Appendix H

Coastal Assessment Supporting Information

- Coastal Consistency Determination

COASTAL CONSISTENCY DETERMINATION
SAN FRANCISCO VA MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN

I. AUTHORITY

The U.S. Department of Veterans Affairs (VA) is submitting this Coastal Consistency Determination in compliance with Section 930.34 et seq. of the National Oceanic and Atmospheric Administration Federal Consistency Regulations (Title 15 Code of Federal Regulations Part 930).

II. DETERMINATION

In accordance with the federal Coastal Zone Management Act (CZMA) of 1972, as amended, VA has determined that the Long Range Development Plan (LRDP) for the San Francisco VA Medical Center (SFVAMC) is consistent to the maximum extent practicable with the CZMA of 1972, as amended, and with the California Coastal Act (CCA) of 1976, as amended.

III. PROJECT DESCRIPTION

The Proposed Action is a LRDP that supports the mission of the San Francisco Veterans Affairs Medical Center (SFVAMC) to provide for the health care needs of Bay Area and North Coast Veterans by providing for the renovation, expansion, and operation of SFVAMC Fort Miley Campus. The LRDP includes development of new and retrofitting of existing buildings and structures that house patient care, research, administrative, and hoptel[1] functions, as well as parking. The SFVAMC has identified a need for retrofitting existing buildings at the Fort Miley Campus to meet the most recent seismic safety requirements and for an additional 589,000 gross square feet (gsf) of medical facility space to satisfy the needs of all San Francisco Bay Area and North Coast Veterans through approximately 2030 (see Figure 1). The LRDP is divided into planned short and long-term phases that would implement various facility components through 2027.

All new development would be designed to achieve Leadership in Energy and Environmental Design (LEED®) Silver certification and would implement the VA Strategic Sustainability Performance Plan (VA SSPP), which identifies VA's sustainability goals and defines VA's policy and strategy for achieving these goals. In addition to new development and associated demolition, buildings would be retrofitted according to VA seismic design requirements (VA Directive H-18-8), in compliance with Executive Order 12941.

An Environmental Impact Statement (EIS) was prepared to evaluate the potential environmental effects associated with implementing the LRDP for the SFVAMC at Fort Miley in San Francisco, California. Four alternatives were evaluated in the EIS process:

- **Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative (Preferred Alternative)**— Alternative 1 is based on the LRDP, which proposes a reduced variation of the layout originally proposed in the October 2010 Draft IMP. Rather than the Draft IMP's proposed 924,200 additional gsf at the SFVAMC Fort Miley Campus, Alternative 1 proposes 322,200 net new gsf of facilities space and 232,252 new gsf of parking.

[1] A hoptel is an overnight, shared lodging facility for eligible Veterans receiving healthcare services. This temporary lodging is available to Veterans who need to travel 50 or more miles from their homes to the SFVAMC Fort Miley Campus.

Source: Data provided by the SFVAMC Engineering Department in 2010

Figure 1: Location of SFVAMC Fort Miley Campus within the Urban Context of San Francisco

garage space, for a total of 554,452 gsf of additional space. This alternative also proposes seismic upgrades to various existing structures on the Campus. Construction would occur in one short-term phase (Phase 1) and one long-term phase (Phase 2). This alternative allows VA to achieve 94% of its determined need of 589,000 net new gsf to serve Veterans through roughly 2030 at a single campus. VA understands this is 6% short of the determined space need.

- **Alternative 2: SFVAMC Fort Miley Campus Buildout Alternative 2**—Alternative 2 is also based on the LRDP, which proposes a reduced variation of the layout originally proposed in the October 2010 Draft IMP. Rather than the Draft IMP's proposed 924,200 additional gsf at the SFVAMC Fort Miley Campus, Alternative 2 proposes 322,200 net new gsf of facilities space and 232,252 new gsf of parking garage space, for a total of 554,452 gsf of additional space. This alternative also proposes seismic upgrades to various existing structures on the Campus. Construction would occur in one short-term phase (Phase 1) and one long-term phase (Phase 2). However a different, longer construction schedule would occur in the form of different phasing and implementation schedules for individual projects compared to Alternative 1. However, the total amount and type of operational space would be the same as that under Alternative 1. This alternative allows VA to achieve 94% of its determined need of 589,000 net new gsf to serve Veterans through roughly 2030 at a single campus. VA understands this is 6% short of the determined space need..

- **Alternative 3: SFVAMC Fort Miley Campus Plus Mission Bay Campus Alternative** —Alternative 3 would include all of the short-term (Phase 1) project components of Alternative 1. However, the long-term (Phase 2) project component would be located off-site. The particular site is unknown at this time; it would be determined and purchased by VA at a later date, and presumably would be located in the Mission Bay area of San Francisco. This alternative would entail adding a total of approximately 170,000 gsf in net new space at a Mission Bay location. This alternative allows VA to achieve 94% of its determined need of 589,000 net new gsf to serve Veterans through roughly 2030 at two campuses. VA understands this is 6% short of the determined space need.

- **Alternative 4: No Action Alternative**—Under the No Action Alternative (Alternative 4), the LRDP would not be implemented. This alternative would be 100% short of the determined space need. The purpose of analyzing the No Action Alternative is to allow decision-makers to compare the impacts of the action alternatives against the impacts of no action in the future. Although this alternative does not meet the purpose and need, it is included to allow decision-makers to compare the impacts of the action alternatives against the impacts of no action in the future.

Under both Alternatives 1 and 2, Phase 1 (short-term) project components would involve new development and/or retrofitting of patient care, research, administrative, hoptel, and parking structures on the existing 29-acre SFVAMC Fort Miley Campus through approximately 2020. The Phase 1 development footprint would take up approximately 0.69 acres within the previously developed areas of the existing 29-acre Campus. Short-term project components are summarized in Tables 1 and 2 and are shown in Figures 2 and 3.

Phase 2 (long-term) project components would be different for Alternatives 1 and 2. For Alternative 1, Phase 2 project components primarily would involve new development of Building 213, a clinical addition building, on the 29-acre SFVAMC Fort Miley Campus through 2027 (see Table 3 and Figure 4). The Alternative 1, Phase 2 development footprint would not take up any new acreage within the previously developed areas of the existing 29-acre Campus, as it would be constructed on the site of Building 12 (which would be demolished as part of

Alternative 1 Phase 1). Implementation of the Alternative 1, Phase 2 project components would involve one subphase of development and retrofitting over approximately 2 years, with completion anticipated by April 2026.

For Alternative 2, Phase 2 project components primarily would involve new development and retrofitting of patient care, research, administrative, and ambulatory care structures on the 29-acre SFVAMC Fort Miley Campus through 2023 (see Table 4 and Figure 5). Like Alternative 1 (Phase 2), the Alternative 2 Phase 2 development footprint would not take up any new acreage within the previously developed areas of the existing 29-acre Campus, as the proposed Building 213 would be constructed on the site of existing Building 12 (which would be demolished as part of Alternative 2 Phase 1) and seismic retrofits to existing Buildings 1, 6, and 8 would not result in new developed acreage. Under Alternative 2, implementation of the long-term (Phase 2) project components of Alternative 1 would involve four subphases of development and retrofitting over approximately 5.5 years, with completion anticipated by approximately March 2026.

Table 1: Alternative 1 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)[1,2]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
Phase 1						
1.1	Bldg 211—Emergency Operations Center and Parking Garage (377 spaces)[5]	155,000 (of which 2,000 is EOC and 3,000 is storage space)	155,000	4	12 months	July 2014
1.2	Bldg 41—Research (requires removal of Trailer 17)	14,200 (of which 4,600 is mechanical penthouse)	12,500	2	15 months	May 2015
1.3	Seismic Retrofit of Bldgs 5 and 7	27,393	0	2 and 3	14 months	May 2015
1.4	Bldg 22 Hoptel and Seismic Retrofit of Bldgs 9 and 10	18,200	8,700	2, 2, and 2	13 months	May 2015
1.5	Bldgs 209 and 211 Parking Garage Extensions (250 spaces)	82,252	82,252	5 and 4	12 months	March 2016
1.6	Bldg 203 C-Wing Extension (Ground-Floor Patient Welcome Center) and Drop-off Area with Canopy Structure	7,100	7,100	1	13 months	August 2016
1.7	Bldg 200 Expansion (Operating Room D-Wing)	5,300	5,300	1	12 months	June 2016
1.8	Bldg 24 Mental Health Clinic Expansion (requires demolition of Bldg 20)	15,600	13,300	3	14 months	October 2016
1.9	Bldg 40—Research (requires demolition of Bldgs 14, 18, and 21; removal of Trailer 23; and relocation of water tower)	110,000	91,300	4 (+ basement and mechanical	39 months	December 2018

Table 1: Alternative 1 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)[1,2]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
				penthouse)		
1.10	Bldg 207 Expansion (IT Support Space)	7,000	7,000	2	14 months	January 2017
1.11	Bldg 43—Research/ Administration (requires removal of Trailer 31)	15,000	13,500	2	15 months	February 2017
1.12	Trailer 36 (New Modular)	2,200	2,200	1	3 months	September 2016
1.13	Bldg 23—Mental Health Research Expansion	15,000	15,000	3 (+ basement)	14 months	December 2017
1.14	Bldg 203 Extension—Psychiatric Intensive Care Unit	1,200	1,200	1	18 months	June 2018
1.15	Bldg 208 Extension—Community Living Center and National Cardiac Device Surveillance Center (requires removal of Trailer 24)	10,000	9,000	3	18 months	August 2018
1.16	Seismic Retrofit of Bldgs 1, 6, and 8	115,547	0	5, 4, and 3	20 months	March 2019
1.17	Demolition of Bldg 12	0	-38,900	N/A	11 months	August 2020
	Total Phase 1 Area	**600,992**	**384,452**	**Total Phase 1 Duration**		**85 months**

