

Appendix A

EIS Public Involvement

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

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

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

Departmental Offices

OMB Number: 1505–0224.

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

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

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

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

Estimated Total Reporting Burden: 26,170 hours.

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

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

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

Dawn D. Wolfgang,

Treasury PRA Clearance Officer.

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

BILLING CODE 4810–25–P

DEPARTMENT OF VETERANS AFFAIRS

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

AGENCY: Department of Veterans Affairs (VA).

ACTION: Notice of intent.

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

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

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

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

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

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

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

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

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

occupancy buildings, and parking structures.

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

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

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

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

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

Approved: March 18, 2011.

John R. Gingrich,

Chief of Staff, Department of Veterans Affairs.

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

BILLING CODE 8320-01-P

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

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

Speaker No. 1

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

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

Speaker No. 2

Raymond Holland

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

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

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

Speaker No. 3

Amy Meyer

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

Speaker No. 4

Charles Galatti

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

Speaker No. 5

Julie Burns, Friends of Lands End

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

Speaker No. 6

David Burns

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

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

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

Re: VAMC IMP Scoping Comments

Dear Mr. Pechman,

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

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

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

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

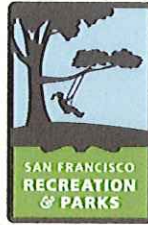
I also have concerns about the aesthetic and quality of life impact on the western part of San Francisco. This area has been traditionally less urbanized and more residential, even suburban, in character. Most people who have chosen to live in this area have done so because of this neighborhood character.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

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

Sincerely,

A handwritten signature in cursive script, reading "Katherine Howard". The signature is written in dark ink and is positioned above the printed name.

Katherine Howard



Mayor Gavin Newsom
Philip A. Ginsburg, General Manager

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

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

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

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

Sincerely,

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

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





SFVAMC Institutional Master Plan Environmental Impact Statement

W

Mr. Chi K. Wai
10 Seal Rock Dr
San Francisco, CA 94121-1437

COMMENT SHEET

(please hand in or mail back)

Name: C. KIN WAI

Organization (if any): _____

Street address (optional): _____

City, State, Zip: _____

E-mail address: chi.kinwai@gmail.com

Phone number: _____

Preferred form of contact: ☒ email ☐ mail ☐ phone

The U.S. Department of Veterans Affairs is interested in your comments regarding the San Francisco VA Medical Center Institutional Master Plan. Please hand them in after the meeting or mail them back to the address below by **November 12, 2010**. Thank you!

Comments EXTENSIVE NEW CONSTRUCTIONS ON SITE WILL BE
TOO DENSE FOR AN ALMOST EXCLUSIVE RESIDENTIAL NEIGHBORHOOD.

IF THERE ARE > 700 SHORT OF PARKING SPACES, THE
MORE IMMEDIATE PLAN SHOULD BE TO MEET THAT DEMAND.

MY DRIVEWAY HAS BEEN BLOCKED BY VA'S EMPLOYEES,
VISITORS & PATIENTS 2-4 TIMES A MONTH.

Comments continued

RON MIGUEL

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

29 October 2010

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

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

Dear Mr. Pechman:

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

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

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

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

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

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

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

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

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

Your EIS, must, at a minimum, cover:

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

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

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

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

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

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

Sincerely,


Ron Miguel

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



United States Department of the Interior

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

IN REPLY REFER TO:

L76 (GOGA-PLAN)

NOV - 1 2010

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

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

Dear Mr. Pechman:

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

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

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

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

Sincerely,



Frank Dean
General Superintendent

PAR Planning Association for the Richmond

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

November 9, 2010

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

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

Dear Mr. Pechman:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

PAR therefore urges that the EIS establish:

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

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

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

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

Sincerely,



Raymond R. Holland
President

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

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

Bennett, Kelsey

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

FYI.

John Pechman

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

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

Mr. Pechman,

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

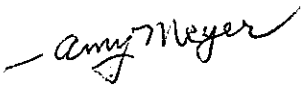
1. The EIS format presented herein is fundamentally flawed for failure to provide a complete set of alternatives: while 4 alternatives are mentioned, none are articulated except for alternative number 1, and therefore the entire EIS process is flawed under the law. To correct, all (or, at a minimum,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

Thank you for your careful consideration of these comments.

Jason Jungreis
527 47th Avenue

San Francisco, CA 94121
415-750-0830

To: John Pechman, Facility Planner
SF VAMC

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

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

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

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

The VAMC does not exist in isolation:

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

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

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

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

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

Funding and “swing space”

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

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

Bennett, Kelsey

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

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

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

Margie Hom-Brown

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

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

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

Hi John:

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

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

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

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

Ray

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



United States Department of the Interior

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

IN REPLY REFER TO:

L76 (GOGA-PLAN)

DEC 13 2010

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

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

Dear Mr. ^{John}Pechman:

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

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

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

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

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

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

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

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

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

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

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

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

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

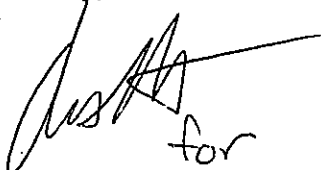
Utilities: The CMPSR discusses the need to relocate main water and combined storm/sewer lines to accommodate new development; however, it does not propose incorporating the north campus storm drain into the combined storm/sewer lines. As expressed in comments the NPS made on the North Slope project, the NPS is concerned that SFVAMC is collecting storm water and discharging this concentrated storm water on an unstable slope. By continuing this practice, NPS is concerned that concentrated storm water will cause increased instability on an unstable slope for lands below where drainage exits the storm water pipes. Additional slides and slumps in this area could destroy trail access and infrastructure in an important pedestrian corridor. We encourage the IMP to address this issue and make a commitment to discharge all campus storm water through low-impact-design (LID) as described in the CMPSR (Section 5.7) or through the combined sewer/storm water piping that exists throughout the campus, discontinuing the practice of discharging storm water on the unstable slope north of the campus.

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

Light Pollution (Dark Skies and Nocturnal Habitat Protection): The Lands End area is one of the darkest places in the City of San Francisco and offers extraordinary opportunities for night sky viewing in an urban environment. Additionally, the existing SFVAMC campus is adjacent to nocturnal wildlife habitat. Please address impacts of the alternatives on the night sky and natural darkness in this area. Attached is an e-mail we received from a concerned citizen regarding this subject that we are forwarding for your information.

Recently, the NPS asked the SFVAMC Planning Team to meet to further discuss this project with us in order to facilitate improved communication (letter dated Nov 1, 2010), and we hope SFVAMC will accommodate this request. Should an agency-to-agency meeting occur, the NPS will provide additional comments on the IMP. If you have any questions regarding NPS comments please contact Katharine Arrow (NPS liaison to SFVAMC) at 415-561-4971. The NPS appreciates having the opportunity to provide scoping comments on this important planning effort.

Sincerely,



Frank Dean
General Superintendent

Enclosures (1)
Dark Skies Letter

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

RE: Dark Skies

From: Concerned Citizen

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

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

- Investigating the planned lighting to determine the luminous flux that would be emitted directly into the sky above, or directly toward, the Sutro Historic District and Sutro Heights Park. Given the elevation of the VAMC substantially above both park sites and the height of the proposed buildings, such flux would not be limited to emissions at or above 90° above nadir, but would likely also include some downlight. Such investigation should pertain to both exterior luminaires as well as interior luminaires producing exterior light spill (e.g. through windows, from sides of parking structures, etc.).
- Investigating the planned lighting to determine the luminous flux that would be reflected into the sky above the Sutro Historic District and Sutro Heights Park, such as by reflection off parking lots, walls, plaza and courtyard surfaces, etc.
- Calculating and demonstrating the effect of both direct and reflected light on both zenith sky darkness and darkness in the low southern sky as seen from Land's End and Sutro Heights Park, taking into account the direction, intensity and spectral power distribution of the planned lighting.
- The planned lighting should be reviewed by experts in the area of dark-sky protection, light pollution mitigation, and effects of night lighting on wildlife and ecology. Given the VAMC's close proximity to National Park Service properties, National Park Service staff experts on light pollution should be engaged to review the project and the full technical details of the lighting plan.

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

San Francisco suffers from severe and ever-increasing artificial sky glow due to the amount of stray light shined into the night sky from various sources, including the city's tens of thousands of inadequately shielded streetlights and security floodlights. Upward-directed light does not contribute to public safety or visibility, but only wastes energy and blankets the city in a monotonous all-night twilight glow that blots out otherwise-visible features of the cosmos. Unnecessarily bright and/or poorly-aimed lighting in many parts of the city also causes excessive amounts of light to be reflected off pavement and buildings into the sky.

Fortunately, a number of locations along San Francisco's ocean coast enjoy a level of sky darkness sufficient for astronomical observation. This is due to the city's geography with unlit ocean on two sides, the city's land use patterns in which urban density (and corresponding outdoor lighting intensity) is much lower near the coastal areas than toward the urban center, and to the fact that much of the coastal strip was set aside by previous generations as undeveloped parkland. These locations include Land's End, Sutro Heights Park, Lincoln Park, and much of Ocean Beach. Land's End serves as the core of the city's dark-sky zone and the San Francisco Amateur Astronomers holds monthly observing sessions for the benefit of the public at Land's End. In addition, individual astronomers carry out telescopic and unaided-eye observing in these locations and many residents of the western neighborhoods value the nighttime ambience, and enjoy viewing astronomical objects from their own yards.

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

Bennett, Kelsey

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

Follow Up Flag: Follow up
Flag Status: Flagged

FYI.

John Pechman

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

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

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

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

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

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

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

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

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

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

Bennett, Kelsey

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

FYI.

John Pechman

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

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

December 12, 2010

Submitted via email

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

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

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

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

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

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

Sincerely,

Julie Burns

Friends of Lands End

3755 Balboa Street, Suite 201

San Francisco, CA 94121

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

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

Speaker No. 1

Jason Jungreis

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

Speaker No. 2

Julie Burns, on behalf of Janet Fiore

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

Speaker No. 3

David Burns

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

Speaker No. 4

Kathy Lassen-Hayne

I have four questions:

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

Speaker No.5

Ron Miguel

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

Speaker No. 6

John Frykman

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

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

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

Maria Souza (spelling?)

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

Speaker No. 8

David Goggin

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

Speaker No. 9

Julie Burns, Friends of Lands End

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

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

Speaker No. 10

Amy Meyer

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

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

Speaker No. 11

Eddie Ramirez

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

Bennett, Kelsey

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

Comments regarding the IMP.

John Pechman

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

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

Dear Mr. Pechman ~

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

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

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

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

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

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

I respectfully request a response.

Norma Wallace

4th Generation San Franciscan

San Francisco Homeowner

Currently Residing Richmond California

Bennett, Kelsey

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

Please see EIS scoping comment from Ms. Howard.

John Pechman

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

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

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

Re: VAMC IMP Scoping Comments

Dear Mr. Pechman,

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

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

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

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

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

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

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

Sincerely,

Katherine Howard
1243 42nd Avenue
San Francisco, CA 94122

Bennett, Kelsey

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

Comments on the EIS/IMP.

John Pechman

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

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

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

C.K. Wai

RON MIGUEL

600 De Haro St., San Francisco, CA 94107

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

27 April 2011

John Pechman, Facility Planner

San Francisco VAMC

4150 Clement St.

San Francisco, CA 94121

RE: SFVAMC Institutional Master Plan

SFVAMC Environmental Impact Statement

Dear Mr. Pechman:

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

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

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

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

There has been vague discussion of four Alternatives:

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

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

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

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

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

Sincerely,

Ron Miguel

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

Bennett, Kelsey

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

Comments on the EIS.

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

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

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

PWR has no comment regarding subject document.

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

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

Marchelle_Dickey@
contractor.nps.go
v

03/30/2011 05:27
PM

To
Debbie_Allen@nps.gov

cc

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

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

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

Document Information

Record #15427

ER Document Number

ER-11/0273

Document Title

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

Location

State

California

County

San Francisco County

Document Type

Notice of Intent, Prepare Environmental Impact Statement

Doc. Classification

Other Types of Project

Applicant

Department of Veterans Affairs

Web Review Address

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

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

Document Uploads

Documents Uploaded

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

Document Reviewers

WASO Lead Reviewer

WASO Reviewers

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

Regional Lead Reviewer

Alan Schmierer (PWR-O)

Regional Reviewers

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

OEPC Contact

Lisa Chetnik Treichel

Action

Lead Bureau

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

Topic Context

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

DI Remarks

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

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

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

Workflow

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

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

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

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

Comments Due to REO:

Tracking Dates

Rcvd. Region Comments:

Comments Sent to OEPC, REO, or Applicant:

New Instructions:

Recvd. Ext. Letter:

Reg. Cmts. to Bureau:

Cmts. Called In:

Comments Sent to EQD Chief:

Comment Letter/Memo Signed:

Recvd. Extension:

Sent Add. Info:

Reg. Cmts. Listed:

Rcvd. Bureau Cmts:

Tracking Notes

Reviewer Notes

Documentation

Document Last Modified: 03/30/2011

Complete: False

Date Created: 03/30/2011

Date Last Email Sent:



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

April 28, 2011

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

Re: San Francisco Veterans Affairs Medical Center Institutional Master Plan

Dear Mr. Pechman,

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

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

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

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

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

Thank you for taking these comments into consideration.

