Veterans Affairs, 425 I Street NW., Washington, DC 20001, or by email at Krishna.banga@va.gov. Any member of the public wishing to attend the meeting or seeking additional information should contact Mr. Banga at (202) 632-4694.

Dated: October 10, 2012.

By Direction of the Secretary:

Vivian Drake,
Committee Management Officer.

[FR Doc. 2012-25329 Filed 10-15-12; 8:45 am]

BILLING CODE 8320-01-P

DEPARTMENT OF VETERANS AFFAIRS

Advisory Committee on Disability Compensation, Notice of Meeting

The Department of Veterans Affairs (VA) gives notice under the Federal Advisory Committee Act, 5 U.S.C. App. 2, that the Advisory Committee on Disability Compensation will meet on October 26, 2012, at the Veterans Health Administration National Conference Center, 2011 Crystal Drive, Suite 150A, Arlington, Virginia. The session will begin at 8:30 a.m. and end at 4 p.m. The meeting is open to the public.

The purpose of the Committee is to advise the Secretary of Veterans Affairs on the maintenance and periodic readjustment of the VA Schedule for



United States Department of the Interior

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

IN REPLY REFER TO:
(ER 12/591)

Filed Electronically

18 October 2012

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

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

Dear Allan Federman:

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

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

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



United States Department of the Interior

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

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

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

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

Dear Mr. Federman:

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

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

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

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

Sincerely,

Frank Dean
General Superintendent

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

NPS Comments

SFVAMC LRDP Draft Environmental Impact Statement

SECTION 1 (INTRODUCTION)

1.7 Public Involvement Process

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

SECTION 2 (ALTERNATIVES)

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

SECTION 3 (AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES)

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

3.1 – Aesthetics

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

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

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

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

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

3.4 - Cultural Resources

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

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

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

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

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

3.9 Land Use

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

3.13 Transportation and Parking

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

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

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

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

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

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

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

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

Cumulative Impacts

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

3.14 Utilities

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



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

October 30, 2012

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

Subject: Draft Environmental Impact Statement (DEIS), San Francisco Veterans Affairs Medical Center (SFVAMC) Long Range Development Plan (LRDP), San Francisco, California (CEQ # 20120279)

Dear Mr. Federman:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Our detailed comments are enclosed.

The Draft Environmental Impact Statement (DEIS) evaluates the impacts of the San Francisco Veterans Affairs Medical Center (SFVAMC) Long Range Development Plan (LRDP). The SFVAMC LRDP involves retrofitting existing buildings to the most recent seismic safety requirements and the development and construction of additional building space, including patient care buildings, research buildings, business occupancy buildings, and parking structures to meet the needs of San Francisco Bay Area and Northern California Coast veterans over the next 20 years.

Based on our review, we have rated the DEIS's Proposed Action as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions"). It is not clear that all reasonable alternatives have been evaluated for the long-term projects since no alternative selection criteria are identified in the DEIS. Additionally, we have concerns regarding construction noise impacts, and request additional information on noise, aesthetics, air quality, stormwater management, and transportation.

EPA appreciates the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: CED-2). Please note that, as of October 1, 2012, EPA Headquarters no longer accepts paper copies or CDs of EISs for official filing purposes. Submissions on or after October 1, 2012, must be made through the EPA's new electronic EIS submittal tool: e-NEPA. To begin using e-NEPA, you must first register with the EPA's electronic reporting site - https://cdx.epa.gov/epa_home.asp. If you have any questions, please contact me at (415) 972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen Martyn Goforth".

Kathleen Martyn Goforth, Manager
Environmental Review Office (CED-2)

**Enclosure: Summary of EPA Rating Definitions
EPA's Detailed Comments**

cc: Brian Aviles, Golden Gate National Recreation Area (GGNRA)

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

“LO” (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

“EC” (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

“EO” (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

“EU” (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category “1” (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category “2” (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category “3” (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

Purpose and Need and Alternatives

The range of alternatives evaluated in the Draft Environmental Impact Statement (DEIS) is limited. In addition to the Proposed Action (Alternative 1), the DEIS evaluates Alternative 2, and the required No Action Alternative. The near-term projects for Alternatives 1 and 2 are identical and evaluated at a project level; the long-term projects are evaluated at a programmatic level and differ only in the location of a new ambulatory care center and the inclusion of an additional research building in Alternative 2.

No criteria for evaluating potential alternatives against the purpose and need are identified in the DEIS. The DEIS states that the San Francisco Veterans Administration Medical Center (SFVAMC) has identified a deficiency of 589,000 square feet of building space needed to adequately serve San Francisco Bay Area and North Coast veterans through the year 2030 (p. 1-3). This would appear to offer a criterion for screening potential alternatives, yet it does not appear to have been so used, since the square footage under the Proposed Action totals 455,600 gross square feet. Alternative 2 has an additional research building as well as a larger ambulatory care center, both located at Mission Bay, and totals 955,600 gross square feet, well over the identified deficiency.

It is not clear why alternatives locating other facilities at Mission Bay or other off-site locations were not deemed feasible. The DEIS does not identify the benefits of locating all facilities on the Fort Miley campus under the Proposed Action, nor the feasibility of locating some functions, such as research, administrative or educational functions, offsite. Identification of these factors could have provided the information needed to determine whether all reasonable alternatives have been evaluated. Providing planning criteria would also help the reader understand what factors the decision-maker will use in making the decision. For example, since the Proposed Action under Alternative 1 does not meet the 589,000 square foot space deficiency identified, it is not clear whether this alternative would meet the goals of serving veterans well into the future, as identified in the DEIS' Purpose and Need statement (p. 1-4).

We understand, based on personal conversation with VA staff, that this EIS was prepared in response to litigation and a subsequent settlement agreement signed by the VA and a neighborhood group. It is common practice for a NEPA document to disclose such legal history.

Recommendation: We recommend providing additional information in the Final EIS regarding the criteria used to screen potential alternatives. If alternatives other than those identified in the DEIS would meet these criteria, they should be considered and discussed.

Clarify the nature of decision-making at this stage. We also recommend including a brief discussion of the history that lead to the development of the EIS, including a discussion of the settlement agreement and if/how its terms are relevant to the actions identified in the DEIS.

Construction Noise Impacts

Construction noise impact assessment

The DEIS predicts substantial noise increases, especially to on-site receptors, during the construction phase of the near-term projects. For on-site receptors, exterior construction noise could reach as high as 84.6 A-weighted decibels (dBA) equivalent sound level (Leq) (1-hour), which is 20 dBA in excess of existing noise levels (p. 3-10-15). The DEIS utilizes, as a significance threshold for on-site receptors, the EPA-recommended noise levels to protect public health and welfare with an adequate margin of safety (p. 3.10-13), and presents these levels in Table 3.10-5, which indicates that outdoor residential or other areas should be less than or equal to 55 dB Leq₂₄ (24 hours) or 55 dB day-night average (DNL) to avoid annoyance and interference with outdoor activity. With the predicted 84.6 dBA Leq 1-hour noise level for on-site receptors, the document concludes that the potential exists for on-site receptors to be exposed to 24-hour (DNL) noise levels in excess of the noise levels established by EPA, and the impacts would be potentially adverse (p. 3.10-15). The predicted noise level is expressed in Leq (1 hour) however, so there is some uncertainty in comparing it to the 24-hour averaging metric of the significance criterion (DNL or Leq₂₄).

It is not clear why noise levels at off-site receptors were not assessed against the same EPA-recommended levels that were used as significance criteria for on-site receptors. Instead, the DEIS utilizes the City of San Francisco's Noise Ordinance sound level for construction equipment as the significance criterion for off-site receptors during the construction phase. The SF Noise Ordinance (Section 2907 of the Police Code) specifies that construction equipment must not exceed 80 dBA Leq when measured at a distance of 100 feet. The DEIS estimates the noise levels at nearby receptors to be 73.8 dBA Leq (1 hour) for the Proposed Action and, therefore, concludes that impacts to off-site receptors would be minor (p. 3.10-16). It is not clear whether the potential also exists for the off-site receptors to be exposed to 24-hour (DNL) noise levels in excess of the noise levels established by EPA, as is stated for on-site receptors.

The locations of the on-site and off-site predicted noise levels are not identified. For off-site receptors, page 3.10-16 states that existing residential structures are located approximately 175 feet south of the anticipated limits of construction. Page 3.10-21 states that the shortest distance between the proposed locations of Phase I and II components and off-site receptors is 100 feet. Nevertheless, the predicted off-site noise level of 73.8 dBA Leq is substantially greater than the existing ambient daytime noise levels in the project vicinity, which range from 51.8 – 62.2 dBA Leq (Table 3.10-4). An increase of 10 dBA is subjectively heard as a doubling of loudness. While construction noise is temporary, the project is expected to continue for 32 months for short-term projects (p. 2-4), and an additional 45 months (23 plus 22 - p. 3.13-34) for the Proposed Actions' long-term projects – a total of approximately 6.4 years. When construction activity lasts for years, the impact on the community might be viewed in terms of a long-term noise source. Because of this, disclosure of noise impacts in the form of additional measures would be helpful to reveal the context and intensity of this impact and to inform mitigation.

Recommendation: Provide noise level estimates in the same units as the significance criteria being used. Explain why impacts to off-site receptors are not evaluated against the same criteria as on-site receptors. Discuss additional noise thresholds, such as the noise levels identified in the

VA's Temporary Environmental Controls¹, and the noise levels agreed to by the VA in the Settlement Agreement². Consider discussing predicted noise impacts in terms of community response (e.g. annoyance), e.g., by relating them to the ISO 1996-1:2003 standard that characterizes the effects of noise on people, or by other measures of annoyance. Because noise impacts will occur over a period of years, the VA should consider comparing noise predictions to thresholds used for long-term noise sources, such as those identified in the 1980 Federal Interagency on Urban Noise (FICUN) "Guidelines for Considering Noise in Land Use Planning and Control".

Clarify the location of the predicted noise levels for on-and off-site receptors. If noise predictions were modeled for other locations, identify them in the FEIS (for example, include a table for construction noise predictions for different locations, similar to Table 3.10-4 used for ambient noise). If there is a supporting noise analysis document, include it as an appendix to the FEIS so assumptions used in the analysis are disclosed.

Noise impacts to children

The DEIS identifies Executive Order 13045 - Protection of Children from Environmental Health Risks and Safety Risks, and its requirement, to the extent permitted by law and appropriate, that federal agencies make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children (p. 3.11-6); however, the DEIS does not discuss construction noise impacts, which are expected to last for years, on children in the on-site child care center.

A 2007 review article³ that summarizes studies from the National Library of Medicine database on the adverse health effects of noise concludes that children are particularly vulnerable to noise interference with spoken communication, and that the evidence is strong enough to warrant monitoring programs in schools and elsewhere to protect children from noise exposure.

Recommendation: Disclose construction noise impacts to children in the on-site child care center, including potential health impacts and impacts to learning. Identify potential mitigation measures, as required by 40 CFR 1502.16(h). Clarify whether children in the child care center use outdoor areas on the campus.

Noise mitigation

The DEIS states that construction activities would adhere to the requirements for noise control outlined in VA Specification Section 01568, "Environmental Protection" which includes such requirements as providing sound-deadening devices on equipment, using shields or other physical barriers to restrict noise transmission, providing soundproof housings or enclosures for noise-producing machinery, and monitoring construction noise levels once a week while work is being performed such that construction noise may exceed 55 dBA. Construction activities would mainly be limited to between the hours of 7:30 a.m. and 6:00 p.m. and would abide by City of San Francisco noise ordinances, unless otherwise permitted. The DEIS also states that the project will comply with the VA Specification Section 015719,

¹ This states that repetitive impact noise on the property shall not exceed specific dB limitations.
<http://www.cfm.va.gov/TIL/spec/015719.doc>.

² The Settlement Agreement states that noise levels associated with the finished Building 16 Annex, measured at the southern property line, will not exceed 50 dBA from 10 p.m. to 7 a.m. and 55 dBA from 7 a.m. to 10 p.m.

³ Goines, Lisa RN and Hagler, Louis MD. 2007. "Noise Pollution: A Modern Plague", *Southern Medical Journal*: Volume 100 - Issue 3 - pp 287-294.

“Temporary Environmental Controls” (p. 4-43). This document directs the VA to “minimize noise using every action possible”, but it is not clear if the measures identified under VA specification 01568 include all possible measures. The DEIS identifies two mitigation measures for noise impacts, both for onsite receptors: the VA will monitor construction noise and implement attenuation measures if levels are measured above 55 dBA DNL (p. 3.10-15); and the VA will employ a noise disturbance coordinator to address noise complaints received by hospital or clinic staff (p. 3.10-16). No monitoring or noise complaint process is identified for off-site receptors, the closest of which is 100 feet from the proposed construction locations (p. 3.10-21).

The construction noise impact assessment assumes that, due to space restrictions at the existing SFVAMC Fort Miley Campus, the amount of construction that could occur simultaneously would be limited. Therefore, for this analysis, it was assumed that no more than one loader and one dozer would operate simultaneously on-site during any phase (p. 3.10-15). It is important to verify predicted noise levels during construction, both on and off-site, to confirm that these assumptions were appropriate.

Recommendation: The FEIS should clarify whether the requirements for noise control outlined in VA Specification Section 01568 (p. 3.10-15) include every action possible to minimize noise impacts as required in VA Specification Section 015719 or whether additional measures are available. Because noise was an issue raised by the public, we recommend that a noise monitoring and mitigation plan be prepared. The plan should identify all mitigation measures to which the VA is committing as part of the project, as well as construction noise monitoring efforts and thresholds that would be used to trigger mitigating actions. We recommend that off-site noise levels be monitored as well as on-site levels to confirm modeling assumptions used to predict noise impacts. The DEIS states that the VA requires monitoring every 5 days (p. 3.10-10) but it does not indicate where monitoring would occur.

