3.3 COMMUNITY SERVICES

This section describes the existing physical affected environment and regulatory framework related to fire protection/emergency medical services, law enforcement services, and parks and recreation and discusses the potential effects of the EIS Alternatives related to these community services.

3.3.1 Affected Environment

This section describes law enforcement, fire protection, and parks/recreational conditions in the immediate vicinity of the existing SFVAMC Fort Miley Campus and in the Mission Bay area of San Francisco. Other public services, including solid waste disposal, are discussed in Section 3.12, “Solid and Hazardous Materials.”

Fire Protection Services and Emergency Medical Services

The San Francisco Fire Department (SFFD) provides fire suppression services and emergency medical services throughout San Francisco. SFFD operates out of 44 fire stations and is headquartered at 698 Second Street in the South of Market (SOMA) neighborhood. SFFD operates 42 engines, 19 trucks, multiple ambulances, two heavy-rescue squads, two fireboats, and multiple special-purpose units. Emergency response operations include fire suppression, tactical rescues, emergency medical care, fire prevention, arson investigations, responses to natural disasters, responses to mass-casualty and hazardous-materials incidents, and fire and emergency medical services (EMS) dispatch supervision. SFFD has a current staff of 1,571 uniformed members and 64 civilians. The daily operational strength is approximately 412 staff members (Schultheis, pers. comm., 2011). Based on San Francisco’s estimated 2010 population of 856,095 residents (CDF, 2010), SFFD’s staffing levels on a per-capita basis are 1.9 staff members per 1,000 residents.

SFFD has three divisions: the Airport Division (serving San Francisco International Airport) and Divisions 2 and 3 (serving the rest of San Francisco). Division 2 is divided into four battalions and extends from downtown San Francisco and the Financial District to the city’s northwestern boundaries. Division 3 is divided into five battalions that serve an area extending from the SOMA neighborhood to the southwestern city limits. The roles and responsibilities of the members of Divisions 2 and 3 are to establish command and control at emergency scenes, conduct fire suppression activities, provide emergency medical services, manage disaster operations, mitigate the effects of hazardous-materials spills, respond to incidents involving weapons of mass destruction, and effectively and rapidly bring closure to mass-casualty incidents. Fire prevention responsibilities consist of preplanning and inspections of buildings, fire protection devices, and water supplies. San Francisco ensures fire safety and emergency accessibility in new and existing developments through provisions of its building and fire codes (CCSF, 2010).

Existing SFVAMC Fort Miley Campus

SFFD responds to fire, EMS, and other emergency calls at the existing SFVAMC Fort Miley Campus. The Campus is located within the Division 2 service area in San Francisco’s outer Richmond District neighborhood. The Campus is in the first alarm area for the following stations: Station 34 (Battalion 7), Station 14 (Battalion 7), and Station 23 (Battalion 8). Station 34 is the nearest fire station located at 499 41st Avenue, approximately 0.3

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1 The first alarm is the geographic area in which a station is responsible for arriving first in case of an emergency call.
mile southeast of the Campus. Station 34 houses an engine company that is staffed by one officer (a lieutenant or captain) and three firefighters, all of whom are qualified as emergency medical technicians (EMTs). Station 14, located at 551 26th Avenue, is 1.2 miles southeast of the Campus and houses one fire engine and one truck. Staffing includes two officers and seven firefighters for a total of nine staff members, all of whom are EMT qualified. Station 23, located at 1348 45th Avenue, is located approximately 2.1 miles south of the Campus and houses an engine company that is staffed by one officer (a lieutenant or captain) and three firefighters. All three firefighters are EMT qualified.

If additional fire resources are necessary, Station 31, located at 441 12th Avenue, would also be dispatched to the existing SFVAMC Fort Miley Campus. Station 31 (Battalion 7) is situated approximately 2 miles east of the Campus and houses an engine company. Staffing includes one officer and three firefighters as well as a rescue captain (paramedic supervisor) and a battalion chief (Schultheis, pers. comm., 2011).

SFFD also transports clinically stable patients to the existing SFVAMC Fort Miley Campus upon request (Myers, pers. comm., 2011). The primary entrance for emergency medical vehicles is at the intersection of 42nd Avenue and Clement Street. Patients are delivered to the west side of Building 200 (the Ambulatory Care Center) via an internal Campus roadway, Fort Miley Circle (VA, 2012). The Campus is a primary and specialty acute-care center that provides limited emergency medical service because it lacks of a fully licensed emergency room. The Campus does not receive a high number of ambulance transports (compared to the other hospitals in San Francisco) and most are not considered life-threatening emergencies (Myers, pers. comm., 2011). According to SFFD, the Campus received 756 transports in 2010 and 561 transports in 2009. Annually, SFFD can expect to have an average of 650 transports to the Campus (Schultheis, pers. comm., 2011).

According to the Association of Bay Area Governments (ABAG), the existing SFVAMC Fort Miley Campus is not designated as a “Community at Risk” because it is an urbanized area; therefore, the Campus is not considered susceptible to wildland fires (ABAG, 2011a). In addition, the California Department of Forestry and Fire Protection ranked the Campus as having “little to no threat” of fire susceptibility, based on expected fire behavior and according to site-specific topography and vegetation (ABAG, 2011b). Furthermore, the California Department of Forestry and Fire Protection has no record of any wildfire in San Francisco (CCSF, 2009).

**Mission Bay Area**

Three SFFD stations operate in the Mission Bay area of San Francisco (see Figure 2-3 in Chapter 2.0, “Alternatives”). All three stations are located within the Division 3 service area, which extends from the SOMA neighborhood to the southwestern city limits.

Station 8 (Battalion 3) is located in SOMA at 36 Bluxome Street and houses one fire engine and one truck. Staffing includes a battalion chief, two officers, and seven firefighters, all of whom are EMT qualified. Station 29 (Battalion 2) is located in SOMA at 299 Vermont Street and houses one engine company. Staffing includes one officer and three firefighters, all of whom are EMT qualified. Station 37 (Battalion 10) is located in the Potrero Hill neighborhood at 798 Wisconsin Street and houses one engine company. Staffing includes one officer and three firefighters, all of whom are EMT qualified (Schultheis, pers. comm., 2011).

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2 On any given day one of the EMT qualified personnel may be a paramedic (Schultheis, pers. comm., 2011).
A new station is planned to be incorporated into the Public Safety Building at Third Street and Mission Rock, with construction tentatively scheduled to begin in 2012 (Schultheis, pers. comm., 2011).

According to ABAG, the Mission Bay area is designated as an urbanized area; therefore, this area is not considered susceptible to wildland fires (ABAG, 2011a). In addition, the California Department of Forestry and Fire Protection ranked the area as having “little to no threat” of fire susceptibility, based on expected fire behavior and according to site-specific topography and vegetation (ABAG, 2011b).

**Fire Water Needs and Fire Truck Access**

The San Francisco Water Department supplies water for the city’s domestic and industrial water needs and for fire service. Fire service requirements include not only the water supplied to SFFD’s low-pressure hydrants but also the water supplied to the storage reservoir and tanks of SFFD’s high-pressure system. This system, also known as the Auxiliary Water Supply System, is a separate and distinct water supply for fire protection use only. The system was built in response to the 1906 earthquake and fire, solely for the purpose of firefighting, and has special features designed to protect the city in emergency situations. Additionally, a separate backup water supply is provided in the form of underground cisterns strategically located throughout San Francisco. SFFD’s cistern system consists of 172 cisterns with a total storage capacity of approximately 11 million gallons (CCSF, 2010).

SFFD has established required minimum street widths to facilitate access by emergency equipment. The San Francisco Fire Code requires a minimum of 20 feet of unobstructed roadway and a vertical clearance of no less than 13.5 feet, and specifies that a turnaround area of at least 80 feet and a 40-foot radius are sufficient for dead-end fire access roads exceeding 150 feet. All site improvements must meet the minimum requirements for fire access stipulated in the San Francisco Fire Code and required by SFFD (SFFD, 2011a).

**Existing SFVAMC Fort Miley Campus**

The domestic and fire water needs of the existing SFVAMC Fort Miley Campus are served by a common water system. The system consists of a 500,000-gallon reservoir located in Building 29; a primary pump (P-1), secondary pump (P-2), and fire pump (P-3) located in Building 30 (pump station); and a 40,000-gallon water tower (Building 206). The reservoir is fed from the City’s water distribution system through primary and secondary connection points located on Clement Street. From the reservoir, the primary and secondary pumps (P-1 and P-2) pressurize the Campus’s loop water system and feed the water tower. The water tower back-feeds the distribution system when the pumps are not running (SFVAMC, 2010).