Sincerely,

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





United States Department of the Interior

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

IN REPLY REFER TO:

L 76 (GOGA - PLAN)

APR 29 2011

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

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

Dear Mr. Pechman:

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

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

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

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

Sincerely,

Frank Dean
General Superintendent

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

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



United States Department of the Interior

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

COPY *RLT*

IN REPLY REFER TO:

L76 (GOGA-PLAN)

DEC 13 2010

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

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

John
Dear Mr. Pechman:

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

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

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

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

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

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

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

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

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

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

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

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

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

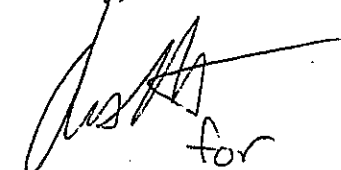
Utilities: The CMPSR discusses the need to relocate main water and combined storm/sewer lines to accommodate new development; however, it does not propose incorporating the north campus storm drain into the combined storm/sewer lines. As expressed in comments the NPS made on the North Slope project, the NPS is concerned that SFVAMC is collecting storm water and discharging this concentrated storm water on an unstable slope. By continuing this practice, NPS is concerned that concentrated storm water will cause increased instability on an unstable slope for lands below where drainage exits the storm water pipes. Additional slides and slumps in this area could destroy trail access and infrastructure in an important pedestrian corridor. We encourage the IMP to address this issue and make a commitment to discharge all campus storm water through low-impact-design (LID) as described in the CMPSR (Section 5.7) or through the combined sewer/storm water piping that exists throughout the campus, discontinuing the practice of discharging storm water on the unstable slope north of the campus.

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

Light Pollution (Dark Skies and Nocturnal Habitat Protection): The Lands End area is one of the darkest places in the City of San Francisco and offers extraordinary opportunities for night sky viewing in an urban environment. Additionally, the existing SFVAMC campus is adjacent to nocturnal wildlife habitat. Please address impacts of the alternatives on the night sky and natural darkness in this area. Attached is an e-mail we received from a concerned citizen regarding this subject that we are forwarding for your information.

Recently, the NPS asked the SFVAMC Planning Team to meet to further discuss this project with us in order to facilitate improved communication (letter dated Nov 1, 2010), and we hope SFVAMC will accommodate this request. Should an agency-to-agency meeting occur, the NPS will provide additional comments on the IMP. If you have any questions regarding NPS comments please contact Katharine Arrow (NPS liaison to SFVAMC) at 415-561-4971. The NPS appreciates having the opportunity to provide scoping comments on this important planning effort.

Sincerely,



Frank Dean
General Superintendent

Enclosures (1)
Dark Skies Letter

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

RE: Dark Skies

From: Concerned Citizen

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

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

- Investigating the planned lighting to determine the luminous flux that would be emitted directly into the sky above, or directly toward, the Sutro Historic District and Sutro Heights Park. Given the elevation of the VAMC substantially above both park sites and the height of the proposed buildings, such flux would not be limited to emissions at or above 90° above nadir, but would likely also include some downlight. Such investigation should pertain to both exterior luminaires as well as interior luminaires producing exterior light spill (e.g. through windows, from sides of parking structures, etc.).
- Investigating the planned lighting to determine the luminous flux that would be reflected into the sky above the Sutro Historic District and Sutro Heights Park, such as by reflection off parking lots, walls, plaza and courtyard surfaces, etc.
- Calculating and demonstrating the effect of both direct and reflected light on both zenith sky darkness and darkness in the low southern sky as seen from Land's End and Sutro Heights Park, taking into account the direction, intensity and spectral power distribution of the planned lighting.
- The planned lighting should be reviewed by experts in the area of dark-sky protection, light pollution mitigation, and effects of night lighting on wildlife and ecology. Given the VAMC's close proximity to National Park Service properties, National Park Service staff experts on light pollution should be engaged to review the project and the full technical details of the lighting plan.

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

San Francisco suffers from severe and ever-increasing artificial sky glow due to the amount of stray light shined into the night sky from various sources, including the city's tens of thousands of inadequately shielded streetlights and security floodlights. Upward-directed light does not contribute to public safety or visibility, but only wastes energy and blankets the city in a monotonous all-night twilight glow that blots out otherwise-visible features of the cosmos. Unnecessarily bright and/or poorly-aimed lighting in many parts of the city also causes excessive amounts of light to be reflected off pavement and buildings into the sky.

Fortunately, a number of locations along San Francisco's ocean coast enjoy a level of sky darkness sufficient for astronomical observation. This is due to the city's geography with unlit ocean on two sides, the city's land use patterns in which urban density (and corresponding outdoor lighting intensity) is much lower near the coastal areas than toward the urban center, and to the fact that much of the coastal strip was set aside by previous generations as undeveloped parkland. These locations include Land's End, Sutro Heights Park, Lincoln Park, and much of Ocean Beach. Land's End serves as the core of the city's dark-sky zone and the San Francisco Amateur Astronomers holds monthly observing sessions for the benefit of the public at Land's End. In addition, individual astronomers carry out telescopic and unaided-eye observing in these locations and many residents of the western neighborhoods value the nighttime ambience, and enjoy viewing astronomical objects from their own yards.

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

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

April 29, 2011

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

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

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

Dear Mr. Pechman:

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

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

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

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

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

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

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

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

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

Scoping comments

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

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

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

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

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

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

Respectfully yours,

Ray Holland, President, Planning Association for the Richmond

Gene Brodsky, ESQ, PAR Board Member

Julie Burns, Friends of Lands End

David Burns, Friends of Lands End

Amy Meyer, People for a Golden Gate National Recreation Area

John Frykman, Coalition to Save Ocean Beach

Cheryl Arnold, Coalition to Save Ocean Beach

Tom Kuhn, Friends of Sutro Heights Park

Jason Jungreis, Friends of Sutro Heights Park

CC:

Eric Mar, Supervisor – District 1

Mark Farrell, Supervisor – District 2

John Rahaim, Planning Director

Jim Illig, SF Health Commission

Kate Stacy, Deputy City Attorney

Sarah Karlinsky, SPUR

Alex Doniach, Senator Leland Yee

Dan Bernal, Senator Nancy Pelosi

Sharon Duggan, ESQ.

Frank Dean, GGNRA

Brian Aviles, GGNRA

Brian Turner, National Trust for Historic Preservation

Bennett, Kelsey

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

FYI in regards to the EIS.

John Pechman

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

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

Dear Mr. Pechman:

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

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

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

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

Patty Lacson

Director of Facilities
Fine Arts Museums of San Francisco
de Young/Legion of Honor
100 - 34th Avenue
Lincoln Park
San Francisco, CA 94121

(415) 750-7655 - phone
(415) 750-2665 - fax
www.famsf.org

Bennett, Kelsey

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

FYI.

John Pechman

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

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

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

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

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

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

Kin

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

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

C.K. Wai

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

[Notices]

[Page 49865]

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

[FR Doc No: 2012-20243]

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DEPARTMENT OF VETERANS AFFAIRS

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

AGENCY: Department of Veterans Affairs (VA).

ACTION: Notice of availability.

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

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

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

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

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

Three alternatives were evaluated in the Draft EIS. Alternative 1

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

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

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

Approved: August 9, 2012.

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

ATTACHMENT C—NON-FUNCTIONAL REQUIREMENTS—Continued

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

[FR Doc. 2012-25408 Filed 10-15-12; 8:45 am]
BILLING CODE 8320-01-P

DEPARTMENT OF VETERANS AFFAIRS

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

AGENCY: Department of Veterans Affairs (VA).

ACTION: Notice of Extension of Comment Period.

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

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

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

FOR FURTHER INFORMATION CONTACT: Chief Engineer, Engineering Service

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

Dated: October 11, 2012.

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

[FR Doc. 2012-25409 Filed 10-15-12; 8:45 am]
BILLING CODE 8320-01-P

DEPARTMENT OF VETERANS AFFAIRS

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

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

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

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

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

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

Dated: October 10, 2012.

By Direction of the Secretary:

Vivian Drake,
Committee Management Officer.

[FR Doc. 2012-25329 Filed 10-15-12; 8:45 am]
BILLING CODE 8320-01-P

DEPARTMENT OF VETERANS AFFAIRS

Advisory Committee on Disability Compensation, Notice of Meeting

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

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

1227 or (954) 423-7977 or write: TAP Office, 1000 S. Pine Island Road, Plantation, FL 33324 or contact us at the Web site: <http://www.improveirs.org>. The committee will be discussing various issues related to Tax Forms and Publications and public input is welcomed.

Dated: March 3, 2015.

Otis Simpson,

Acting Director, Taxpayer Advocacy Panel.

[FR Doc. 2015-05365 Filed 3-6-15; 8:45 am]

BILLING CODE 4830-01-P

DEPARTMENT OF VETERANS AFFAIRS

Notice of Availability of a Supplemental Draft Environmental Impact Statement for the San Francisco VA Medical Center Long Range Development Plan

AGENCY: Department of Veterans Affairs.

ACTION: Notice of availability.

SUMMARY: The Department of Veterans Affairs (VA), San Francisco VA Medical Center (SFVAMC) announces the availability of the *Supplemental Draft Environmental Impact Statement (SDEIS) for the Long Range Development Plan (LRDP)*, for public comment pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. 4331 *et seq.*), the Council on Environmental Quality Regulations for Implementing the Procedural Requirements of NEPA (40 CFR parts 1500-1508), VA's implementing Regulations (38 CFR part 26), as well as the settlement agreement resulting from *Planning Association for the Richmond, et al v. U.S. Department of Veterans Affairs*, C-06-02321-SBA (filed 6 June 2008). VA supplemented the draft EIS originally released in August 2012 to account for design and project phasing changes from the LRDP released in 2012 to the LRDP released in 2014. Both versions of the LRDP describe development and construction of patient care buildings, research buildings, business occupancy buildings, and parking structures, as well as retrofitting seismically deficient buildings. The SDEIS identifies and

addresses environmental impacts associated with the Proposed Action.

DATES: Interested parties are invited to submit comments in writing on the SFVAMC SDEIS by May 8, 2015. In preparing the SDEIS the SFVAMC will consider all comments received or postmarked by that date. Comments received after that date will be considered to the extent practicable. Interested parties are also invited to participate in a public meeting regarding the SFVAMC SDEIS on April 14, 2015 at SFVAMC (4150 Clement Street, San Francisco, CA 94121, Building 7, 1st floor, Auditorium) at 5 p.m.

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

Written comments may also be submitted electronically to robin.flanagan@va.gov please reference "SFVAMC Supplemental Draft EIS" in any correspondence.

FOR FURTHER INFORMATION CONTACT: Robin Flanagan, San Francisco Veterans Affairs Medical Center, 4150 Clement Street, San Francisco, CA 94121 or by telephone, (415) 750-2049. The SFVAMC 2014 LRDP and SDEIS are available for viewing on the SFVAMC Web site: <http://www.sanfrancisco.va.gov/planning>.

SUPPLEMENTARY INFORMATION: VA operates the SFVAMC, located at Fort Miley in San Francisco, California. It is the only VA medical center in the City and County of San Francisco and VA considers it an aging facility that needs to be retrofitted and expanded.

Proposed Action

The SFVAMC has identified a need for retrofitting existing buildings to the most recent seismic safety requirements and for an additional 589,000 gross square feet (gsf) of medical facility space to meet the needs of San Francisco Bay Area and northern California coast Veterans over the next 15 years, in two phases.

Purpose and Need for Action

The purpose of the Proposed Action is to meet the Veterans Health

Administration mission of providing comprehensive, high-quality health care services that improve the health and well-being of Veterans and other eligible persons in the San Francisco Bay Area and Northern California. VA's need for the Proposed Action is to address the area's current and future capacity issues brought about by the growing Veteran population, to better serve the ever-changing health care needs of the growing Veteran population, and to provide safe and appropriate facilities for providing health care services and conducting research.

SFVAMC has major space and parking deficiencies at its existing Fort Miley Campus. The SFVAMC mission is to continue to be a major primary and tertiary care medical center providing high-quality care to eligible Veterans in the San Francisco Bay Area and along the North Coast. SFVAMC strives to deliver needed care to Veterans while contributing to health care knowledge through research. SFVAMC is also a ready resource for Department of Defense backup, serving as a Federal Coordinating Center in the event of a national emergency. New construction initiatives would transform the Campus by providing seismic improvements and additional facility space. VA can meet its mission more effectively by integrating clinical care, education, and research, because such integration makes for more efficient and progressive overall care for Veterans.

Signing Authority

The Secretary of Veterans Affairs, or designee, approved this document and authorized the undersigned to sign and submit the document to the Office of the Federal Register for publication electronically as an official document of the Department of Veterans Affairs. Jose D. Riojas, Chief of Staff, approved this document on February 25, 2015 for publication.

Approved: March 5, 2015.

Michael Shores,

Regulation Policy and Management, Office of General Counsel.