The following are possible additional noise mitigation measures that could be considered:

- Prohibit unnecessary idling of internal combustion engines.
- Avoid staging of construction equipment within 200 feet of residences and locate all stationary noise-generating construction equipment, such as air compressors and portable power generators, as far as practical from existing noise sensitive receptors.
- Utilize "quiet" air compressors and power equipment by electricity rather than using portable generators.
- Route all construction traffic to and from the project site via designated truck routes.
- Notify residents adjacent to the project site of the construction schedule in writing.
- Designate a "noise disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. Post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

Visual Resources

The DEIS's assessment of impacts on aesthetics (views and visual character) is limited, despite the interest expressed by the public on this issue during scoping, including comments received by the National Park Service (Appendix A). The project area is surrounded on three sides by the Golden Gate National Recreation Area, and the DEIS acknowledges that recreational areas are considered to have relatively high sensitivity to visual impacts (p. 3.1-16). The fourth side borders a residential area, which the DEIS identifies as having moderate sensitivity to visual impacts.

While many EIS concerns can be measured in quantitative terms, visual impacts are assessed largely by qualitative judgments. Common tools used in visual impact assessment include models, perspectives and photomontages as viewed from specific points in the landscape (viewpoint analysis). The DEIS appears to incorporate this analysis, since it includes photographs of existing viewpoints, but it does not provide computer simulated views from these same viewpoints that incorporate project structures. Instead, the DEIS relies on text descriptions of likely view impacts and an aerial rendering of new building massing and location. Without visual simulations in the viewpoint analysis; however, support for conclusions that visual impacts are minor for high sensitivity land uses is limited.

In addition, the impact assessment does not appear to account for the effects on visual character and aesthetics from the removal of 70 trees⁴. The DEIS does not identify where these trees are located, and it is unclear whether these trees currently function as visual screens or whether their removal will significantly affect aesthetics and views.

Recommendation: EPA recommends that, to the extent feasible, the visual impact assessment be improved in the FEIS to include visual simulations of new project features from the photographed viewpoints contained in the DEIS. Ensure that the 70 trees that are proposed for removal have been considered in the visual impact assessment.

Air Quality

Air quality impact assessment and mitigation measures

The DEIS describes the health risks associated with diesel particulate matter (p. 3.2-17) and includes a health risk assessment that calculated cancer risk well below the 10 in one million threshold for offsite receptors (p. 3.2-24). The receptors that were chosen included open park areas that could allow for extended recreation, and residential structures that could have windows open for ventilation. The health risk assessment did not include on-site receptors. Based on conversations with VA staff, we understand that this was due, in part, to the fact that on-site receptors would be located almost entirely indoors and, with the high air filtration requirements placed on hospitals, quantitative modeling of on-site receptors was not considered necessary. The DEIS states that temporary environmental controls will be employed during construction activities and will be enumerated as part of construction specifications (p. 3.2-32). It identifies generic mitigation measures for air quality that are not specific to the Fort Miley site (p. 3.2-33).

Recommendations: We recommend including, in the FEIS, the above information regarding the rationale for not including on-site receptors in the health risk assessment. Confirm that the

⁴ The DEIS indicates that under the Proposed Action, 65 trees will be removed because of their fall and limb breakage potential (p. 2-6), and that an additional 5 trees will be removed from the eastern edge of the campus (p. 3.15-16).

children in the private on-site child care center were considered in the model assumptions and appropriately covered in the air quality impact assessment.

We recommend that construction mitigation measures be more specifically identified in the FEIS. We recommend preparing a Construction Emissions Mitigation Plan and adopting this plan in the Record of Decision. Identify all commitments to reduce construction emissions and update the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.

To reduce impacts associated with emissions of particulate matter (PM) and other toxics from construction-related activities, we recommend:

- Maintaining and tuning engines per manufacturer's specifications to perform at California Air Resources Board (CARB) certification levels, where applicable, and to perform at verified standards applicable to retrofit technologies.
- Employing periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained. CARB has a number of mobile source anti-idling requirements. See their website at: <http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm>.
- Prohibiting any tampering with engines and requiring continuing adherence to manufacturer's recommendations.
- If practicable, leasing new, clean equipment meeting the most stringent of applicable Federal⁵ or State Standards⁶. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible⁷. Lacking availability of non-road construction equipment that meets Tier 4 engine standards, commit to using CARB and or EPA-verified particulate traps, oxidation catalysts and other appropriate controls where suitable to reduce emissions of DPM and other pollutants at the construction site.
- Where appropriate, using alternative fuels or power sources such as natural gas or electric.
- Developing a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Locating construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners. The DEIS states that construction staging would be in a previously disturbed area (p. 2-3, 2-9) but does not indicate where.

For fugitive dust source controls, we recommend:

- Stabilizing open storage piles and disturbed areas by covering and/or applying water or dust palliative where appropriate, on both inactive and active sites, and during workdays, weekends, holidays, and windy conditions.

⁵ EPA's website for nonroad mobile sources is <http://www.epa.gov/nonroad/>.

⁶ For ARB emissions standards, see: <http://www.arb.ca.gov/msprog/offroad/offroad.htm>.

⁷ Diesel engines < 25 hp rated power started phasing in Tier 4 Model Years in 2008. Larger Tier 4 diesel engines will be phased in depending on the rated power (e.g., 25 hp - <75 hp: 2013; 75 hp - < 175 hp: 2012-2013; 175 hp - < 750 hp: 2011 - 2013; and \geq 750 hp 2011- 2015).

- Installing wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, preventing spillage and limiting speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

General conformity – minor comment

The DEIS (p. 3.2-20) cites the general conformity rule incorrectly. The general conformity rule was revised April 5, 2010 (75 FR 17257). The EPA deleted the provision in 40 CFR 93.153 that required Federal agencies to conduct a conformity determination for regionally significant actions where the direct and indirect emissions of any pollutant represent 10 percent or more of a nonattainment or maintenance area’s emissions inventory for that pollutant.

Stormwater Pollution and Management

The DEIS discusses the stormwater runoff requirements for federal projects under Section 438 of the Energy Independence and Security Act (EISA) and states that they would be applicable to the project site (p. 3.8-11), but it does not describe how the project would comply with EISA. Page 3.14-13 states that stormwater is currently collected in gutters and drainpipes and conveyed to the City’s combined sewer interceptors and that this method of discharge would generally continue with implementation of the project (p. 3.14-13). The DEIS also states that new facilities would include sustainable features such as green roofs and bioswales, would be designed to minimize stormwater runoff (p. 2-6), and that best management practices (BMPs) may include: bioretention and rain gardens; rooftop green roof gardens; sidewalk storage; vegetated swales, buffers, and strips; rain barrels and cisterns; permeable pavement, and soil amendments (p. 3.8-16). The DEIS does not specify which or how these techniques will be utilized. Land is restricted at the Fort Miley site; some low-impact development (LID) techniques, such as rain gardens and other bioretention features, require a space commitment and, therefore, should be integrated into siting decisions and development plans.

Recommendations: The FEIS should provide more details on how the project intends to comply with EISA Section 438. Indicate which LID features would be utilized, and for bioretention features, where they would be located.

Transportation and Parking

The DEIS indicates that the net addition of 263 spaces under the Proposed Action would not meet the long term parking demand of 730 spaces under 2023 conditions (p. 3.13-38). The DEIS concludes that drivers would seek alternatives and shift to other modes of travel and the parking impacts would be minor. The DEIS does not identify mitigation measures to help ease the parking burden. The DEIS states that the Fort Miley campus currently contracts with a major transportation service to provide free bus and shuttle service to staff and patients daily from major transportation hubs (p. 3.13-8); however, no increased shuttle service is proposed as part of the Proposed Action. Additionally, the DEIS states that the Proposed Action would generate new bicycle trips (p. 3.13-32), but no information regarding current bicycle facilities/parking is included, nor are new bicycle facilities proposed under the Proposed Action.

During the construction phase for short term projects, the Proposed Action would eliminate 214 existing parking spaces and replace them with a 477-space parking structure (p. 3.13-32). It is not clear whether

there would be a period when the existing parking spaces are eliminated and the parking structure is not yet available.

Recommendation: EPA recommends increasing the shuttle service under both short-term and long-term projects to help reduce the parking burden on the surrounding neighborhood. Identify current bicycle transportation facilities on the Fort Miley campus and whether new bicycle facilities/parking are proposed.

In the FEIS, clarify whether there would be a period when existing parking spaces would be eliminated before the parking structure is available and if so, how long that period would be and whether those impacts have been disclosed. If additional impacts are identified, additional mitigation measures may be warranted.



Mayor Edwin M. Lee
Philip A. Ginsburg, General Manager

October 25, 2012

Allan Federman
Acting Facility Planner
San Francisco Veterans Affairs Medical Center
4150 Clement Street #138
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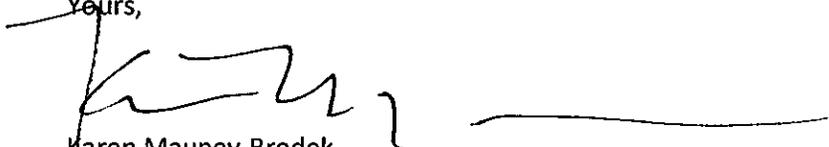
Dear Mr. Federman,

Thank you for the opportunity for the Recreation and Parks Department to provide feedback on the San Francisco Veterans Affairs Medical Center (SFVAMC) Long Range Development Plan (LRDP) Section 106 and Draft Environmental Impact Statement (DEIS), and for being patient while we prepare our comments. We request that you review the following sections (text, maps, and tables) to clarify that the San Francisco Recreation Parks Department's property, Lincoln Park, is identified correctly throughout the documents as an adjacent site and neighbor that is separate from the Golden Gate National Recreation Area (GGNRA) property. The sections include, but are not limited to:

- Figure 1-2: "Neighborhood Context" of the LRDP
- Section 4.6 "Landscape Context" of the LRDP
- Section 1.7.2 of the DEIS
- Section 3.9.1 of the DEIS
- Section 3.15.1 of the DEIS

Thank you for taking these comments into consideration.

Yours,



Karen Mauney-Brodek
Deputy Director for Park Planning
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October 31, 2012

Mr. Allan Federman, Acting Facility Planner
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San Francisco, CA 94121

In Re: SFVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

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

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

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

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

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

Sincerely,

Raymond R. Holland
President, PAR

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

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 document represents comments on environmental and other issues and is intended to other submissions on other subjects.

We respectfully acknowledge the efforts made by the SFVAMC and AECOM in the preparation of the LRDP and DEIS.

We also respect the mission of the SFVAMC to support the healthcare needs of our veterans and the goal of the SFVAMC to retain its leadership position as the major research institution of the VA system.

General comments

The SFVAMC Fort Miley campus encompasses two State of California institutions (LRDP 1-9), the University of California, San Francisco (UCSF) and the Northern California Institute of Research and Education (NCIRE). As both these institutions have physical presence and staff on the SFVAMC campus, we question whether or not the SFVAMC is subject to CEQA and/or to the City of San Francisco Planning Department (although the LRDP claims this is not the case).

We are concerned that the LRDP and DEIS continually assert that because this is a Federal action, impacts beyond the campus itself – whether environment and health, parking and traffic, or other impacts – are not of concern and need not be analyzed or mitigated. By extension, this suggests unbridled power of the Federal branch and fails to respect local or regional entities.

The LRDP as a “living” document does not provide a stable or sufficient project purpose, it is challenging to comment on the adequacy of the DEIS.

We are also not entirely clear whether Alternative 3, the no-action alternative, truly means no action or if this alternative is a continuation of projects already funded and described in the LRDP – essentially a *fait accompli*.

Total build out

The LRDP explicitly excludes parking spaces in total square footage of the proposed build out. This masks the full impact of both Alternative 1 and Alternative 2.

Offsite alternative

Of the three Alternatives proposed, Alternative 2 (LRDP 3-13 *inter alias*) is not adequately addressed in the DEIS, on the basis that a specific site at Mission Bay has not been selected. Until the actual environmental impact of Alternative 2 can be determined, the DEIS must be considered incomplete.

Environmental

Aesthetics

One goal of the LRDP is to “embrace and build on Fort Miley’s hilltop location status, continuing to provide exceptional views and enhance the Campus character” from the campus, (LRDP 4-2) but does not adequately address the views of the SFVAMC from other Federal lands, notably the GGNRA, including the Marin Headlands, nor its overall impact on the aesthetics of the California coast from Point Reyes to Point Lobos. As designed, the massing, together with lighting, will negatively impact these viewsheds.

Air Quality

Neither the air quality nor the odor assessments mention the impact of the use of asphalt tar in paving or roofing. In fact, on page 3.2-33, the localized odor assessment accounts only for diesel exhaust. What will the air quality and odor impacts of the use of asphalt tar and/or other bituminous products be during construction? What effect does ignoring these input have on the estimates of whether health impacts from construction exceed the threshold values, given that the 70-year estimate is over 50% of the threshold value?

NEPA (and CEQA) requires that projects under review use a baseline which must be the existing physical conditions of the affected area. The LRDP uses an area within one or two miles from the VAMC boundary as the affected area in its analysis; however it uses as a baseline conditions at 10 Arkansas Street in San Francisco. 10 Arkansas Street is in an industrial/commercial district and transportation hub. It is less than 900 feet from the busy I-280 freeway on one side, and only slightly farther from the I-80 and US 101 freeways on the other.

By contrast, the neighborhood of the SFVAMC campus is a residential district on the edge of the ocean, where the prevailing westerly winds deliver some of the cleanest air in the United States. People travel from all over the world to enjoy the natural environment and clean air of the area

directly adjacent to the SFVAMC campus. By improperly using data from the unrepresentative 10 Arkansas Street site the consultants have invalidated the entire section 3.2, Air Quality.

In addition, the LRDP considers only visual impact, light and glare in Section 3.1, Aesthetics. But air quality is an important and perceptible aesthetic value, as well as a health issue. We believe the LRDP must be modified to account for the effect of the admitted increases in air pollution documented in section 3.2 on the important aesthetic value of the area.