Notes:
Bldg = Building; EOC = Emergency Operations Center; IT = information technology; N/A = not applicable
1 This table reflects approximate construction schedules and completion dates.
2 In addition, a total of 321 parking spaces would be eliminated from a combination of surface parking lots D, E, H, J, K, and L.
3 Construction includes all demolition, grading, structure development, and painting activities associated with the Proposed Action.
4 Dates shown represent approximate time frames; funding has yet to be secured for some project components. Furthermore, because of space restrictions, the ability of the U.S. Department of Veterans Affairs to construct multiple phase components simultaneously is limited.
5 The Emergency Operations Center and Building 211 Parking Garage square footage in this table reflects both the habitable (center and storage area) and the nonhabitable (parking garage) space planned for construction. Although the San Francisco Veterans Affairs Medical Center Long Range Development Plan discusses habitable square footage, this Environmental Impact Statement must evaluate the impacts associated with construction of the entire square footage, including nonhabitable space.
Source: VA, 2014

Table 2-1: Alternative 1 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)[1,2]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
Phase 1						
1.1	Bldg 211—Emergency Operations Center and Parking Garage (377 spaces)[5]	155,000 (of which 2,000 is EOC and	155,000	4	12 months	July 2014

Table 1: Alternative 1 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)[1,2]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
		3,000 is storage space)				
1.2	Bldg 41—Research (requires removal of Trailer 17)	14,200 (of which 4,600 is mechanical penthouse)	12,500	2	15 months	May 2015
1.3	Seismic Retrofit of Bldgs 5 and 7	27,393	0	2 and 3	14 months	May 2015
1.4	Bldg 22 Hoptel and Seismic Retrofit of Bldgs 9 and 10	18,200	8,700	2, 2, and 2	13 months	May 2015
1.5	Bldgs 209 and 211 Parking Garage Extensions (250 spaces)	82,252	82,252	5 and 4	12 months	March 2016
1.6	Bldg 203 C-Wing Extension (Ground-Floor Patient Welcome Center) and Drop-off Area with Canopy Structure	7,100	7,100	1	13 months	August 2016
1.7	Bldg 200 Expansion (Operating Room D-Wing)	5,300	5,300	1	12 months	June 2016
1.8	Bldg 24 Mental Health Clinic Expansion (requires demolition of Bldg 20)	15,600	13,300	3	14 months	October 2016
1.9	Bldg 40—Research (requires demolition of Bldgs 14, 18, and 21; removal of Trailer 23; and relocation of water tower)	110,000	91,300	4 (+ basement and mechanical penthouse)	39 months	December 2018
1.10	Bldg 207 Expansion (IT Support Space)	7,000	7,000	2	14 months	January 2017
1.11	Bldg 43—Research/ Administration (requires removal of Trailer 31)	15,000	13,500	2	15 months	February 2017
1.12	Trailer 36 (New Modular)	2,200	2,200	1	3 months	September 2016
1.13	Bldg 23—Mental Health Research Expansion	15,000	15,000	3 (+ basement)	14 months	December 2017
1.14	Bldg 203 Extension—Psychiatric Intensive Care Unit	1,200	1,200	1	18 months	June 2018
1.15	Bldg 208 Extension—Community Living Center and National Cardiac Device Surveillance Center (requires removal of Trailer 24)	10,000	9,000	3	18 months	August 2018
1.16	Seismic Retrofit of Bldgs 1, 6, and 8	115,547	0	5, 4, and 3	20 months	March 2019

Table 1: Alternative 1 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)[1,2]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
1.17	Demolition of Bldg 12	0	-38,900	N/A	11 months	August 2020
	Total Phase 1 Area	**600,992**	**384,452**	**Total Phase 1 Duration**		**85 months**

Notes:
Bldg = Building; EOC = Emergency Operations Center; IT = information technology; N/A = not applicable
1 This table reflects approximate construction schedules and completion dates.
2 In addition, a total of 321 parking spaces would be eliminated from a combination of surface parking lots D, E, H, J, K, and L.
3 Construction includes all demolition, grading, structure development, and painting activities associated with the Proposed Action.
4 Dates shown represent approximate time frames; funding has yet to be secured for some project components. Furthermore, because of space restrictions, the ability of the U.S. Department of Veterans Affairs to construct multiple phase components simultaneously is limited.
5 The Emergency Operations Center and Building 211 Parking Garage square footage in this table reflects both the habitable (center and storage area) and the nonhabitable (parking garage) space planned for construction. Although the San Francisco Veterans Affairs Medical Center Long Range Development Plan discusses habitable square footage, this Environmental Impact Statement must evaluate the impacts associated with construction of the entire square footage, including nonhabitable space.
Source: VA, 2014

Table 2: Alternative 2 Short-Term (Phase 1) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2013 through 2020)1,2

Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[3]	Approximate Completion Date[4]
Phase 1					
Bldg 211—Emergency Operations Center and Parking Garage (377 spaces)[5]	155,000 (of which 2,000 is EOC and 3,000 is storage space)	155,000	4	12 months	July 2014
Bldg 41—Research (requires removal of Trailer 17)	14,200 (of which 4,600 is mechanical penthouse)	12,500	2	15 months	March 2015
Seismic Retrofit of Bldgs 5 and 7	27,393	0	2 and 3	14 months	May 2015
Bldg 22 Hoptel and Seismic Retrofit of Bldgs 9 and 10	18,200	8,700	2, 2, and 2	13 months	May 2015
Bldgs 209 and 211 Parking Garage Extensions (250 spaces)	82,252	82,252	5 and 4	12 months	March 2016
Bldg 203 C-Wing Extension (Ground-Floor Patient Welcome Center) and Drop-off Area with Canopy Structure	7,100	7,100	1	13 months	August 2016
Bldg 200 Expansion (Operating	5,300	5,300	1	12 months	June 2016

Room D-Wing)					
Bldg 24 Mental Health Clinic Expansion (requires demolition of Bldg 20)	15,600	13,300	3	14 months	October 2016
Bldg 40—Research (requires demolition of Bldgs 14, 18, and 21; removal of Trailer 23; and relocation of water tower)	110,000	91,300	4 (+ basement and mechanical penthouse)	39 months	September 2018
Bldg 207 Expansion (IT Support Space)	7,000	7,000	2	14 months	January 2017
Bldg 43—Research/ Administration (requires removal of Trailer 31)	15,000	13,500	2	15 months	February 2017
Trailer 36 (New Modular)	2,200	2,200	1	3 months	September 2016
Bldg 23—Mental Health Research Expansion	15,000	15,000	3 (+ basement)	14 months	December 2017
Bldg 203 Extension—Psychiatric Intensive Care Unit	1,200	1,200	1	18 months	June 2018
Bldg 208 Extension—Community Living Center and National Cardiac Device Surveillance Center (requires removal of Trailer 24)	10,000	9,000	3	18 months	August 2017
Demolition of Bldg 12	0	-38,900	N/A	11 months	August 2019
Total Phase 1 Area		**485,445**	**384,452**	**Total Phase 1 Duration**	**73 months**

Bldg = Building; EOC = Emergency Operations Center; IT = information technology; N/A = not applicable

Notes:

[1] This table reflects approximate construction schedules and completion dates.

[2] In addition, a total of 321 parking spaces would be eliminated from a combination of surface parking lots D, E, H, J, K, and L.

[3] Construction includes all demolition, grading, structure development, and painting activities associated with the Proposed Action.

[4] Dates shown represent approximate time frames; funding has yet to be secured for some project components. Furthermore, because of space restrictions, the ability of VA to construct multiple phase components simultaneously is limited.

[5] The Emergency Operations Center and Building 211 Parking Garage square footage in this table reflects both the habitable (center and storage area) and the nonhabitable (parking garage) space planned for construction. Although the San Francisco Veterans Affairs Medical Center Long Range Development Plan discusses habitable square footage, this Environmental Impact Statement must evaluate the impacts associated with construction of the entire square footage, including nonhabitable space.

Source: VA, 2014

Source: VA, 2014
Note: The 17 subphases of Phase 1 components identified in Table 1 are indicated in this figure.

Figure 2: Alternatives 1 and 3 (Phase 1) Footprint and Concept Plan through 2020—SFVAMC Fort Miley Campus

Source: VA, 2014
Note: The 16 subphases of Phase 1 components identified in Table 2 are indicated in this figure.