[FR Doc. 2015-05507 Filed 3-6-15; 8:45 am]

BILLING CODE 8320-01-P



United States Department of the Interior

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

IN REPLY REFER TO:
(ER 12/591)

Filed Electronically

18 October 2012

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

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

Dear Allan Federman:

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

A1-1

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

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



United States Department of the Interior

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

IN REPLY REFER TO:

L76 (GOGA-PLAN)

OCT 31 2012

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

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

Dear Mr. Federman:

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

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

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

A2-1

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

A2-2

Sincerely,

Frank Dean
General Superintendent

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

NPS Comments

SFVAMC LRDP Draft Environmental Impact Statement

SECTION 1 (INTRODUCTION)

1.7 Public Involvement Process

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

A2-3

SECTION 2 (ALTERNATIVES)

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

A2-4

SECTION 3 (AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES)

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

A2-5

3.1 – Aesthetics

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

A2-6

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

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

A2-7

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

A2-8

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

A2-9

3.4 - Cultural Resources

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

A2-10

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

A2-11

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

cont.
A2-11

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

A2-12

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

3.9 Land Use

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

A2-13

3.13 Transportation and Parking

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

A2-14

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

A2-15

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

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

cont.
A2-15

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

A2-16

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

A2-17

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

A2-18

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

A2-19

Cumulative Impacts

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

A2-20

3.14 Utilities

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

A2-21



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

Letter A3

October 30, 2012

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

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

Dear Mr. Federman:

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

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

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

A3-1

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

A3-2

Sincerely,

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

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

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

SUMMARY OF EPA RATING DEFINITIONS*

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

ENVIRONMENTAL IMPACT OF THE ACTION

“LO” (Lack of Objections)

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

“EC” (Environmental Concerns)

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

“EO” (Environmental Objections)

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

“EU” (Environmentally Unsatisfactory)

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

ADEQUACY OF THE IMPACT STATEMENT

Category “1” (Adequate)

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

Category “2” (Insufficient Information)

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

Category “3” (Inadequate)

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

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

Purpose and Need and Alternatives

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

A3-3

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

A3-4

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

A3-5

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

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

A3-6

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

Construction Noise Impacts

Construction noise impact assessment

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

A3-7

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

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

A3-8

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

A3-9

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

cont.
A3-9

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

Noise impacts to children

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

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

A3-10

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

Noise mitigation

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

A3-11

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

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

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

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

cont.
A3-11

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

A3-12

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

A3-13

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

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

Visual Resources

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

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

A3-14

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

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

Air Quality

Air quality impact assessment and mitigation measures

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

A3-15

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

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

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

↑ cont.
A3-15

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

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

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

A3-16

For fugitive dust source controls, we recommend:

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

↓

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

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

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

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

cont.
A3-16

General conformity – minor comment

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

A3-17

Stormwater Pollution and Management

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

A3-18

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

Transportation and Parking

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

A3-19

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

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

↑ cont.
A3-19

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

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

↑
A3-20



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

October 25, 2012

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

Dear Mr. Federman,

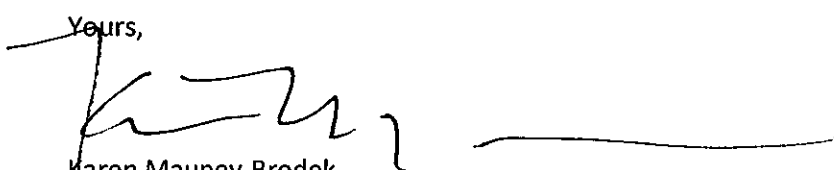
Thank you for the opportunity for the Recreation and Parks Department to provide feedback on the San Francisco Veterans Affairs Medical Center (SFVAMC) Long Range Development Plan (LRDP) Section 106 and Draft Environmental Impact Statement (DEIS), and for being patient while we prepare our comments.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

A4-1

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

Thank you for taking these comments into consideration.

Yours,


Karen Mauney-Brodek
Deputy Director for Park Planning
karen.mauney-brodek@sfgov.org



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October 31, 2012

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

In Re: SFVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

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

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

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

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

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

Sincerely,

Raymond R. Holland
President, PAR

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

October 31, 2012

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

In Re: SfVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

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

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

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

General comments

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

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

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

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

A5-1

Total build out

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

A5-2

Offsite alternative

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

A5-3

Environmental

Aesthetics

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

A5-4

Air Quality

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

A5-5

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

A5-6

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

A5-7

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

↑
cont.
A5-7

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

A5-8

Noise and vibration

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

A5-9

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

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

A5-10

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

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

A5-11

Vegetation

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

A5-12

Infrastructure, fire, and safety

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

A5-13

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

Fire safety and response

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

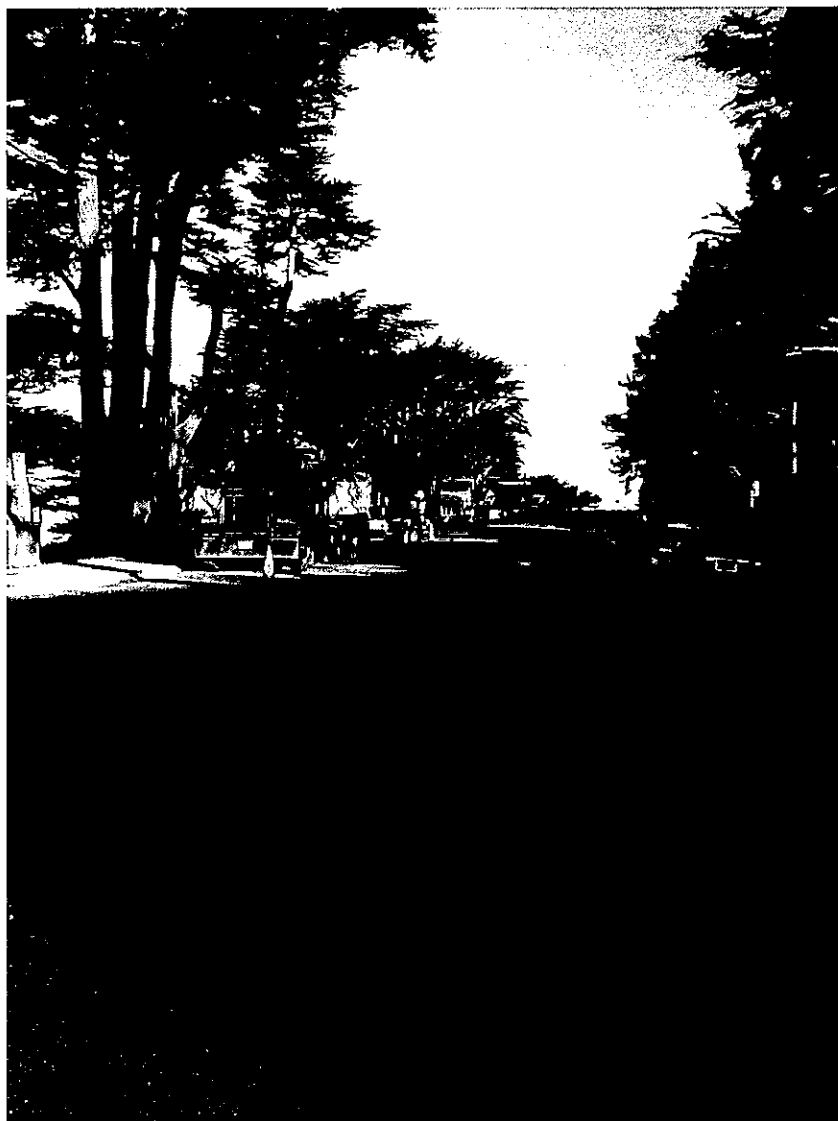
A5-14

Mitigation and contractor compliance

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

A5-15

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



cont.
A5-15

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

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

A5-16

Summary

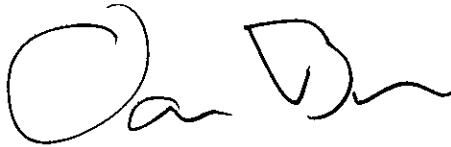
We believe that despite its scope, the LRDP and associated documents neglect significant impacts, fails to completely address the impact of Alternative 2, that its conclusions are based upon dated or questionable data, and that the issue of jurisdiction raised by the presence of UCSF and NCIRE on site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

A5-17

Respectfully submitted,



Julie Burns, Co-Founder
Friends of Lands End



David Burns, Co-Founder
Friends of Lands End

People For a Golden Gate National Recreation Area
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October 31, 2012

Mr. Allan Federman, Acting Facility Planner
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4150 Clement Street (138)
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In Re: SFVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

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

General Comments

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

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

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

Comments on Historic Preservation in Regard to Both Historic Districts

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

A5-19

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

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

"Physical damage to all or part of the property.

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

"Changing the character of the property's use or of physical features within the property's setting that contribute to its historic significance.

"Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features."

A5-20

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

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

A5-21

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

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

A5-22

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

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

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

cont.
A5-22

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

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

This should be entirely unacceptable to all concerned.

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

A5-23

Effects on the Golden Gate National Recreation Area

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

A5-24

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

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

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

A5-24

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

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

A5-25

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

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

A5-26

Comments relating to Cumulative Impacts

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

A5-27

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

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

cont.
A5-27

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

Sincerely,



Amy Meyer, People for a GGNRA



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October 31, 2012

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

Dear Mr. Federman:

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

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

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

A5-28

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

cont.
A5-28

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

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

A5-29

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

A5-30

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

A5-31

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

A5-32

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

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

A5-33

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

A5-34

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

A5-35

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

A5-36

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

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

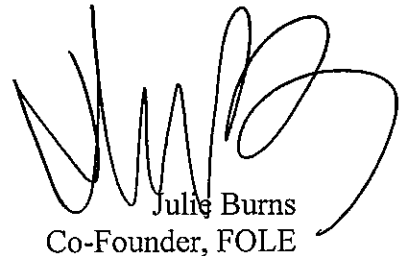
The foregoing demonstrates that adverse impacts on the nearby residents resulting from overflow parking from the SFVAMC site have not been adequately evaluated. If objectively evaluated, it would be clear that Alternative 1 should not be allowed to proceed, and that Alternative 2, while imposing significantly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

A5-37

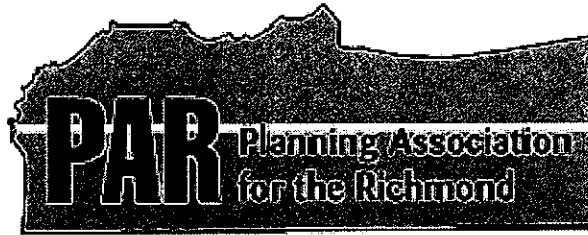
Sincerely,



Raymond R. Holland
President, PAR



Julie Burns
Co-Founder, FOLE



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October 31, 2012

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

In Re: SFVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

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

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

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

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

A5-38

A5-39

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

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


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

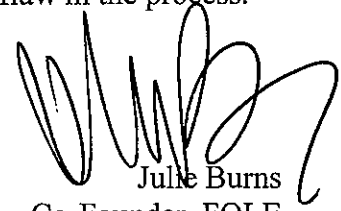
While the LRDP identifies the SFVAMC’s important “partnerships” with the University of California at San Francisco (UCSF) and the Northern California Institute of Research and Education (NCIRE) and the general nature of each on page 1-9, it fails to mention or to identify what role, if any, each of those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

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

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

Sincerely,


Raymond R. Holland
President, PAR


Julie Burns
Co-Founder, FOLE

cont.
A5-39

A5-40

A5-41

October 30, 2012

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

In Re: SFVAMC LRDP Draft EIS and Section 106

Dear Mr. Federman:

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

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

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

Infrastructure and fire safety

Infrastructure

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

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

Fire safety and response

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

A5-42

A5-43

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

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

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

cont.
A5-44

Transportation

Appendix: Transportation Impact Study(TIS)

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

A5-45

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

A5-46

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

A5-47

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

A5-48

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

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

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

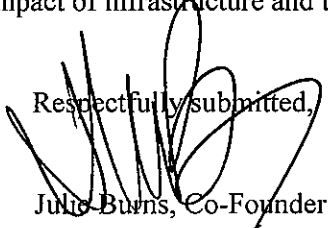
A5-49

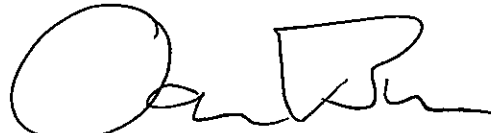
Summary

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

A5-50

Respectfully submitted,


Julie Burns, Co-Founder
Friends of Lands End


David Burns, Co-Founder
Friends of Lands End



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

Letter A6

COMMENT SHEET

(please hand in or mail back)

Name:

Robert Hollis

Organization (if any):

Street address (optional): P.O. Box 6033

City, State, Zip: SAN RAFAEL, CA 94903

E-mail address: DOCCONSULT@COMCAST.NET

Phone number: (415) 479-5713

Preferred form of contact: ☒ email ☐ mail ☐ phone

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

Comments

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

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

Thank you
Robert L. Hollis

A6-1

Comments continued



SFVAMC Long Range Development Plan Draft Environmental Impact Statement

Letter A7

COMMENT SHEET

(please hand in or mail back)

Name: JASON SUNGERBIS
Organization (if any): CSOB/BSP, FOLE, PAR
Street address (optional): 527 4th AVE.
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E-mail address: JASON.SUNGERBIS@GMAIL.COM
Phone number: 415-750-0890
Preferred form of contact: ☒ email ☐ mail ☐ phone

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

Comments

1) Request additional 60 days for the DEIS comment period. [A7-1]

2) proposed VAMC - TRK/Proth, not Ksearch [A7-2]

3) impact on Richmond
a) parking still deficient
b) transit impact insufficiently addressed
c) building height exceeds Richmond residential height [A7-3]

Comments continued

Bennett, Kelsey

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

Judi Cheary
Director of Public Affairs
San Francisco VA Medical Center
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From: jason jungreis [<mailto:jasonjungreis@gmail.com>]
Sent: Wednesday, October 31, 2012 9:29 PM
To: Cheary, Judi A.
Subject: LRDP Draft EIS comments

Judi,

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

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

Thank you for your efforts in this regard.