Annex H of the 2009 National Fire Protection Association Fire Code provides the required minimum fire flow rate and duration for all new buildings or building upgrades. These requirements are based on the type of building construction and the total building area in square feet. The minimum required fire flow for any building type or size is 1,500 gallons per minute for a minimum of 2 hours, with a minimum system residual pressure of no less than 20 pounds per square inch. A reduction in the required fire flow rate of up to 75 percent, as approved by the local fire chief, and not less than 1,000 gallons per minute is allowed if each new building is equipped with an approved automatic sprinkler system installed in accordance with the applicable building and fire code requirements (Kennedy, pers. comm., 2011).
Winzler & Kelly conducted a series of fire hydrant flow tests to determine the fire flow capacity of several existing hydrants at various locations on the existing SFVAMC Fort Miley Campus. The Campus’s existing water distribution system was also analyzed as part of a separate project to evaluate whether the system can provide sufficient fire flow to the Campus during a fire emergency. The Campus’s existing fire flow system has sufficient capacity to meet NFPA Fire Code requirements (Kennedy, pers. comm., 2011).

Fire access is provided to each building on the existing SFVAMC Fort Miley Campus via Fort Miley Circle and Veterans Drive, which together form an access loop around the perimeter and through the center of the Campus. Emergency fire apparatus and related vehicles use the 42nd Avenue or 43rd Avenue entrance to the Campus. Although the Campus provides limited emergency medical service, Building 200 is the Ambulatory Care Center and the current destination of emergency medical vehicles to the Campus. Patients are delivered to the west side of Building 200 via Fort Miley Circle. The primary entrance for emergency medical vehicles is at the intersection of 42nd Avenue and Clement Street (SFVAMC, 2010).

### Emergency Response Times

SFFD is a permitted ambulance provider in San Francisco providing EMS care for the full spectrum of medical emergencies. The department follows the local ambulance ordinance and adheres to the policies and protocols for pre-hospital care set by the San Francisco Emergency Medical Services Agency. SFFD responds to an average of more than 73,000 EMS calls per year (more than 200 per day) and, as of 2010, provided about 80 percent of the ambulance response in San Francisco (SFFD, 2011b).

To bring a higher level of care to patients more quickly, SFFD implemented a reconfiguration of ambulance deployment in 2004. As part of the reconfiguration, ambulances were moved to geographically relevant locations, and ambulance scheduling was adjusted to accommodate the busiest times of day. The new deployment, which was completed in 2009, benefited SFFD by providing flexibility of scheduling, increased efficiency, and improved response times, creating a more mobile response force to cover its service area. SFFD is working closely with the San Francisco Department of Emergency Management to explore new ways to further reduce response times and improve efficiency (SFFD, 2011b).

According to SFFD, any single-alarm response brings the four closest available fire engines, the two closest available fire trucks, and the closest available heavy-rescue squad. Each vehicle is typically staffed by at least one officer and three to four firefighters. Some of the firefighters may be licensed paramedics, but that is not always the case. An ambulance carrying two paramedics and one paramedic rescue captain would also be dispatched to the scene. This response scenario is the initial dispatch (first response) to any confirmed working fire, regardless of the size of the fire. If the magnitude of the fire is found to require more resources, a second-alarm response (i.e., more fire trucks and/or engines) would be dispatched to the scene, as would be the case in a high-rise building. The responding units are from the nearest and available stations (assuming that all engines and trucks are available and not responding to calls somewhere else). Considering the fact that four engines respond to a fire, a minimum of four stations would receive a dispatch for a single fire incident. Chief officers from various stations may be dispatched as well.

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3 A single-alarm response is defined as the initial response to a confirmed working fire or reports of smoke.
Existing SFVAMC Fort Miley Campus

All emergency (911) and nonemergency calls for police, fire, and medical services are received by San Francisco’s Emergency Communications Dispatch Center located at 1011 Turk Street. The 911 dispatch center receives approximately 2,500 calls per day; of these calls, 80 percent require police services, 14 percent involve EMS, and the remaining 6 percent require fire protection (CCSF, 2010). Based on this information, the dispatch center receives approximately 912,500 calls per year, of which 182,500 are related to EMS or fire.

Table 3.3-1 provides a breakdown of the annual number of calls according to service type (fire or EMS) during the time frame from 2006 to 2010. According to SFFD personnel, SFFD can expect to respond to calls at the Campus an average of 50 times per year, with 55 percent expected to be EMS-related responses and 45 percent expected to be fire-related responses (Schultheis, pers. comm., 2011). Given that SFFD annually responds to 182,500 calls per year, the estimated 50 calls for service at the Campus represent less than 0.01 percent of the total call volume for EMS or fire services in San Francisco.

Table 3.3-1: San Francisco Fire Department Responses to the Existing SFVAMC Fort Miley Campus

<table>
<thead>
<tr>
<th>Year</th>
<th>Fire</th>
<th>EMS</th>
<th>Total</th>
<th>% Fire</th>
<th>% EMS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006</td>
<td>25</td>
<td>8</td>
<td>33</td>
<td>75.76%</td>
<td>24.24%</td>
</tr>
<tr>
<td>2007</td>
<td>20</td>
<td>19</td>
<td>39</td>
<td>51.28%</td>
<td>48.72%</td>
</tr>
<tr>
<td>2008</td>
<td>26</td>
<td>26</td>
<td>52</td>
<td>50%</td>
<td>50%</td>
</tr>
<tr>
<td>2009</td>
<td>18</td>
<td>27</td>
<td>45</td>
<td>40%</td>
<td>60%</td>
</tr>
<tr>
<td>2010</td>
<td>23</td>
<td>29</td>
<td>52</td>
<td>44.23%</td>
<td>55.77%</td>
</tr>
</tbody>
</table>

Note: EMS = emergency medical services
Source: Schultheis, pers. comm., 2011

San Francisco’s objective is to get professional help to the scene of high-priority medical emergencies within 6.5 minutes of receiving a 911 call, 90 percent of the time. The 6.5-minute goal includes 2 minutes for dispatch and 4.5 minutes for the fire engine or ambulance to arrive at the curb. This standard was adopted in 2004 by the San Francisco Emergency Medical Services Agency under the Department of Public Health. The State’s goal for emergency response to a high-priority call in an urban area is 5 minutes (CCSF, 2010). According to SFFD personnel, the department’s average response time is 3 minutes and 23 seconds for all emergency calls, which indicates that SFFD is exceeding both the City and State standards (Schultheis, pers. comm., 2011). The two closest stations to the Campus (Stations 34 and 14) also have superior average response times. Table 3.3-2 displays the average response times per station and SFFD as a whole.

Mission Bay Area

As mentioned earlier, SFFD’s average response time of 3 minutes and 23 seconds for all emergency calls surpasses both the City and State standards (Schultheis, pers. comm., 2011). All three stations located within the Mission Bay area also have superior average response times. Table 3.3-3 presents a breakdown of average response times per station in the Mission Bay area.
### Table 3.3-2: San Francisco Fire Department Average Response Times for All Emergency Calls: Existing SFVAMC Fort Miley Campus

<table>
<thead>
<tr>
<th>SFFD Station</th>
<th>Destination</th>
<th>Average Response Time (minutes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Station 34</td>
<td>499 41st Avenue</td>
<td>3:47</td>
</tr>
<tr>
<td></td>
<td>SFVAMC Fort Miley Campus</td>
<td></td>
</tr>
<tr>
<td>Station 14</td>
<td>551 26th Avenue</td>
<td>3:32</td>
</tr>
<tr>
<td></td>
<td>4150 Clement Street</td>
<td></td>
</tr>
<tr>
<td>All SFFD stations</td>
<td>Citywide</td>
<td>3:23</td>
</tr>
</tbody>
</table>

Notes: SFFD = San Francisco Fire Department; SFVAMC = San Francisco Veterans Affairs Medical Center

Average response times were not provided for Stations 23 and 31

Source: Schultheis, pers. comm., 2011

### Table 3.3-3: San Francisco Fire Department Average Response Times for All Emergency Calls: Mission Bay Area

<table>
<thead>
<tr>
<th>SFFD Station</th>
<th>Destination</th>
<th>Average Response Time (in minutes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Station 8</td>
<td>36 Bluxome Street</td>
<td>3:35</td>
</tr>
<tr>
<td></td>
<td>Mission Bay Area</td>
<td></td>
</tr>
<tr>
<td>Station 29</td>
<td>299 Vermont Street</td>
<td>3:26</td>
</tr>
<tr>
<td></td>
<td>All SFFD stations Citywide</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Citywide</td>
<td>3:23</td>
</tr>
</tbody>
</table>

Note: SFFD = San Francisco Fire Department

Source: Schultheis, pers. comm., 2011

### Law Enforcement Services

VA Police is the police service at the existing SFVAMC Fort Miley Campus. As a federal entity, VA Police operates under the Office of Security and Law Enforcement (OS&LE). The OS&LE provides national oversight and direct support in the areas of physical security and law enforcement to individual VA Police services at each location throughout the United States. In addition to OS&LE upper-level management and specialty positions, there are standardized rank positions established within each VA Police service at the local level. VA Police services are empowered by statute to exercise federal authority for offenses occurring on property owned by VA (SFVA Police 2011a and b). According to VA Police personnel, there is a mutual-aid agreement with the San Francisco Police Department (SFPD) for nonroutine police matters, such as traffic control and parking enforcement (Baczek, pers. comm., 2011). The mutual-aid agreement articulates a reciprocal relationship where each party helps one another when needed (Baczek, pers. comm., 2011).