Figure 3: Alternative 2 (Phase 1) Footprint and Concept Plan through 2020—SFVAMC Fort Miley Campus

Table 3: Alternative 1 Long-Term (Phase 2) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2020 through 2027)[1]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[2]	Approximate Completion Date[3]
Phase 2						
2.1	Bldg 213 (Clinical Addition Building)	170,000	170,000	5 (+ basement)	24 months	March 2026
	Total Phase 2 Area	**170,000**	**170,000**	**Total Phase 2 Duration**		**24 months**

Bldg = Building
Notes:
1 This table reflects approximate construction schedules and completion dates.
2 Construction includes all demolition, grading, structure development, and painting activities associated with the Proposed Action.
3 Dates shown represent approximate time frames; funding has yet to be secured for some project components. Furthermore, because of space restrictions, the ability of VA to construct multiple phase components simultaneously is limited.
Source: VA, 2014

Source: VA, 2014
Note: The one Phase 2 subphase component identified in Table 3 is indicated in this figure.

Figure 4 **Alternative 1 Long-Term (Phase 2) Footprint and Concept Plan through 2027—SFVAMC Fort Miley Campus**

Table 4: Alternative 2 Long-Term (Phase 2) Area, Massing, and Construction Schedule at the SFVAMC Fort Miley Campus (2020 through 2027)[1]

Phase	Proposed Action	Gross Square Feet	Net New Gross Square Feet	Number of Stories	Construction Duration[2]	Approximate Completion Date[3]
Phase 2						
2.1	Bldg 8 (Seismic Retrofit)	25,521	0	3	14 months	December 2021
2.2	Bldg 1 (Seismic Retrofit)	37,765	0	5	20 months	June 2022
2.3	Bldg 6 (Seismic Retrofit)	52,261	0	4	20 months	February 2024
2.4	Bldg 213 (Clinical Addition Building)	170,000	170,000	5 (+ basement)	24 months	March 2026
	Total Phase 2 Area	**285,487**	**170,000**	**Total Phase 2 Duration**		**65 months**

Bldg = Building
Notes:
1 This table reflects approximate construction schedules and completion dates.
2 Construction includes all demolition, grading, structure development, and painting activities associated with the Proposed Action.
3 Dates shown represent approximate time frames; funding has yet to be secured for some project components. Furthermore, because of space restrictions, the ability of the U.S. Department of Veterans Affairs to construct multiple phase components simultaneously is limited.
Source: VA, 2014

Source: VA, 2014
Note: The four subphases of Phase 2 components identified in Table 4 are indicated in this figure.

Figure 5: Alternative 2 Long-Term (Phase 2) Footprint and Concept Plan through 2027—SFVAMC Fort Miley Campus

For Alternative 3, Phase 2 project components would involve primarily development of ambulatory care, research, and parking structures at a potential new SFVAMC Mission Bay Campus. Since only project components located at the SFVAMC Fort Miley Campus are subject to consistency determination by the California Coastal Commission (Commission), Alternative 3 Phase 2 project components would not be applicable and are not discussed further.

Landscaping and Open Space

An objective of the LRDP is to coordinate the location and massing of the buildings so that continued development of the Campus improves connections to surrounding parks and other parts of the City of San Francisco. The public urban spaces that would be created are intended to transform the Campus into an integral urban area that fits with the City. Various open space areas of the existing SFVAMC Fort Miley Campus would be developed with the proposed buildings including the Mental Health Clinic Expansion and the Hoptel Addition. In addition, a new landscape area would be developed within the drop- off circle that is proposed as part of the Patient Welcome Center and Drop-off Area, including a healing garden. Sidewalks and walkways for pedestrians would be modified to improve connectivity and flow between facilities. Six landscape zones are envisioned in the LRDP for the Campus:

1. the gateway landscape zone that would serve as the entry to the SFVAMC Fort Miley Campus, marking the transition from the adjacent city grid to the Campus setting,

2. the buffer zone which would be designed to serve as appropriate buffer and transition areas at the edges of the Campus,

3. the coastal landscape/overlook trail area at the northern edge of the Campus which would include walking trails, as well as a location for formal events and informal gatherings and reflection,

4. the healing garden zone, which would be designed as areas of quiet relaxation and contemplation, incorporating the area’s natural setting and views,

5. the garden landscape areas would be integrated throughout the Campus, with formal landscaped areas that provide a pleasant and comfortable pedestrian environment surrounding buildings and near parking areas,

6. the pedestrian pathways and connections would be incorporated throughout the Campus, with the intent of enhancing the pedestrian environment and encouraging mobility, creating connections to landscaped areas and destinations.

IV. PROJECT AREAS AND ACTIVITIES SUBJECT TO CONSISTENCY DETERMINATION

The existing SFVAMC Fort Miley Campus is located at 4150 Clement Street in the northwestern portion of San Francisco, adjacent to the outer Richmond neighborhood, approximately 2 miles west of State Route (SR) 1 (also known as Park Presidio Bypass Drive in this area) (see Figure 1). The Campus is bordered by Clement Street and private residential uses to the south, and National Park Service lands to the north, east, and west (see Figure 6). The Campus is situated approximately 6 miles west of downtown San Francisco and encompasses approximately 29 acres.

Source: VA, 2014

Figure 6: Existing SFVAMC Fort Miley Campus Layout

The SFVAMC Fort Miley Campus is located on federal lands that are owned by VA. The existing SFVAMC Fort Miley Campus facilities occupy approximately 1 million square feet and include a 124-bed tertiary-care hospital, primary- and specialty-care services, and a 120-bed community living center. SFVAMC has identified a deficiency of 589,000 square feet of building space. As shown in Figure 6, the Campus contains 36 buildings totaling approximately 987,000 square feet of habitable development, including:

- An inpatient hospital building
- An outpatient clinical building
- Research buildings
- Two hoptel buildings
- A community living center
- Administrative/office buildings
- Various storage, infrastructure, and other facilities

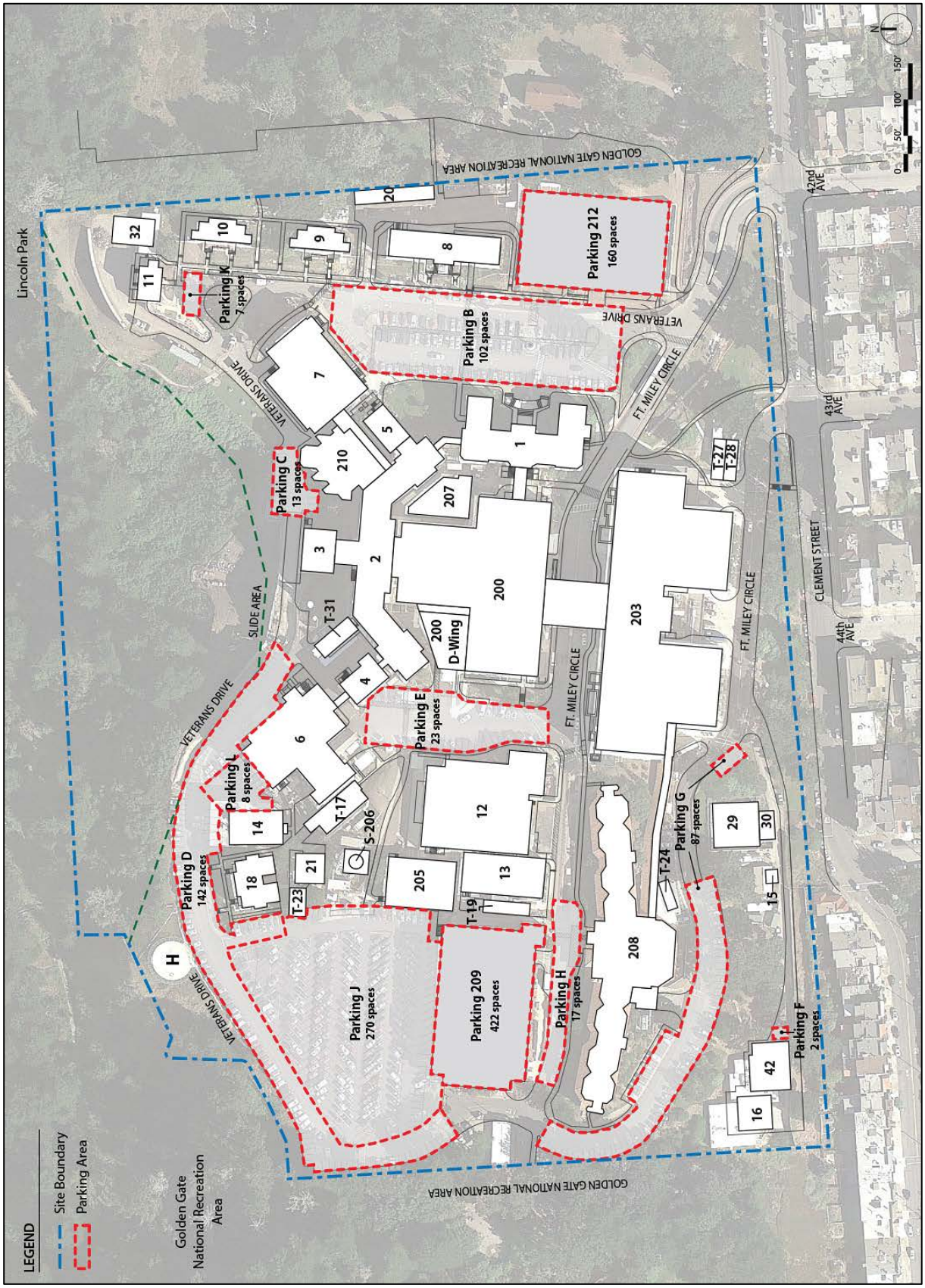
In addition, 10 surface parking lot areas and two parking structures provide 1,253 parking spaces (see Figure 7). A helipad is located at the northwestern corner of the Campus.