Jason Jungreis

Letter A8

The LRDP DEIS is deficient in the following:

1. The document fails to provide information or analysis of meaningful alternatives. By definition, an EIS must provide detailed information of all alternatives. Here, there is no detailed information – indeed, hardly more than passing mention – of the alternatives. In the most fundamental way, this DEIS is a complete failure. It must be re-considered in the light of fully-developed alternatives that are as complete and offer as much information as the LRDP offers. The DEIS in its present form must be completely scrapped and re-formed with complete alternatives and complete analyses of these alternatives. A8-1
2. The DEIS fails to address the purpose of the LRDP. Presumably, the purpose of the VAMC is to treat veterans. Going fully unconsidered in the DEIS is the fact that nearly the whole of the SFVAMC expansion would be for research, and not for treatment. It is anathema to the core purpose of the VAMC to conduct research, and moreover it is a complete disservice to the purpose of the VAMC to generate a LRDP that does not centrally address treatment first and foremost while instead allotting invaluable limited resources to research over treatment. In this regard, the DEIS in its present form must be completely scrapped and re-formed with completely new analysis and development planning must be generated to prioritize treatment over research. A8-2
3. The DEIS fails to address what the nature of the research is that it proposed to conduct to distinguish between disease and symptomology that is primarily endemic to veterans, as opposed to the public at large, so as to confirm that it must be conducted at a VAMC. To provide examples, clearly the veteran population may suffer from hangnails, or athlete's foot, or cardiac disease: these are all laudable bases for some sort of medical research, and yet none rise to the level of requiring VAMC medical research resources applied toward their study. Invaluable limited VAMC resources should only be applied toward those diseases and symptoms that are relatively unique to veterans.



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

Letter A9

COMMENT SHEET

(please hand in or mail back)

Name: ANNE SUN / BILL KAKTIS
Organization (if any): NEIGHBOR
Street address (optional): 2645 EL CAMINO DEL MAR
City, State, Zip: SAN FRANCISCO CA 94121-1421
E-mail address: antonia_sun@msn.com; wkaktis@gmail.com
Phone number: SUN: 415 939 6170; KAKTIS 415 387 9632
Preferred form of contact: ☒email ☒mail ☒phone

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

Comments

OVER →

Comments continued



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

TO : ALLAN FEDERMAN

FROM : ANNE SUN / BILL KAKTIS

SUBJ : SFVAMC - LRDP DRAFT EIS

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

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

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

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

Affix
Stamp

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

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

Reference	No.	Comment	Resolution
-	1	Indicate if CD content is part of LRDP package, and if reviewers may request inspection of same prior to finalizing comments, by reference in LRDP.	A9-1
3-2?	2	The LRDP should indicate to what LEED standard new phased structures will be designed.	A9-2
1-2	3	The Long Range Development Plan (LRDP plan) needs to include a reference date, i.e., 2023 LRDP instead of LRDP. Indicate if there has been any LRDP development before 2012 (i.e., LRDP has been a continuous process).	A9-3
1-2	4	Include the VA Director's foreword at the beginning of the introduction, to establish that the Director is buying in to the LRDP.	A9-4
1-2	5	The LRDP Introduction should tie in the importance of the LRDP as it relates to any Environmental Impact Statements developed previously by GGNRA, and should emphasize that joint or phased work in planning is not considered independent.	A9-5
1-7	6	The campus location should be described in detail in the plan to include some of the site constraints such as proximity to the GGNRA parks, Sutro Park, Lincoln Park Golf Course, Legion of Honor, LaFayette School and residential areas. The description should include some of the fixed constraints such as protected habitat and distance to the San Andreas and Hayward faultlines.	A9-6
1-2	7	The draft LRDP should emphasize the importance of new structures adjacent to or encroaching on the Lincoln Park Golf Course and/or the extension of El Camino del Mar on the west side of SFVAMC.	A9-7

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

Reference	No.	Comment	Resolution	
1-7?	8	Easement and setback constraints should also be included in the description above. Major utility constraints and easements within Federal property and the City and County of San Francisco should be included in the LRDP.		A9-8
4-5	9	The draft LRDP should reference any environmental investigations (i.e., CERCLA or RCRA) performed to mitigate contamination, hazardous waste or control hazardous materials in the vicinity of new planned structures. The LRDP should state whether hazards exist and how mitigated.		A9-9
2-9	10	Due to constraints of the site location, indicate if SFVAMC studied additional parking space requirements for additional employees, patients and visitors on any given day. The existing number of parking spaces available is insufficient, employees, patients and guests cannot find parking and have to park along Clement and Seal Rock Drive, El Camino del Mar, Point Lobos Ave., and other network streets. Indicate if SFVAMC performed a space and population projection through 2023 and beyond (i.e., beds, number of full and part-time staff, number of guests, study of people versus space). Indicate if, on the phased construction schedule the 211 Parking Facility will be built first to alleviate vehicle overcrowding during construction phasing.		A9-10
5-2	11	Any expansion of SFVAMC will affect traffic on local city streets. Indicate if traffic studies and projections have been performed on Point Lobos, Seal Rock, El Camino del Mar, Clement, Alta Mar, 38th through 48th Avenues and other grid streets. Indicate if traffic studies, that may also have been accumulated by others, indicate how increased traffic/overflow parking needs will be controlled.		A9-11

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

Reference	No.	Comment	Resolution	
5-2	12	The plan should include discussion to locate construction staging areas to avoid impacting the residential neighborhood. This study should include where contractors layover and park equipment such as semitrailer trucks, backhoes, cranes and delivery vehicles. If contractors will use helicopters to offload materials and equipment, this usage should be described in the plan as it is a potential noise hazard. Indicate that City Permitting will be required for street closures, detours, lane closures and barricading/traffic control.		A9-12
3-2?		The LRDP should describe noise and dust mitigation practices that will be implemented during the construction phases. Typically, construction noise on City streets is permitted, monitored and mitigated at specific measurable noise levels (dB) at specific times of the day,		A9-13
4-14?	13	The LRDP should indicate new permanent lighting requirements as well as temporary lighting used during construction that will impact the surrounding neighborhood. Indicate how the intensity of this lighting will affect the neighborhood, and if dimming and or adjustment is practical following installation and use.		A9-14
Supplemental Geology	14	Soil investigations and soil reports published for new plan structures should be referenced completely in EIS documentation, or an indication should be provided that such and what reports will be forthcoming during design phases. Also reference any investigations performed in the former landslide area along the El Camino del Mar right of way north of SFVAMC proper.		A9-15
3-2?	15	The LRDP should describe whether the landslide area on the north slope of SFVAMC was considered for potential use for new phased structure construction, including the rehabilitation of El Camino del Mar and potential traffic impacts to outlying areas, as an easement from GGNRA.		A9-16

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

Reference	No.	Comment	Resolution	
3-2?	16	Indicate if a background survey was done for the existing buildings on the SFVAMC campus to account for the need to perform seismic upgrades of any/all of the structures, and suitability studies for each building.		A9-17
4-1	17	The plan should include a description of existing utility infrastructure, condition, and strategies for the future. Utilities include, but are not limited to: water supply and distribution; sanitary sewer lines; storm drain system; surface runoff on erodible slopes; electrical power and distribution; natural gas system/distribution telecommunication and network and hazardous wastes.		A9-18
3-2?	18	Indicate if temporary staff housing will be required during phased construction and where this housing will be located.		A9-19
1-4	19	Due to the site location, the plan needs to justify the importance of adding a research center at this location. Provide a rationale as to why a research center is needed at this site.		A9-20
1-4	20	Indicate what are the SFVAMC site and facility visions at Fort Miley proper that project beyond 2023.		A9-21
1-2	21	Organization for implementing the LRDP should include not only SFVAMC but also stakeholders such as the residential community, facility tenants, suppliers, the Legion of Honor, Lincoln Park Golf Course, GGNRA, the City and County of San Francisco, the designers of record and the Contractor. Indicate how future public hearings would be part of the implementing process.		A9-22
1-2	22	DOD should be correctly referenced as "United States Department of Defense"; VA should be referenced as "United States Department of Veteran Affairs"; and VHA should be referenced as "United States Veteran Health Administration".		A9-23

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

GENERAL COMMENTS

Reference	No.	Comment	Resolution	
5-2	23	Indicate if perimeter roadway would be used for circulation and stops for SFMTA buses and delivery trucks. Indicate that a significant roadway cross section may be required to support bus/truck wheelloads (HS-20 loading).		A9-24
5-2	24	Indicate what impact the routing of SFMTA buses has on patients/staff that choose to walk from the vicinity of 42rd Avenue and Point Lobos to SFVAMC.		A9-25
4-2	25	Indicate construction impacts affecting standing trees and other flora and fauna that inhabit SFVAMC grounds included in phased construction work. Indicate if in situ and construction soils are stable on erodible slopes and how slope slippage can be controlled, by the use of compaction, fill, selective cuts, retaining walls, tieback walls, curbing and paving.		A9-26
4-2?	26	Indicate the height limitation on new structures and how the height of new structures will affect the neighborhood. Indicate the drivers that influence the selection of design heights, such as soil (geologic) conditions, aesthetics and visions.		A9-27
1-1	27	Indicate what SFVAMC facilities will be required to be temporarily / permanently relocated during construction phasing.		A9-28
2-3	28	Indicate to what seismic level (i.e., magnitude 8) new structures will be designed.		A9-29
1-4	29	Indicate the proximity of other VA research facilities on the west coast.		A9-30

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

GENERAL COMMENTS

Reference	No.	Comment	Resolution	
5-5	30	Indicate what proportion of new parking spaces are for patients, guests or medical / administration staff. Indicate where spaces must be reserved for transit stops, POV / handicapped access and deliveries. Indicate how much space is required for emergency vehicles and shuttle vans.		A9-31
5-5	31	Indicate the number of POVs / shuttles that will be directed, due to overflow, to GGNRA parking lots (such as at the Vietnam Memorial area and at the Lookout Area along Point Loos west of El Camino del Mar) and adjacent streets, now, during construction and in the future.		A9-32
5-3	32	Indicate if SFMTA (MUNI) has been asked to increase transit service on the 38, 38L and 38AX lines servicing SFVAMC directly or indirectly. The City of San Francisco is a "Transit First" city.		A9-33
5-2	33	Indicate if SFMTA (DPT) has been asked, due to potential parking overflows, to allow residential permit parking and parking metering on network and vicinity streets.		A9-34
5-3	34	Indicate if SFDPW has been asked to complete ADA ramps on network and vicinity street corners that are in the pathway of ambulatory and disabled patients accessing SFVAMC without transit (i.e., from 42nd Avenue and Point Lobos or Seal Rock and El Camino del Mar, or Clement and 38th Avenues.		A9-35
4-14	35	Indicate if the increase in gross building square footage will affect fire department access and earthquake evacuation routes.		A9-36
2-17	36	Indicate how designated bicycle routes (particular along El Camino del Mar, Seal Rock and Clement) will be affected during construction. Indicate if re-routing of bicycle routes will be required during construction phasing.		A9-37

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

GENERAL COMMENTS

Reference	No.	Comment	Resolution	
3-7	37	Indicate what Building 20, slated for demolition, has been or is used for. Indicate if this structure contains ordnance, hazardous materials, hazardous waste, and how mitigation will be achieved.		A9-38
5-3	38	Indicate if CCSF, SFMTA and / or SFDPW has been asked to improve traffic safety at the intersections of 42nd and Clement, 43rd and Clement, 42nd and Point Lobos and 43rd and Point Lobos by enlarging and restriping crosswalks, adding signage and adding traffic signals.		A9-39
		END OF COMMENTS		

Dear Mr. Allan Freedman
Acting Facility Planner

Re Long-Range Development Plan *SFVAMC LRDP*

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

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

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

Your consideration of this situation is very much appreciated.