SFPD provides police protection services to San Francisco. SFPD operates out of 10 district stations and is headquartered at 850 Bryant Street, in the SOMA neighborhood. There are a total of 2,242 sworn members and 412 civilian members in SFPD (SFPD, 2011a). Based on San Francisco’s estimated 2010 population of 856,095
residents (CDF, 2010), SFPD’s staffing levels on a per-capita basis are 3.1 staff members per 1,000 residents. Authorized staffing at each district station includes one captain, four lieutenants, and 16 sergeants. The number of active patrol units varies from day to day from one station to another (SFPD, 2011a). SFPD has mutual-aid agreements with all government law enforcement agencies that border the City and County of San Francisco (SFPD, 2011a).

In the performance measures for SFPD set out as part of the City’s 2008–2009 budget plan, the department established target response times for 2008–2009. All calls are prioritized into three categories—A, B, and C—with Type A calls reflecting those of highest priority. Priority A calls are defined as “life-threatening emergencies,” otherwise known as Code 3 calls, and include situations such as a homicide or an officer down. Priority B calls are defined as involving “potential for harm to life and/or property” but are not considered emergency situations, and include violations such as a burglary. Priority C calls, the lowest priority, are categorized as “crime committed with no threat to life or property/suspect left crime scene” and typically consist of quality-of-life violations, found property, or an auto burglary with no suspect (CCSF, 2010).

Target response times are 4.4 minutes for Priority A calls, 8.3 minutes for Priority B calls, and 10.8 minutes for Priority C calls. In 2007, the SFPD met the 2008–2009 target response times for Priority A and C calls, but failed to meet the Priority B target response time of 8.3 minutes (CCSF, 2010).

Existing SFVAMC Fort Miley Campus

VA maintains a police force, which is responsible for the protection and safety of the Veterans, staff, and visitors who use the existing SFVAMC Fort Miley Campus. The SFVAMC police force consists of 22 VA Police officers (Baczek, pers. comm., 2011). The police officers provide 24-hour patrols of the facility and parking lots; their duties include responding to suspicious or criminal activity, vehicle accidents, and personal property losses on the facility grounds (SFVA Police, 2011b). The area directly south of the existing SFVAMC Fort Miley Campus is patrolled by SFPD’s Richmond Police District Station. The Richmond Police District Station is within SFPD’s Golden Gate Division and employs a total of 98 sworn officers. Located at 461 Sixth Avenue, the Richmond District Station is approximately 2.4 miles southeast of the Campus (SFPD, 2011a).

Although property owned by VA is considered federal property and outside the jurisdiction of SFPD, SFPD may provide backup support in the event of an emergency.

Mission Bay Area

SFPD provides police protection services throughout San Francisco, including the Mission Bay area. The Mission Bay area is currently patrolled by SFPD’s Southern and Bayview Police District Stations. As explained above, VA Police is responsible for providing law enforcement and security services to Veterans, visitors, and staff on department facilities and grounds. Thus, any VA-owned medical center facility in this area would be under the jurisdiction of VA Police and not the local SFPD.

Parks and Recreation

The City and County of San Francisco has approximately 5,848 acres of land permanently dedicated to publicly accessible park and recreational uses. These lands are under the jurisdiction of the San Francisco Recreation and
Park Department (SFRPD), the State of California, the National Park Service (NPS), and local agencies. SFRPD owns and manages approximately 3,433 acres of that total, including more than 200 parks, playgrounds, and open spaces. System recreation facilities also include 15 recreation centers, nine swimming pools, five golf courses, and more than 300 athletic fields, tennis courts, baseball diamonds, and basketball courts. The State of California owns approximately 255 acres at Candlestick Point State Recreation Area and Mount Sutro, and the federal government owns approximately 1,600 acres, including portions of the Presidio and the Golden Gate National Recreation Area (GGNRA), managed by NPS. The remaining 560 acres of publicly accessible lands are under the jurisdiction of local agencies other than SFRPD (e.g., Port of San Francisco, San Francisco Public Utilities Commission, San Francisco Redevelopment Agency, San Francisco Department of Public Works, and San Francisco Unified School District). These spaces include shoreline access, reservoirs, schoolyards open during nonschool hours, college campuses, urban plazas, alleys, and undeveloped street rights-of-way (CCSF, 2010).

The National Park and Recreation Association (NPRA) formerly required 10 acres of open space per 1,000 city residents. However, the NPRA no longer recommends a single absolute “average” park acreage per population, in recognition of the fact that it is more relevant for each area plan and its program facilities to be based on community need. More important than acreage is accessibility (location and walking distance) and whether the facility provides needed services to the population in question. Based on San Francisco’s estimated 2008 household population (856,095 persons) (CDF, 2010), the 5,848 acres of parkland result in approximately 6.8 acres per 1,000 residents, somewhat less than the former NPRA standard.

The City has not established a citywide target ratio of parkland to residents, nor has it adopted a Quimby Act ordinance requiring land dedications or in-lieu fees, because San Francisco’s population density, small land mass, and other development constraints make such policies infeasible. However, revisions to the San Francisco General Plan (City General Plan) Recreation and Open Space Element (May 2009 draft) do not state a baseline standard to be maintained. The focus of the updated Recreation and Open Space Element is on developing existing open space into high-performing open spaces that better serve neighborhood residents, improving access to open space, and prioritizing open space acquisitions and improvements in high-need areas. Furthermore, the updated Recreation and Open Space Element states that publicly owned open spaces make up almost 20 percent of the city’s total land area, making San Francisco among the top five cities in the nation in terms of parkland per resident (SF Planning, 2009).

Existing SFVAMC Fort Miley Campus

Recreational resources within 0.5 mile of the existing SFVAMC Fort Miley Campus are discussed below. A 0.5-mile radius to recreational resources was defined because the City General Plan specifies that this is an acceptable walking distance (an approximately 10-minute walk) for City-serving open spaces (CCSF, 2010). As listed in Table 3.3-4, two GGNRA facilities and one SFRPD facility are located within 0.5 mile of the SFVAMC Fort Miley Campus.
### Table 3.3-4: Parks and Related Facilities within 0.5 Mile of the SFVAMC Fort Miley Campus

<table>
<thead>
<tr>
<th>Facility</th>
<th>Park Acres</th>
<th>Ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lands End</td>
<td>110</td>
<td>NPS/GGNRA</td>
</tr>
<tr>
<td>East and West Fort Miley (excluding SFVAMC Campus)</td>
<td>24.82</td>
<td>NPS/GGNRA</td>
</tr>
<tr>
<td>Lincoln Park</td>
<td>112</td>
<td>SFRPD</td>
</tr>
</tbody>
</table>

**Notes:**
- GGNRA = Golden Gate National Recreation Area; NPS = National Park Service; SFPRD = San Francisco Recreation and Park Department; SFVAMC = San Francisco Veterans Affairs Medical Center
- East and West Fort Miley acreage was derived from Figure 1-2 of the SFVAMC Long Range Development Plan (“Existing SFVAMC Fort Miley Campus Layout”).

#### Golden Gate National Recreation Area

The existing SFVAMC Fort Miley Campus occupies 29 acres near the Lands End region of San Francisco. Lands End is a 110-acre portion of the GGNRA\(^4\) known for its rugged natural areas and dramatic coastal cliffs. NPS manages the Golden Gate National Parks as well as 391 other park sites across the United States (NPS, 2010). These federal parklands border the Campus to the north, east, and west and provide a greenbelt next to the dense urban neighborhoods of the outer Richmond District. Some of the featured attractions in Lands End include Eagles’ Point Overlook, Fort Miley East and West, and Point Lobos, which includes the Cliff House and Sutro Baths.

Lands End is considered a coastal preserve, which offers a number of mid-length hikes along a network of trails that meander through the cliff bluffs. In addition to several informal trails, the most popular trails include the California Coastal Trail\(^5\) and El Camino del Mar Trail. The California Coastal Trail at Lands End offers a cliff-top walk with several scenic overlooks (including the Golden Gate Bridge and Marin Headlands), 30-mile views of the coast, opportunities for birdwatching, and foot access to several shoreline pocket beaches (GGNPC, 2011). The Coastal Trail at Lands End is currently being improved and the surrounding forest is being revitalized through NPS stewardship programs. Since the recent area restorations and upgrades to the Lands End section of the Coastal Trail, visitor use has increased substantially (GGNRA, 2011). El Camino del Mar Trail at Lands End runs parallel to the California Coastal Trail, offering access points through connector trails or staircases. Visitors follow the trails, stopping at historic landmarks such as the *USS San Francisco* Memorial and the Fort Miley Military Reservation.

The existing SFVAMC Fort Miley Campus is surrounded on three sides by GGNRA property (including East Fort Miley and West Fort Miley) and a historic resource listed in the National Register of Historic Places (for more information about the historical significance of Fort Miley, see Section 3.4, “Cultural Resources”). There are several access points into Fort Miley via the surrounding trail system, but the main entrances are located at the Merrie Way parking lot located on Point Lobos Avenue and Merrie Way and the El Camino del Mar parking lot.