The majority of the SFVAMC, primarily the west side (approximately 24.4 acres, or 84 percent) of the Campus is located within the California Coastal Zone boundary (see Figure 8). As defined in Section 304 of the federal CZMA of 1972, the term “coastal zone” does not include “lands the use of which is by law subject solely to the discretion of or which is held in trust by the federal government.” The Campus is within federal jurisdiction and is wholly owned and operated by VA. Although the regulations of the Coastal Zone Management Act are not directly applicable to the existing SFVAMC Fort Miley Campus, VA recognizes that actions outside the coastal zone may affect land or water uses or natural resources along the coast and, therefore, are subject to the provisions of the CZMA.

The coastal zone established by the CCA does not include San Francisco Bay, which is defined as the area east of the Golden Gate Bridge. The San Francisco Bay Conservation and Development Commission (BCDC) is the federally designated State coastal management agency for San Francisco Bay. This designation empowers BCDC to use the authority of the federal CZMA, so that federal projects and activities are consistent with the policies of the San Francisco Bay Plan and State law. The coastal portions of the Mission Bay area are located within BCDC’s area of jurisdiction, which includes the first 100 feet shoreward from the line of highest tidal action (mean high-tide line) around San Francisco Bay. Therefore, only the proposed project activities at the existing SFVAMC Fort Miley Campus are subject to consistency determination under the CCA by the Commission.

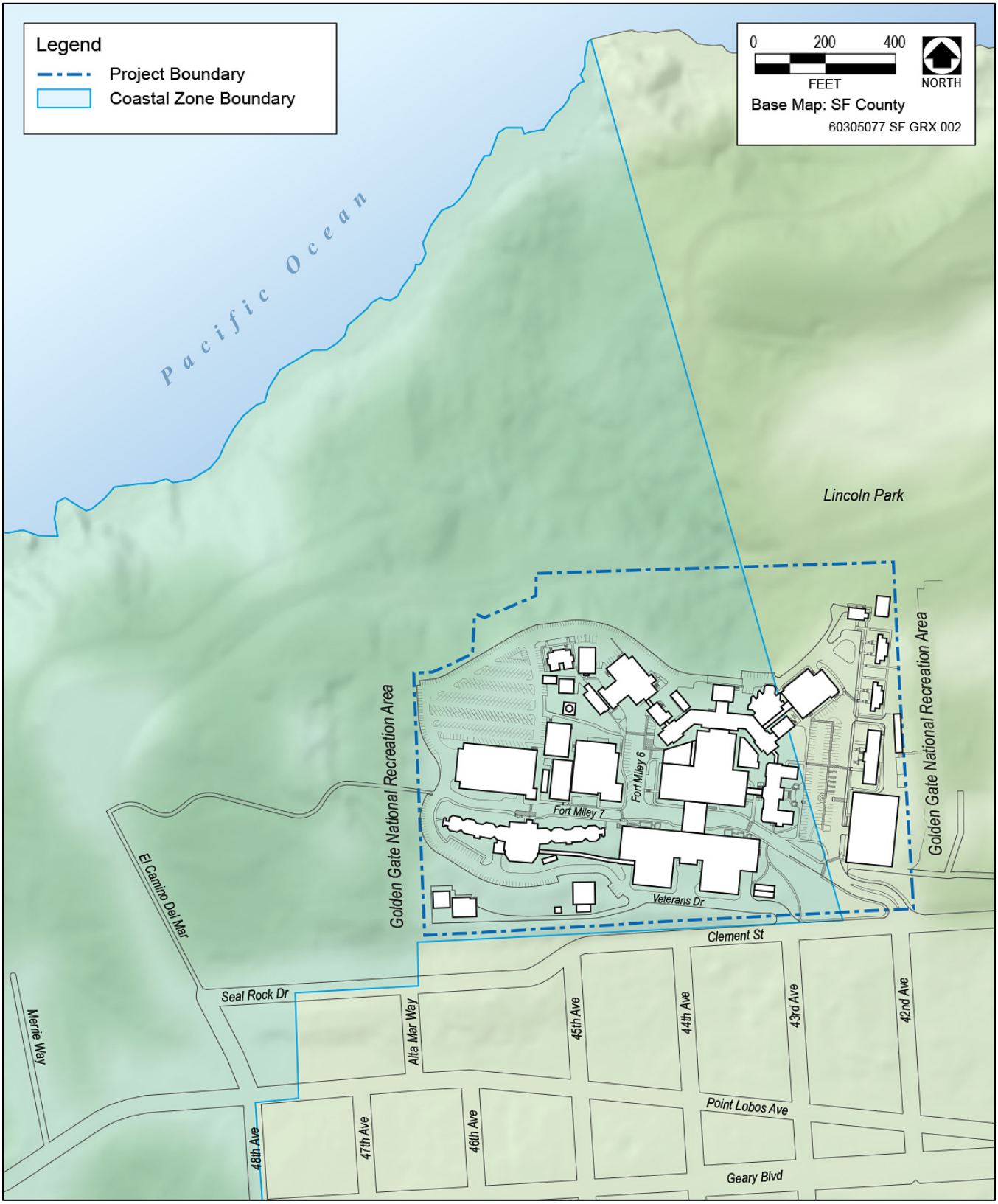
If Alternative 3 is chosen and the selected project site for Phase 2 is situated within 100 feet of San Francisco Bay, a consistency determination would be obtained from BCDC before commencement of construction and the construction contractor would attempt to avoid the BCDC jurisdictional line. If development were to be proposed along the water’s edge of San Francisco Bay, an application would be submitted to BCDC for approval if any of the following actions would need to occur:

- placing solid material, building or repairing docks or pile-supported or cantilevered structures, disposing of material, or mooring a vessel for a long period in San Francisco Bay or in certain tributaries that flow into the bay;



Source: VA, 2012

Figure 7: Parking Facilities—Existing SFVAMC Fort Miley Campus



Source: Base layer from SF County; coastal zone boundary layer from California Department of Transportation TSI/GIS Data Branch, 2009; data compiled by AECOM in 2014

Figure 8: Coastal Zone Boundary

- dredging or extracting material from the bay bottom;
- substantially changing the use of any structure or area;
- constructing, remodeling, or repairing a structure; or
- subdividing property or grading land.

Prior Commission Action on VA Proposals at the SFVAMC Fort Miley Campus

One previous VA action at the SFVAMC has been subject to federal consistency review. On March 12, 2007, the Commission issued Negative Determination (ND) ND-095-06 for the SFVAMC Building 203 Seismic Retrofit Project.

V. CONSISTENCY OF THE LRDP WITH PROVISIONS OF THE CALIFORNIA COASTAL ACT

Since CZMA Section 307 provides the legal authority for the Commission to review federal agency activities along the Pacific Coast in California for consistency with the California Coastal Management Program, this portion of the federal consistency determination analyzes consistency between policy sections of the CCA (Divisions 20, California Public Resources Code) and the proposed LRDP project components on federal lands included within the SFVAMC Fort Miley Campus.

Policies under the CCA that are <u>not applicable</u> to the LRDP include:

- Article 2, Public Access
  - Section 30212 - New development projects
  - Section 30213 - Lower cost visitor and recreational facilities; encouragement and provision; overnight room rentals
- Article 3, Recreation
  - Section 30220 - Protection of certain water-oriented activities
  - Section 30221 - Oceanfront land; protection for recreational use and development
  - Section 30222 - Private lands; priority of development purposes
  - Section 30222.5 - Oceanfront lands; aquaculture facilities; priority
  - Section 30224 - Recreational boating use; encouragement; facilities
- Article 4, Marine Environment
  - Section 30230 - Marine resources; maintenance
  - Section 30233 - Diking, filling or dredging; continued movement of sediment and nutrients
  - Section 30234 - Commercial fishing and recreational boating facilities
  - Section 30234.5 - Economic, commercial, and recreational importance of fishing
  - Section 30235 - Construction altering natural shoreline
  - Section 30236 - Water supply and flood control
- Article 5, Land Resources

- Section 30241 - Prime agricultural land; maintenance in agricultural production
- Section 30241.5 - Agricultural land; determination of viability of uses; economic feasibility evaluation
- Section 30242 - Lands suitable for agricultural use; conversion
- Section 30243 - Productivity of soils and timberlands; conversions

- All sections of Article 7, Industrial Development

Policies under the CCA that are applicable to the LRDP include:

Article 2, Public Access

Section 30210: Access; recreational opportunities; posting. In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse. (Amended by Ch. 1075, Stats. 1978.)

Section 30211: Development not to interfere with access. Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Analysis and Comment: The existing SFVAMC Fort Miley Campus is bounded on three sides by a contiguous system of parklands consisting of Lands End, Fort Miley, and Lincoln Park. Implementation of the project components would not inhibit access to or use of adjacent Golden Gate National Recreation Area (GGNRA) recreational areas. Access to East Fort Miley and West Fort Miley is available from the Campus near the main entrance by way of a paved roadway. During construction, this road could be temporarily closed, although this access road is not the primary entry point into adjacent Fort Miley, some hospital-related staff and recreationists likely use these roadway occasionally to access the parklands. To the extent practicable, the access road would be kept open during construction, however, if a temporary closure of the roadway is necessary, notification of the closure would be posted a minimum of 2 weeks in advance. There are multiple locations to access the Lands End–Fort Miley–Lincoln Park system and the primary access points into the parklands system would remain open and would not be affected, therefore temporary closure of the Campus access road is not expected to inhibit access to and use of these parks.