Noise and vibration

The DEIS notes that impacts of noise on sensitive receptors (people) on the SFVAMC campus would be adverse under Alternative A but describe potential impacts for off-site receptors as “noticeable,” and a “minor direct impact.” We dispute this qualitative assessment. Mitigations offered including monitoring and employment of a Noise Disturbance Coordinator. Neither of these mitigations addresses the noise itself nor its impact on the health of off-site receptors. We are particularly concerned with the absence of health impacts on both on-site and off-site receptors, especially those SFVAMC clients who are already suffering from health issues as well as children residing in the neighborhood.

Also, the DEIS does not address the noise-concentrating properties of buildings that may either attenuate or increase noise impact.

The impact of backup beepers is also not directly addressed. According to Chantal Laroche, professor at the University of Ottawa, these beepers typically volume of 97–112 decibels (dB) at the source, are loud enough to damage hearing and can be heard blocks from the danger zone. Already an annoyance and health threat to on-site and off-site receptors, the DEIS fails to address this impact.

Impact of noise of Alternative A Phase 1 are described as noticeable and short term (3.10-6). Yet the period of Phase 1 construction is nearly three years, and the entire project extends over a decade. We dispute the characterization of this as short term.

Likewise, under Alternative 1, ground based vibration is anticipated and its impact on 50+-year old buildings on campus is addressed. Vibration off-site addresses human receptors and annoyance as a minor direct impact. However, the potential for property damage is not addressed. Furthermore, the vibratory impact from equipment and materials en route to and from the SFVAMC is not addressed. The Outer Richmond District residences are almost exclusively older than 50 years and may be vulnerable to damage from ground based vibration. How will this potential impact be mitigated?

Vegetation

Alternative 1 Phase 1 construction would remove approximately 70 mature including five trees along the border with the GGNRA East Fort Miley reservation and a “significant portion of the understory” (DEIS 3.15-16). Replacement of vegetation is discussed at best in general terms with no clear indication under Alternative 1 to mitigate visual impact and preserve buffering.

Infrastructure, fire, and safety

The LRDP explicitly excludes infrastructure improvements (LRDP 3-2). Without these details, the full Environmental Impact of Alternatives 1 or 2 cannot be assessed.

To take only one of numerous examples, under Alternative 1, long-term increase in wastewater generation is estimated at 9.2 million gallons per year. The DEIS does **not** address whether or not the SF PUC can accommodate this increase in capacity.

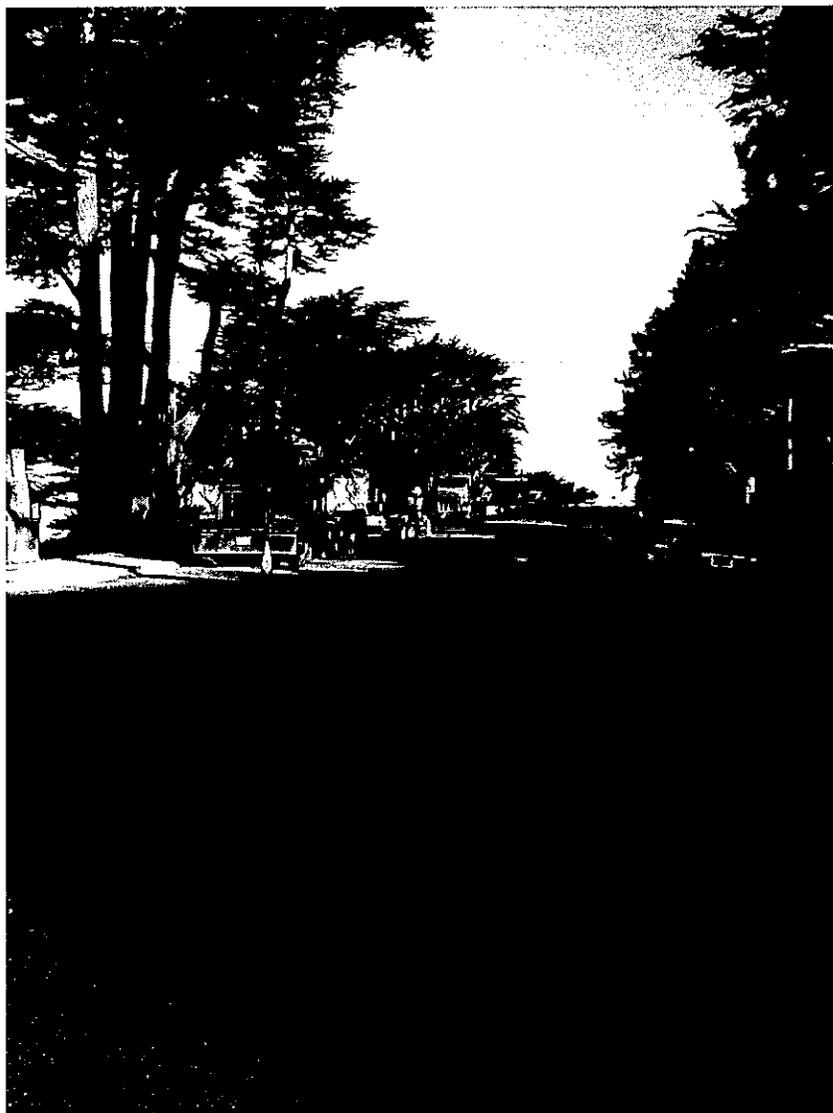
Fire safety and response

The LRDP states that access to City of San Francisco Fire Department access is provided to each building “via Fort Miley Circle and Veterans Drive.” The DEIS (3.3-17) claims fire truck and emergency vehicle access will be maintained at all buildings during construction, with a minimum (3.3-3) access and turning radius requirements, which are not currently met at Buildings 16 and 42. Given the present deficit, we have little confidence that full access will be maintained at this and other sites on the campus during the 10-year construction process. The LRDP and DEIS does not provide adequate to-scale maps to demonstrate its compliance.

Mitigation and contractor compliance

The LRDP discusses numerous mitigations for the various construction impacts at the SFVAMC campus. It fails to address the issue of actual compliance of the VAMC and its contractors with those mitigations. The history of the SFVAMC proves that compliance should be estimated as abysmal, producing frequent and at time continuous impacts far beyond those claimed in the VAMC’s documents.

One recent example of this is the use by SFVAMC contractors of the National Park as a construction staging area for heavy trucks and construction equipment, in violation of the mission of the National Park. When reported on September 21 of this year, the SFVAMC’s initial response to this abuse was to suggest that other agencies should police the SFVAMC’s contractors. This picture shows a minor part of the activity that took place:



The experience of the neighborhood is that at least one in two VAMC projects is accompanied by similar abuse and **neglect of professed standards and mitigations**. All estimates of impacts that depend on mitigations should be discarded and replaced with estimates based on the actual experience of the neighborhood and the Park of the SFVAMC's compliance with its own professed practices.

This also applies to **routing** of construction traffic. The DEIS is deficient in providing all but the most general detail concerning routing of construction traffic. While construction traffic is "expected" to access the SFVAMC site via Geary Boulevard and 19th Avenue, specific routing is not described, nor is there any discussion of what mitigations project contractors would be required to observe to minimize impact. Our experience is that SFVAMC have to date often used ill-advised routing that a) puts undue wear and tear on SF City streets; b) subjects buildings to heavy and potentially damaging vibration; and c) is a threat to safety of cyclists and pedestrians.

Summary

We believe that despite its scope, the LRDP and associated documents neglect significant impacts, fails to completely address the impact of Alternative 2, that its conclusions are based upon dated or questionable data, and that the issue of jurisdiction raised by the presence of UCSF and NCIRE on site remains unresolved. We believe these issues must be resolved before the draft EIS can be accepted as final.

Respectfully submitted,



Julie Burns, Co-Founder
Friends of Lands End



David Burns, Co-Founder
Friends of Lands End

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October 31, 2012

Mr. Allan Federman, Acting Facility Planner
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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



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October 31, 2012

Mr. Allan Federman, Acting Facility Planner
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In Re: SFVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

This letter provides comments, questions and suggestions regarding the issues of **"Parking"** and the SFVAMC's Long Range Development Plan (LRDP), the Draft Environmental Impact Statement (DEIS) and the Finding of Effect (FOE) that accompanied it.

Neither the LRDP nor the DEIS appear to provide any substantive analysis of the actual parking impacts the proposed expansion will have on the nearby residential neighborhood streets. The AECOM Transportation Impact Study ("Study") on which the LRDP and DEIS heavily rely is based on flawed assumptions and its failure to recognize the serious adverse impacts the existing operation of the SFVAMC is having on the nearby neighborhood. Competition in this residential area for street parking is already at an unreasonable level, in part, due to the SFVAMC's failure to provide sufficient on-site parking for its existing facilities.

It is our understanding that currently there is a parking demand of over 700 additional vehicles on a daily basis beyond what the SFVAMC facility can accommodate. The existing overflow is, at least in part, the result of two important factors: (1) In the past the SFVAMC expanded incrementally ignoring its responsibility to expand the number of its on-site parking spaces; and (2) In undertaking its past incremental expansions without

environmental review, the SFVAMC has ignored its legal responsibility to conduct an environmental impact analysis that would take into consideration the incremental, cumulative impacts on the adjacent residential neighborhood, including the impact on street parking.

The LRDP will increase the SFVAMC's on-site square-footage (exclusive of parking facilities) by approximately 24% from 987,500 sq. ft. to 1,231,500 sq. ft. Yet the LRDP only proposes to increase its existing on-site parking by 21% with a net increase of 263 spaces (an increase from the existing 1,253 spaces to 1,516 spaces). A proportionate increase would be an increase of 24% or 301 new parking spaces for a total of 1,554, which would require 38 additional spaces. Importantly, these numbers total ignore the existing on-site parking deficiency of over 700 parking spaces. Thus, rather than correcting its past deficiencies, the LRDP exacerbates the already unreasonable, unmitigated parking impact on the residential neighborhood.

Based on the Study, the DEIS falsely concludes that adverse effects on parking would be non-existent or minor under Alternative 1 for both the "Near-Term Projects" and the "Long-Term Projects", both as to construction-related impacts and operation-related impacts. (DEIS 3.13-27 to 3.13-38) The DEIS analysis also reaches the same conclusions for Alternative 2. (DEIS 3.13-39 to 3.13-45) In doing so, the analysis appears to have ignored the impacts of the existing parking space shortfall of over 700 spaces. This existing on-site parking shortage is in excess of 46% of the total spaces to be provided under the LRDP (700/1516). Combining the 700+ shortage with the new incremental shortage of 38 spaces (as discussed in the preceding paragraph), the total shortfall of parking spaces on-site amounts to approximately 50% of the total number of on-site parking spaces. Instead of addressing the significant, adverse environmental impacts on the neighborhood, the DEIS ignores the obvious and wrongly concludes this parking impact essentially is trivial.

The LRDP and DEIS relies on the AECOM Transportation Study, which clearly attempts to minimize and/or ignore the adverse impacts of the excessive street parking demands placed upon the residents of the adjacent neighborhood. The Study states that the existing load on the parking demand in the neighborhood at weekday PM peak periods is around 90% of maximum capacity, and the on-site SFVAMC existing parking load for the same time period is about 80% of maximum capacity. We believe both of these percentages should be much closer to 100%. Also, the Study does not address the natural vacancy percentage from constant parking turnover. Even when parking facilities routinely post a "FULL" sign in downtown San Francisco, there is always an active level of vacancies due to turnover, so that the realistic maximum capacity of a parking facility is nearly always less than 100%. Stated in another way, even an active parking facility with a line of vehicles waiting to enter cannot operate at 100% capacity. The same is true in the residential neighborhoods with the constant turnover briefly leaving a percentage of spaces empty before other drivers find them. Thus, it is our position that the existing parking load in the neighborhood and on-site are functionally operating at their maximum capacity at the present time.

At 2.1.4 of the Study, the consultant states that its analysis is based on ITE parking generation rates based on suburban surveys conducted throughout the United States. We question whether this is a valid comparison, as the adjacent neighborhood is located in a densely populated city of over 800,000 residents and millions of visitors within a relatively small land area (less than 49 sq. miles). Similarly, at 3.2.5 of the Study, the consultant relies on San Francisco's downtown planning code to support the Study's conclusions. Specifically, it assumes that a high percentage of the new construction will be office space and then applies downtown San Francisco's planning ratio of one car per 1,000 sq. ft. of office space. The ratio obviously is irrelevant for the SFVAMC based on its existing conditions where there is already a shortfall of in excess of 700 on-site parking spaces. The assumption ignores the fact that in commercial areas of San Francisco, the City's policy for over 50 years has been to encourage public transit by not permitting its office buildings to contain parking spaces for all of its users and in many instances has not allowed any parking. The SFVAMC is located on the edge of a residential neighborhood, and its employees and visitors come from all over the Bay Area, a large percentage of whom do not rely on public transit and, for many, can only get to the Fort Miley campus by driving their own car.

However, the Study relies on the 1 vehicle per 1,000 sq. ft. of construction to arrive at the seemingly preposterous conclusion that there will be more parking spaces available during the Near-Term period of the Project than is needed, essentially saying there will be an excess of 135 parking spaces (263 – 128). (Study, 3.2.5 at p. 30) This, of course, is even more dubious, since the figures rely on a parking structure that is not scheduled to be completed until on or after May 2014, well into the "Near-Term." If a realistic ratio of the necessary parking spaces relative to square footage of construction were used, there would be a large deficit of parking consistent with the existing deficit of on-site parking spaces in excess of 700 vehicle spaces.

The Study does acknowledge that the Long-Term period of the Project would result in a shortfall of "approximately 730 new spaces." (Study, 4.2.5) It attempts to pass off this shortfall with another false assumption that drivers will eventually get too weary of trying to find open parking spaces and just quit driving to the SFVAMC. Actually the Study refers to them seeking out "alternative parking facilities"; however, there are no alternative parking facilities. Thus, for those who have no option but to drive to work or visit the SFVAMC, the assumption is inherently unrealistic, as it leaves the individual driver with the option of quitting his/her job or not to visit the SFVAMC. (Study, 4.2.5)

Furthermore, the DEIS fails to account for the significant residential in-fill that is anticipated for the neighborhood during the life of the proposed LRDP. The neighborhood's existing housing stock largely consists of 20-25 high structures in an area zoned for 40 foot high structures. As the demand for housing in San Francisco continues its rapid rise, so will the height of these residences and their street parking demands. Thus, the DEIS comes up short in its glossed-over analysis of the adverse impacts on the residents of the nearby neighborhood.