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\(^4\) Established in 1972, the GGNRA constitutes one of the largest urban parks in the world, encompassing 80,500 acres in three counties: Marin, San Francisco, and San Mateo. Parklands in San Francisco County ring the northern and western shores of San Francisco and include areas such as Ocean Beach, Fort Funston, Lands End, and the Presidio. These lands are coastal preserves that encompass many miles of bay and ocean shorelines. Each year 16–20 million visitors explore the park, accounting for nearly 50 percent of all visits to the 29 national park systems in California (NPS, 2011a).

\(^5\) The Coastal Trail at Lands End is part of a larger network of public trails along the 1,200-mile California Coast (Coastwalk 2011).
off Point Lobos Avenue. Access to Fort Miley from the California Palace of the Legion of Honor (Legion of Honor) is also very common (The Bandit Notes, 2000).

Because of its unique location adjacent to the GGNRA, the existing SFVAMC Fort Miley Campus provides formal access points to East Fort Miley and West Fort Miley. There are two paved roadways that lead into the surrounding parklands. One was located on the east end of the site near Parking Lot A and the other was located on the west end of the site near Parking Lot J. It appeared that these roadways provided both pedestrian and vehicle access (vehicles were observed on these roads). Along these access points, there was signage indicating entry into a recreation area. For the most part, the boundaries between the Campus and the NPS portion of Fort Miley are delineated with a chain-link fence and dense vegetation (Winzler and Kelly, 2011).

The portion of Fort Miley within the GGNRA is a popular visitor attraction because it offers hiking and sightseeing, all within a historic military setting. NPS maintains picnicking facilities and hiking trails within West Fort Miley. The picnic area is open during daylight hours and is accessible from the West Fort Miley entrance at El Camino del Mar and 48th Avenue. This area is popular because it is situated among three gun emplacements, including Battery Chester, which offers views down to Ocean Beach (NPS, 2011a). West Fort Miley is also the site of an outdoor skills and fitness challenge course sponsored by Pacific Leadership in partnership with NPS (PLI, 2009). East Fort Miley houses a maintenance building for NPS (NPS, 2011b). The remains of several pre–World War I batteries edge the perimeter of the existing SFVAMC Fort Miley Campus (NPS, 2011a) and represent some of the original concepts of coastal defense.

These adjacent federal parklands are patrolled by law enforcement programs provided by the GGNRA. The mission of the GGNRA’s law enforcement personnel is to protect people, property, and park resources and to ensure that park visitors can enjoy the park without unlawful interference. Patrol operations cover all GGNRA lands (GGNRA, 2011). In addition, SFFD has a memorandum of understanding with the GGNRA to provide fire suppression services for GGNRA property (Schultheis, pers. comm., 2011).

**Lincoln Park**

Immediately east and contiguous to East Fort Miley is Lincoln Park, a 112-acre facility owned and maintained by SFRPD. Because of its adjacency to GGNRA lands, Lincoln Park includes some natural areas and trails; however, the bulk of the park is consumed by a golf course and the Legion of Honor (The Bandit Notes, 2000). The Lincoln Park Golf Course is an 18-hole golf facility known for its scenic qualities and year-round public memberships. Views are highlighted by the famed 17th hole that overlooks San Francisco Bay and the Golden Gate Bridge (SFNGF, 2007). The Legion of Honor is one of two fine arts museums in San Francisco (FAMSF, 2011). This museum can be accessed by trails and overlooks the Pacific Ocean, Golden Gate Bridge, and large portions of San Francisco.

**Mission Bay Area**

As listed in Table 3.3-5, 10 SFRPD and five non-SFRPD facilities are located within the boundaries of the Mission Bay project area.
## Table 3.3-5: Parks and Related Facilities located within the Mission Bay Area

<table>
<thead>
<tr>
<th>Facility</th>
<th>Park Acres</th>
<th>Ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Potrero Hill Neighborhood</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jackson Playground</td>
<td>4.41</td>
<td>SFRPD</td>
</tr>
<tr>
<td>McKinley Square</td>
<td>2.81</td>
<td>SFRPD</td>
</tr>
<tr>
<td>Potrero Hill Recreation Center &amp; Mini Park</td>
<td>10.29</td>
<td>SFRPD</td>
</tr>
<tr>
<td>James Rolph Jr. Playground</td>
<td>2.93</td>
<td>SFRPD</td>
</tr>
<tr>
<td>Potrero del Sol</td>
<td>4.36</td>
<td>SFRPD</td>
</tr>
<tr>
<td><strong>South of Market (SOMA) Neighborhood</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South Park</td>
<td>1.12</td>
<td>SFRPD</td>
</tr>
<tr>
<td>Utah &amp; 18th Mini Park</td>
<td>0.10</td>
<td>SFRPD</td>
</tr>
<tr>
<td>Connecticut Friendship Garden</td>
<td>0.14</td>
<td>SFRPD</td>
</tr>
<tr>
<td>Arkansas Friendship Garden</td>
<td>0.13</td>
<td>SFRPD</td>
</tr>
<tr>
<td>AT&amp;T Park</td>
<td>11.96</td>
<td>Port</td>
</tr>
<tr>
<td><strong>Dogpatch Neighborhood</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Esprit Park</td>
<td>1.83</td>
<td>SFRPD</td>
</tr>
<tr>
<td>Woods Yard Park</td>
<td>0.28</td>
<td>Muni</td>
</tr>
<tr>
<td><strong>Mission Bay Neighborhood</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agua Vista Park</td>
<td>0.62</td>
<td>Port</td>
</tr>
<tr>
<td>Mission Creek Garden</td>
<td>0.69</td>
<td>Port</td>
</tr>
<tr>
<td><strong>Central Waterfront</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Warm Water Cove Park</td>
<td>0.57</td>
<td>Port</td>
</tr>
</tbody>
</table>

Notes:  
Muni = San Francisco Municipal Railway; Port = Port of San Francisco; SFRPD = San Francisco Recreation and Park Department  
Source: Stasio, pers. comm., 2011

Esprit Park is located at Minnesota and 20th Streets and features a grass field surrounded by redwood trees and picnic tables (NPC, 2011a). Jackson Playground, located at 17th and Carolina Streets, provides a variety of amenities including a kids’ play structure and sand area, tennis and basketball courts, and two baseball fields (NPC, 2011b). James Rolph Playground, located at Potrero Avenue and Cesar Chavez Street, includes a playground, baseball field, recreation center, and two basketball and tennis courts (NPC, 2011c). Located at the corner of 20th and Vermont Streets, McKinley Square features a playground with a sand pit, large grassy area, walking trail, and a community garden with benches (NPC, 2011d). The recently remodeled Potrero del Sol Park is located at 25th and Utah Streets. This park offers a new skate park, grassy areas for picnics, a performance space, and a community garden (NPC, 2011e). The Potrero Hill Recreation Center and Mini Park is located at 801 Arkansas Street and offers a playground, baseball field, two tennis courts, a basketball court, and a recreation center (NPC 2011f). The Arkansas and Connecticut Friendship Gardens are located on 22nd Street, just north of the Potrero Hill Recreation Center. South Park is a small neighborhood park located on South Park Street and
Jack London Alley. This 1.1-acre park has a small playground with paths and picnic tables (NPC, 2011g). The Utah and 18th Mini Park is currently undergoing renovation with short and long-term projects (NPC, 2011h).

The non-SFRPD facilities include AT&T Park, Yerba Buena Gardens, United Nations Plaza (UN Plaza), Agua Vista Park, Warm Water Cove Park, Hallidie Plaza, Mission Creek Garden, and Woods Yard Park. AT&T Park is the San Francisco Giants’ baseball stadium. The Giants lease the land from the Port of San Francisco. This 12-acre site is bounded by King Street, Second Street, Third Street, and China Basin (Ballparks, 2011). Agua Vista Park, owned by the Port Authority, is located at 800 Terry Francois Boulevard. It is a small landscaped park and fishing pier with picnic benches and public art (NPC, 2011i). Warm Water Cove is located at the end of 24th Street and east of Illinois Street. This waterfront park is owned by the Port of San Francisco and sits adjacent to a power plant (SF Citizen, 2010). Mission Creek Garden is owned by the Port Authority and located at Channel and Sixth Streets. This park is a new green space on the creek with many trees and shrubs. A basketball court, volleyball court, and dog park were recently added (NPC, 2011j). Woods Yard Park is owned by the San Francisco Municipal Transit Authority and located at Tennessee and 22nd Streets. This park is a block-long miniature open space with two grassy areas and a sand pit (NPC, 2011k).

### 3.3.2 Regulatory Framework

**National Fire Protection Association Fire Code**

The NFPA is an international nonprofit organization established in 1896 that provides consensus codes and standards for fire protection. Specifically, the NFPA is responsible for 300 codes and standards designed to minimize the risk and impacts of fire by establishing criteria for building, processing, design, service, and installation in the United States. The NFPA Fire Code provides the requirements to establish a reasonable level of fire safety and property protection in new and existing buildings. The NFPA Fire Code includes standards for the inspection of permanent and temporary buildings, processes, equipment, systems, and other fire and related life safety situations; investigation of fires, explosions, hazardous materials incidents, and other related emergency incidents; and review of construction plans, drawings, and specifications for life safety systems, fire protection systems, access, water supplies, processes, hazardous materials, and other fire and life safety issues.