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

A10-1

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

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

Letter: Greetings,

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

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

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

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

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

Sincerely,

P247

Signatures

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

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

Comments

Name	City	State	Zip	Country	SignedOn	Comment	
ajay scoular	san francisco	CA	94121	United States	9/17/12	Do not spoil the natural beauty of Lands End and the GGNRA, and stop building in a residential area when the VA Mission Bay campus in a commercially zoned area of SF can be expanded and can better serve veterans without increasing the city's carbon footprint as much.	A11-1
George & Nancy Pannos	San Francisco	CA	94121	United States	9/17/12	The beauty of this part of my beautiful town is vital..the construction and tearing down of it's beauty by the VA is a shame and will only get worse if plans to expand this construction continue..it's a question of the quality of life we in this great City enjoy..please keep it a quality zone.	A11-2
Nanci Price Scoular	San Francisco	CA	94121	United States	9/21/12	In this age of concern re global warming and our carbon footprint,, It is completely irresponsible for the VA to encourage even more patients, staff and visitors + their vehicles to travel all the way to the very north western edge of the city for such essential services. Additional VA facilities should be located where the majority of its constituents are and close to train and muni hubs. Finally the current traffic, and continual construction threaten the adjacent GGNRA nature preserve with its abundant wildlife and peaceful serenity that most of us neighbors moved out here to enjoy.	A11-3

1567

9697

Millena Flore	San Francisco	CA	94118	United States	9/24/12	<p>There is currently a construction project that has been going on for almost two years. There is drilling and loud, screeching noise from tractors, trucks and land moving vehicles that starts at 7:00 am and sometimes is still going on at 11:30 at night-weekdays and some weekends. Generators run loudly 24 hour/day. To imagine 10 more years of this noise pollution and environmental destruction is not acceptable.</p> <p>The harm that is being done to the land is irreversible. There have been trees cut down, and hillsides razed. Already there are fewer songbirds, hawks and other wildlife in the area.</p> <p>More importantly, this facility does not provide adequate access to the health care that our veterans need. It is very confusing and challenging to get through to a doctor, find a class or even get through to an operator who won't hang up on you.</p> <p>These are our tax dollars and should be used more responsibly with more accountability, creating a better environment not destroying it. Enough!</p>	A11-4
Janet Galeano	San Francisco	CA	94121	United States	10/1/12	Because as a long-time resident, I have already lived through the many construction projects already.	A11-5
David Wilson	Berkeley	CA	94707	United States	10/2/12	I visit the park and hike at Lands End often. It would break my heart to have long shadows from new buildings cast over this hidden treasure.	A11-6
Mary Anne Leary	Woodside	CA	94062	United States	10/2/12	This is an incredible natural resource with the GGNRA and a single family zoned neighborhood. Please preserve the natural beauty!	A11-7

8727

ayana baltrip	San Francisco	CA	94132	United States	10/12/12	The preservation of nature within San Francisco is critical. Everyday there is some event that is threatening this fact. All of us must insist that San Francisco retain its beautiful natural habitats. It's critical that this happens. We must say no to the destruction of our lands paid by our tax dollars.	A11-8
Cynthia Cooper	Oakland	CA	94619	United States	10/28/12	want to keep the visual beauty undeveloped and pristine at Lands End	A11-9

San Francisco VA Medical Center

Long Range Development Plan

Draft Environmental Impact Statement (DEIS)

and Finding of Effect (FOE)

Public Meeting

Thursday, September 20, 2012

5:00 - 7:00 P.M.

San Francisco VA Medical Center

Auditorium

Building 7, 1st Floor, Room 112

San Francisco, CA

Reported by
Kent Odell

APPEARANCES

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

INDEX

Proceedings	4
Adjournment	34
Certificate of Reporter	35

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

2 SEPTEMBER 20, 2012

5:33 P.M.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 they could be hard to see on the screen.

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

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

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

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

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

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

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

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

1 project.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

16 MR. BRODSKY: It was (inaudible).

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

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

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

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

24 --

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

1 microphone so he can record it?

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

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

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

PM-1

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

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

PM-2

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

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

PM-3

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

cont.
PM-3

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

10 MS. CRICHLLOW: It's Crichlow.

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

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

PM-4

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

cont.
PM-4

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

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

PM-5

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

cont.
PM-5

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

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

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

24 MR. REEL: Thank you. Amy Meyer.

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

PM-6

PM-7

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

cont.
PM-7

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

cont.
PM-7

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

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

PM-8

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

PM-8

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

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

PM-9

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

cont.
PM-9

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

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

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

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

20

21

22

23

24

25



United States Department of the Interior

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

IN REPLY REFER TO:
(ER 15/0152)

Filed Electronically

18 May 2015

Attn: Robin Flanagan
San Francisco Veterans Affairs Medical Center,
4150 Clement Street,
San Francisco, CA 94121

Subject: Draft Supplemental Environmental Impact Statement (DEIS), Veterans Affairs
(VA) for the San Francisco VA Medical Center Long Range Development Plan
(LRDP), CA

B1-1

Dear Robin Flanagan:

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

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc: OEPC Staff Contact;; Lisa.Treichel@ios.doi.gov



United States Department of the Interior

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

IN REPLY REFER TO:
L76 (GOGA-PL)

MAY - 8 2015

Bonnie Graham
Medical Center Director
Attn: Robin Flanagan
San Francisco Veterans Affairs Medical Center
4150 Clement Street
San Francisco, CA 94121

Re: National Park Service Comments on the Supplemental Draft Environmental Impact Statement for the Long Range Development Plan

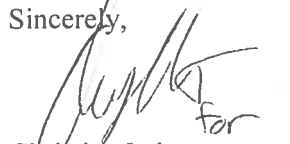
Dear Ms. Graham:

The National Park Service (NPS) appreciates the opportunity to comment on the San Francisco Veterans Affairs Medical Center (SFVAMC) Supplemental Draft Environmental Impact Statement (EIS) for its Long Range Development Plan (LRDP). NPS supports the mission of the SFVAMC, and the purpose, goals, and objectives outlined in the Supplemental Draft EIS. As emphasized in our earlier scoping letters and comments, NPS is still concerned that the proposed future development described in the Supplemental Draft EIS would affect NPS lands adjacent to the SFVAMC. Having close proximity to the SFVAMC on three sides, any development along the boundaries of the SFVAMC has the potential to affect NPS lands.

Enclosed are our comments on the document. As we noted in our comments for the 2012 Draft EIS, we remain concerned the analysis in the Supplemental Draft EIS does not adequately describe the impacts of the action on NPS lands. A core concern continues to be the proposed construction of Buildings 22, 23, and 24 along our east boundary, as well as the expansions of Garages 209 and 211, and the proposed new water tower location on the west boundary. The siting of these new buildings along our boundaries would have an adverse effect on the Fort Miley Military Reservation Historic District. However, as we have expressed directly to the SFVAMC, we continue to offer our full cooperation and support to design solutions that resolve these issues.

We encourage you to continue to engage NPS staff in this and future planning processes, especially in the development of an alternative that avoid adverse impacts on NPS lands. If you have questions regarding our comments, please feel free to contact Katharine Arrow (Liaison to SFVAMC) of my staff at (415) 561-4971 or katharine_arrow@nps.gov.

Sincerely,


Christine Lehnertz
General Superintendent

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

Enclosures (1): NPS Comments – SFVAMC LRDP Supplemental Draft EIS

B2-1

NPS COMMENTS—SFVAMC LRDP Supplemental Draft EIS

SECTION: EXECUTIVE SUMMARY

Public Involvement and Agency Coordination

(Page ES-14) Amend the statement “In addition, the City and County of San Francisco has provided information, comments, and input during the EIS process” to include that the NPS/GGNRA has also done so.

B2-2

Table ES-1: Summary of Environmental Impacts and Mitigation Measures

(Page ES-26) Hydrology and Water Quality: Change drainage effect from minor to Minor with Mitigation. Amend to include Mitigation to redirect storm water currently directed to the north slope storm drainage system into the combined sewer system consistent with commitment made by VA management to the NPS.

B2-3

(Page ES-42) Note: f: Mitigation Measure CR-3, a.iv, SFVAMC has not yet finalized or posted the HDDG to its LRDP website by April 3, 2015 as stated.

B2-4

SECTION 2 (ALTERNATIVES)

Per NEPA (Sec. 1502.14), the analysis needs to consider a reasonable range of alternatives. A reasonable alternative to include in the analysis is one of the alternatives eliminated from further review, i.e., Further Reduced Development at the Existing Campus. Under NEPA, a reasonable alternative recommended by another agency and the public cannot be eliminated, as this one is, if it only partially satisfies the purpose and need of the LRDP. Moreover, an agency cannot craft a Purpose and Need (P&N) statement that unduly restricts reasonable alternatives. In fact, the VA is required to involve the public and agencies in defining the P&N of a project. It is also a best practice for agencies to include a broad range of alternatives for controversial projects, including alternatives that only partially satisfy the P&N statement should be found reasonable and therefore analyzed.

Secondly, an alternative selected for analysis needs to be substantially different and distinguishable from the other alternatives considered for review. The NPS considers the proposed Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative 1 (Preferred Alternative) and Alternative 2: SFVAMC Fort Miley Campus Buildout Alternative 2 are not substantially different and are barely distinguishable as required by NEPA. Therefore, the NPS recommends the VA to eliminate the proposed Alternative 2 and to replace it with Further Reduced Development at the Existing Campus as a more reasonable Alternative 2.

B2-5

In the NPS comments to the previous Draft EIS (letter dated October 31, 2012), NPS stated that a reasonable alternative was not evaluated for Phase 1 new construction that utilizes the Mission Bay Campus in place of new construction on the Fort Miley Campus. In response, this Supplemental Draft EIS states on page 2-3 that such an option “would result in less opportunity for collaboration and interaction between programs at the SFVAMC Fort Miley Campus...therefore, it is not feasible to further reduce the facilities’ density and achieve a more efficient interactive setting at the existing SFVAMC Fort Miley Campus, because a...reduction would not allow VA to close its space deficit and meet program needs.” In our estimation, this justification for not considering moving all new construction to Mission Bay that *would* allow the SFVAMC to fill space deficit (off-site) is at the expense of impacts to two Fort Miley National Register Historic Districts, as well as construction and operational impacts voiced by neighborhood community groups. This alternative should be more fully evaluated.

Table 2-1: Area, Massing, and Construction Schedule for Alternative 1 and 3 Short-Term (Phase 1) Projects at the SFVAMC Fort Miley Campus (2013-2020) (page 2-6) and Table 2-3: Area, Massing and

B2-6

Construction Schedule for Alternative 2 Short-Term (Phase 1) Projects at the SFVAMC Fort Miley Campus (2013-2020)

The NPS contends that new construction proposed in Phase 1.4 (Building 22 Expansion), Phase 1.5 (Buildings 209 and 211 Parking Garage Extensions), Phase 1.8 (Building 24 Expansion), Phase 1.9 (Building 40, including relocation of the water tower S-206), and Phase 1.13 (Building 23 Expansion) at the SFVAMC/ East & West Fort Miley GGNRA boundaries constitutes structural crowding resulting in diminished park experiences as park viewsheds are impacted and the feeling and setting of the Fort Miley Military Reservation Historic District are adversely affected. The current aged condition of many of the existing trees is such that they will not continue to provide adequate screening of new construction projects. Consequently, the NPS expects the proposed new building sites—particularly Buildings 22, 23, 24, 209 Extension, 211 Extension, and the new water tower site—may be pulled back from the Campus/Park boundary, be reduced in height, size, be screened with new tree plantings or the impacts mitigated in other ways.

B2-6
cont.

(Pages 2-6 and 2-15) At the SFVAMC meeting of April 6, 2015, NPS/GGNRA staff were informed that the height of the Building 24 Expansion (Phase 1.8) has been reduced from three stories to two and would be 10,000 gross square feet. Consequently, the figures in Table 2-1 and Table 2-3 for Phase 1.8 and Total Phase 1 Area need to be updated.

B2-7

Landscaping and Open Space Areas

(Pages 2-7 and 2-14) The NPS would like assurance that vegetative screening, particularly tree planting, will be incorporated into the short-term project phases to provide for screening as mitigation for new construction on the Campus/Park boundaries at East and West Fort Miley. The text "...and potentially along the eastern Campus boundary adjacent to Golden Gate National Recreation Area lands" does not provide assurance that screening will take place, nor that it will be placed at *both east and west* sides of the Campus/Park interfaces. The intent is for SFVAMC to mitigate viewshed impacts from the park of new construction of Buildings 22, 23, and 24 on the East Fort Miley side and Buildings 209 Extension and 211 Extension, and the new location of the water tower on the West Fort Miley side.

B2-8

In addition, we request that the Final EIS recognize the two agencies' intention to collaborate on strengthening existing pedestrian connections and exploring new opportunities between the SFVAMC Campus and the Park. Unfortunately, the potential to enhance these connections for the benefit of the broad public is in some ways diminished by proposed construction described in this document; particularly the little-used northern gate at West Fort Miley that would be dominated by the water tower and expansion of 211, and a gateway to East Fort Miley to compensate those likely to be lost by construction of Buildings 22 and 24.

B2-9

(Page 2-9, 2-13 and 2-16) At the SFVAMC meeting of December 17, 2014, NPS staff were informed that the north slope storm water drainage system would be fully redirected into the SFPUC combined sewer system as a project component in the construction of Building 40 (Phase 1). The subsection titled, Sewer and Stormwater, needs to reflect this commitment rather than continuing the current practice which states, "Furthermore, where practical, stormwater runoff would be redirected away from the sewer system to direct-discharge outfalls."