The LRDP and DEIS rely on the Study to meet its environmental review burden of analyzing the "Cumulative Effects" of the Project, which can be found at Section 5.0 of the Study. Unfortunately, no cumulative effects regarding parking are mentioned in Section 5.0 and, instead, we are referred back to Sections 4.2.5 and 4.3.5 of the Study. Section 4.2.5, however and as shown above, does not accurately address any of the effects of the proposed Project, and instead grossly understates the potential impacts through faulty assumptions and an incomplete, unrealistic analysis. Section 4.3.5 does point out that if Alternative 2 is adopted, the parking problem at the Fort Miley SFVAMC campus could be substantially reduced by the transfer of non-patient operations to the Mission Bay Campus and the construction of 875 new vehicle spaces at that new location. But it still fails to address the existing shortage of on-site parking and resultant burdens on the nearby residents.

It is anticipated that the City of San Francisco will impose parking restrictions on the use of El Camino del Mar Drive near the Legion of Honor, an area presently being heavily used by the employees and visitors of the SFVAMC. Any parking restrictions in that area will have the likely effect of pushing more SFVAMC vehicles into the nearby residential neighborhood to the south of the campus. In light of this, the LRDP and the DEIS should anticipate and address the adverse environmental impacts, including the unreasonable impacts on the residential neighborhood resulting from the severe lack of on-site parking and over development of the SFVAMC campus.

In passing, it is noted that the SFVAMC's Institutional Master Plan dated November 2010 ("2010 IMP") projected that a total of 3,440 on-campus parking spaces would be needed for that somewhat larger proposed build-out at the Fort Miley campus. On a *pro rata* basis for the reduced buildout as specified in the LRDP, this would result in a total of approximately 2,227 vehicle spaces being needed, or about one and a half times (150%) the number of spaces projected in the LRDP. Interestingly, this number of 2,227 needed spaces is similar to the combination of the LRDP projection of 1,561 spaces plus the 700+ existing parking shortfall, which total is approximately 2,261 needed spaces.

To provide a total of 2,227 on-site parking spaces for the build-out proposed in Alternative 1, we estimate it would require an additional parking structure approximately 1.5 times the size of Building 211, the new proposed parking structure. However, there simply is insufficient space on the SFVAMC property for such a structure.

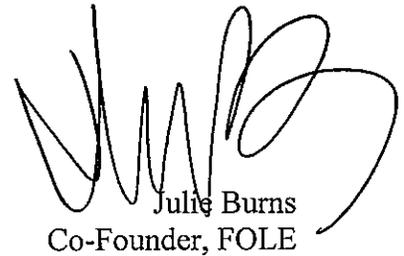
As a consequence, substantial research services should be located at another campus site, such as proposed in Alternative 2 with a Mission Bay campus nearby UCSF's new campus.

The foregoing demonstrates that adverse impacts on the nearby residents resulting from overflow parking from the SFVAMC site have not been adequately evaluated. If objectively evaluated, it would be clear that Alternative 1 should not be allowed to proceed, and that Alternative 2, while imposing significantly less adverse effects, still does not address or propose any mitigation from the years of cumulative build-up of adverse environmental effects through incremental expansion over an extended period of time. Any new development plans for the Fort Miley campus must fully address the past cumulative damage in combination with any proposed on-site expansion.

Sincerely,



Raymond R. Holland
President, PAR



Julie Burns
Co-Founder, FOLE



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October 31, 2012

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

In Re: SFVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

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

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

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

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

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

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

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

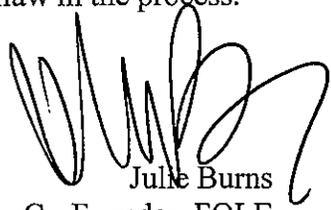
While the LRDP identifies the SFVAMC’s important “partnerships” with the University of California at San Francisco (UCSF) and the Northern California Institute of Research and Education (NCIRE) and the general nature of each on page 1-9, it fails to mention or to identify what role, if any, each of those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

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

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

Sincerely,


Raymond R. Holland
President, PAR


Julie Burns
Co-Founder, FOLE

October 30, 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 document represents comments on **infrastructure** and **transportation** components of the LRDP and Draft EIS (DEIS).

We respectfully acknowledge the efforts made by the SFVAMC and AECOM in the preparation of the LRDP and DEIS.

We also respect the mission of the SFVAMC to support the healthcare needs of our veterans and the goal of the SFVAMC to retain its leadership position as the major research institution of the VA system.

Infrastructure and fire safety

Infrastructure

The LRDP explicitly excludes infrastructure improvements (LRDP 3-2). Without these details, the full Environmental Impact of Alternatives 1 and 2 cannot be assessed.

For example, under Alternative 1, long-term increase in wastewater generation is estimated at 9.2 million gallons per year, but does not address whether or not the SF PUC can accommodate this increase in capacity.

Fire safety and response

The LRDP states that access to City of San Francisco Fire Department access is provided to each building "via Fort Miley Circle and Veterans Drive." The DEIS (3.3-17) claims fire truck and emergency vehicle access will be maintained at all buildings during construction, with a minimum (3.3-3) access and turning radius requirements, which are not currently met at Buildings 16 and 42.

Given the present deficit of an adequate turning radius – or policing of fire lane violations, we have little confidence that full access will be maintained at this and other sites on the campus during the 10-year construction process.

We seek illustrations and diagrams to demonstrate that Fire Department access will be maintained.

An earlier document, the Conceptual Master Plan Summary Report (project 662-08-306, 5.11) states that water pressure will not be adequate to supply fire hydrants if there is a pump or power failure at the pump station, as there is no back up. That document recommended the SFVAMC be consulted for site fire-flow requirements for each new building on campus. The DEIS is deficient on these grounds. The DEIS acknowledges the need for a backup pump as a possible response, but offers no details to guarantee fire safety on the SFVAMC campus.

Transportation

Appendix: Transportation Impact Study (TIS)

The TIS assessment is based on limited data: a) an unsupported assumption that the hours of 4pm and 6pm represent the peak travel hours; b) the San Francisco MTA Transit Effectiveness Project; c) the San Francisco Bicycle Plan. It does not include proposed plans to change traffic configuration and reduce travel lanes on The Great Highway that are part the implementation of the Ocean Beach Master Plan, a multi-jurisdiction plan managed by SPUR and AECOM – who also prepared the SFVAMC documents. The Great Highway provides important north-south access to the SFVAMC and must be included in any comprehensive traffic study.

The TIS states that spillover parking does not need to be accounted for because the proposed development is federal. However, to the extent that significant numbers of on-site staff are UCSF and NCIRE employees – not federal employees – spillover parking does need to be addressed.

The DEIS describes Clement Street as an east-west roadway transitioning to Seal Rock Drive. The DEIS and TIS fail to note that Clement Street – besides being a signed Class II/II bikeway (10 and 95), is also a designated sharrow. The LRDP does acknowledge this fact, so the failure of the DEIS to address the impacts of heavy construction vehicles on designated sharrows is striking.

The DEIS and TIS fail also to note that Seal Rock Drive is a limited travel street where vans and buses with eight or more passengers or six or more axles are prohibited, and which includes a very steep grade. We have already observed SFVAMC heavy construction vehicles using this residential street, compromising public safety.

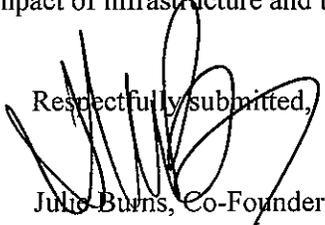
Publication and public notice of the DEIS and TIS does not satisfy the NEPA requirement for interagency coordination concerning transportation and parking impacts, despite the claim that it does so (TIS, p. 17).

We dispute the conclusion that neither Alternative 1 or Alternative 2 would not require mitigation during the Project (TIS, 3.5), e.g.

- **Construction traffic** (38 one-way or 76 total trips – impact on local traffic would be “a temporary reduction in capacity along local streets” and would increase demand for on-street parking (TIS, 3.2.8). However, no excess capacity of on-street parking is available.
- While construction traffic is “expected” to access the SFVAMC site via Geary Boulevard and 19th Avenue, **specific routing** is not described, nor is there any discussion of what mitigations project contractors would be required to observe to minimize impact.

Summary

We believe that despite its scope, the LRDP and associated documents neglect to address the full impact of infrastructure and transportation of both Alternative 1 and 2.

Respectfully submitted,

Julie Burns, Co-Founder
Friends of Lands End


David Burns, Co-Founder
Friends of Lands End



SFVAMC Long Range Development Plan
Draft Environmental Impact Statement

COMMENT SHEET

(please hand in or mail back)

Name: ROBERT HOLLIS
Organization (if any): _____
Street address (optional): P.O. Box 6033
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E-mail address: DOCCONSULT@COMCAST.NET
Phone number: (415) 479-5713
Preferred form of contact: email mail phone

The U.S. Department of Veterans Affairs is interested in your comments regarding the San Francisco VA Medical Center Long Range Development Plan Draft Environment Impact Statement. Please hand them in after the meeting or mail them back to address below by **October 16, 2011**. Thank you!

Comments

The VA is protecting the physical property very well. I find the atmosphere conducive for the well being for patients that are being treated here, as well as, those living on the campus.

I do hope that the people and the various org any others will continue to support the VA Hospital and Services.

Thank you
Robert L. Hollis

Comments continued



SFVAMC Long Range Development Plan Draft Environmental Impact Statement

COMMENT SHEET

(please hand in or mail back)

Name: JASON SUNGERBIS
 Organization (if any): CSOB/BSP, FOLE, PAR
 Street address (optional): 527 4TH AVE.
 City, State, Zip: SF CA 94121
 E-mail address: JASON.SUNGERBIS@GMAIL.COM
 Phone number: 415-750-0890
 Preferred form of contact: email mail phone

The U.S. Department of Veterans Affairs is interested in your comments regarding the San Francisco VA Medical Center Long Range Development Plan Draft Environment Impact Statement. Please hand them in after the meeting or mail them back to address below by **October 16, 2011**. Thank you!

Comments

- 1) Request additional 60 days for the DEIS comment period.
- 2) purpose of VAMC - treatment, not research
- 3) impact on Richmond
 - a) parking still deficient
 - b) transit impact insufficiently addressed
 - c) building height exceeds Richmond residential height

Comments continued

Bennett, Kelsey

From: Cheary, Judi A. [Judi.Cheary2@va.gov]
Sent: Thursday, November 01, 2012 7:57 AM
To: Federman, Allan; Bennett, Kelsey
Subject: FW: LRDP Draft EIS comments

Judi Cheary

Director of Public Affairs
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Follow us on:



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From: jason jungreis [<mailto:jasonjungreis@gmail.com>]
Sent: Wednesday, October 31, 2012 9:29 PM
To: Cheary, Judi A.
Subject: LRDP Draft EIS comments

Judi,

I apologize for submitting directly to you the comments below regarding the SFVAMC LRDP Draft EIS, but the time for submission runs tonight and the on-line submission page was not working.

Please accept these comments on behalf of myself individually and on behalf of the Coalition to Save Ocean Beach / Friends of Sutro Heights Park.

Thank you for your efforts in this regard.

Jason Jungreis

527 47th Avenue
San Francisco, CA 94121
415-750-0830

The LRDP DEIS is deficient in the following:

1. The document fails to provide information or analysis of meaningful alternatives. By definition, an EIS must provide detailed information of all alternatives. Here, there is no detailed information – indeed, hardly more than passing mention – of the alternatives. In the most fundamental way, this DEIS is a complete failure. It must be re-considered in the light of fully-developed alternatives that are as complete and offer as much information as the LRDP offers. The DEIS in its present form must be completely scrapped and re-formed with complete alternatives and complete analyses of these alternatives.
2. The DEIS fails to address the purpose of the LRDP. Presumably, the purpose of the VAMC is to treat veterans. Going fully unconsidered in the DEIS is the fact that nearly the whole of the SFVAMC expansion would be for research, and not for treatment. It is anathema to the core purpose of the VAMC to conduct research, and moreover it is a complete disservice to the purpose of the VAMC to generate a LRDP that does not centrally address treatment first and foremost while instead allotting invaluable limited resources to research over treatment. In this regard, the DEIS in its present form must be completely scrapped and re-formed with completely new analysis and development planning must be generated to prioritize treatment over research.
3. The DEIS fails to address what the nature of the research is that it proposed to conduct to distinguish between disease and symptomology that is primarily endemic to veterans, as opposed to the public at large, so as to confirm that it must be conducted at a VAMC. To provide examples, clearly the veteran population may suffer from hangnails, or athlete's foot, or cardiac disease: these are all laudable bases for some sort of medical research, and yet none rise to the level of requiring VAMC medical research resources applied toward their study. Invaluable limited VAMC resources should only be applied toward those diseases and symptoms that are relatively unique to veterans.



SFVAMC Long Range Development Plan Draft Environmental Impact Statement

COMMENT SHEET (please hand in or mail back)

Name: ANNE SUN / BILL KAKTIS

Organization (if any): NEIGHBOR

Street address (optional): 2645 EL CAMINO DEL MAR

City, State, Zip: SAN FRANCISCO CA 94121-1421

E-mail address: antonia_sun@msn.com; wkaktis@gmail.com

Phone number: SUN: 415 939 6170; KAKTIS 415 387 9632

Preferred form of contact: email mail phone

The U.S. Department of Veterans Affairs is interested in your comments regarding the San Francisco VA Medical Center Long Range Development Plan Draft Environment Impact Statement. Please hand them in after the meeting or mail them back to address below by **October 16, 2011**. Thank you!