Because the existing SFVAMC Fort Miley Campus is a federal property, the NFPA Fire Code requirements would apply to all new or modified buildings on-site. Building fire suppression system design and site fire water system improvements should be evaluated for each specific project in accordance with NFPA Fire Code requirements. These requirements vary depending on the type of construction and size (square feet) of new buildings.

**2010 San Francisco Fire Code**

The 2010 San Francisco Fire Code went into effect January 1, 2011 (SFFD, 2011c). The new San Francisco Fire Code replaced the 2007 Fire Code and consists of the 2010 California Fire Code and portions of the 2009 International Fire Code, together with San Francisco amendments. The San Francisco Fire Code is designed to regulate and govern the safeguarding of life and property from fire and explosion hazards arising from the storage, handling, and use of hazardous substances, materials and devices, and from conditions hazardous to life or property in the occupancy of buildings and premises; and to provide for the issuance of permits, inspections, and other SFFD services, and the assessment and collection of fees for those permits (SFFD, 2011d).
Although the existing SFVAMC Fort Miley Campus is a federal property, the local SFFD is responsible for responding to emergency calls for fire, EMS, and other emergencies at the site. Because SFFD services the Campus, any new development would need to meet the requirements in accordance with the latest edition of the NPFA Fire Code (i.e., the NFPA 1 Fire Code), with consideration of the San Francisco Fire Code. The buildings’ fire flow requirements are adjusted individually for buildings with sprinkler systems whose designs meet the requirements of the NPFA Fire Code (Kennedy, pers. comm., 2011).


The GGNRA operates under U.S. Department of the Interior and NPS policies and guidelines, in accordance with a general management plan (GMP), which was first published in 1980. The park GMP is currently undergoing revision to reflect new lands and responsibilities added since the park was established (NPS, 2012).

The 2011 *Golden Gate National Recreation Area Muir Woods National Monument Draft General Management Plan* addresses the NPS-administered lands within the legislative boundaries of the GGNRA and Muir Woods National Monument. Although the existing SFVAMC Fort Miley Campus is under the jurisdiction of VA and outside the NPS boundaries, the Campus is surrounded on three sides by these national parklands (specifically Lands End and Fort Miley). Furthermore, the SFVAMC LRDP has taken as a core design principle the full integration of the site into the surrounding park and pedestrian systems. An aspect of the LRDP is to coordinate the location and massing of the buildings critical to the continued development of the existing Campus with the surrounding parks and city, so that the amenities of the newly created urban spaces for public use will transform the SFVAMC into an urban campus, an integral part of San Francisco (SFVAMC, 2010). Because VA is an adjacent landowner, the GGNRA land management objectives are referenced in this document.

In the Fort Miley area, the GMP advocates “better connections to the surrounding community, nearby Land’s End site, and the Veteran’s Administration hospital campus.” The area is also under management for the preservation of dark night skies (NPS, 2011b). The mitigation measures summarized below are recommended to avoid or minimize potential impacts from implementation of the action alternatives included in the GMP. They are included in this document because under NEPA, all relevant reasonable mitigation measures that could improve the project are to be identified, even if they are outside the jurisdiction of the lead agency or the cooperating agencies, and thus would not be committed as part of the RODs of these agencies (CEQ, 2011).

The following mitigation measures are recommended to preserve natural ambient lightscapes (NPS, 2011c):

- Limiting the use of artificial outdoor lighting to that which is necessary for basic safety requirements
- Shielding all outdoor lighting to the maximum extent possible
- Keeping light on the intended subject and out of the night sky to the greatest degree possible
- Working with park partners and visitors on education and best management practices to minimize their impacts on lightscapes

The existing SFVAMC Fort Miley Campus itself is not NPS property; however, through the LRDP, the SFVAMC attempts, where possible, to take into consideration the GGNRA policies to minimize effects on adjacent NPS

**San Francisco General Plan Recreation and Open Space Element**

The City General Plan provides the following description for the existing SFVAMC Fort Miley Campus:

**East and West Fort Miley (GGNRA)**

Develop public open space area for continued recreational use and preserve natural and historic features in conjunction with the GGNRA. Maintain picnic areas and create an historic interpretive center and facilities for day camp use. Fort Miley Veteran’s Administration hospital parking should be provided on the hospital grounds (SFVAMC, 2010).

Although the existing SFVAMC Fort Miley Campus is not subject to City General Plan policies, the LRDP aims to integrate the site into the surrounding park and pedestrian systems. For this reason, local recreation objectives are referenced in this document.

**Western Shoreline Area Plan**

The *Western Shoreline Area Plan* does not specifically mention the existing SFVAMC Fort Miley Campus, although the site lies with the boundaries of the plan. The following policies are referenced in the LRDP (SFVAMC, 2010):

- **Policy 1.1:** Improve crosstown public transit connections to the coastal area, specifically Ocean Beach, the zoo, and the Cliff House.
- **Policy 1.2:** Provide transit connections amongst the important coastal recreational destinations.
- **Policy 1.3:** Connect local transit routes with regional transit, including BART [Bay Area Rapid Transit], Golden Gate Transit, and the Golden Gate National Recreation Transit.
- **Policy 1.4:** Provide incentives for transit usage (VA, 2010).

Even though the *Western Shoreline Area Plan* does not directly apply to the existing SFVAMC Fort Miley Campus (because the Campus is under federal jurisdiction), these policies are relevant because they would be beneficial to public transit within the area, including the Campus.

**3.3.3 Environmental Consequences**

**Significance Criteria**

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

No national thresholds exist for police and fire services from an individual project. As defined by CEQ, the significance of an effect is determined by the context and intensity of the resulting change relative to the existing environment (40 Code of Federal Regulations 1508.27).
However, national thresholds do exist for park resources in the form NPS Management Guidelines. The NPS Management Guidelines value the importance of leaving “park resources and values unimpaired unless a particular law directly and specifically provides otherwise” (NPS, 2006). The NPS Guidelines go on to say that impairment of park resources can be triggered by activities operating within the park but may also result from “sources or activities outside the park” (NPS, 2006). The impact threshold at which impairment occurs is not readily apparent; therefore, NPS has established policies that protect against unacceptable impacts within a park’s environment. Park managers must not allow uses that would cause unacceptable impacts; they must evaluate existing or proposed uses and determine whether the associated impacts on park resources and values are acceptable. Therefore, for the purposes of these policies, unacceptable impacts are impacts that, individually or cumulatively, would do any of the following (NPS, 2006):

- be inconsistent with a park’s purposes or values;
- impede the attainment of a park’s desired future conditions for natural and cultural resources as identified through the park’s planning process;
- create an unsafe or unhealthful environment for visitors or employees;
- diminish opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values; or
- unreasonably interfere with:
  - park programs or activities;
  - an appropriate use;
  - the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic, or commemorative locations within the park; or
  - NPS concessioner or contractor operations or services.

Other environmental assessment documents and the aforementioned NPS thresholds were reviewed and the following criteria were selected for the evaluation.

Thus, an alternative would be considered to result in an adverse impact related to community services if it would:

- result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered fire or police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police and fire protection;

- result in inadequate fire access and circulation;

- result in the need for expanded fire-flow infrastructure;

- increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated or the construction or expansion of recreational facilities would be required; or

- substantially inhibit access to and use of existing recreational facilities.
Assessment Methods

Evaluation of potential community service and recreation impacts was based on a review of documents pertaining to the proposed project area including the SFVAMC LRDP and the GGNRA GMP, consultation with appropriate agencies and City staff, and review of the project area and surroundings. The project does not involve proposals for new residential structures and would not directly generate new residents in the project area. Because the project would not generate new residents, it would not substantially increase citywide demand on community services. However, localized impacts resulting from increases in daily population (personnel, patients, visitors) may occur and are analyzed below.

For purposes of this analysis, impacts on fire and police services are considered significant if an increase in daily population would result in inadequate staffing levels, increased response times, and/or increased demand for services requiring the construction or expansion of new or altered facilities that could have an adverse physical effect on the environment. With regard to fire flow adequacy, it is assumed that all temporary and permanent improvements would be designed and constructed in compliance with all applicable building and fire codes, which include requirements for fire alarms, smoke detectors, sprinkler systems, fire extinguishers, and the number and location of exits.

In determining whether the Proposed Action or Alternatives would have a significant adverse impact on recreational facilities, this analysis considers the surrounding recreational facilities, the existing capacity (usage) of those facilities, and the expected recreational improvements that would be included as part of the Proposed Action or Alternatives.

Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative

Near-Term Projects

Construction

Fire Protection Services

Fire and EMS Response Times

Alternative 1 (Phase 1) near-term projects would involve new development and/or retrofitting of patient care, research, administrative, hotel, and parking structures on the existing 29-acre SFVAMC Fort Miley Campus through mid-2015. The existing Campus is already served by SFFD, with the nearest fire station (Station 34) located only 0.3 mile southeast of the Campus. Three other fire stations, Station 14, Station 23, and Station 31, are located within approximately 2 miles of the Campus and could provide backup in an emergency.