B2-10

Parking

(Pages 2-10, 2-19, and 2-22) The current text discusses how much parking would be added under the Alternative discussed, but does not address how this relates to the overall Campus need for parking. NPS requests you clarify the overall parking need, and if the balance is a deficit, state any plans to mitigate the impacts caused by the deficit. This should also be reflected in Section 4.0 Cumulative Impacts and its corresponding Table 4-3 section on Transportation, Traffic, and Parking on pages 4-4, as well as Section 4.4.5 "Transportation, Traffic, and Parking Alternative 1" (pages 4-70 to 4-77). The NPS knows from past SFVAMC construction, that loss of parking due to construction impacts parking capacity on NPS lands. This impact needs to be fully disclosed, and mitigation suggested minimizing this impact.

B2-11

SECTION 3 (AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES)

3.1 Aesthetics

(Page 3.1-2) Views and Visual Character/ Existing SFVAMC Fort Miley Campus: Except for the selection of one vantage point (View 9), NPS staff was not consulted when view locations to be studied were selected. Consequently, the relatively few number and location of vantage points in East and West Fort Miley do not adequately reflect visual impacts caused by proposed new construction. Omitting these impact view locations compromises the analysis, since visual impacts were assessed based upon incomplete information. We would like to see additional viewshed studies at West Fort Miley, where virtually no viewshed analysis were performed, especially between Views 4 and 5 to assess impacts from proposed Garage Extensions 209 and 211, and the new water tower location and at East Fort Miley between existing viewsheds 9 and 10 to assess impacts from proposed new construction of Buildings 23 and 24, as well as moving View 10 to the north end of the Building FI-304 to better assess impacts from proposed construction of Building 24, as well as Building 212.

(Page 3.1-2) Table 3.1-1: Existing SFVAMC Fort Miley Campus View Locations: Add to the description of View 10 the identification of the National Park Service Building, FI-304.

(Page 3.1-18 & 19) Operation: The study concedes that intermittent unobstructed views of Campus buildings (both existing and proposed) exist from the trails of East Fort Miley, but takes into consideration only *character* and *scale* when evaluating compatibility. It is our position that the close *proximity* to the edge of the Campus/Park boundary and the proposed building heights make the increased density of new construction incompatible. We believe the overall level of impact to be greater than the “minor impact” noted in the document (page 3.1-19) and the overall impact should be considered “moderate.”

(Page 3.1-19) The third paragraph appears to be referring to the Alternative 1 *short-term* projects, not the long-term projects as identified, for this portion of the document falls under the *Short-Term Projects* heading (page 3.1-17).

(Page 3.1-21) View 5a description should include the proposed new water tower location to the list of buildings that would be visible, along with Buildings 40 and 211.

(Page 3.1-25) View 11a description should include the proposed new water tower location to the list of buildings that would be visible, along with Buildings 40, 43, and 211.

(Page 3.1-25) View 12a description should include the proposed new water tower location to the list of buildings that would be visible, along with Buildings 40.

3.4 Cultural Resources

(Page 3.4-5) Cultural Resources Identified in the Project Area: Add the word “Reservation” to read: Fort Miley Military Reservation Historic District.

(Page 3.4-13) Regulatory Framework/ National Historic Preservation Act of 1966: Update the end of this section with a mention of the history of how this Supplemental Draft EIS came to be.

(Page 3.4-17) Historic Properties, 2nd paragraph, 2nd sentence: The statement “Construction would introduce visual and/or atmospheric changes to the Fort Miley Historic District; however, these changes would be obscured from view by existing trees and steep terrain that diminish the views from the Fort Miley Historic District in the GGNRA toward the SFVAMC Fort Miley Campus” is exaggerated on several accounts. The new construction would not be completely obscured from view, but only *partially* obscured from view, a point supported by this document’s admission in the View and Visual Character analysis section (see page 3.1-19, 4th paragraph) that states, “These proposed development changes to the

B2-12

B2-13

Campus would result in a minor impact.” Our position that the new construction would not be completely obscured from view is also supported in that impacts are also assigned to the proposed buildouts in Table 3.4-1: Impacts of Alternative 1 Short-Term Projects on the SFVAMC and Fort Miley Historic District (page 3.4-18). If the buildings were obscured from view as this document states, there would be no impact listed. And, as stated before in our comment for page 3.1-18 & 19 above, our position is that the impact is moderate, not minor. Many of the trees and vegetation referred to are old and dying and, being more impermanent than the construction of the new buildings, once gone, there will be clearly foreseeable and much greater direct adverse effects to viewsheds and to the feeling and setting of the historic Fort Miley Military Reservation Historic District.

The NPS disagrees with the text on page 3.4-17 that concludes, “Therefore, there would be no direct or indirect adverse impacts on the Fort Miley Historic District from the future buildout of the SFVAMC LRDP under Alternative 1 short-term projects.” The NPS believes there *would* be adverse impacts associated with the “minor visual impact” status assigned to each of the following views: view 5a and 7a (page 3.1-21), and views 8a, 9a, 11a, 12a (page 3.1-25). Furthermore, it is our position that the impact at these locations is moderate, not minor. As mentioned in our previous comment, we also believe the overall level of impact to be greater than the “minor impact” noted in the document (page 3.1-19) but is in fact, moderate. We also disagree that the impacts would be “indirect,” as stated on page 3.4-17, but instead believe them to be “direct” impacts affecting the feeling and setting of the Fort Miley Military Reservation Historic District. Consequently, we disagree with Page 3.1-19, 4th paragraph that states, “The Fort Miley Historic District retains its integrity of location, design, feeling, and setting and would continue to convey its significance.”

The increased mass of three additional structures directly on the East Fort Miley boundary, the Building 209 and 211 Extensions and the new water tower location on the West Fort Miley boundary, diminish the integrity of feeling and setting and thus the ability of the Fort Miley Military Reservation Historic District to convey its significance along the pedestrian pathways adjacent to our shared boundaries. Furthermore, because of these impacts, we would like to see a CR Mitigation Measure to plant new trees along our shared boundaries of a sufficient size to provide the necessary screening for the foreseeable future.

(Page 3.4-18) Table 3.4-1: Impacts of Alternative 1 Short-Term Projects on the SFVAMC and Fort Miley Historic District: Corrections are required for the Impact on Fort Miley District column for Phase 1.9 (change from “No” to “Indirect” as per View 5a on page 3.1-21 and Views 9a, 11a and 12a on pages 3.1-25) and Phase 1.11 (change from “No” to “Indirect” as per View 7a on page 3.1-21 and Views 8a, 9a, and 11a on pages 3.1-25). In addition, we believe each of the impacts on this table currently labeled as “Indirect,” as well as those just mentioned for Phases 1.9 and 1.11, to be “Direct” as they directly impact the feeling and setting of the Fort Miley Military Reservation Historic District.

(Page 3.4-20) Mitigation CR-3, HDDG a.iv. should reflect that the April 3, 2015 date has passed without completion, or change the expected completion date.

(Page 3.4-21) Mitigation CR-3, HDDG d., change reference of “CR-2” to “CR-3” if reference is incorrect.

(Page 3.4-21) Operation: The operation of the Alternative 1 new construction buildings identified in notes for page 3.4-17 above does in fact involve “permanent visual changes” to historical resources, as identified in the viewshed impacts mentioned in this previous comment.

(Page 3.4-23) Alternative 2, Short-Term Projects: Add Mitigation Measure CR-3 to the mention of CR-1 and CR-2.

(Page 3.4-23) Alternative 3, Short-Term Projects: Add Mitigation Measure CR-3 to the mention of CR-1 and CR-2.

B2-13
cont.

(Page 3.4-25) Alternative 4, Short-Term and Long-Term Projects, Construction: Clarify which historic district is being referred to by adding "SFVAMC" to the sentence "This would be a direct adverse impact on the Historic District."

B2-13
cont.

3.6 Geology, Soils, and Paleontological Resources

(Page 3-12) Geology and Soils, states, "An Alternative analyzed in this EIS is considered to result in an adverse impact related to geology and soils if it would... be located on a geologic unit or soil that is unstable, or would become unstable as a result of the project, and potentially result in on- or off-site landslide..." However, the evaluation of Alternatives 1 and 2 found on pages 3.6.15 and 3.6.17 state that no impact related to seismically induced landslides or slope failures would result from the operation of Alternative 1 short-term projects. The statement notes that, "...the mapped landslide scarps to the north of the Campus and another previous landslide area on the northern slope of the Campus...are outside the proposed development footprint and do not pose a risk to the development activities associated with Alternative 1 short-term projects..." This statement is not consistent with the requirement that the EIS needs to consider an adverse impact potential in an off-site landslide. The proposed improvements are within a few hundred feet or less of the landslide area and within the VA Campus.

B2-14

The current storm water management practice of discharging storm water on to a known landslide area combined with a seismic event would potentially have an adverse impact and needs to be studied further. The Fugro West, Inc. report commissioned by the VA for the North Slope Stabilization project dated March 2010 states, "Discharge of surface water onto the North Slope is a major destabilizing factor contributing to on-going slope failure...there are certain risks associated with discharging storm water onto the landslide, including: the potential for erosion on and beyond the VA property, increased risk of localized land sliding downslope of the proposed walls, and the potential for undermining the proposed retaining walls due to continued landslide movement."

3.8 Hydrology and Water Quality

(Page 3.8-2) The paragraph states, "A small separate storm drainage system conveys stormwater off-site on the north side of the existing SFVAMC Fort Miley Campus along the north-facing slope. The drainage area being served by this separated system is relatively small. This separate system appears to have adequate capacity for its current drainage area and no known drainage problems (HGA, 2010)." NPS requests that this section be revised to better reflect the comments made above in 3.6 Geology, Soils, and Paleontological Resources.

(Page 3-12) Specifically quantify the volume of flows from the campus and reflect the concerns of the Fugro West report. A Storm and Sanitary Sewer Site Plan dated March 2006 for Project No 662-05-119 shows the approximately 6-8 storm drains that feed the north storm water drainage system, which has been modified with the retaining wall project possibly representing 20+/- % of the total storm water for the Campus. Upon quantifying the volume of flows, add this amount in to the SFPUC calculations for volumes consistent with SF Public Works Code, Articles 4.1 and 4.2 as applicable.

B2-15

NPS recognizes that the North Slope Stabilization project improved the potential landslide conditions, but this section does not reflect the NPS's oft-stated concerns about the drainage situation. Further, this section states that "...native shrubs and trees were planted below the retaining wall after construction." Unfortunately, most of these plants died, none were planted on the east retaining wall, and none of the 14 trees identified in the EA appear to have survived. Hence, the larger retaining wall can be seen from the Marin Headlands. This impact needs to be resolved with re-screening of the retaining wall.

(Page 3.8-17) Last paragraph discusses the continued use of the north slope for storm water drainage. See above comments in Section 2 Alternatives, (page 2-9, 2-13 and 2-16) regarding discontinuing use of the north slope to discharge storm water.

(Page 3.8-18) Management Measure HYD-1 (2): See above comment regarding use of north slope for stormwater discharge.

3.13 Transportation, Traffic, Circulation, and Parking

Figure 3.13-7 needs to be updated to show the partial removal of Lot J and the addition of Parking Garage Building 211.

(Page 3.13-21 and 28) The discussion titled, *Loading Existing Fort Miley Campus*, should be expanded to include the East Fort Miley access road as it is the only source for materials and equipment deliveries for the NPS Trails Crew facility at East Fort Miley. This intersection is also an occasional pinch point that blocks traffic into and out of the main 42nd and Clement entrance when NPS has large vehicles entering or exiting this road. Loading Demand on page 28 should also include a discussion regarding loading at East Fort Miley.

(Page 3.13-23) Table 3.13-6: Existing Off-Street Parking Supply at the SFVAMC Fort Miley Campus. Footnote states, “Reflects status as of 2012, as reported in the SFVAMC Long Range Development Plan. Some facilities listed have since been permanently or temporarily closed or restriped/reconfigured as a result of construction activities, Americans with Disabilities Act compliance, or other factors.” This three year old table needs to be updated to current conditions, particularly the partial removal of Lot J and the addition of Parking Garage Building 211.

(Page 3.13-40, 42 and 67) Table 3.13-10: Net-New Person-Trip Generation—Alternative 1, Table 3.13-14 and Table 3.13-19. Update line 1.8 to reflect the reduced size of the building from 15,600 square feet to 10,000 square feet.

(Page 3.13-59) East Fort Miley Access: Campus traffic impacts on GGNRA East Fort Miley access needs to be quantitatively assessed and analyzed in the Supplemental Draft EIS. This section needs to describe GGNRA’s only vehicle access route into East Fort Miley in more detail. Construction of the access lane was planned as mitigation for the construction of the two story garage referred to as the Mental Health Patient Parking Addition Project 662-CSI-612. The original plan was to have the SFVAMC construct an access driveway in the southeastern corner of East Fort Miley, separating GGNRA vehicles from SFVAMC vehicles. This eventually was determined by the SFVAMC to not be cost effective so the access lane was built on the south side of the Parking Addition.

The one-lane route provides access to GGNRA’s maintenance facility which comprises numerous employees, interns, volunteers, trucks, earth-moving equipment, and materials deliveries. East Fort Miley also services as an operational facility for park lands in San Mateo County, Ocean Beach, and the Sutro Heights Grounds Crew comprising additional staff. Due to the reduced turning radius provided at the westerly end of the lane, delivery vehicles and GGNRA trucks require multiple maneuvers to align with the road. Larger delivery vehicles have blocked the key intersection at Fort Miley Circle and Veteran’s Drive for up to 30 minutes. The Final EIS should include mitigation designed to resolve or minimize this impact. Although the proposed Patient Welcome Center drop-off circle is expected to reduce this impact, large delivery vehicles would continue to cross into oncoming cars and buses in order to make the hard right turn onto the access road.