Comments

OVER ↙

Comments continued



**SFVAMC Long Range Development Plan
Draft Environmental Impact Statement**

To : ALLAN FEDERMAN

FROM : ANNE SUN / BILL KAKTIS

SUBJ : SFVAMC-LRDP DRAFT EIS

1. Attached are 38 general comments (7 pages) on the Draft EIS. Commentors would be happy to participate in additional public meetings on the subject EIS or LRDP. Our interests are only as neighbors and we are not affiliated with any community organizations, or government entity.

2. Thank you for providing us the review materials in a timely fashion.

-----Please fold in thirds-----

Tape it closed, affix a stamp, and mail. Thank you!

Affix
Stamp

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

Draft SFVAMC Long Range Development Plan Environmental Impact Statement
 10/4/2012 - Comments by Anne Sun / Bill Kaktis - Organization: Neighbors - San Francisco CA 94121
 GENERAL COMMENTS

Reference	No.	Comment	Resolution
-	1	Indicate if CD content is part of LRDP package, and if reviewers may request inspection of same prior to finalizing comments, by reference in LRDP.	
3-2?	2	The LRDP should indicate to what LEED standard new phased structures will be designed.	
1-2	3	The Long Range Development Plan (LDRP plan) needs to include a reference date, i.e., 2023 LDRP instead of LDRP. Indicate if there has been any LDRP development before 2012 (i.e., LRDP has been a continuous process).	
1-2	4	Include the VA Director's foreword at the beginning of the introduction, to establish that the Director is buying in to the LRDP.	
1-2	5	The LRDP Introduction should tie in the importance of the LRDP is it relates to any Environmental Impact Statements developed previously by GGNRA, and should emphasize that joint or phased work in planning is not considered independent.	
1-7	6	The campus location should be described in detail in the plan to include some of the site constraints such as proximity to the GGNRA parks, Sutro Park, Lincoln Park Golf Course, Legion of Honor, Lafayette School and residential areas. The description should include some of the fixed constraints such as protected habitat and distance to the San Andreas and Hayward faultlines.	
1-2	7	The draft LRDP should emphasize the importance of new structures adjacent to or encroaching on the Lincoln Park Golf Course and/or the extension of El Camino del Mar on the west side of SFVAMC.	

Draft SFVAMC Long Range Development Plan Environmental Impact Statement
 10/4/2012 - Comments by Anne Sun / Bill Kaktis - Organization: Neighbors - San Francisco CA 94121
 GENERAL COMMENTS

Reference	No.	Comment	Resolution
1-7?	8	Easement and setback constraints should also be included in the description above. Major utility constraints and easements within Federal property and the City and County of San Francisco should be included in the LRDP.	
4-5	9	The draft LRDP should reference any environmental investigations (i.e., CERCLA or RCRA) performed to mitigate contamination, hazardous waste or control hazardous materials in the vicinity of new planned structures. The LRDP should state whether hazards exist and how mitigated.	
2-9	10	Due to constraints of the site location, indicate if SFVAMC studied additional parking space requirements for additional employees, patients and visitors on any given day. The existing number of parking spaces available is insufficient, employees, patients and guests cannot find parking and have to park along Clement and Seal Rock Drive, El Camino del Mar, Point Lobos Ave., and other network streets. Indicate if SFVAMC performed a space and population projection through 2023 and beyond (i.e., beds, number of full and part-time staff, number of guests, study of people versus space). Indicate if, on the phased construction schedule the 211 Parking Facility will be built first to alleviate vehicle overcrowding during construction phasing.	
5-2	11	Any expansion of SFVAMC will affect traffic on local city streets. Indicate if traffic studies and projections have been performed on Point Lobos, Seal Rock, El Camino del Mar, Clement, Alta Mar, 38th through 48th Avenues and other grid streets. Indicate if traffic studies, that may also have been accumulated by others, indicate how increased traffic/overflow parking needs will be controlled.	

Draft SFVAMC Long Range Development Plan Environmental Impact Statement
 10/4/2012 - Comments by Anne Sun / Bill Kaktis - Organization: Neighbors - San Francisco CA 94121
 GENERAL COMMENTS

Reference	No.	Comment	Resolution
5-2	12	The plan should include discussion to locate construction staging areas to avoid impacting the residential neighborhood. This study should include where contractors layover and park equipment such as semitrailer trucks, backhoes, cranes and delivery vehicles. If contractors will use helicopters to offload materials and equipment, this usage should be described in the plan as it is a potential noise hazard. Indicate that City Permitting will be required for street closures, detours, lane closures and barricading/traffic control.	
3-2?		The LRDP should describe noise and dust mitigation practices that will be implemented during the construction phases. Typically, construction noise on City streets is permitted, monitored and mitigated at specific measurable noise levels (dB) at specific times of the day,	
4-14?	13	The LRDP should indicate new permanent lighting requirements as well as temporary lighting used during construction that will impact the surrounding neighborhood. Indicate how the intensity of this lighting will affect the neighborhood, and if dimming and or adjustment is practical following installation and use.	
Supplemental Geology	14	Soil investigations and soil reports published for new plan structures should be referenced completely in EIS documentation, or an indication should be provided that such and what reports will be forthcoming during design phases. Also reference any investigations performed in the former landslide area along the El Camino del Mar rightof way north of SFVAMC proper.	
3-2?	15	The LRDP should describe whether the landslide area on the north slope of SFVAMC was considered for potential usefor new phased structure construction,including the rehabilitation of El Camino del Mar and potential traffic impacts to outlying areas, as an easement from GGNRA.	

Draft SFVAMC Long Range Development Plan Environmental Impact Statement
 10/4/2012 - Comments by Anne Sun / Bill Kattis - Organization: Neighbors - San Francisco CA 94121
 GENERAL COMMENTS

Reference	No.	Comment	Resolution
3-2?	16	Indicate if a background survey was done for the existing buildings on the SFVAMC campus to account for the need to perform seismic upgrades of any/all of the structures, and suitability studies for each building.	
4-1	17	The plan should include a description of existing utility infrastructure, condition, and strategies for the future. Utilities include, but are not limited to: water supply and distribution; sanitary sewer lines; storm drain system; surface runoff on erodible slopes; electrical power and distribution; natural gas system/distribution telecommunication and network and hazardous wastes.	
3-2?	18	Indicate if temporary staff housing will be required during phased construction and where this housing will be located.	
1-4	19	Due to the site location, the plan needs to justify the importance of adding a research center at this location. Provide a rationale as to why a research center is needed at this site.	
1-4	20	Indicate what are the SFVAMC site and facility visions at Fort Miley proper that project beyond 2023.	
1-2	21	Organization for implementing the LRDP should include not only SFVAMC but also stakeholders such as the residential community, facility tenants, suppliers, the Legion of Honor, Lincoln Park Golf Course, GGNRA, the City and County of San Francisco, the designers of record and the Contractor. Indicate how future public hearings would be part of the implementing process.	
1-2	22	DOD should be correctly referenced as "United States Department of Defense"; VA should be references as "United States Department of Veteran Affairs"; and VHA should be referenced as "United States Veteran Health Administration".	

Draft SFVAMC Long Range Development Plan Environmental Impact Statement
 10/4/2012 - Comments by Anne Sun / Bill Kaktis - Organization: Neighbors - San Francisco CA 94121
 GENERAL COMMENTS

Reference	No.	Comment	Resolution
5-2	23	Indicate if perimeter roadway would be used for circulation and stops for SFMTA buses and delivery trucks. Indicate that a significant roadway cross section may be required to support bus/truck wheelloads (HS-20 loading).	
5-2	24	Indicate what impact the routing of SFMTA buses has on patients/staff that choose to walk from the vicinity of 42rd Avenue and Point Lobos to SFVAMC.	
4-2	25	Indicate construction impacts affecting standing trees and other flora and fauna that habitate SFVAMC grounds included in phased construction work. Indicate if in situ and construction soils are stable on erodible slopes and how slope slippage can be controlled, by the use of compaction, fill, selective cuts, retaining walls, tieback walls, curbing and paving.	
4-2?	26	Indicate the height limitation on new structures and how the height of new structures will affect the neighborhood. Indicate the drivers that influence the selection of design heights, such as soil (geologic) conditions, aesthetics and visions.	
1-1	27	Indicate what SFVAMC facilities will be required to be temporarily / permanently relocated during construction phasing.	
2-3	28	Indicate to what seismic level (i.e., magnitude 8) new structures will be designed.	
1-4	29	Indicate the proximity of other VA research facilities on the west coast.	

Draft SFVAMC Long Range Development Plan Environmental Impact Statement
 10/4/2012 - Comments by Anne Sun / Bill Kaktis - Organization: Neighbors - San Francisco CA 94121
 GENERAL COMMENTS

Reference	No.	Comment	Resolution
5-5	30	Indicate what proportion of new parking spaces are for patients, guests or medical / administration staff. Indicate where spaces must be reserved for transit stops, POV / handicapped access and deliveries. Indicate how much space is required for emergency vehicles and shuttle vans.	
5-5	31	Indicate the number of POVs / shuttles that will be directed, due to overflow, to GGNRA parking lots (such as at the Vietnam Memorial area and at the Lookout Area along Point Loos west of El Camino del Mar) and adjacent streets, now, during construction and in the future.	
5-3	32	Indicate if SFMTA (MUNI) has been asked to increase transit service on the 38, 38L and 38AX lines servicing SFVAMC directly or indirectly. The City of San Francisco is a "Transit First" city.	
5-2	33	Indicate if SFMTA (DPT) has been asked, due to potential parking overflows, to allow residential permit parking and parking metering on network and vicinity streets.	
5-3	34	Indicate if SFDPW has been asked to complete ADA ramps on network and vicinity street corners that are in the pathway of ambulatory and disabled patients accessing SFVAMC without transit (i.e., from 42nd Avenue and Point Lobos or Seal Rock and El Camino del Mar, or Clement and 38th Avenues.	
4-14	35	Indicate if the increase in gross building square footage will affect fire department access and earthquake evacuation routes.	
2-17	36	Indicate how designated bicycle routes (particular along El Camino del Mar, Seal Rock and Clement) will be affected during construction. Indicate if re-routing of bicycle routes will be required during construction phasing.	

Draft SFVAMC Long Range Development Plan Environmental Impact Statement
 10/4/2012 - Comments by Anne Sun / Bill Kaktis - Organization: Neighbors - San Francisco CA 94121
 GENERAL COMMENTS

Reference	No.	Comment	Resolution
3-7	37	Indicate what Building 20, slated for demolition, has been or is used for. Indicate if this structure contains ordnance, hazardous materials, hazardous waste, and how mitigation will be achieved.	
5-3	38	Indicate if CCSF, SFMTA and / or SFDPW has been asked to improve traffic safety at the intersections of 42nd and Clement, 43rd and Clement, 42nd and Point Lobos and 43rd and Point Lobos by enlarging and restriping crosswalks, adding signage and adding traffic signals.	
END OF COMMENTS			

Dear Mr. Allan Freedman
Acting Facility Planner

Re Long-Range Development Plan *SFVAMC LRDP*

Please consider adding much more additional parking because the current situation is close to unbearable for those who live in the area. We have now chosen to always leave a car to reserve a space so that your employees do not occupy the space. Furthermore, we always park our second car so that another car cannot park behind us (we live close to clement). Unless we do that, the third car park so close that we cannot get out.

On street cleaning days, the whole area is one big parking lot.

Something must be done to relieve the stress to those who must live close to a government hospital that we cannot use. Furthermore, I am sure that it must be a tremendous burden for employees who live in areas that do not allow them to go to work using public transit.

Your consideration of this situation is very much appreciated.

Best regards,
Neighbor living on Clement Street
htakahashisfo@aol.com

To: *Congress woman Nancy Pelosi,*
The U.S. House of Representatives and Allan Federman Facility Planner SFVAMC
LRDP Draft EIS (VA Medical Center, 4150 Clement St (138), San Francisco, CA
94121)

Subject: ~~NO 10 yr Mega Building projects @ VA Med Ctr on RESIDENTIAL Clement St~~

Letter: Greetings,

I just signed the following petition addressed to: VA Medical Center, 4150 Clement St (138), San Francisco, CA 94121.

NO 10 yr Mega Building projects @ VA Med Ctr on RESIDENTIAL Clement St

Stop the Long Range Development Plan at the Clement St location that is in the heart of a residential neighborhood and the beautiful Land's End nature trail that lies in the GGNRA nature preserve area.

- Continued expansion of this VA facility will definitely intrude upon the visual beauty of Land's End that is also home to a significant amount of fauna and flora and enjoyed by both locals and visitors to San Francisco.
- The new development plan includes the construction of another large parking garage and other buildings visible from the pristine Marin Headlands and other Golden Gate National Recreation Area lands, as well as the many cruise ships entering under the iconic Golden Gate Bridge.
- The plan will also entail 10 years of construction headache for the residential neighborhood (a single residential or 2 unit residential zoned area).
- The expansion of a VA hospital will significantly increase the carbon footprint of the city as more staff, patients and visitors will be traveling to the furthest NW point of the city.
- There are other more accessible (by public transport), commercially zoned San Francisco areas like the VA Mission Bay Campus that could accommodate an upgraded facility rather than the residential Fort Miley neighborhood and its proximity to the Land's End nature trail of the GGNRA (NPS).
- Fort Miley buildings are listed in the National Register of Historic Places so the VA's long range development plan will impact the historic nature of these public lands and buildings.
- The VA has never publicly stated to the residential neighborhood that it is not conducting research experiments on live animals in this facility.

PLEASE sign this petition and thus help a small neighborhood and the environment. Pass along to family, friends and work colleagues, and any supportive organizations.