Construction of Alternative 1 near-term projects would increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment and use of flammable construction materials. In most cases, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize such hazards. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring

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6 LRDP Phase 1 spans the 2013 through 2015 time frame.
partial land closures during street improvements and utility installations. Fire truck and emergency vehicle access to all buildings would be maintained during construction; however, slow-moving, construction-related traffic near the site could reduce traffic flows and delay emergency vehicles traveling through the area, thereby potentially affecting emergency response times. However, given the current traffic levels of surrounding streets, impacts related to response times are expected to be less than in other more congested areas. (See Section 3.13, “Transportation and Parking,” for more information about traffic flow and street closures.) More importantly, Station 34 is within close range of the existing SFVAMC Fort Miley Campus (only 0.3 mile southeast of the Campus), indicating that response times would not likely be affected.

Any on-site street closures or temporary obstruction would be subject to NFPA emergency access standards, requirements, and review (with consideration of the San Francisco Fire Code), which would further reduce construction-related effects on response times. Thus, construction-related impacts on fire protection services are expected to be minor.

Fire Truck Access and Circulation

As described above, fire truck and emergency vehicle access would be maintained to all buildings during construction. Therefore, impacts related to fire truck access and circulation would be minor.

Law Enforcement Services

Because the existing SFVAMC Fort Miley Campus is under federal jurisdiction, police service would continue to be provided by VA Police during construction. The Campus currently maintains a police force of 22 officers, who are responsible for providing law enforcement and security services to Veterans, visitors, and staff on department facilities and grounds. Construction sites can be sources of attractive nuisances, providing hazards and inviting theft and vandalism. Therefore, the additional activity associated with construction of Alternative 1 near-term projects has the potential to increase the number of calls regarding minor incidents. To properly secure the site, VA Police may have to hire additional personnel and/or acquire equipment to serve the project site during construction. The need for additional staff and/or equipment would not in itself constitute an adverse environmental effect related to police protection services unless it would “result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered government facilities, the construction of which could cause significant environmental impacts.” Because any increase in police activity would be limited to the construction period and would not result in the need for a new police station, short-term impacts during construction would be minor.

Parks and Recreation

Park Accessibility

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 hospital is Fort Miley, part of the GGNRA managed by NPS. Under the proposed LRDP, there would be no taking of adjacent parklands because all future modifications would be entirely within the existing footprint of the hospital. However, East Fort Miley and West Fort Miley are currently accessible from the Campus by way of paved roadways on the project site. Although these access roads are not the primary entry points into adjacent Fort Miley, some hospital-related
staff and recreationists likely use these roadways occasionally to access the parklands. To the extent practicable, the access roads would be kept open during construction. Should temporary closure of the roadways be necessary, notification of the closure would be posted a minimum of 2 weeks in advance. Although temporary closure of these roads could potentially restrict access to the surrounding parklands from the hospital, it is not expected to affect overall recreational use of Fort Miley. There are multiple access points into the Lands End–Fort Miley–Lincoln Park system within blocks of the Campus (i.e., Merrie Way trailhead/parking lot and Camino del Mar parking lot). These access points are considered the primary entrances into Lands End–Fort Miley–Lincoln Park system, and they likely experience a higher usage than the Campus’s access roads. Because the primary access points into the Lands End–Fort Miley–Lincoln Park system would remain open, temporary closure of the Campus’s access roads are not expected to inhibit access to and use of these parks. Access to the parklands would not be significantly disrupted because recreationalists could still visit these areas via other nearby park entrances. For these reasons, impacts related to park accessibility during construction would be minor.

Noise from construction activities at the existing SFVAMC Fort Miley Campus is likely to cause temporary impacts on recreational users’ experience at adjacent Fort Miley. The noise impacts on recreational users would be temporary as the construction activities conclude and move to different areas of the campus. Visual impacts are expected to be minor because the new construction would be mostly shielded from view by dense vegetation and a sloping hillside. These impacts would be minimized through coordination with the GGNRA. Therefore, construction-related impacts are expected to be minor.

**Park Usage**

Project construction would be performed by a temporary workforce consisting of approximately 66 persons derived from the local labor pool, depending on the concurrent phase(s) of LRDP construction on the existing SFVAMC Fort Miley Campus. Although construction workers would be within walking distance of nearby parks and open space areas such as adjacent Fort Miley, Lands End, or Lincoln Park, the increase in park usage would be minimal. The temporary influx of construction workers on the Campus would not be expected to substantially increase the demand for surrounding parks and recreational facilities. In addition, all of these workers would be expected to already reside in San Francisco or the greater Bay Area. Therefore, construction-related impacts on park usage would be minor.

**Operation**

**Fire Protection Services**

**Fire and EMS Response Times**

By mid-2015, there would be a net increase in daily population at the existing SFVAMC Fort Miley Campus of 149 people as a result of the increase in VA employees. Because there are approximately 3,545 employees currently at the Campus, this would represent a 4 percent net increase in employees at the Campus between 2013 and mid-2015. It should be noted that this increase in personnel, patients, and visitors is expected to occur incrementally over a construction period of approximately 2 years and 8 months as the near-term phases of Alternative 1 are completed.
Because the Proposed Action would not result in an influx of new residents and would only involve approximately 149 new employees working on the site, as well as daily patients and visitors, additional fire demand is expected to be minimal. As described previously, SFFD currently responds to calls at the existing SFVAMC Fort Miley Campus an average of 50 times per year, which represents less than 0.01 percent of total calls for EMS or fire service in San Francisco. Because the gross square footage at the Campus would increase by approximately 208,300 gross square feet under Alternative 1, one could assume that the call volumes for police services might also increase. Using the conservative assumption that calls for service would double to 100 calls per year by mid-2015, these additional calls would continue to make up less than 0.01 percent of the total call volume for fire or EMS services in San Francisco. Therefore, even if calls for service at the Campus were to double in the near term, this would still represent a very small fraction of the total number of calls for service experienced by SFFD. Therefore, any increase in demand would be considered minimal and is not expected to compromise response times.

As stated previously, the two nearest stations to the existing SFVAMC Fort Miley Campus (Stations 34 and 14) have response times that are better than City and State standards (Table 3.3-2). Based on the above information, it is expected that the Proposed Action would generate a very limited demand for fire and EMS services, and that this demand could be met by existing SFFD staff and equipment. Furthermore, SFFD has indicated that the Proposed Action would not increase demand for fire protection, equipment, and services beyond its ability to maintain acceptable service ratios, response times, or other performance objectives (Schultheis, pers. comm., 2011). Impacts are expected to be minor.

Fire Truck Access and Circulation

SFFD has established requirements for the minimum street widths to facilitate access by emergency equipment. A minimum requirement of 20 feet of unobstructed roadway and vertical clearance of not less than 13.5 feet has been established. In addition, the San Francisco Fire Code specifies minimum 80-foot turnarounds and 40-foot radii for corners. All site improvements must meet the minimum requirements for fire access as stipulated in the San Francisco Fire Code and required by SFFD.

As part of the Patient Welcome Center drop-off area, circulation within the SFVAMC Fort Miley Campus would be altered slightly to include a roundabout near the entrance of Clement Street and 42nd Avenue. Changes from existing conditions would include disconnecting the internal roadway, Fort Miley Circle, between Buildings 200 and 203 to create open space and a pedestrian zone, and narrowing Fort Miley Circle between Buildings 200 and 12 to provide traffic calming and incorporate a healing garden area with pedestrian walkways. Under Alternative 1, fire apparatus and related vehicles would continue to use the 42nd Avenue or 43rd Avenue entrance to the Campus. According to LRDP Figure 5-1, “Proposed Circulation System,” fire vehicle access is shown along the full perimeter of the Campus site along Veterans Drive and Fort Miley Circle, with two designated entrances at 42nd Avenue and 43rd Avenue. Emergency vehicles would be directed to enter though the 43rd Avenue entrance, and proceed to the new Ambulatory Care Center (VA, 2012).

Because the SFVAMC Fort Miley Campus’s Emergency Department is not a trauma center and does not expect to receive patients who have experienced major trauma and ambulance transports to the Campus do not constitute a high percentage of SFFD’s patient clientele. However, because the ambulance routes would be altered under Alternative 1, SFFD has requested that the ambulance entrances and patient loading areas be clearly marked with
proper signage to avoid confusion (Myers, pers. comm., 2011). As indicated on page 5-3 of the SFVAMC LRDP, “clear signage will indicate which entrance should be used by those arriving at the Campus” (VA, 2012). Construction-related fire access and circulation impacts are expected to be minor.

Water and Fire Flow Systems

Improvements to the existing SFVAMC Fort Miley Campus’s water distribution system are required with implementation of Alternative 1 near-term projects because of utility conflicts with proposed facilities and other site improvements. Water system improvements would involve removing and abandoning existing water mains within proposed building footprints and installing new water mains to provide potable water and water for fire hydrants and sprinklers to new buildings. Specifically, new domestic water service connections would be established to provide potable water to the buildings, and new fire hydrants and fire sprinkler system services would be installed to meet NFPA Fire Code requirements.