This section needs to also describe in more detail and clarify, what is meant by, “would not involve implementing specific changes to GGNRA access to and from East Fort Miley,” but “SFVAMC would implement some minor changes to the internal roadway network ...” and overall, “[it]...is not anticipated to result in adverse operational impacts on GGNRA access....” Without more information it is unclear how the impact assessment was determined to be minor.

3.14 Utilities

Wastewater and Stormwater: See comments regarding north slope storm water drainage concerns in Sections 3.6 “Geology, Soils, and Paleontological Resources” and “Hydrology and Water Quality”.

B2-16

B2-17

(Page 3.14-5) Revise “This system is described further in Section 3.18, ‘Hydrology and Water Quality’ to read, “Section 3.8.”

B2-17
cont.

SECTION 4 (CUMULATIVE IMPACTS)

Table 4-1: Cumulative Projects in the Vicinity of the SFVAMC Fort Miley Campus

(Page 4-4) Project No. 3: Change the Completion Date text from “Completed in 2012” to “2012 and beyond” as the implementation of the GGNRA Dog Management Plan is still in progress and will be ongoing.

(Page 4-4) Project No. 4: Change the Completion Date text from “2012 and beyond” to “2015 and beyond” as the GGNRA’s general management plan (GMP) approvals were signed in 2015. The Final EIS should document that the GMP describes the desired future conditions for park lands adjacent to the SFVAMC, including Fort Miley and Lands End. During the GMP planning process, the public expressed great interest in preserving dark night sky conditions and other natural resources in these areas. The GMP documents the National Park Service’s commitment to preserve and enhance those resource conditions. The night-time illumination of the multi-level parking garage, Building 211, is changing conditions in the area and is readily visible from many locations, including the Marin Headlands. The NPS is concerned the proposed expansion of the garages (209 and 211) will further impact night sky conditions if constructed without mitigation.

B2-18

Table 4-3: Cumulative Environmental Impacts

(Page 4-20) Operation: Views and Visual Character: The NPS does not agree with the statements, “Because views of GGNRA land and the existing Campus from any one location are relatively limited, the new permanent structures associated with this Alternative would not be visually intrusive when combined with cumulative projects in the same viewshed, and the visual character of the area would not change substantially. Therefore, this would be a minor cumulative impact.” In fact, the permanent SFVAMC structures *would* be somewhat visually intrusive in some park areas, and the visual character of the park area *would* change moderately in certain areas. The NPS believes this would be a moderate cumulative impact.

B2-19

APPENDIX E: TRANSPORTATION

Impacts Study – On-Site Circulation Optional Recommendations (Memorandum) AECOM Memorandum, July 11, 2014

(Page 3) NPS requests adding the recommendations below to the analysis within the Supplemental Draft EIS, Chapter 3.13 Transportation, Traffic, Circulation, and Parking:

“It is recommended that consideration be given to removing this driveway access from the site and constructing a new driveway access point off of Clement Street for GGNRA vehicles at a location east of the Campus or a new driveway located off of Camino del Mar. This would separate the truck movements from other traffic movements at this intersection, reducing confusion.

B2-20

It is recommended that VA work closely with the GGNRA to understand the volume and types of trucks that must access this driveway each day to determine the full extent of the impact of this driveway if it remains within the Campus. Truck turning templates should be developed to confirm whether trucks will be unable to complete this movement in one maneuver and to ascertain how many maneuvers this movement may require.”



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

MAY 08 2015

Robin Flanagan
San Francisco VA Medical Center
4150 Clement Street
San Francisco, California 94121

Subject: Supplemental Draft Environmental Impact Statement for the San Francisco Veterans Affairs
Medical Center Long Range Development Plan, San Francisco, California (CEQ # 20150066)

Dear Ms. Flanagan,

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

The Supplemental Draft Environmental Statement (SDEIS) evaluates the environmental effects associated with implementing the Long Range Development Plan (LRDP) for the San Francisco Veterans Affairs Medical Center at Fort Miley in San Francisco, California. It updates the Draft EIS, issued in August 2012, to reflect the revised LRDP, released in January 2014, which included refinements to individual project designs and schedules and the overall master plan.

EPA reviewed the Draft EIS and provided comments to the Veteran's Administration on October 30, 2012. We rated the DEIS as *Environmental Concerns – Insufficient Information (EC-2)*. Our comments expressed concerns regarding construction noise impacts and requested additional information regarding the alternatives selection criteria, noise, visual resources, air quality, stormwater management, and transportation and parking. We appreciate the additional information in the SDEIS that responds to our comments. The SDEIS also includes additional air quality mitigation measures, including plans to employ Tier 4 engines in construction equipment and the use of alternative fuels in accordance with the Department of Veteran Affairs Strategic Sustainability Performance Plan.

B3-1

While the changes to the Proposed Action that are described in the SDEIS appear to be relatively minor, the amount of construction and demolition (C&D) waste that the VA predicts will be generated has increased by over a thousand percent. The DEIS stated that demolition would generate a maximum of 56,000 cubic feet of construction waste (p. 2-3); the SDEIS states that demolition would generate a maximum of 945,085 cubic feet of construction waste (p. 2-5). Such a substantial increase in C&D waste could reasonably be expected to result in more truck trips than was predicted in the DEIS under the lower estimate, yet it does not appear that the impact assessment has been updated to reflect this, particularly in the assessments of noise, air quality and transportation impacts.

Based on the increase in construction and demolition waste that was not evaluated, we have rated the SDEIS as *Environmental Concerns – Insufficient Information (EC-2)* (See attached “Summary of the EPA Rating System). We recommend that the Final SEIS include a more detailed discussion as to how C&D waste will be managed on- and off-site. Indicate whether and, if so, how many additional truck trips would be expected, and update the noise, air quality, and transportation impact assessments, as appropriate.

EPA appreciates the opportunity to comment on the Supplemental Draft EIS. When the Final SEIS is released for public review, please send one hard copy and one electronic copy to the address above (specify Mail Code ENF-4-2) at the same time it is officially filed with our Washington, D.C. Office. If you have any questions, please contact me at 415-972-3521, or contact Phillip Lopez, the lead reviewer for this document, at 415-972-3210 or lopez.phillip@epa.gov.

Sincerely,



Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosure: Summary of EPA Rating Definitions

B3-1
cont.

SUMMARY OF EPA RATING DEFINITIONS*

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

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

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

"EC" (Environmental Concerns)

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

"EO" (Environmental Objections)

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

"EU" (Environmentally Unsatisfactory)

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

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

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

"Category 2" (Insufficient Information)

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

"Category 3" (Inadequate)

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

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

May 8, 2015

SUBJECT: SFVAMC LRDP Supplemental Draft EIS

This document represents comments on the SFVAMC Draft Supplemental Environmental Impact Statement (date) by the following five community organizations:

1. Planning Association for the Richmond
2. People for a Golden Gate National Recreation Area
3. Friends of Sutro Park
4. Friends of Lands End
5. Coalition to Save Ocean Beach

INTRODUCTION

- **Background**

- Our organizations support our veterans and the work done by the SFVAMC in furtherance of their care and well-being.
- Many of the groups submitting these comments include veterans and family members of veterans.
- We have been engaged with the San Francisco Veterans Administration Medical Center (SFVAMC) for many years concerning development on the Fort Miley Campus. We recognize the SFVAMC as a nationally important institution for health care, research and education. We support it in that mission.
- We recognize the care that has gone into the preparation of the Draft Supplemental Environmental Impact Statement and anticipate a similar thoroughness in the final EIS.

- **Scope of comments**

- We are concerned with the livability of the Outer Richmond neighborhood and conservation of the values of the adjacent national parklands and cultural/historical resources. We do not address the impact of a potential Mission Bay campus.
- Our comments largely address the impact of Alternative 1 (Preferred Alternative) but should be considered applicable to Alternative 2 and Alternative 3, insofar as both those alternatives subsume much of Alternative 1.
 - Alternative 2 differs in schedule of build out

B4-1

- Alternative 3 relocates long-term/Phase 2 projects offsite (approximately 170,000 gsf at Mission Bay) and reduces net new construction on the Fort Miley campus by 110,000 gsf.

B4-1
cont.

Recommendation

- We prefer Alternative 4 (No Action).
 - We believe the development needs of the SFVAMC can be better served at a more accessible, less sensitive area.
 - We oppose the industrialization of a quiet community surrounded by protected parklands.
- We recognize that institutional needs and projects that have already received allocated funding make this unlikely and that at least some additional construction may take place.
- Alternative 3 reduces the load on the Fort Miley campus by only 110,000 gsf, or only one less building on the campus.
 - However, Alternative 3 is fundamentally flawed in that it does not contain complete information as is required for each EIS alternative. Therefore, the EIS is itself fundamentally flawed.
 - More information must be provided to ensure that Alternative 3 is as fully developed as the other alternatives and the public must have an opportunity to comment.
 - We look to a final EIS that fully documents the impacts on the Mission Bay site or other alternative site.
- Under these circumstances, we consider Alternate 3 as preferable to either Alternative 1 or 2, if
 - Inaccuracies are corrected and assumptions clarified in the EIS
 - Short-term and long-term environmental issues related to noise, vibration, air quality, cultural/historical resources, parking and transit, and overall health safety are accurately assessed as to their cumulative effect and adequately mitigated in the Final EIS.
 - Other issues in the document are satisfactorily addressed.

B4-2

DETAILED COMMENTS

General comments

- **The DSEIS is not always accurate or consistent, within itself or with other related documents issued by the SFVAMC.** In many cases, assumptions made in the DSEIS are either not stated or are based on outdated or questionable data. We request clarity on these assumptions. Some examples:

- Employment (DSEIS reports employment has fallen in the SF Bay area)
- Parking and traffic – the area of traffic study is narrowly defined; as a result, the true impact on parking and traffic to this area of San Francisco is understated.
- Air Quality is based on Arkansas Street, not the Fort Miley area
- Lincoln Park Steps (Table 4.1) is listed as in the planning phase. This project is now complete.
- All inaccuracies and inconsistencies should be corrected when a final EIS is issued.

B4-3

- **The DSEIS understates the cumulative impact.** Individual negative impacts are assessed as Minor or Minor with Mitigation, with two exceptions:

- Vibration – Adverse during Construction
- Historic Properties – Adverse during construction
- Table 4.3 states there will be a “**Minor cumulative impact**” on almost every criterion during both construction and operational phases, and that there is the “**Potential for significant cumulative impact**” on Traffic, Transit and Parking.
 - What are these impacts?
 - What is the cost/benefit ratio of cumulative impacts to the SFVAMC mission?
 - Is the sum cost of total cumulative environmental impacts reasonable and appropriate to the SFVAMC Fort Miley campus and its adjacent areas? Why or why not?
 - Is the degradation of adjacent resources justified by delivery of substantially increased in-patient and outpatient care?

B4-4

- **The DSEIS is incomplete.**

- For some criteria, there is the “Potential for significant cumulative impact” during both construction and operational phases, but analysis of these impacts is not complete.
 - For example, impacts on Air Quality are potentially significant during both construction and operational phases; such impacts are “retained for further, or more detailed analysis.”

B4-5

- Until such analysis is complete, the DSEIS is not complete.
- Mitigation measures to address economic damages to area property owners are not addressed.
- Alternative
- The average patient count per day now is 1700, as per the DSEIS.
 - What does the VAMC expect the increased number of patients to be in 2020? in 2030?
- What **percentage** of the gsf proposed build out is directly tied to activities that support the mission of the SFVAMC?
 - In-patient and outpatient facilities?
 - Research and laboratories?
 - Administration?
 - Parking?

B4-5
cont.

B4-6

DETAILED COMMENTS

Aesthetics

Views and Visual Character

Our analysis focuses on the impact on views and visual character that would impact adjacent federal parkland. Inevitably, impact on views and visual character also impact Cultural Resources (Historic Resources), Land Use, and Socioeconomic factors (the economic value of recreational sites).

- **Water tower.** At the public meeting on April 14, we noted that the DSEIS indicates, apparently only through maps, that the SFVAMC intends to move its water tower, S-206. Maps show its new place at the north corner of the West Fort Miley fence.
 - Even the misty photo (p.3.1-37, 12B) shows the tower would be very prominent on a clear day. Because of the height of the tower, moving the water tower would have a significant adverse effect on the Golden Gate in general and West Fort Miley in particular.
 - What alternatives were considered for this move of the water tower that would

B4-7

avoid this adverse effect?

- Did the SFVAMC consult with the Park Service? There is no site analysis in the DSEIS.
- At the April 14 meeting, we were heartened to learn that SFVAMC staff believes the water tower can be entirely eliminated. This should be addressed in the final EIS.

- **East Fort Miley.** We understand from GGNRA staff that the design for Building 24 has been reduced in height from 3 stories to 2 stories.