Sincerely,

P247

Signatures

Name	Location	Date
George & Nancy Pannos	San Francisco, CA, United States	2012-09-17
Kathleen Baeza	San Francisco, CA, United States	2012-09-18
Kathy Lassen-Hahne	San Francisco, CA, United States	2012-09-18
Nanci Price Scoular	San Francisco, CA, United States	2012-09-21
Milena Fiore	San Francisco, CA, United States	2012-09-24
Michael Falsetto-Mapp	sf , CA, United States	2012-09-24
Rita Falsetto	Aguilar, CO, United States	2012-09-24
BellaDonna Iodice	Rochester, NY, United States	2012-09-25
John Richard Young	Township of East Norriton, PA, United States	2012-09-25
James Mulcare	Clarkston, WA, United States	2012-09-26
charlie bogen	Junction City, KS, United States	2012-09-26
Erik Attaway	New Lenox, IL, United States	2012-09-26
Margaret Wilterdink	Windham, OH, United States	2012-09-26
Michael Steele	Morrice, MI, United States	2012-09-28
Freeman Wong	San Francisco, CA, United States	2012-09-28
shedy berrios	jacksonville nc, NC, United States	2012-10-01
Janet Galeano	San Francisco, CA, United States	2012-10-01
David Wilson	Berkeley, CA, United States	2012-10-02
marco barricelli	davenport, CA, United States	2012-10-02
Mary Anne Leary	Woodside, CA, United States	2012-10-02
Linda Colnett	San Francisco, CA, United States	2012-10-02
Mary Liljedahl	San Francisco, CA, United States	2012-10-02
Fereshteh Noory	San Francisco, CA, United States	2012-10-02
Art Zendarski	San Francisco, CA, United States	2012-10-02
Marlene Hesketh	San Francisco, CA, United States	2012-10-03
Char Maassen	Corte Madera, CA, United States	2012-10-03
Dario C. Cruz	Milpitas, CA, United States	2012-10-04
Jill Rabinowitz	San Francisco, CA, United States	2012-10-12
Lisa Tollman	Westlake Village, CA, United States	2012-10-12
Evan Arkush	SF, CA, United States	2012-10-12

Name	Location	Date
Sheila Laguna	San Jose, CA, United States	2012-10-12
Malou Carreon	Burlingame, CA, United States	2012-10-12
Jon Kastl	New York, NY, United States	2012-10-12
Tracy Mazza	San Francisco, CA, United States	2012-10-12
ayana baltrip	San Francisco, CA, United States	2012-10-12
laura guido clark	berkeley, CA, United States	2012-10-27
Cynthia Cooper	Oakland, CA, United States	2012-10-28
Kathleen Soper	San Francisco, CA, United States	2012-10-29
Laura Rojas	Carlsbad, CA, United States	2012-10-30
Tomas Bermejo	San Francisco, CA, United States	2012-10-30

Comments

Name	City	State	Zip	Country	SignedOn	Comment
ajay scoular	san francisco	CA	94121	United States	9/17/12	Do not spoil the natural beauty of Lands End and the GGNRA, and stop building in a residential area when the VA Mission Bay campus in a commercially zoned area of SF can be expanded and can better serve veterans without increasing the city's carbon footprint as much.
George & Nancy Pannos	San Francisco	CA	94121	United States	9/17/12	The beauty of this part of my beautiful town is vital...the construction and tearing down of it's beauty by the VA is a shame and will only get worse if plans to expand this construction continue...it's a question of the quality of life we in this great City enjoy..please keep it a quality zone.
Nanci Price Scoular	San Francisco	CA	94121	United States	9/21/12	In this age of concern re global warming and our carbon footprint,, it is completely irresponsible for the VA to encourage even more patients, staff and visitors + their vehicles to travel all the way to the very north western edge of the city for such essential services. Additional VA facilities should be located where the majority of its constituents are and close to train and muni hubs. Finally the current traffic, and continual construction threaten the adjacent GGNRA nature preserve with its abundant wildlife and peaceful serenity that most of us neighbors moved out here to enjoy.

Milena Flore	San Francisco	CA	94118	United States	9/24/12	<p>There is currently a construction project that has been going on for almost two years. There is drilling and loud, screeching noise from tractors, trucks and land moving vehicles that starts at 7:00 am and sometimes is still going on at 11:30 at night-weekends and some weekends. Generators run loudly 24 hour/day. To imagine 10 more years of this noise pollution and environmental destruction is not acceptable.</p> <p>The harm that is being done to the land is irreversible. There have been trees cut down, and hillsides razed. Already there are fewer songbirds, hawks and other wildlife in the area.</p> <p>More importantly, this facility does not provide adequate access to the health care that our veterans need. It is very confusing and challenging to get through to a doctor, find a class or even get through to an operator who won't hang up on you.</p> <p>These are our tax dollars and should be used more responsibly with more accountability, creating a better environment not destroying it. Enough!</p>
Janet Galeano	San Francisco	CA	94121	United States	10/1/12	<p>Because as a longtime resident, I have already lived through the many construction projects already.</p> <p>I visit the park and hike at Lands End often. It would break my heart to have long shadows from new buildings cast over this hidden treasure.</p> <p>This is an incredible natural resource with the GGNRA and a single family zoned neighborhood. Please preserve the natural beauty!</p>
David Wilson	Berkeley	CA	94707	United States	10/2/12	
Mary Anne Leary	Woodside	CA	94062	United States	10/2/12	

ayana baltrip	San Francisco	CA	94132	United States	10/12/12	<p>The preservation of nature within San Francisco is critical. Everyday there is some event that is threatening this fact. All of us must insist that San Francisco retain its beautiful natural habitats. It's critical that this happens. We must say no to the destruction of our lands paid by our tax dollars.</p> <p>want to keep the visual beauty undeveloped and pristine at Lands End</p>
Cynthia Cooper	Oakland	CA	94619	United States	10/28/12	

San Francisco VA Medical Center

Long Range Development Plan

Draft Environmental Impact Statement (DEIS)

and Finding of Effect (FOE)

Public Meeting

Thursday, September 20, 2012

5:00 - 7:00 P.M.

San Francisco VA Medical Center

Auditorium

Building 7, 1st Floor, Room 112

San Francisco, CA

Reported by
Kent Odell

APPEARANCES

Judi Cheary
Allan Federman
Adena Friedman
David Reel
Susan Lassell
Eugene Brodsky
Julie Burns
David Burns
Nick Belloni
Alexandra Crichlow
Brian Aviles
Eddie Ramirez
Amy Meyer
Freddie Hahne
Jason Jungreis

INDEX

Proceedings	4
Adjournment	34
Certificate of Reporter	35

1 P R O C E E D I N G S

2 SEPTEMBER 20, 2012

5:33 P.M.

3 MS. CHEARY: We're going to start about 5:30, so
4 if you haven't had an opportunity to look at the boards or
5 talk to any of our Long Range Development Plan, EIS, or
6 Finding of Effect, please feel free to do that. Then we'll
7 start right about 5:30.

8 For those of you that don't know me, my name is
9 Judi Cheary. I'm the PR Director here at the San Francisco
10 VA Medical Center and I want to welcome everyone for being
11 here.

12 Tonight we're here to provide an overview of our
13 Long Range Development Plan, our Draft Environmental Impact
14 Statement, and our Draft Finding of Effect. This is a
15 meeting to receive your public comments, it's not a question
16 and answer session. There are many people that will want to
17 speak tonight, so I'll ask everybody to please be
18 respectful, civil, and courteous to one another so we can
19 have a productive meeting.

20 Before we begin, I'd like to make some
21 introductions of some VA staff that have worked on this
22 project, as well as our consultants who have guided us
23 through this.

24 Ed Safdie is in the room, and if you could raise
25 your hand when I say your name? Ed is now the Director of

1 the Office of Administration, Emergency Preparedness and
2 Facilities with the Veterans Benefits Administration in
3 Washington, D.C. For those of you who know, he's our former
4 Associate Director.

5 Jeff Joseph is our Acting Associate Director; Dr.
6 Diana Nicoll, our Chief of Staff; Rina Shah is our Deputy
7 Chief of Staff; Carl Grunfeld is in the room, he is our
8 ACOS* for Research; Bob Obana is the CEO of NCIRE; also Ken
9 Carrico, our Chief Engineer; Allan Federman, our Facility
10 Planner; Robin Flanagan, AO to the Director and Associate
11 Director and our AECOM Team; David Reel, David is the
12 Environmental Project Director; Kelsey Bennett, who many of
13 you know is the Environmental Project Manager; Adena
14 Friedman is the Senior Associate Planner; and Susan Lassell
15 is the Senior Historic Preservation Planner.

16 I'd also like to thank Supervisor Eric Mar for
17 coming tonight. We also have representatives from several
18 government agencies including representative of EPA Region
19 IX, and also GGNRA. So thank you to everyone who is here
20 tonight.

21 So as I said, we're going to provide an overview
22 of the project and the plan that we've been working on.
23 Allan Federman, will give a project overview, and Adena
24 Friedman will then provide an overview of the Long Range
25 Development Plan. David Reel will discuss the Draft

1 Environmental Impact Statement, and then Susan Lassell will
2 discuss the Section 106 process, and then we'll take
3 comments from you. And just a reminder, if you would like
4 to make a comment tonight, please fill out a speaker's card
5 and we will collect that from you. We have a mic in the
6 middle of the room if you would like to make your comments
7 from that area. So without any further ado, I'd like to
8 introduce Allan Federman.

9 MR. FEDERMAN: Thank you. Before I begin, we also
10 have a Court Reporter to take comments, as well. As you
11 know, my name is Allan Federman and I'm an Acting Facility
12 Planner here, so I'm going to introduce the LRDP EIS.

13 The purpose of tonight's meeting is to receive the
14 public input on the Draft EIS Long Range Development Plan
15 and from this point on I'm going to refer to it as the Draft
16 EIS. The EIS process is designed to involve the public and
17 other Federal and local agencies. The VA is taking the Lead
18 Agency role responsible for the NEPA evaluation of the
19 proposed action, which we'll get to.

20 On August 17th, a Notice of Availability was
21 published in the Federal Register. What this did was make
22 the Draft EIS available for the public to review and
23 comment. This started the 60-day commenting period and
24 we're now about half-way through that commenting period.
25 Tonight, I'm going to provide an overview of that LRDP EIS,

1 as well as the Cultural Resources Section 106 documentation
2 which will lead to the Finding of Effect. Following our
3 presentation, you will be able to comment.

4 So I would like to start with the development
5 process of how we got here today. In 2010, a Draft INP was
6 published. As a result of the comments received during the
7 EIS scoping process, and further analysis, it was determined
8 that this plan needed further refinement. Based on the
9 results of the planning exercise, we then commissioned the
10 Long Range Development Plan, the LRDP. This drastically
11 reduced the square footage that was in the 2010 IMP.

12 The Draft EIS analyzes three alternatives:
13 Alternative 1 is going to be an existing campus build-out of
14 the LRDP. Alternative 2 is a split campus with some
15 facilities located in the Mission Bay area. And Alternative
16 3 will be a no-action alternative.

17 Each of these alternatives were analyzed under the
18 required NEPA environmental topics, which we'll go into
19 briefly. The EIS proposes mitigation measures to address
20 any potential impacts that would occur, and our consultants
21 will talk more about that, as well.

22 During the planning process, several alternatives
23 were considered, but eliminated from further review. And
24 the ones that were eliminated from further review are a full
25 build-out of the existing campus proposed under the 2010

1 INP. An expansion of the existing campus into both East and
2 the West four, and a relocation of the entire campus.
3 Again, these were eliminated from further review.

4 The proposed action is an LRDP that supports the
5 mission of the San Francisco VA Medical Center and provides
6 for the healthcare of their North Coast Veterans over the
7 next couple of decades. The purpose of that LRDP is to
8 provide a strategic and organized approach for the future
9 development of the SFVAMC campus. This is a comprehensive
10 plan that will guide the physical development of the campus
11 in order to provide for the health care needs of the
12 veterans that we serve here.

13 This plan describes the type and amount of
14 development that will be required for this campus, serving
15 the needs of a growing Veteran population and research and
16 educational facilities among the project overview. Now, as
17 many of you know, we are right here on the 29-acre site
18 located in the outer Richmond District adjacent and the
19 national Golden Gate Area, Recreational Area, owned by the
20 National Park Service, is to the northeast and west of us.
21 Part of this campus does lie in a Historic District which
22 we'll talk about shortly.

23 The Long Range Development Plan is a conceptual
24 planning document that establishes a vision for the campus.
25 We refer to this LRDP as a living document which allows this

1 institution the flexibility to shift as the priorities have
2 changed. We anticipate further refinement to this document
3 and all of the projects are subject to available funding.
4 So, basically, the components of the LRDP may continue to
5 change based on what funding is.

6 The campus contains 36 buildings, 987,000 building
7 square feet of habitable space. We have 10 surface parking
8 garages and two parking lots. This mix includes one in-
9 patient hospital building, one out-patient clinic, various
10 research buildings, two hop tail (ph) [10:17] buildings, a
11 community loading center, and various administrative office
12 and support buildings.

13 What the LRDP will help is to determine the
14 facility requirements, and it's also going to give us an
15 existing building inventory, seismic retrofits, building
16 masking parking inventory, circulation access, landscape,
17 and open space. Of course, the campus is over 75-years-old
18 and requires retrofitting and enhancements to the
19 facilities, as well as utilities and other infrastructure.

20 The LRDP is also going to estimate timing for the
21 implementation and includes two phases. With an anticipated
22 build-out of 2023, this LRDP includes a total of
23 approximately 305,000 gross square feet, of which 244,000 is
24 net new. This square footage does not include parking
25 garage.

1 The goals of the LRDP: We need to enhance Ft.
2 Miley's campus function as a vital medical center to serve
3 the Veterans in need, that's why we're here. We have a
4 mission and every day we wake up with this mission, to serve
5 Veterans, and ask ourselves how we can enhance the service.

6 In fiscal year 2011, alone, the Medical Center
7 treated over 58,700 patients, with over 400,000 outpatient
8 visits, and 5,600 in-patient hospital stays. Incredibly,
9 this was done with a 589,000 square foot deficiency.
10 Approximately 2,300 homeless Veterans were also treated here
11 this year. We have several National Centers of Excellence
12 residing on campus; these include cardiac surgery, post-
13 traumatic stress disorder, and HIV infection.