The proposed water system improvements necessary to support the LRDP development may require removal and/or abandonment of portions of the existing water system where new water mains, service laterals, and fire hydrants could be located. The minimum size for any new mains on the existing SFVAMC Fort Miley Campus should be 6 inches (SFVAMC, 2010).

If the required new fire flow cannot be met at locations throughout the distribution system after further hydraulic analysis and fire flow testing, measures would be taken to increase the available fire flow so that the minimum NFPA Fire Code requirements are satisfied. Methods to increase the available flow may include but not be limited to the following measures (SFVAMC, 2010):

- Replacing existing water mains with larger mains with greater hydraulic capacity
- Adding parallel mains to provide the needed hydraulic capacity
- Changing the fire pump controls from water tower level to system pressure
- Adding a second redundant fire pump to improve fire system reliability

The fire sprinkler systems for individual buildings would meet the requirements in the latest edition of the NFPA Fire Code (i.e., the NFPA 1 Fire Code), with consideration of the San Francisco Fire Code. The minimum required fire flow, pressure, and flow duration for sprinklered buildings varies by the type of building construction, construction material fire resistivity, occupancy type, and the gross floor area of the building. The building fire flow requirements are adjusted individually for buildings with sprinkler systems whose designs meet the requirement of the Fire Code (SFVAMC, 2010).

Sufficient capacity is available in the existing SFVAMC Fort Miley Campus’s existing fire flow system to meet NFPA Fire Code requirements (Kennedy, pers. comm., 2011). A more thorough analysis of system capacity would be conducted as a part of the design of any new buildings, building upgrades, or site utility improvements. The fire code requirements will vary depending on the specifics of each project or new building (Kennedy, pers. comm., 2011). Impacts related to water and fire flow systems are expected to be minor.
Law Enforcement Services

Because the existing SFVAMC Fort Miley Campus is under federal jurisdiction, police service would continue to be provided by VA Police. The Campus currently maintains a police force of 22 officers, who are responsible for providing law enforcement and security services to Veterans, visitors, and staff on department facilities and grounds. Because implementing Alternative 1 near-term projects would increase the number of personnel at the Campus by 149, the additional activity associated with the new population has the potential to increase the number of calls for service. However, any increase in demand for police services is not expected to substantially affect response times because VA Police officers are stationed on-site. Although VA Police may have to hire additional personnel and acquire equipment to serve the Campus, the need for additional staff and/or equipment would not in itself result in changes to service levels such that new police protection facilities would need to be built. Impacts on law enforcement services are expected to be minor.

Parks and Recreation

Park Accessibility

Implementing Alternative 1 near-term projects would not inhibit access to or use of adjacent GGNRA recreational areas. An aspect of the LRDP is to coordinate the location and massing of the buildings critical to the continued development of the existing Campus with the surrounding parks and city, so that the amenities of the newly created urban spaces for public use will transform the SFVAMC into an urban campus, an integral part of San Francisco (SFVAMC, 2010).

During Phase 1, various existing open space areas of the SFVAMC Fort Miley Campus would be developed with proposed buildings, including the Mental Health Clinic Expansion and the Hoptel Addition. A new landscape area would also be developed within the drop-off circle that is proposed as part of the Patient Welcome Center and drop-off area, and a healing garden would be integrated with the Welcome Center. Sidewalks and walkways for pedestrians would be modified to improve connectivity and flow between facilities. Future Veterans and hospital personnel would benefit from these additional park spaces and connections to the surrounding federal park system. Impacts related to park accessibility during operation would be minor.

Park Usage

As described in Section 3.11, “Socioeconomics and Environmental Justice,” implementing Alternative 1 near-term projects would result in new and additional medical and medical office uses. No permanent housing component is proposed; therefore, the area’s population density would not be affected directly. However, the number of personnel at the existing SFVAMC Fort Miley Campus is projected to increase by 149 (a 4 percent increase) between 2013 and mid-2015. Some of these people might use adjacent Fort Miley within the GGNRA (e.g., personnel visiting a local park on their lunch break), 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 would potentially use park grounds for lunch or before or after work. The use of nearby recreational spaces by Campus employees is expected to be concentrated on weekday lunch hour shifts, when resident usage might 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, given that there are existing
open space areas on Campus for passive recreation and new open space amenities would be provided as part of Alternative 1 near-term projects, it is expected that access to on-site open space would help offset any potential deterioration of nearby parks caused by Campus personnel and visitors. For the reasons stated above, operational impacts on park usage would be minor.

**Long-Term Projects**

**Construction**

*Fire Protection Services*

*Fire and EMS Response Times*

Construction-related impacts of Alternative 1 long-term projects on fire and EMS response times would be similar to those of Alternative 1 near-term projects. Therefore, for the same reasons as described above for Alternative 1 near-term projects, these impacts would be minor.

*Fire Truck Access and Circulation*

Construction-related impacts of Alternative 1 long-term projects on fire truck access and circulation would be similar to those of Alternative 1 near-term projects. Therefore, for the same reasons as described above for Alternative 1 near-term projects, these impacts would be minor.

**Law Enforcement Services**

Construction-related impacts of Alternative 1 long-term projects on law enforcement services would be similar to those of Alternative 1 near-term projects. Therefore, for the same reasons as described above for Alternative 1 near-term projects, these impacts would be minor.

**Parks and Recreation**

*Park Accessibility*

The impact of Alternative 1 long-term projects on park accessibility would be similar to those of Alternative 1 near-term projects. Therefore, for the same reasons as described above for Alternative 1 near-term projects, these impacts would be minor.

*Park Usage*

The impact of Alternative 1 long-term projects on park usage would be similar to those of Alternative 1 near-term projects. Therefore, for the same reasons as described above for Alternative 1 near-term projects, these impacts would be minor.
**Operation**

*Fire Protection Services*

**Fire and EMS Response Times**

Implementation of Alternative 1 long-term (Phase 2) projects would involve five subphases of development and retrofitting over approximately 7 years and 7 months, with completion anticipated by April 2023. By 2023, there would be a net increase in daily employee population at the existing SFVAMC Fort Miley Campus of 687 persons. This represents an increase of 19 percent between mid-2015 and 2023. For the same reasons as described above for Alternative 1 near-term projects, the increase in daily population levels would not generate substantial demand on fire or EMS services. Impacts of the operation of Alternative 1 long-term projects on fire and EMS response times are expected to be minor.

**Fire Truck Access and Circulation**

Under Alternative 1 long-term projects, no major changes would be made to SFVAMC Fort Miley Campus access and circulation. Access for emergency medical and fire vehicles would continue to be provided internally. As described above for Alternative 1 near-term projects, VA would be required to comply with all applicable access and circulation requirements of the NFPA Fire Code (with consideration of the San Francisco Fire Code) during implementation of Alternative 1 long-term projects. For the same reasons as described above for Alternative 1 near-term projects, impacts of the operation of Alternative 1 long-term projects on fire truck access and circulation are expected to be minor.

**Water and Fire Flow Systems**

Improvements to the water distribution system for Alternative 1 long-term projects would be similar to those implemented for Alternative 1 near-term projects. As described above for Alternative 1 near-term projects, VA would be required to comply with all applicable fire flow regulations of the NFPA Fire Code (with consideration of the San Francisco Fire Code) during implementation of Alternative 1 long-term projects. For the same reasons as described above for Alternative 1 near-term projects, impacts of the operation of Alternative 1 long-term projects on water and fire flow systems are expected to be minor.

**Law Enforcement Services**

Because the existing SFVAMC Fort Miley Campus is under federal jurisdiction, police service would continue to be provided by VA Police during operation of Alternative 1 long-term projects. Although daily employee population levels are expected to increase by 687 persons between late 2015 and 2023, this increase is not expected to generate substantial demand on police services. For the same reasons as described above for Alternative 1 near-term projects, impacts of the operation of Alternative 1 long-term projects on law enforcement services are expected to be minor.
Parks and Recreation

Park Accessibility

Implementation of Alternative 1 long-term projects would not inhibit access to or use of adjacent GGNRA recreational areas. Impacts of operation of Alternative 1 long-term projects on park accessibility are expected to be minor.

As part of Alternative 1 (Phase 2), a Central Green park area would be completed with permanent landscaping, walkways, and gardens to serve employees, patients, visitors, and the surrounding community. The addition of new park facilities and connections to surrounding parklands would provide a recreational benefit to the personnel and patients at the Campus.

Park Usage

In the long term, the number of personnel at the existing SFVAMC Fort Miley Campus is projected to increase by 687 persons (a 19 percent increase) between late 2015 and 2023. This increase in daily population levels would not lead to a substantial increase in usage of nearby recreational facilities. For the same reasons as described above for Alternative 1 near-term projects, impacts of the operation of Alternative 1 long-term projects on park usage are expected to be minor.