Section 30212.5: Public facilities; distribution. Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.

Analysis and Comment: Parking structures within the SFVAMC Fort Miley Campus serve the personnel, patients and visitors and are not intended for coastal access parking (see Figure 8). On-street parking in the vicinity of the existing SFVAMC Fort Miley Campus generally consists of unmetered parallel parking. Existing on-street parking conditions were qualitatively assessed by field observations conducted during the weekday peak periods. Based on the field observations, it was determined that on-street parking is well utilized throughout the day, although particular occupancy percentages can vary depending on location and peak period.

Alternative 1, Alternative 2, and Alternative 3 (Phase 1) would result in a net new parking demand of an estimated 132 spaces during the weekday peak period. As part of Phase 1, 321 existing parking spaces would be eliminated and replaced by 377 new parking spaces as part of the proposed Emergency Operations Center and Building 211 Parking Garage. In addition, 250 new parking spaces would be added as part of the extensions of Buildings 209 and 211, for a net addition of 306 spaces by the year 2020 which would exceed the estimated new demand by 174 spaces. Alternative 1 and Alternative 2 (Phase 1 and Phase 2) would generate a demand for 426 parking spaces under 2027 conditions. Parking generally is not considered part of the permanent physical environment, with supply and demand highly variable and dependent on many different factors. The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit services, taxis, bicycles, or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Shifts to transit service are consistent with the City of San Francisco's "Transit First" policy.

Some SFVAMC Fort Miley Campus parking spaces would be temporarily unavailable to accommodate space for temporary modular structures that would be put in place for employees to work in while some buildings are being seismically retrofitted. However, VA parking would not overflow into public parking areas that would affect the public's ability to gain coastal access. During construction periods, VA would provide additional valet parking services on the SFVAMC Fort Miley Campus to address temporary parking reductions. In addition, VA parking (primarily weekday operations) would not overlap with weekend public parking for access to coastal public areas.

Veterans and hospital personnel would benefit from additional park spaces, improved circulation and connections to the surrounding federal park system.

Section 30214: Implementation of public access policies; legislative intent. (a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

(1) Topographic and geologic site characteristics.

(2) The capacity of the site to sustain use and at what level of intensity.

(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.

(4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

Analysis and Comment: Public access to adjacent parklands is not regulated by VA, however connections are available adjacent to the Campus into the Lands End–Fort Miley–Lincoln Park system. There is not a security fence around SFVAMC, therefore, while the site is primarily for patients, visitors and personnel, the public can pass through the Campus. Access to East Fort Miley and West Fort Miley, located within the GGNRA, is available from the Campus near the main entrance through a roadway that may be closed during a portion of construction activities. Access to Fort Miley from the Campus may be used by hospital-related staff, patients, visitors and occasional recreationists. Temporary closure of the access road will not affect use of the

parklands because the primary entry point into adjacent Fort Miley would still be available and there are multiple other locations in which to access the parklands.

During construction the contractor would manage nonhazardous building construction and demolition waste in accordance with VA Specifications Section 017419, which requires efficient waste management and removal and legal disposal of materials. During demolition and construction, hazardous waste would be disposed in a manner consistent with federal, State, and local regulations. During operation of SFVAMC the VA complies with all waste management policies.

Article 3, Recreation

Section 30223: Upland Areas. Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

Analysis and Comment: The existing SFVAMC Fort Miley Campus is bounded on three sides by a contiguous system of parklands consisting of Lands End, Fort Miley, and Lincoln Park. Immediately east and west of the Campus is Fort Miley, part of the GGNRA managed by the National Park Service (NPS). Under the LRDP, no taking of adjacent parklands would occur because all future modifications would be entirely within the existing footprint of the Campus. However, East Fort Miley and West Fort Miley are currently accessible from the Campus by way of a paved roadway from the Campus near the main entrance. Although this access road is not the primary entry points into adjacent Fort Miley, some hospital-related staff, patients, visitors and recreationists may occasionallyaccess the parklands from this road. To the extent practicable, the access roads would be kept open during construction, however, if a temporary closure is necessary, notification of the closure would be posted a minimum of 2 weeks in advance. There are several other locations to access the Lands End–Fort Miley–Lincoln Park system include the main access points, which would remain open during any temporary closure. Therefore, implementation of project components would not inhibit access to or use of the adjacent GGNRA recreational areas.

Article 4, Marine Environment

Section 30231: Biological productivity; water quality. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Analysis and Comment: No creeks or open water bodies are located on or near the existing SFVAMC Fort Miley Campus. During construction, potentially adverse impacts could occur to bird species and bats using the area, related to vegetation removal. However, with the implementation of wildlife surveys and avoidance of the breeding season, impacts would be minor **[EIS Mitigation Measure WH-1]**. Removal of landscape species such as Monterey pine, Monterey cypress, and the understory during construction would not constitute an adverse impact to vegetation and habitats because these species are not native to the area. Because the footprint of operations at the SFVAMC Fort Miley Campus generally would remain the same,

the condition of surrounding habitat is not anticipated to change or become degraded. No impacts to vegetation and habitat would occur from operation of the project.

The project would be required to comply with Article 4.1 of the San Francisco Public Works Code, which regulates the quantity and quality of discharges to the combined sewer system. A storm water pollution prevention plan (SWPPP) would be prepared to reduce project-related pollution of surface water throughout the construction period. Most stormwater runoff from the project site would be collected and treated at the Oceanside Water Pollution Control Plant before discharge to the Pacific Ocean, and therefore would meet the effluent discharge limitations set by the plant's National Pollutant Discharge Elimination System (NPDES) permit. For stormwater that discharges to the small, separate storm drainage system on the north side of the existing SFVAMC Fort Miley Campus along the north-facing slope, the project would be required to obtain coverage under the Construction General Permit (Order 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ), which requires the development and implementation of a SWPPP. Through preparation and implementation of SWPPPs, compliance with required permits, and implementation of VA Specification Section 015719, "Temporary Environmental Controls," construction-related water quality impacts to the Pacific Ocean would be minor.

All wastewater from the SFVAMC Fort Miley Campus would be treated at the Oceanside Water Pollution Control Plant before being discharged to the Pacific Ocean. Treatment would be provided to meet the effluent discharge limitations set by the plant's NPDES permit.

An increase in total or peak runoff volume from the site relative to existing conditions could contribute to the frequency or severity of combined sewer overflow (CSO) events discharged to the Pacific Ocean. Project implementation is anticipated to result in an increase in impervious sites (0.69 acre increase in impervious area, which is a 4 percent increase in impervious area at the 29-acre Campus), compared to existing conditions on the SFVAMC Fort Miley Campus. However, implementation of the project components would result in minimal alterations to runoff conditions because the projects would occur within the existing development footprint of the Campus, primarily on existing impervious sites (i.e., existing paved parking areas and buildings). Submittal and implementation of final drainage plans would ensure proper sizing of infrastructure to handle stormwater and wastewater flows, to protect from downgradient flooding hazards that could affect the coastal zone **[EIS Mitigation Measure HYD-1]**. In addition, the use of Low Impact Development (LID) techniques to infiltrate, evaporate, and detain stormwater would be required to comply with Section 438 of the federal Energy Independence and Security Act and Article 4.2 of the San Francisco Public Works Code, and this would ensure maintenance of predevelopment stormwater runoff conditions. No groundwater would be used as part of the project.

Section 30232: Oil and hazardous substance spills. Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

Analysis and Comment: The project would be required to comply with Article 4.1 of the San Francisco Public Works Code, which regulates the quantity and quality of discharges to the combined sewer system. A SWPPP would be prepared to reduce project-related pollution of surface water throughout the construction period. Most stormwater runoff from the project site also would be collected and treated at the Oceanside Water

Pollution Control Plant before discharge to the Pacific Ocean, and therefore would meet the effluent discharge limitations set by the plant's NPDES permit. For stormwater discharged to the small, separate storm drainage system on the north side of the existing SFVAMC Fort Miley Campus along the north-facing slope, the project would be required to obtain coverage under the Construction General Permit (Order 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ), which requires the development and implementation of a SWPPP. Through preparation and implementation of SWPPPs, compliance with required permits, and implementation of VA Specification Section 015719, "Temporary Environmental Controls," construction-related water quality impacts to the Pacific Ocean would be minor.

Operation of the project would not substantially degrade water quality or contaminate the public water supply. All sanitary wastewater from the proposed buildings and most stormwater runoff from the SFVAMC Fort Miley Campus would flow into the City's combined sewer system, to be treated at the Oceanside Water Pollution Control Plant before discharge into the Pacific Ocean. Treatment would be provided pursuant to the effluent discharge limitations set by the plant's NPDES permit, and therefore would comply with all local wastewater discharge requirements. Stormwater runoff from the north slope of the Campus would flow to the small, separate storm drainage system and would be conveyed off-site through piping equipped with energy dissipaters. In addition, the stormwater runoff to the separate storm drain system that drains areas to the north of the Campus would be monitored by the SFVAMC, pursuant to requirements in the Industrial Class I Wastewater Permit issued by the San Francisco Public Utilities Commission (SFPUC) (Permit No. 10-06550).