14 Our second goal is to continue to be a state-of-
15 the-art facility because we want to include top-notch
16 researchers here.

17 And our third goal is to provide appropriate space
18 to conduct managed research, clinical administrative and
19 educational programs. Our world class research leads to
20 excellence in the clinical care and teaching of the VA. We
21 are designated as one of five centers of excellence in
22 primary care education, and selected as a Community Research
23 and Referral Center. We have been affiliated with the UCSF
24 School of Medicine for over 60 years. These are among the
25 top schools nationwide.

1 Like any plan, we have several objectives to reach
2 our goals. These objectives are clear. We need to address
3 the space deficiency at the San Francisco VA Medical Center.
4 We need to retrofit existing buildings to current size and
5 safety standards. We need to strengthen clinical in-patient
6 and out-patient primary and specialty care for San Francisco
7 Bay Area and North Coast Veterans. We need to provide
8 appropriate space to conduct research. We need to improve
9 the clinical and administrative space when we remodel. We
10 need to meet patient privacy standards and resolve ADA
11 deficiencies. We need to include access and improve access,
12 both internal and external, increase parking, and create
13 more access for public transportation. Thank you. I'm now
14 going to turn it over to AECOM to go through the LRDP
15 Phasing.

16 MS. FRIEDMAN: Thank you very much, Allan. As
17 Judi mentioned in her introductions, my name is Adena
18 Friedman and I am a Planner on the AECOM team. I'm going to
19 give a very brief overview of the Long Range Development
20 Plan Summary Program.

21 This slide here illustrates a graphic of the
22 Development Summary Overview. I also want to mention,
23 before I go too much further, in the back of the room there
24 are several posters that have these graphics blown up at a
25 nice size, so you can look at them a little more clearly;

1 they could be hard to see on the screen.

2 So anyway, the Long Range Development Plan,
3 Development Program Summary, includes a combination of
4 construction of the new facilities, expansion of existing
5 facilities, seismic retrofit of existing facilities,
6 demolition as needed, and some facilities which would have
7 no action associated with them at all. And following up on
8 what Allan mentioned, all of the actions or projects
9 included in the Development Summary are all with a eye
10 towards providing the medical and research facilities and
11 campus enhancements needed to serve the Veteran population.

12 This next slide illustrates the Phase 1
13 Development Program, which would be near term development.
14 The primary projects in this phase would include new medical
15 facilities, new research space, a new Welcome Center and
16 drop-off area, which would enhance the arrival experience to
17 the campus, as well as a seismic retrofit of six buildings
18 on campus.

19 And this next slide here illustrates a 3-D view of
20 generally the location and massing of where these projects
21 would occur. And, again, these graphics are also in the
22 back of the room if you want to take a look at them after
23 the presentation.

24 Phase 2 is the longer term development and would
25 be slated to occur between the years mid-2015 through 2023.

1 The primary projects anticipated for this phase would be
2 expansion of existing medical and support facilities, which
3 are illustrated in yellow, several new medical and research
4 facilities, additional seismic retrofits of three more
5 buildings on campus, and the associated demolition to make
6 room for the new facilities.

7 Again, this next slide illustrates the potential
8 -- or, I'm sorry, the proposed locations of where these
9 projects would occur, as well as some general ideas about
10 building, massing, and size. With that, I would like to
11 turn it over to David Reel, who will provide an overview of
12 the Draft EIS.

13 MR. REEL: Thanks, Adena. Once again, my name is
14 David Reel with AECOM. I am the Environmental Director on
15 the project. So, as many know, the Environmental Impact
16 Statement is created and put together under the guise of
17 NEPA, the National Environmental Policy Act. And it's done
18 with the intent to look at a range of alternatives and
19 considering a variety of impacts on proposed development.

20 This is a diagram of the environmental process.
21 The red box there indicates where we are. We're here today
22 at the Public Meeting, but this process began in 2010 with
23 initially a scoping meeting that took place in October, and
24 then a follow-on scoping meeting took place again in April
25 of last year, in which we initiated the NOI process on this

1 project.

2 And as you can see from that process, we have
3 taken into consideration the comments that were provided
4 during those scoping sessions. We then looked at the
5 analysis and, as we went through that, we considered those
6 comments and put together the environmental document. As
7 Allan described, we're about half-way through that process
8 now and the conclusion of that will be on October 16th, so
9 there's almost another 30 days left to comment on the
10 document. Once we go through that process and we close down
11 the public comment period, we will be responding to those
12 comments that we receive and writing -- as well as the ones
13 that we hear tonight -- we'll take those into consideration,
14 finalize the EIS, and release it, and the final steps as you
15 can see on here would be the VA coming to a Record of
16 Decision in the final box there at the lower right.

17 The purpose and need is really an important part
18 of how we go through the document and analyze the
19 alternatives. The goals and objectives that Allan described
20 in the beginning have a lot to do with this, so basically in
21 this case, there's a need to improve the facilities here,
22 there's a shortage of square footage, a shortage of parking,
23 but even more importantly, there's some seismic standards
24 that need to be met, and that's one of the main reasons why
25 these improvements are needed here on campus.

1 So once again, the Alternatives, Allan had gone
2 through this briefly. Alternative 1 is this campus here
3 and, as was mentioned earlier, a reduction in the original
4 square footage was taken into consideration based on the
5 comments, and so this alternative looks at the expansion of
6 just on this campus a lot of seismic improvements, and
7 that's what Adena just pointed through on the Long Range
8 Development Plan. If there are some specific questions
9 about that on the details, we have a print-out of the Long
10 Range Development Plan there at the back, and we'll be
11 around here after we finish today to answer or listen to
12 your comments, or answer any clarity questions.

13 Alternative 2 is the off-site location that Allan
14 mentioned that would be somewhere in the Mission Bay and to
15 be determined, I'll show you in a little bit of where the
16 general area would be, and that looks at moving some of the
17 square footage and expanding down there, so a dual campus in
18 that situation.

19 And then the final alternative, which is the
20 requirement under NEPA, is to look at the no-action
21 alternative, what would happen if the improvements were not
22 made. And we use that as a comparison against the build
23 alternatives. So the Environmental Impact Statement
24 document goes through, talks about each of those three
25 alternatives, and discusses the difference in impacts. So

1 once again, the build alternative, as you know, the site
2 where we are there on the left-hand side, and the right-hand
3 side, the green boundary there is kind of a 2.5 mile area
4 where somewhere in the Mission Bay a site would be chosen
5 and the additional square footage would be moved off to that
6 location. A future environmental document would have to
7 drill down and get into more details and address those. So
8 we've really dealt with that at more of a program level in
9 this document.

10 The Environmental Topics Analyzed, so there is a
11 total of 15 topics plus the 16th one, which is addressing
12 the cumulative impacts of each of these sections, once again
13 go through each of the alternatives, and then the cumulative
14 discussion is really about the impacts that are occurring
15 from the development here, or in Alternative 2 in Mission
16 Bay, and what other development is occurring at the same
17 time, taking those all into consideration.

18 The Summary of Findings: so we did have some
19 adverse impacts, and I'll go through those in a little bit
20 more detail in the next coming slides, one is under the
21 Historic Resources, due to the fact that there is a Historic
22 District here on campus. The other two are related to
23 Alternative 2 in the Mission Bay Campus for air quality and
24 transportation. So the two adverse impacts, again, long
25 term projects in the Mission Bay Area, mostly related to

1 construction, so the amount of new construction that would
2 occur down there from the equipment, from the vehicles,
3 there would be some air quality temporary short term
4 impacts, but in the operational conditions, as well, based
5 on what is put on-site and the traffic conditions that would
6 occur. So, once again, future analysis would be done to get
7 down further into that detail and, if the site changed,
8 those impacts could change, or be lowered.

9 So the proposed mitigation that I mentioned
10 earlier is to deal with historic resources. Once again,
11 there is a Historic District here, so both direct and
12 indirect from either seismic improvements within the
13 district, or new buildings adjacent to the district. Susan
14 Lassell is here to talk about Section 106 and will follow-up
15 after me, but she also has some boards in the back and she
16 can answer some of the questions specifically about the
17 Historic District and the Section 106 process.

18 So the mitigation still needs to address, you
19 know, the Secretary of the Interior standards and issues
20 related to Historic. Some of those things will be worked
21 out through the Section 106 process and, finally, discuss
22 SHPO in the end.

23 In addition, there would be minor impact to
24 archaeological resources and so we have mitigation on-site,
25 which is very standard mitigation; if something is found, we

1 basically bring out professional archaeologists to come out
2 and record that and make a decision as to what the follow-up
3 steps would be.

4 The other proposed mitigation measures, both in
5 the long term and near term, related to hydrology and water.
6 quality. From an operational standpoint, these new
7 buildings are put in place, additional drainage would come
8 off of those buildings, and so the way that that is dealt
9 with through mitigation is by having stormwater protection
10 plans in place, and other drawings that are required to meet
11 those requirements for drainage conditions.

12 In addition, during construction, there would be
13 pre-construction surveys taking into consideration birds and
14 bat nesting seasons, and looking for any species of concern.

15 Finally, the proposed mitigation measure that is
16 even more noticeable often in projects like this is from
17 construction noise, so there are several mitigation measures
18 that are in the document, that talk to the fact about noise
19 attenuating features, monitoring and recording what those
20 noise disturbance levels are, as well as looking out into
21 vibration and things that could happen from construction,
22 and then finally, in Alternative 2 there in the bottom,
23 operational condition, if a stationary source such as
24 equipment for the building is put in place, what does that
25 do to the area? And once again, a future analysis would be

1 done to look at that once a natural site is chosen.

2 So now I'm going to turn it over to Susan to talk
3 a little bit about Section 106.

4 MS. LASSELL: Again, my name is Susan Lassell and
5 I'll be back in that corner after the presentation during
6 the rest of the open house if anyone has additional
7 questions about Section 106, or our historic properties, in
8 general.

9 So, Section 106 is a section of the National
10 Historic Preservation Act. Like NEPA, it is a Federal law
11 that asks Federal agencies to take into account the effects
12 that their projects will have on resources important to the
13 public. And the Section 106 process basically entails four
14 steps; the first is to initiate the process and to identify
15 a plan for public involvement. The VA has initiated Section
16 106 consultation with the California State Historic
17 Preservation Office, and we refer to that as the SHPO, so
18 when you hear that, the word we're talking about, the State
19 office that manages all things having to do with historic
20 and cultural resources oversight.

21 The VA has also reached out to various parties
22 with a demonstrated interest in the Historic and Cultural
23 Resources, and have invited them to participate as
24 consulting parties, a formal status in the Section 106
25 process, and then also opportunities for public involvement

1 and public input, including tonight, if you want to provide
2 written comments about historic resources, in particular, or
3 the Section 106 process, we invite you to do that. And then
4 there are also all the other ways to comment via the website
5 and to look at the documents that are available on the
6 website, as well.

7 So the second step is to identify historic
8 properties within the area of the proposed undertaking. In
9 this case, the undertaking is the Long Range Development
10 Plan, and one of the main historic properties that was
11 identified is the Historic District that has already been
12 listed in the National Register of Historic Places, and
13 that's indicated on this graphic with the red boundary. And
14 there are some other historic properties that were
15 identified with the potential for archaeological buried
16 resources, as well as the Ft. Miley Military Reservation
17 Historic District, which is on both the east and west sides
18 of this campus.

19 So the third step, then -- oh, I'm sorry, let me
20 back up -- another thing that you would be able to find
21 available on the website is what we're calling the baseline
22 documentation, so in step 2, to identify historic
23 properties, we compiled all of the available information
24 about historic properties and made that available to the
25 State Preservation Office back in December of last year, and

1 it's now available for you to be able to look at, as well,
2 to link on the website.

3 Step 3 is to apply the criteria for adverse
4 effect, which is a specific set of criteria available in the
5 Section 106 regulatory language, and we use that to do the
6 analysis of whether the Long Range Development Plan will
7 result in adverse effects to historic properties.

8 The fourth step will be, once we've concluded the
9 public involvement period and have incorporated comments
10 into the Finding of Effect, and coordinate that with the
11 State Historic Preservation Office, we would then enter into
12 conversations with SHPO, as well as consulting parties about
13 ways that the VA might go about resolving the adverse
14 effects.

15 So the Finding of Effect document that, again, is
16 available on the website for review and comment, concluded
17 that there would be an adverse effect on the San Francisco
18 VA Medical Center Historic District. Essentially, the
19 development, whether it's demolitions that are contributing
20 elements of the district, introduction of new buildings, or
21 even the retrofit of some of the existing contributors, you
22 know, contributing buildings to the Historic District, all
23 of that seen together does have the potential to cause an
24 adverse effect to this Historic District, that's been called
25 out.

1 We did conclude that there would be no adverse
2 effects on the Ft. Miley Military Reservation and Historic
3 District, on either side, essentially the reasoning there
4 being that there has long been a medical center here and
5 that changes that are being made are consistent with that
6 75-year plus history of the medical center being here, and
7 then that there would be no adverse effect on archaeological
8 historic properties, as well.

9 The Finding of Effect Report will be revised per
10 any comment we receive, as well as ongoing conversations
11 with the consulting parties. And then the VA will send that
12 Finding of Effect to SHPO requesting their concurrence on
13 the findings. That will then open up the opportunity to
14 talk with SHPO about what to do about any adverse effects
15 that are agreed upon, and that could basically involve a
16 range of potential mitigation measures from the Secretary of
17 the Interior Standards that David alluded to earlier, or
18 other ways to ensure that future projects are as compatible
19 as possible with the Historic District. With that, I'll
20 turn it back to David.

21 MR. REEL: Thanks, Susan. So that concludes our
22 technical presentation on the LRDP, the Draft EIS, as well
23 as the Section 106 process. We now want to open it up to
24 the comments and the process for that, if anybody wants to
25 speak, if they could put their name on a speaker card, that

1 way we can keep track for the Recorder here, and what we'd
2 like to do is I'm going to call each name out and if they
3 could just come up to the microphone and state what they
4 would like to state, we want to limit that to five minutes,
5 so everybody gets a fair chance to speak, and we'll let you
6 know one minute out from that time period ending.