Alternative 2: Fort Miley Campus Plus Mission Bay Campus Alternative

Near-Term Projects

Alternative 2 near-term projects (both construction and operation) would be the same as Alternative 1 near-term projects (see Tables 2-1 and 2-2 and Figures 2-1 and 2-2). Therefore, the impacts of Alternative 2 near-term projects would be the same as the impacts of Alternative 1 near-term projects. These impacts would be minor.

Long-Term Projects

Alternative 2 long-term projects (both construction and operation) located at the existing SFVAMC Fort Miley Campus would be the same as Alternative 1 long-term projects, except that the ambulatory care center would be located at the potential new SFVAMC Mission Bay Campus under Alternative 2 (see Tables 2-1 and 2-2 and Figures 2-1 and 2-2). Therefore, the impacts of Alternative 2 long-term projects at the existing Campus would be the same as or less than those described for Alternative 1 long-term projects.

The impact discussion below focuses on the impacts at the potential new SFVAMC Mission Bay Campus from construction and operation of the ambulatory care center, research building, and associated parking structures garages proposed as part of Alternative 2, Phase 2.
**Construction**

**Fire Protection Services**

**Fire and EMS Response Times**

Three fire stations operate in the Mission Bay area (Station 8, Station 29, and Station 37). In addition to the three existing stations, a new station is slated for construction in 2012 at Third Street and Mission Rock. All three existing stations have response times that surpass both the City and State standards (Table 3.3-3).

Construction of Alternative 2 long-term projects in the Mission Bay area would increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment and use of flammable construction materials. In most cases, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize such hazards. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial street closures during street improvements and utility installations. Because this alternative would involve owning an alternate site, any street closures or temporary obstruction would be subject to the NFPA standards (with consideration of the local SFFD emergency access standards, requirements, and review), which would further reduce construction-related effects on response times. Thus, construction-related impacts of Alternative 2 long-term projects on fire protection services are expected to be minor.

**Fire Truck Access and Circulation**

Construction related to development of the potential new 620,000-square-foot SFVAMC Mission Bay Campus has the potential to require temporary lane closures or detours for fire and emergency personnel. Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, should there be partial closures to streets surrounding the potential new Campus, flagmen would be used to facilitate the traffic flow until construction is complete. Although a specific site for the potential new Campus has not been selected within the Mission Bay area, it is assumed that fire truck and emergency vehicle access to all surrounding buildings would be maintained during construction. Therefore, construction-related impacts of Alternative 2 long-term projects on fire truck access and circulation would be minor.

**Law Enforcement Services**

As under Alternative 1, because the potential new SFVAMC Mission Bay Campus would be under federal jurisdiction, police service would need to be provided by VA during construction of Alternative 2 long-term projects. Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, the additional activity associated with construction of Alternative 2 long-term projects has the potential to increase the number of calls for minor incidents. To properly secure the project site, VA Police would need to hire additional personnel and/or acquire equipment to serve the site during construction. The need for additional staff and/or equipment would not in itself constitute an adverse environmental effect related to police protection services unless it would “result in substantial adverse physical impacts associated with the
provision of, or need for, new or physically altered government facilities, the construction of which could cause significant environmental impacts.” Because any increase in police activity would be limited to the construction period and would not result in the need for a new police station, construction-related impacts of Alternative 2 long-term projects on law enforcement services would be minor.

Construction-related impacts on traffic and circulation are identified in Section 3.13, “Transportation and Parking.” Traffic generated by construction workers and trucks would occur primarily during off-peak hours. Although minor traffic delays could result from construction activities at times, these impacts would be temporary and would be coordinated ahead of time with local police and emergency officials. Impacts are expected to be minor.

**Parks and Recreation**

**Park Accessibility**

Because a specific site has not yet been selected for the potential new 620,000-square-foot SFVAMC Mission Bay Campus, it is unclear whether construction activities for Alternative 2 long-term projects would affect park accessibility. Project-level NEPA analysis would be required once a specific location and site plan for the potential new Campus is determined. However, during construction the project would be built in a concentrated area of Mission Bay and is not anticipated to impact the accessibility to parkland. Best management practices would be followed to ensure compliance with local codes and regulations. Therefore, the impact to park accessibility during construction would be minor.

**Park Usage**

Project construction at the potential new SFVAMC Mission Bay Campus would be performed by a temporary workforce consisting of approximately 54 persons derived from the local labor pool, depending on the concurrent phase(s) of construction for Alternative 2 long-term projects. Although construction workers would be within walking distance of nearby parks and open space areas, an increase in park usage is expected to be minimal and temporary. The temporary influx of construction workers in the Mission Bay area would not be expected to substantially increase the demand on surrounding parks and recreational facilities. Therefore, construction-related impacts of Alternative 2 long-term projects on park usage would be minor.

**Operation**

**Fire and EMS Response Times**

Adding 620,000 square feet of new development in the Mission Bay area has the potential to result in an increase in fire demand in the Mission Bay area. Under Alternative 2 long-term projects, there would be an increase in the daily employment population of 1,268 employees at the potential new SFVAMC Mission Bay Campus (Table 3.11-7). Three fire stations operate in the Mission Bay area and a new fire station is slated for construction in 2012 at Third Street and Mission Rock. All three existing stations have response times that surpass both the City and State standards (Table 3.3-3). Thus, operational impacts of Alternative 2 long-term projects on fire and EMS response times would be minor.
Fire Truck Access and Circulation

In implementing long-term projects at the 620,000-square-foot space in the Mission Bay area, SFVAMC would be required to comply with all applicable access and circulation requirements of the NFPA Fire Code (with consideration of the San Francisco Fire Code) during operation of Alternative 2 long-term projects. For the same reasons as described for Alternative 1, operational impacts of Alternative 2 long-term projects on fire truck access and circulation are expected to be minor.

Water and Fire Flow Systems

As described above, the SFVAMC would be required to comply with all applicable provisions related to water and fire flow in the NFPA Fire Code (with consideration of the San Francisco Fire Code) during implementation of Alternative 2 long-term projects at the potential new SFVAMC Mission Bay Campus. Therefore, operational impacts of Alternative 2 long-term projects on water and fire flow systems are expected to be minor.

Law Enforcement Services

As a federal entity, the potential new SFVAMC Mission Bay Campus would be served by VA Police during operation of Alternative 2 long-term projects. Although daily employee population levels are expected to increase by 100 percent between late 2015 and 2027, this increase is not expected to affect public police (SFPD) resources. For the same reasons as described for Alternative 1, operational impacts of Alternative 2 long-term projects on law enforcement services are expected to be minor.

Parks and Recreation

Park Accessibility

Because a specific site has not yet been selected for the potential new 620,000-square-foot SFVAMC Mission Bay Campus, it is unclear whether operation of Alternative 2 long-term projects would affect park accessibility. Project-level NEPA analysis would be required once a specific location and site plan for the potential new Campus is determined. However, it is anticipated that project components would include open space for passive recreation and that the new Mission Bay Campus would be designed fit within the Mission Bay area while complying with local codes and regulations. Therefore the impact to park accessibility would be minor.

Park Usage

As described in Section 3.11, “Socioeconomics and Environmental Justice,” implementing Alternative 2 long-term projects would result in new and additional medical and medical office uses. No permanent housing component is proposed; therefore, the area’s population density would not be affected directly. Thus, the demand on recreational facilities resulting from implementation of Alternative 2 long-term projects would not be substantial in the context of existing citywide demand for these facilities.

Although medical personnel, and to a lesser extent, patients and visitors might use surrounding parks and recreational facilities (e.g., medical staff visiting local parks on their lunch breaks), the incremental increase in demand associated with operation of Alternative 2 long-term projects is not expected to result in the need to expand existing recreational facilities or construct new facilities, or to cause the physical deterioration of nearby
parks and open spaces. Implementing Alternative 2 long-term projects would intensify the activity and uses on-site and could generate more trips to local nearby parks than under current conditions. Although some of these people might visit recreational facilities in the vicinity of the proposed new Campus, such usage is not expected to result in substantial physical deterioration of nearby facilities or facilities areawide. The use of nearby recreational spaces by employees is expected to be concentrated on weekday lunch hour shifts, when resident usage might be lower than during the evening and weekend hours. Therefore, operational impacts of Alternative 2 long-term projects on park usage would be minor.

**Alternative 3: No Action Alternative**

**Near-Term Projects**

**Construction**

Under Alternative 3, there would be no new construction or retrofitting of existing buildings. However, ongoing maintenance repairs of the existing SFVAMC Fort Miley Campus would be completed. No impacts on community services (fire protection services, law enforcement services, or parks/recreation) would occur as a result of ongoing maintenance repairs under Alternative 3.

**Operation**

Under Alternative 3, the LRDP would not be implemented and no additional facilities would be operated. Thus, no impacts on community services (fire protection services, law enforcement services, or parks/recreation) would occur under this alternative.

**Long-Term Projects**

As stated above, under Alternative 3, the LRDP would not be implemented. There would be no new construction or retrofitting of existing buildings, and no additional facilities would be operated. Thus, no construction-related or operational impacts on community services would occur under Alternative 3.

**3.3.4 References**


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