The existing SFVAMC Fort Miley Campus and the surrounding area are occupied by structures of various uses that either are known to or presumably manage hazardous materials, medical chemicals, and petroleum products. Furthermore, the Campus is in an area of possible serpentinitic bedrock; therefore, naturally occurring asbestos may be present in the soil. The SFVAMC would be required to adhere to the regulations and standards for inspection, abatement, exposure, and disposal of any hazardous building materials encountered (e.g., lead, PCBs, mercury).

To minimize construction risks associated with hazardous materials exposure, all hazardous materials would be stored, used, transported, and disposed in strict accordance with all local, State, and federal hazardous waste regulations. Furthermore, the construction contractor would be required to submit an environmental protection plan, in accordance with VHA Environmental Protection Specifications Section 015719. This plan would describe the best management practices (BMPs) that would be implemented to minimize risks associated with the use, storage, handling, and transport of hazardous materials and the contingency protocols to be implemented in the event of an accidental release or exposure during construction. Compliance with the environmental protection plan would ensure that impacts associated with potential hazardous materials exposure would be minor.

Operation of the project would generate hazardous wastes similar to those currently permitted to be generated, stored, and/or released on the existing SFVAMC Fort Miley Campus by State and federal agencies. Because the project would expand the Campus, an increase in the generation of hazardous wastes may result. However, the VA SSPP includes the implementation of environmental management action plans. These action plans would provide guidance on reducing the use and disposal of hazardous materials, implementing integrated pest management and landscape management practices that would reduce the use of hazardous chemicals and would increase the use of alternative chemicals and processes. Therefore, compliance with the

VA SSPP and the acquisition and/or maintenance of the appropriate permits from agencies (such as a Hazardous Material Registration, Hazardous Materials Certificate of Registration, and Large Quantity Generator permit for medical waste from the San Francisco Department of Public Health, Hazardous Materials Unified Program Agency (HMUPA) for the operation of Alternative 1 short-term projects would ensure that impacts associated with hazardous waste generation would be minor.

Article 5, Land Resources

Section 30240 Environmentally sensitive habitat areas; adjacent developments. (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas. (Amended by Ch. 285, Stats. 1991.)

Analysis and Comment: No creeks, wetlands, or open water bodies are located on or near the existing SFVAMC Fort Miley Campus. Habitat within the Campus is largely developed and consists of landscaped and planted trees; however, the areas along the northern, eastern, and western perimeters of the Campus property are less developed. The vegetation assemblages, observed on the property in 2008 and 2012 by AECOM staff, are primarily nonnative. Remnant coastal scrub habitat is present in the northern undeveloped area of the Campus. Serpentine-derived soils or outcrops, chaparral, coastal scrub, sand dunes, wetlands, and native grasslands have not been observed on the remainder of the Campus, although some of these habitats historically have existed on the Campus.

Section 30244 Archaeological or paleontological resources. Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

Analysis and Comment: The existing SFVAMC Fort Miley Campus is underlain by artificial fill, dune sand, and the geologic formation known as the Franciscan Assemblage. Because of the young age of the artificial fill and dune sand, and the way in which the Franciscan Assemblage was formed, they are considered to be of low paleontological sensitivity. Furthermore, the result of a records search at the University of California Museum of Paleontology (UCMP) indicated that no fossils have been recovered from areas beneath the Campus. Therefore, construction activities would have minor impact.

Archival research demonstrates that no prehistoric or historic-era archaeological sites, features, artifacts, or human remains have been documented within the existing SFVAMC Fort Miley Campus. Therefore, construction activities at the Campus would have no direct or indirect impact to presently documented archaeological resources and human remains.

If an inadvertent discovery of cultural materials (e.g., unusual amounts of shell, animal bone, bottle glass, ceramics, structure/building remains) or human remains was made during project-related construction activities, ground disturbances in the area of the find would be halted and a qualified professional archaeologist would be notified regarding the discovery. The archaeologist would determine whether the resource was potentially significant as per the National Register of Historic Places (NRHP) and would

develop appropriate mitigation. If human remains were encountered, the San Francisco County Coroner would be notified immediately on their discovery. If the Coroner determined that they were of Native American origin, the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) would apply **[EIS Mitigation Measure CR-1]**.

The Campus includes the SFVAMC Historic District and is adjacent to the Fort Miley Historic District. Implementing the LRDP would result in a direct adverse impact to the SFVAMC Historic District because of the incremental impairment of the integrity of materials, design, feeling, and setting of the Historic District that would result from buildout of all phases.

VA will ensure that any alteration or renovation of buildings that would occur in the SFVAMC Historic District would conform to the Secretary of the Interior's Standards for Rehabilitation to minimize any physical alterations to the buildings' structure and appearance that may compromise their integrity and status as an eligible resource. New construction that would alter the setting of the SFVAMC Historic District also would take the Secretary's Standards into consideration. Treatment or design guidelines for the SFVAMC Historic District may be necessary to ensure that these standards are customized to reflect the historical character of the Historic District. (This mitigation measure would be updated to reflect the consultation with State Historic Preservation Officer (SHPO) and consulting parties taking place under Section 106 of the National Historic Preservation Act of 1966 (NHPA) **[EIS Mitigation Measure CR-2]**). Adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties (Rehabilitation) to Reduce Impacts on the SFVAMC Historic District (implementation of **EIS Mitigation Measure CR-2**) would help reduce the severity of impacts of Alternative 1 short-term projects on the SFVAMC Historic District; however, the impact would remain adverse because project construction would still result in demolition of contributors and increased densification of the SFVAMC Historic District.

Article 6, Development

Section 30250: Location; existing developed area. (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

Analysis and Comment: The project would be located within the development footprint of the existing SCVAMC Fort Miley Campus, primarily on impervious sites (i.e., existing paved parking areas and buildings). The LRDP is consistent with this section.

Section 30251: Scenic and visual qualities. The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the

California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Analysis and Comment: The project would be located within the development footprint of the existing SCVAMC Fort Miley Campus, and none of the proposed structures would exceed the height of Building 2, which is the tallest existing building on the Campus.

Conventional BMPs related to screening of construction staging areas would be implemented during construction, to limit the frequency and prominence of views of construction equipment and materials. This would be a minor impact. Some of the structures proposed for Alternatives 1, 2, and 3 (Phase 1) would be located in relatively central areas of the Campus, which is not as visible from outside the Campus boundaries as areas along the perimeter. Buildings proposed in central portions of the Campus generally would not be visually dominant relative to existing buildings in that part of the Campus, because several of the existing structures are larger than the proposed structures. In addition, views of these new buildings from outside the Campus would be mostly screened from view by existing buildings, and/or would be set back sufficiently from the Campus boundaries to render them visually subordinate to other visible features. Therefore, buildings proposed for the central areas of the Campus would have a minor visual impact to views and would minimally affect the visual character of the Campus.

Buildings proposed as part of Phase 1 for both Alternatives 1, 2, and 3 for the eastern portion of the existing SFVAMC Fort Miley Campus would be intermittently visible in views from East Fort Miley. Although noticeable from GGNRA lands, the proposed new buildings in the eastern portion of the site would not be inconsistent with the character or scale of existing buildings in this area of the Campus, and they would be visible only intermittently through the heavy vegetation along the East Fort Miley and Campus boundary. New buildings proposed for the western portion of the Campus would not be visible from outside the Campus because they would be obscured by existing buildings, dense vegetation, or other landforms.

For Alternatives 1 and 2 (Phase 2), the massing of the proposed Clinical Addition Building (Building 213) would be visible from various publicly accessible locations on GGNRA lands north and east of the existing SFVAMC Fort Miley Campus, resulting in an alteration of the physical surroundings experienced by visitors to that area. Although this proposed multistory building would be visible to hikers from the trail along El Camino del Mar, the location is not a focal or prime destination for hikers; this is generally an area that people pass through on their way to more scenic GGNRA locations with more expansive views that include views of the Golden Gate Bridge and Marin Headlands. Most hiking trails are downslope of the Campus at a lower elevation and views of new buildings would only be noticeable from certain vantage points when the observer is looking upward toward the Campus. The proposed new building would be built with materials, colors, and massing that would be designed to fit with the context of existing buildings of the SFVAMC Fort Miley Campus, including the historic district, thereby minimizing its visual impact. In addition, vegetation currently screens portions of these views. Trees would be removed for construction associated with Buildings 24 and 203, and such tree removal; however, project implementation would result in the planting of trees along the perimeter of the Campus, which would further screen views of the proposed new buildings from the trail along El Camino del Mar and from more distant views such as those from the Marin Headlands and the Presidio. The effect of these proposed development changes to the Campus would be considered a minor impact.

Section 30252 Maintenance and enhancement of public access. The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Analysis and Comment: Based on the ridership totals, sufficient capacity would be available on transit services in the Geary Boulevard corridor (38 Geary, 38L Geary Limited, 38AX Geary "A" Express, and 38BX Geary "B" Express) to accommodate the transit demand of the project, which would generate the majority of its new ridership in the less-crowded "reverse commute" direction.