7 In addition, this is just one format to provide
8 comments. There are the documents at the website, you can
9 also tonight write down your comments on the sheet of piece
10 of paper if you prefer, and all the information is posted on
11 the wall where to send your comments electronically if you
12 prefer, and we'll also be here at our stations afterward, at
13 least until 7:00, or longer if necessary this evening. So
14 with that said, let's see here. The first person is Eugene
15 Brodsky. You wanted to come up and say something?

16 MR. BRODSKY: It was (inaudible).

17 MR. REEL: I'm sorry; did I mispronounce your
18 name? Eugene?

19 MR. BRODSKY: It's Eugene, but I was not going to
20 proceed myself today.

21 MR. REEL: Oh, you'd like to make a comment, okay,
22 all right. The next person is Julie Burns.

23 MS. BURNS: I'm Julie Burns and I'm here tonight

24 --

25 MR. REEL: Julie, if you can speak into the

1 microphone so he can record it?

2 MS. BURNS: Oh, can you hear me? My name is Julie
3 Burns. I'm here representing four different community
4 organizations, the Planning Association for the Richmond,
5 for which I'm a Board member, Friends of Lands End, of which
6 I'm a co-founder, I'm also here representing Coalition to
7 Save Ocean Beach, and Friends of Sutro Heights Park, who
8 also could not send representatives tonight because of
9 scheduling conflicts.

10 All of our organizations support the mission of
11 the VA to serve those who served our country. We are
12 formally requesting a 30-day extension to the public comment
13 period based on the size and scope of the project, and the
14 size and the scope of the Draft EIS. This should not be
15 construed as our formal comments, which will be submitted in
16 written form, but we are asking for a 30-day extension.
17 There is a precedent for this. The Presidio Main Post
18 process, of which you may be familiar, had a 60-day public
19 commentary period, which was at the request of many
20 organizations and individuals, extended by 30 days. With
21 that, thank you very much for the work you've done and,
22 again, we're looking forward to that 30-day extension so we
23 can process this document. Thank you.

24 MR. REEL: Thank you for your comment. Some
25 people may not know that a typical EIS process has a 45-day

1 comment period, a 60-day comment period was allocated for
2 this project, so we will take your comments and bring them
3 for consideration. Thank you. The next person is David
4 Burns.

5 MR. BURNS: I'd just like to add to Julie's
6 request that we extend this comment period. The documents
7 behind us are voluminous, the EIS was started, I'm sure it
8 was just the way your workflow happened and it wasn't
9 intentional, but this came out in the middle of August when
10 a lot of people were on vacation; in effect, we're starting
11 right now in the process of evaluating these documents and I
12 think an additional 30 days would be crucial to be able to
13 respond in a reasoned, rational way to all this information.
14 So, I am also asking for an extension of the period.

15 MR. REEL: Thank you. The next person is Nick
16 Belloni.

17 MR. BELLONI: Really, all I -- my name is Dick
18 Belloni, I'm the Vice President of PAR, the Planning
19 Association for the Richmond, and we are formally asking for
20 a 30-day extension, too, to get a qualitative analysis to
21 this document and thing that is like the weightlifter's
22 bible here, there needs more time. You can't just go over
23 this and go, "Ooh, ah, here's our comments." No, we want to
24 go over this, we want to give you a thorough, thought
25 provoking reasoning behind our comments. And we need to go

1 over this all. This is not single-sided, this is actually
2 double-sided on each one of these pages, so it's a very big
3 document, and it's something that we need to have time to
4 look over. So just by requesting 30 days, as Julie said, we
5 have precedent over it with the main post, this is something
6 we need to do. Okay, thank you.

7 MR. REEL: Thank you for your comment. Alexandra
8 Crichlow. If you want to restate your name correctly to --
9 sorry about that.

10 MS. CRICHLLOW: It's Crichlow.

11 MR. REEL: You may need to adjust the microphone,
12 as well.

13 MS. CRICHLLOW: Okay. Alexandra Crichlow. Sorry
14 to speak with my back to you. I am a Veteran who receives
15 care at this hospital. I sit on the Veterans and Family
16 Advisory Council, an appointment by Hospital Director,
17 Laurence Carroll. And I've been coming to this hospital for
18 about 25 years. This was -- the hospital has gone through
19 several transformations and I want to say thank you to the
20 community in the Richmond District here, as a Veteran, you
21 know, who has been coming out to your community. I notice
22 this -- I mean, I don't know all that's going on, but I do
23 know that there are going to continue to be Veterans coming
24 home, and that's just the reality. And to be able to handle
25 what is required to help take care of them and help them to

1 get healthy, people look at me and they can't tell I
2 actually have physical and mental health stuff going on, I'm
3 one of the women who, because of me, there's now a term,
4 "military sexual trauma," and that's just the reality, you
5 know, so we need to have a place where this can be taken
6 care of, as well as all the other things such as traumatic
7 brain injury and things like that, it happens as a result of
8 conflict. So, as hard as it is to expand and put things
9 into place to take care of our Veterans, we need -- we have
10 to, you know, because it's not going to end today. You
11 know, we're looking at 100 years down the road here, you
12 know of what's going to be in place to take care of people
13 and help them be reintegrated back into society, to become
14 part of the community again. So thank you for letting me
15 speak.

16 MR. REEL: Thank you. The next person is Brian
17 Aviles.

18 MR. AVILES: That was pretty good. Hi, my name is
19 Brian Aviles, I'm a Senior Planner at National Park Service,
20 Golden Gate National Recreation Area. I'm here with Steve
21 Ortega, who is our NEPA specialist in the Park Service, and
22 on behalf of Frank Dean, our Superintendent. And I want to
23 commend the VA and the consultant team on completing your
24 EIS for its important project that's necessary to advance
25 your mission. Steve and I are directly involved in similar

1 things and we know this is no easy task and hats off to you.
2 I also want to acknowledge that you've included the National
3 Park Service as a consulting party in 106 review, which is
4 really helpful. And I'd like to -- I think Julie put it
5 well -- these are not our formal comments, but I want to
6 suggest that we are going to submit some very thoughtful
7 comments based on review of that rather extensive document
8 that you've given us. We'll be constructive as your nearest
9 neighbor and fellow federal agency. Some of the areas that
10 we'll submit comments will include a variety of concerns
11 that we have about the large new buildings that are proposed
12 for the border of East Ft. Miley, and we also will probably
13 have comments about stormwater management, some landscape
14 concerns, night lighting, and a variety of other things. We
15 have not yet completed our review of the document, though.
16 But thank you for holding this, we wish you the best in
17 moving forward, and hope that you'll listen, or know that
18 you will listen to our concerns in the communities, as well.
19 Thank you.

20 MR. REEL: All right, thank you for your comments.
21 Many of those things that you mentioned such as lighting and
22 stormwater are all addressed thoroughly in the environmental
23 document, so we'll look for those specifically. The next
24 person is Eddie Ramirez. If there is anybody else who wants
25 to give a comment, if you could just write your name on a

1 comment card and bring it up, that would be great.

2 MR. RAMIREZ: My name is Eddie Ramirez, I'm the
3 President of the San Francisco VA Commission for the City
4 and County of San Francisco. I am a Veteran who served 22
5 years active duty. I am a native San Franciscan. I am 70
6 percent Service connected; although you might not see it,
7 it's there. Suicide rates are up, military sexual trauma is
8 a new term that is being used now days. Veterans need work,
9 need education, need healthcare benefits. There are 2.2
10 million Vets here in the State of California right now, and
11 more are coming. There is a wave of Veterans coming back
12 that need facilities, that need healthcare, and where are
13 they going to get it? They need their VA. Let's not treat
14 them like we treated the men and women that returned from
15 Vietnam. My son is currently on deployment, his third
16 deployment, one to Afghanistan, two to Guantanamo Bay,
17 detainee OPS. He's in the jailhouse guarding the prisoners.
18 He will be coming home. My grandson needs a dad. My son
19 will need services, along with the other hundreds of
20 Veterans that are going to be returning to California. They
21 will be flocking here. And we need the facilities to help
22 take care of our Veterans. I support this expansion. Thank
23 you.

24 MR. REEL: Thank you. Amy Meyer.

25 MS. MEYER: My name is Amy Meyer and I'm

1 representing People for Golden Gate National Recreation
2 Area. And of course, the hospital is surrounded on three
3 sides by portions of the National Park. And I take very
4 seriously what Alexandra and the just previous speaker said,
5 this is a place that serves a tremendous part of the
6 population, people need good care, and it's really important
7 to do it right and to have a successful, you know,
8 reorganization of facilities and appropriate building and
9 demolition as needed. What's concerning me is that, in
10 looking at the LRDP and the EIS, that there isn't the sense
11 that the priorities for what absolutely has to be here have
12 been laid out and the priorities for what really should be
13 located elsewhere, this is not clear enough. And because,
14 as I think it was Alexandra who said, "This is for the next
15 100 years," and it's not from now to -- from 2012 or 2013 to
16 2023, but it's got to extend into the future, and there's
17 only 29 acres here, so that the need to look really for
18 alternatives, I recognize that you have been trying in some
19 places and in some ways to get in many cases facilities
20 closer to where people live, but there is a limitation as to
21 what this site can provide for. Therefore, and also in
22 supporting other speakers who have spoken about this, I do
23 support and ask for a 30-day extension for the comment
24 period because it's just an awful lot of stuff to work on.
25 My own particular area, I mean, I just work in one area of

1 this, is we've got two Historic Districts, the VAMC
2 District, and the Ft. Miley Park District, bumping each
3 other, and there's work to be done there to understand what
4 is proposed. And we have been feeling cut short because it
5 started in August. So I implore you to give us a greater
6 period of time to work on this, and particularly want to
7 call your attention to the priorities that we need to hear.
8 Thanks.

9 MR. REEL: Thank you. And the Long Range
10 Development Plan, in particular, does go through the
11 phasing, so if there are questions about the phasing and
12 that sequencing, that's in the document and we have a copy
13 there, and Adena will be in the back to answer any of those
14 questions, as well, also the EIS really does talk about the
15 near term things and also the long term things, so make sure
16 to look at those, in particular, to see what some of the
17 priorities might be in there for you to find an answer. The
18 next person is, let's see, Freddie Hahne.

19 MR. HAHNE: It's Hahne. I'm Freddie Hahne. I
20 live across the street with my wife, we've owned the home on
21 the corner of 42nd and Clement for the last 27 years, and
22 I've been through discussions with three Administrations
23 here at the VAMC on construction activities and proposals
24 that they've put forth, and I've come to the conclusion that
25 the only way to really have an impact is through a Federal

1 lawsuit. I don't have those kind of funds. And currently,
2 with the activities you have going on here, what the
3 neighborhood has to endure now is this, all day long (plays
4 recording). It's with construction activity. I'm sure you
5 hear it, as well. That's what goes on all day long. I work
6 from home all day, upstairs, downstairs, it's invasive,
7 that's not in the environmental impact statement.

8 MR. REEL: All right, thank you for your comment.
9 We do address construction and phasing for the future
10 projects in the Long Range Development Plan, so there are
11 certain periods where construction activities, you know,
12 will be higher than others. So thank you for your comment.
13 And then, finally, Eric Mar, I didn't know if you wanted to
14 come up and say anything today? Is there anybody else who
15 wanted to come up and speak today?

16 MR. JUNGREIS: I'd like to speak. But I left my
17 notes in the car. Do you mind if I say it and then I'll
18 hand you the cards. Yeah, hi, I'm Jason Jungreis, a member
19 of Coalition to Save Ocean Beach and Friends of Sutro Park,
20 a member of the Planning Association for the Richmond, and a
21 member of Friends of Lands End. I have three quick
22 comments, 1) I echo the need for additional time in order to
23 review this voluminous document and how it impacts all the
24 organizations and group that are in this vicinity. Second,
25 I think that the statement is insufficient in the way that

1 it addresses the purpose of the VAMC. The purpose is to
2 provide medical treatment. I am all in favor of providing
3 medical treatment, any medical treatment necessary for
4 Veterans, however, the majority of the expansion is
5 apparently going to be for research. I am not in favor of
6 research taking place on this facility, that's why San
7 Francisco has actually gone to the trouble of creating
8 Mission Bay, for exactly that sort of thing. And then
9 thirdly, I think it fails to adequately take into
10 consideration all the impacts on the neighborhood,
11 particularly with regard to parking because there is still
12 an ongoing parking deficiency at this time, and it carries
13 through all the expansion, secondly with regard to the
14 impact on transit, all the vehicles that will be coming
15 through the neighborhood, it is discussed, but it is not
16 fully and sufficiently addressed, and thirdly, the impact on
17 building height because you have some buildings here that
18 are going to be apparently scaled up to as high as 100 feet,
19 where you've got building height limitation generally for
20 this residential neighborhood of, I believe, it's 40 feet.
21 So I think it's disproportionate in that way. Thank you.

22 MR. REEL: Some of those details are included
23 definitely in the document, the height in particular. I
24 don't believe they reach 100 feet in height, but we have
25 those details, a copy of the EIS here, as well as the Long

1 Range Development Plan, that talk to those issues. We do
2 have 263 additional parking spaces that will be provided as
3 part of the development, again, some of those details are in
4 both the Long Range Development Plan and the EIS. So if you
5 wanted to talk about any of those specifics or see those in
6 the documents, we will be here sticking around for another
7 hour.

8 Does anybody else have other public comment that
9 they'd like to come up and speak? That said, this closes
10 the formal public period here tonight to discuss this.
11 Again, you can provide your comments in written format.
12 This last slide here provides the website at the very bottom
13 there, so if you go to www.sanfrancisco.va.gov/planning, you
14 can see the documents on there, the Long Range Development
15 Plan, Section 106 stuff that Susan had talked about, as well
16 as the Draft EIS. And there are instructions to provide
17 comments through that process as well. So thank you very
18 much for coming and we'll be around for another hour.

19 [Public Hearing Adjourned at 6:20 P.M.]

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