The project would improve sidewalks and walkways for pedestrians, and would provide improved connectivity across the Campus. Four major citywide bicycle routes consisting of Class I and Class III bikeways are situated in the vicinity of the existing SFVAMC Fort Miley Campus. Class I bicycle facilities are paved off-street paths, and Class III bicycle facilities are signed routes only, where bicyclists share travel lanes with vehicles. The expected increase in bicycle trips that would occur with implementation of the project would not be substantial enough to affect overall bicycle circulation in the area or the operations of adjacent bicycle facilities.

Parking demand generated by construction workers' personal vehicles is expected to be accommodated by existing parking facilities within the existing SFVAMC Fort Miley Campus. A valet parking system has been in place in the parking structures during construction and operation of the SFVAMC over the past couple of years which has assisted with overflow situations. Should parking constraints become an issue, a variety of measures are available at the disposal of SFVAMC and its contractors to minimize traffic and parking effects during construction activities, such as using a vanpool service to connect the construction site with transit stations and off-site parking facilities. For example, VA has leased offsite parking spaces through the NPS for limited temporary construction periods and provided shuttles to SFVAMC. Any offsite parking locations would be at existing parking lots and would not impact public access to parking or impact use of parklands or other adjacent land uses. Overall, construction-related parking demand would be short-term and temporary, and impacts would be minor.

Alternatives 1, 2, and 3 (Phase 1) would result in a long-term parking demand of an estimated 132 spaces during the weekday peak period. As part of Phase 1, 321 existing parking spaces would be eliminated and replaced by the construction of 627 new parking spaces as part of the proposed Emergency Operations Center, and Buildings 211 and 209 extensions, for a net addition of 306 spaces by the year 2020.

Alternatives 1 and 2 (Phase 2) would not include any additional parking facilities beyond the net addition of 306 spaces proposed under Phase 1. The net addition of 306 spaces would not meet the parking demand under Phase 2 conditions in 2027, for Alternative 1 or 2 Parking generally is not considered part of the permanent physical environment, with supply and demand highly variable and dependent on many different factors. The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit

services, taxis, bicycles, or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular would be consistent with the City of San Francisco's "Transit First" policy.

Operation of the project would result in new and additional medical and medical office space to accommodate existing medical needs. No permanent housing component is proposed; therefore, the area's population density would not be affected directly. However, Alternatives 1 and 2 would increase the number of personnel at the existing SFVAMC Fort Miley Campus by 642 (an 18 percent increase) between 2013 and 2020 and 616 (a 15 percent increase) between late 2020 and 2027. Some of these people might use adjacent Fort Miley within the GGNRA (e.g., personnel visiting a local park on their lunch breaks), but this additional usage is not expected to result in a substantial increase in demand for nearby recreational facilities. Furthermore, these employees would have lunch breaks at different times (because they would work various shifts), and only a fraction of daytime employees potentially would use park grounds for lunch or before or after work. The use of nearby recreational spaces by Campus employees is expected to be limited to weekday lunch hours, when resident usage may be lower than during the evening and weekend hours. Visitors and patients are not expected to use nearby parks because their visits to the Campus would be focused on healthcare services. Finally, because open space amenities would be provided as part of the project, access to on-site open space is expected to help offset any potential deterioration of nearby parks caused by Campus personnel, patients and visitors. For the reasons stated above, this impact would be minor.

Section 30253: Minimization of adverse impacts. New development shall do all of the following:

(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

(Amended by Ch. 179, Stats. 2008)

Analysis and Comment:

<u>Flood Hazard</u>

According to both the City and County of San Francisco's Interim Floodplain Maps and the Federal Emergency Management Agency's (FEMA) preliminary Flood Insurance Rate Map (FIRM), the existing SFVAMC Fort Miley Campus is not located within a flood hazard area. The elevation of the Campus ranges from 300 to 350 feet relative to mean sea level (msl), and the Campus is located approximately 1,000 feet (0.2 miles) from the nearest shoreline at its closest point. However, the total or peak runoff volume from the Campus could increase as a result of the project and would contribute to downstream flooding. The SFVAMC would be required to comply with Section 438 of the Energy Independence and Security Act (EISA) and implement LID techniques (e.g., bio-retention areas, permeable pavements, cisterns/recycling, and green

roofs) to mimic predevelopment stormwater runoff conditions by using site design techniques that would store, infiltrate, evaporate, and detain runoff. The SFVAMC also would be required to comply with Article 4.2 of the San Francisco Public Works Code, which requires submittal of a stormwater control plan that meets SFPUC guidelines. For compliance with Article 4.2, the stormwater runoff rate and volume from the portion of the project site that drains to the combined sewer would be required to decrease by 25 percent from the 2-year, 24-hour design storm. Submittal and implementation of final drainage plans would ensure proper sizing of infrastructure to handle stormwater and wastewater flows, to protect from downgradient flooding hazards that could affect the coastal zone **[EIS Mitigation Measure HYD-1]**.

Fire Hazard

Certain construction equipment, materials, and activities, such as welding, may increase the risk of fire on the SFVAMC Fort Miley Campus during construction of Alternative 1 short-term projects. This would be a potentially adverse impact. However, in accordance with VHA Specification Section 010000, "General Requirements," the construction contractor would be required to prepare a fire safety plan (prepared in accordance with Title 29 Code of Federal Regulations Part 1926) before the initiation of work. The plan would provide detailed, project-specific fire safety measures. In addition, all workers would be required to undergo a safety briefing, in accordance with Occupational Safety and Health Administration requirements. Compliance with the Fire Safety Plan and safety measures conveyed at the worker safety briefing would ensure that the potential impacts associated with fire during construction would be minor.

The SFVAMC Fort Miley Campus is located in an urbanized area with no or low wildland fire threat, according to the California Department of Forestry and Fire Protection. The project would operate on the Campus and would maintain existing urbanized land uses; therefore, the wildland fire threat would not increase.

General Hazard

Furthermore, to ensure public safety, the SFVAMC establishes and regularly updates hazards emergency protocols in its All-Hazards Emergency Operations Plan. This emergency operations plan identifies an organized process to initiate, manage, and recover from various types of emergencies that may potentially occur at the SFVAMC Fort Miley Campus. The plan also addresses emergency situations related to fire, hazardous materials/radiological/decontamination, utilities, bomb threats, behavioral emergencies, external emergencies, earthquakes, national disaster medical systems, VA/U.S. Department of Defense contingency hospitals, the national response framework, medical equipment, an infectious diseases/pandemic influx, a 96-hour plan, and medical surges. This emergency operations plan also includes detailed emergency operations procedures for staff and departmental response and communication, recovery procedures, communication procedures, resource and asset management, and security and safety operations. Through continued compliance with the SFVAMC's All-Hazards Emergency Operations Plan at the Campus, impacts associated with hazards and public safety would be minor.

Geologic Hazard

The San Francisco Bay Area is located in a seismically active region. The SFVAMC Fort Miley Campus lies within a region of active faulting and high seismicity, associated with the San Andreas Fault system. The San

Andreas Fault lies approximately 3.5 miles southwest of the Campus at its closest point. Several other active and potentially active faults occur within the project limits: the San Gregorio, Hayward, Point Reyes, Rodgers Creek, Calaveras, and others. The majority of Campus structures are more than 75 years old. Alternatives 1, 2, and 3 (Phase 1) projects, as well as Alternative 2 (Phase 2) projects, would involve seismic, structural, mechanical, and electrical reconstruction activities that would have a long-term beneficial effect on public safety by structurally stabilizing deteriorating buildings and infrastructure.

The SFVAMC Fort Miley Campus is not located within an area that is mapped as a liquefaction hazard zone. Lateral spreading is unlikely because no liquefaction hazard is present at the Campus. The Campus is not located within a designated landslide hazard zone, and no evidence of landslides was observed during a previous investigation.

An engineering geologic hazards (geotechnical investigation) and site-specific ground response report would be required for the Critical and Essential Facilities proposed as part of the project. Consequently, design and construction of the proposed facilities would address seismically induced ground shaking and associated ground failure, through engineering and design recommendations for the proposed facilities. Furthermore, a geotechnical contractor would review the project plans and specifications before construction, to check their conformance with the recommendations of the geotechnical reports. Therefore, because the facilities would be designed and constructed to meet VA's seismic design requirements, operation of the facilities constructed as part of the project would result in a minor impact related to seismically induced ground shaking and associated ground failure.

Native soil on the existing SFVAMC Fort Miley Campus has been found to be moderately to highly expansive. Consequently, design and construction of the proposed facilities would address any potential expansive or corrosive soils, through engineering and design recommendations for the proposed facilities. Furthermore, a geotechnical contractor would review the project plans and specifications before construction to check their conformance with the recommendations of geotechnical reports. Therefore, a minor impact related to expansive or corrosive soils would result from facility operation.

To minimize potential erosion and associated water quality degradation during construction, the SFVAMC would be required to comply with Article 4.1 of the San Francisco Public Works Code, which regulates the quantity and quality of discharges to the combined sewer system. These requirements include controlling sediments and erosion and implementing BMPs for construction materials and waste management and handling. In addition, a SWPPP would be prepared to reduce pollution of surface water throughout the project's construction period. The SWPPP would include specific and detailed BMPs, designed to reduce the amount of sediment and other construction-related pollutants in discharges associated with construction activities.

For the northern portion of the site, which drains to a separate storm system, the SFVAMC would obtain coverage under the Construction General Permit (SWRCB Order 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ), which requires the development and implementation of a SWPPP.

Potential construction impacts also would be minimized by implementing the requirements for protection of land resources, outlined in VA Specification Section 015719, "Temporary Environmental Controls." These include requirements such as setting work area limits, protecting the landscape, reducing exposure of

unprotected soils, protecting disturbed areas, installing erosion and sediment-control devices, managing spoil areas, and following good housekeeping procedures.

(c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.

Based on modeling performed by AECOM (2014), direct, short-term, construction-related emissions of criteria pollutants would be substantially less than the significance thresholds, and the direct impact to regional air quality would be minor. In an effort to reduce the effects of construction at VA facilities on the environment, VA requires that temporary environmental controls be employed during construction activities and enumerated as part of construction specifications (VA Specification Section 015719). These controls typically include actions related to the control of air pollutant emissions. Based on additional modeling performed by AECOM (2014), toxic air contaminants (TACs) and particulate matter ($PM_{2.5}$) emissions generated during construction would result in a minor direct impact with respect to health risks and no indirect impacts would occur.

Asbestos and lead-based paint are expected to be present in each of the structures to be demolished, and they would be abated per VA Specification Sections 028333.13, “Lead-Based Paint Removal and Disposal,” and 028213.41, “Asbestos Abatement for Total Demolition Projects.”

Short-term area- and mobile-source emissions were modeled using CalEEMod (AECOM, 2014), and short-term operational emissions of criteria pollutants would be substantially lower than the de minimis thresholds. Therefore, the direct impact to regional air quality of operational emissions of criteria pollutants would be minor.

Implementation of the project would not increase short-term (2020) traffic volumes in the vicinity of the existing SFVAMC Fort Miley Campus to 44,000 vehicles per hour, the carbon monoxide (CO) hotspot screening level that has been recommended by Bay Area Air Quality Management District (BAAQMD) and that evaluates a project’s relative level of compliance with national ambient air quality standards (NAAQS)and California ambient air quality standards (CAAQS), and no horizontal or vertical restrictions exist in the area that would trap CO and limit mixing. Therefore, receptors in the vicinity of the project would not be directly adversely affected by operation of the project. Impacts from localized CO emissions would be minor.

The Campus is not located near any high-volume roadways (i.e., 100,000 vehicles per day within a 150-meter radius if the SFVAMC site), and daily delivery truck trips to the Campus average approximately two per day. This number could potentially increase in the near term, relative to current conditions, but not substantially. Therefore, localized TAC and PM emissions from both on-site and off-site mobile sources would not directly adversely affect sensitive receptors either on-site (patients) or off-site (residents).

No permitted sources of TACs operate near the existing SFVAMC Fort Miley Campus, outside of the Campus itself. It is unknown whether the project would include any new permitted sources of TACs, such as incinerators, fume hoods, sterilizers, or backup diesel generators, but such a source would require a permit and best available control technology for toxics (T-BACT) to ensure that the patients and the neighboring community would not be adversely affected. Therefore, the operational impacts of TAC and $PM_{2.5}$ emissions from stationary sources would not adversely affect sensitive receptors. Impacts would be minor.

(d) Minimize energy consumption and vehicle miles traveled.

Although the project would involve expanding the existing SFVAMC Fort Miley Campus, the overall energy efficiency likely would improve with the decommissioning, demolition, and replacement of older, energy-intensive buildings. Consistent with the VA SSPP, SFVAMC would incorporate physical features and operational measures that would sustain and improve environmental efficiencies through a sustainable design master plan, to achieve a 30 percent reduction in greenhouse gas emissions by 2020. The improvements in the Sustainable Design Master Plan would include consideration of stand-alone technologies, such as installing photovoltaic panels on the roofs of new and/or existing buildings, as partial shades over windows or in open land areas as a method of providing building electrical power on-site.

The SFVAMC Fort Miley Campus currently contracts with a major transportation service to provide free bus and shuttle service to staff and patients daily. The service operates between the Campus and major transportation hubs in San Francisco, from 5:00 a.m. to 9:00 a.m. and again from 2:30 p.m. to 6:30 p.m. More than 200 staff and patients utilize this service daily. In addition, San Francisco Municipal Transportation Agency (SFMTA or Muni) Lines 38-Geary, 38L-Geary Limited, and 38AX-Geary A Express operate in the vicinity of the Campus. The Campus would continue to experience multimodal access and circulation, including passenger vehicles, buses, shuttle vans, delivery vehicles, emergency medical and fire vehicles, and pedestrians. Therefore, a reduction would occur in vehicle miles traveled.

Section 30254: Public works facilities. New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

Analysis and Comment: Implementation of the LRDP would not require an expansion of the existing water utility system for water treatment or wastewater treatment. The VA SSPP establishes water conservation goals for VA facilities to be achieved by 2020. Specifically, the VA SSPP states that VA facilities have a potable-water reduction target of 26 percent by 2020, as compared to the base year (2007), and an industrial and landscaping water use reduction target of 20 percent by 2020, as compared to the base year (2010). SFVAMC has committed to a 30 percent reduction target that exceeds the goal established in the VA SSPP. The estimated increase in water demand and wastewater generation with implementation of the project would not require expansion of water treatment facilities. In addition, the SFPUC has confirmed that the growth projections used in the SFPUC's 2010 Urban Water Management Plan (UWMP) included implementation of the project; regardless of whether the SFVAMC implements the VA SSPP's reduction target, SFPUC would be able to accommodate the project water demands.

Several utility lines serving the existing SFVAMC Fort Miley Campus are located within the footprint of the project components. These lines would be relocated as necessary before construction of the project components, to prevent interruption of service during construction. To accomplish this, project engineers

would prepare and implement a plan to provide alternate service to these buildings before demolition and during construction. Utilities to be relocated would include domestic water, fire suppression water, and combined storm/sanitary sewer lines, underground electric, natural gas, and compressed air lines.

Although the project would expand the existing SFVAMC Fort Miley Campus, the overall energy efficiency likely would improve with the decommissioning, demolition, and replacement of older, energy-intensive buildings. Consistent with the VA SSPP, as stated above, SFVAMC would incorporate physical features and operational measures that would sustain and improve environmental efficiencies through a sustainable design master plan, to achieve a 15 percent reduction in greenhouse gas emissions by 2015 (29.6 percent reduction by 2020). Existing electricity and natural gas infrastructure capacity is considered adequate to accommodate the anticipated demand at the Campus. Should on-site improvements and connections be required, such improvements would be coordinated with PG&E during the continued planning of the project components, so that the construction and operation of new electric and natural gas distribution lines would be completed in compliance with federal, State, and local regulatory requirements, minimizing the potential for adverse impacts.

Section 30254.5: Terms or conditions on sewage treatment plant development; prohibition. Notwithstanding any other provision of law, the commission may not impose any term or condition on the development of any sewage treatment plant which is applicable to any future development that the commission finds can be accommodated by that plant consistent with this division. Nothing in this section modifies the provisions and requirements of Sections 30254 and 30412. (Added by Ch. 978, Stats. 1984.)

Analysis and Comment: Implementation of the LRDP would not require an expansion of existing wastewater treatment facilities at the Oceanside Water Pollution Control Plant or construction of a new wastewater treatment plant. The SFVAMC Fort Miley Campus is located within the service area of the City of San Francisco's combined sewer system; therefore, both domestic wastewater and stormwater flow into the sewers. The sanitary sewer system at the Campus collects and conveys wastewater from building lateral connections to the site's combined sewer system and eventually to SFPUC's combined sewer interceptor on Clement Street. This method of discharge generally would continue with implementation of the project. Stormwater design would incorporate LID techniques to maintain the site's predevelopment stormwater discharge rates and volumes by using design techniques that would infiltrate, filter, store, evaporate, and detain runoff close to the source, such as green roofs and bioswales, as well as energy dissipaters to prevent concentrated flows. Landscaping and LID practices would be incorporated as part of building design and would provide improved ground/soil absorption of runoff. The use of energy dissipaters to prevent concentrated flows also would minimize the impact of stormwater flows.

The VA SSPP establishes water conservation goals for VA facilities to be achieved by 2020. Specifically, the VA SSPP states that VA facilities have a potable-water reduction target of 26 percent by 2020, as compared to the base year (2007), and an industrial and landscaping water use reduction target of 20 percent by 2020, as compared to the base year (2010). SFVAMC has committed to a 30 percent reduction target that exceeds the goal established in the VA SSPP. The estimated increase in water demand and associated wastewater generation with implementation of the project would not require expansion of wastewater treatment facilities.

Section 30255: Priority of coastal-dependent developments. Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-

dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support. (Amended by Ch. 1090, Stats. 1979.)

Analysis and Comment: The SFVAMC Fort Miley Campus is located adjacent to the Point Lobos bluff at an elevation of 300 to 350 feet relative to msl. The land to the north and west of the site drops sharply downward toward the Pacific Ocean, while the terrain to the east slopes more gently. However, the Campus is not located on the shoreline; the Campus is approximately 1,000 feet (0.2 miles) from the nearest shoreline at its closest point. The Campus has been at its present location since 1934, and the project would be constructed on its existing 29 acres, within a reasonable location adjacent to the same type of medical uses. This location allows patients and visitors to enjoy the views and vistas of the Pacific Ocean and portions of the City that support the healing process.