- Park staff tells us they have expressed an interest directly to SFVAMC planners to make the building's back side (facing East Ft. Miley) more interesting and in keeping with the historical style than what was previously designed. They have reported that although the building's site plan and massing has already been planned, the SFVAMC has said there may be latitude to dress up the back side to mitigate the massing, as the facade materials and surface design have not been yet finalized. We look forward to seeing these alterations reflected in the final design and in the final EIS.
- The photos comparing the row of buildings that will be seen from East Fort Miley show no change between Figure 3.1-6B and Figure 3.1-20B.
- One garage, Building 20, is supposed to be demolished. Buildings 22 and 23 are the same height as Buildings 8 and 9 behind them, but they are much closer to the park fence and therefore have much more impact on the park land than the present structures.
 - The final EIS should include a new photo simulation of what is actually proposed.
 - Also, the location from where the photo is taken may not give the full picture. We cannot get a clear concept of how many trees will have to be severely trimmed or will not survive on the park side of the fence, nor when trees will be replaced after the buildings are finished. The replacement seems to be part of Phase 2, by 2027, which would not be satisfactory. The screen and buffer of

B4-7
cont.

B4-8

trees is important to both the GGNRA and to the SFVAMC. Please find a better solution to this problem.

↑ B4-8
cont.

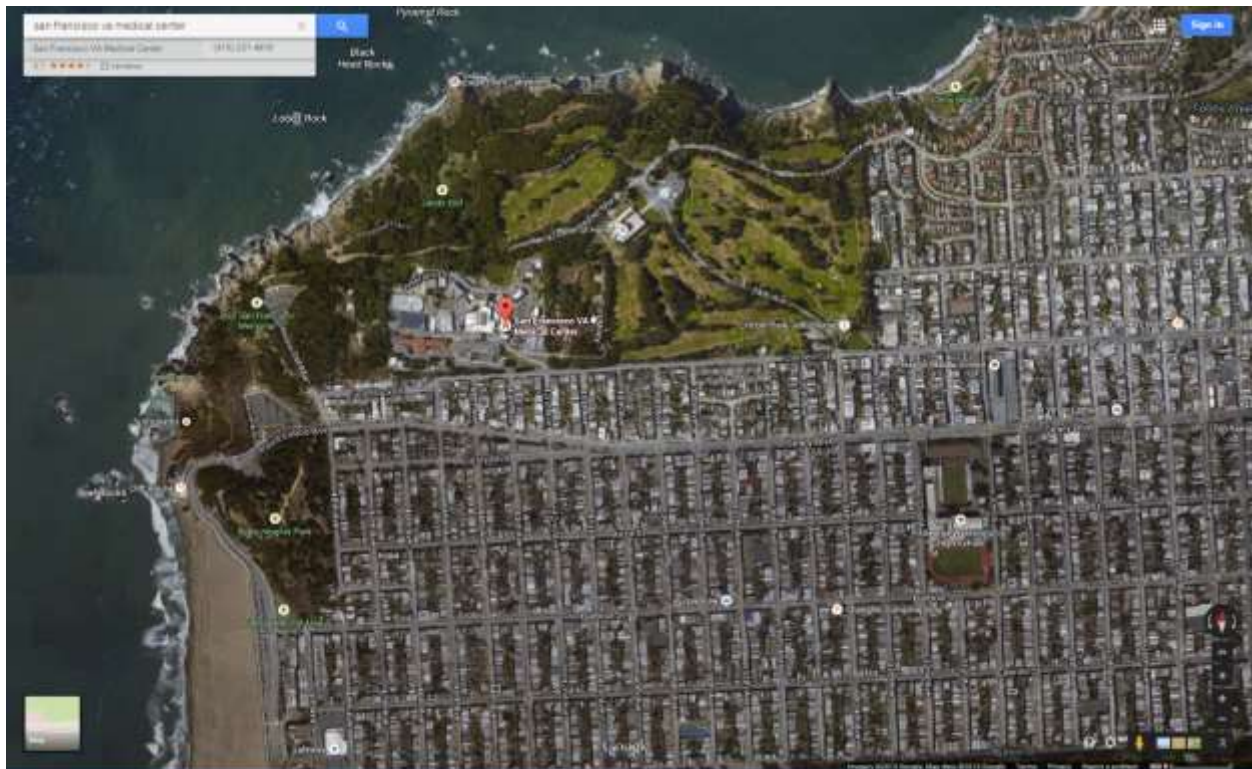
- **West Fort Miley.** The present garage buildings, 209 and 211, do not impact West Fort Miley because they are well back from the fence line separating the VAMC and NPS properties. However, the proposed extensions of these garages to the fence line of West Fort Miley, listed on page 2-6 as “5 and 4 stories” in height, will have a **significant adverse impact** on the aesthetic, recreational, and historic qualities of that portion of the GGNRA. The buildings should not come as close to the fence line as is shown on the maps.

B4-9

Air Quality

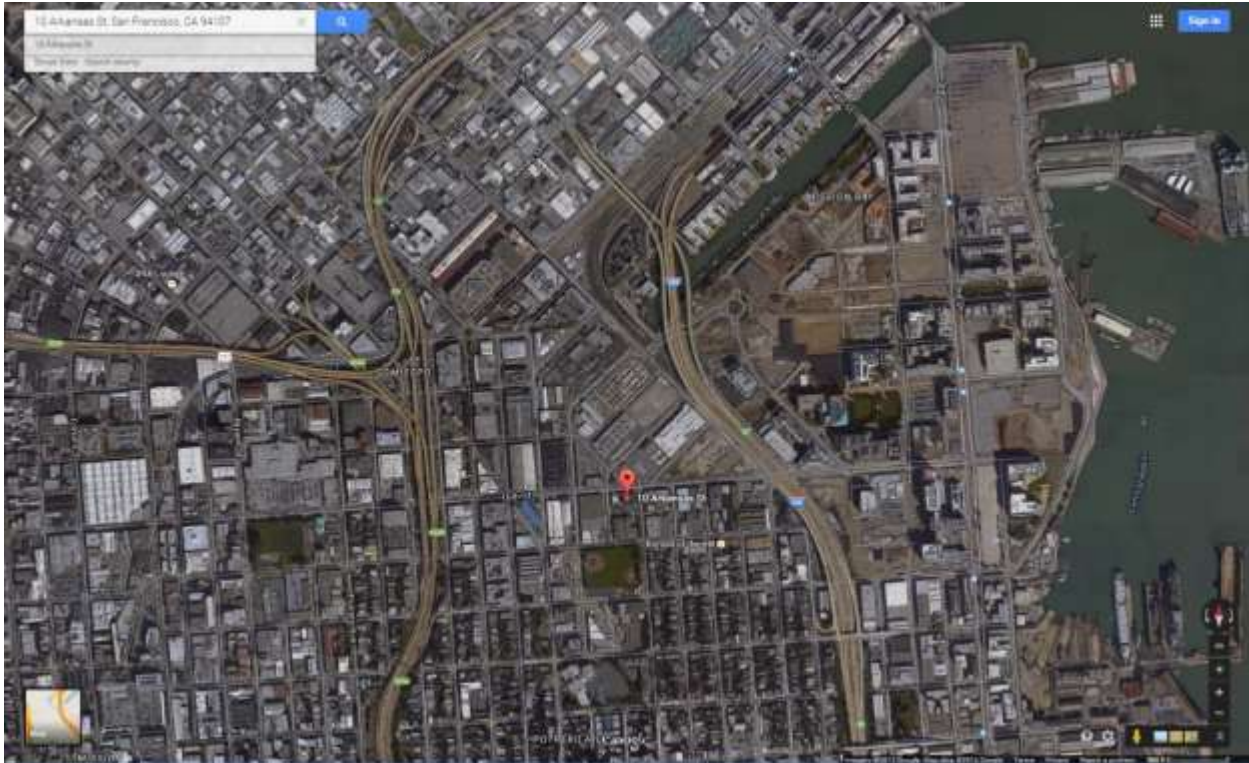
1. Existing conditions

- The EIS bases its air quality assessment on conditions at 10 Arkansas Street. This is appropriate for Mission Bay but seriously understates the existing air quality at the Fort Miley location and the impact of proposed alternatives.
- *Outer Richmond neighborhood including SFVAMC campus:*



B4-10

- This area is overwhelmingly low-density residential and parkland. At the western edge of San Francisco, it is exposed to prevailing westerly winds that prevent most urban pollution from reaching this area.
- Other than residences, the most important features in addition to the VAMC are parks, beaches, schools, a golf course, and a museum.
- *10 Arkansas Street (same scale):*



- This neighborhood is between two major freeways and not far from San Francisco's downtown. While there are some residences, the neighborhood is dominated by commercial, industrial and transportation facilities.
- It is near the eastern edge of San Francisco, and prevailing westerly winds result in it being exposed to pollutants from a large percentage of San Francisco's businesses, residences and commuters.

B4-10
cont.

2. Construction impacts on air quality

- Construction impacts of Alternative 1 with mitigation as modeled result in a risk to a residential child of 9.08 per million, and to a risk to a child in the Childcare Center of 9.94 per million. In the case of the residential child this is less than ten percent below the standard, and in the case of the Childcare Center child it is less than one percent below the standard.
- In addition, the analysis relies on an assumption that no more than **two** pieces of equipment would be used for a single demolition or construction phase, and that no more than five projects would be active concurrently.
 - Uncertainties in modeling, possible bias of the SFVAMC's consultants, and the history of repeated failures to comply with promised mitigations and other standards by the SFVAMC and its contractors ensure that actual risks will be higher, possibly much higher.
- Construction impacts for Alternative 2 are barely lower. Both are far higher than the area's **baseline**, which is **not** mentioned in the EIS.
- The only mitigation measure proposed is a requirement for Tier 4 (low emission) engines for construction equipment in four of the short-term projects. We believe that mitigation should go far beyond what is proposed, including at least:
 - Use low-emission engines for all construction work
 - Limit the number of concurrent projects to reduce the intensity of polluting activity
 - Implement compliance monitoring to ensure that contractors do not violate the promised mitigations
- The final EIS should address these significant air quality concerns.

B4-11

Community Services

No comments.

B4-12

Cultural Resources

- Table 3-4 identifies the following impacts on the SFVAMC and Fort Miley Historic Districts, which in total will significantly change the historic character of these Districts and risk their protected status:
 - **SFVAMC:** Seven direct impacts and four indirect impacts
 - **Fort Miley:** Five indirect impacts

B4-13

- Building 18 is a graceful historic building. It will be lost in the construction of Building 40.
 - Has the VAMC made any effort to incorporate Building 18 or some of its features in the design of Building 40?
 - What is the design stage of Building 40? At what stage will the design be shared with the public?
- In the past, building designs have progressed too far by the time the public can view designs and provide input.
 - We have been told that because the designs were pre-decisional we could not see them, and by the time we could see them, they were too far along to make adjustments.
 - In the past, neighborhood and park advocates have had serious contention with the SFVAMC because of this. We understand that the present administration seeks and has supported a more collaborative relation with the community.
 - Where the historic buildings on the National Register district of the SFVAMC are concerned, the process is made more explicit and participatory by the new Programmatic Agreement.
 - However, much of the proposed SFVAMC construction does not concern the historic district. What will be the process for reviewing the designs of other buildings? We are concerned with Building 40 not only because of the historic value of Building 18, but this building is quite large.

B4-13
cont.

Floodplains, Wetlands and Coastal Management

No comments.

B4-14

Geology, Soils, and Paleontological Resources

- **Geology and Soils.** The stability of the South Slope of the SFVAMC is not addressed, although Alternatives 1, 2 and 3, Phase 1 include construction above or adjacent to this slope (Building 36, Building 208 expansion).
 - Stability of the North Slope required significant engineering and stabilization.
 - The South Slope historically created erosion problems for residents on Seal Rock Drive, which were mitigated in the past 20 years.

B4-15

- However, the slope itself is unstable and is advancing into residential property on Seal Rock Drive.
- What mitigation actions are proposed?

B4-15
cont.

Greenhouse Gas Emissions and Climate Change

No comments.

B4-16

Hydrology and Water Quality

No comments.

B4-17

Land Use

- **Size of available land.** The DSEIS states that the present SFVAMC campus is 29 acres; these are not 29 usable acres. The slide area on the north side diminishes the size. We believe the SEIS should indicate that the campus is functionally smaller than has been previously stated and should provide an estimate of that portion of its acreage suitable for use.
- **Accessibility.** The SFVAMC has done a land use study which included the adjacent national parklands. Neither of those park areas are fully accessible for physically impaired patients nor staff. The upward slope of the path is too steep from the SFVAMC into East Fort Miley and the downward slope is too steep from the SFVAMC into West Fort Miley. This becomes then a self-fulfilling prophecy in the DSEIS text: few patients and staff visit the park.
 - Park entrances should be visible and accessible to all. That will require adjustment of the paths and signage.
 - Will the SFVAMC cooperate in slope modification design, signage, and funding with the GGNRA to make that possible?
 - Building 23 has not yet been designed. Park staff feels that its location could be designed to provide better opportunities for the development of a more accessible pedestrian interface between East Fort Miley and the SFVAMC than where the current sidewalk path, which enters the VA property farther south, behind proposed Building 24.
- **Land Use: Operation.** We disagree with the conclusion that Alternative 1 or 2 would have only a “minor cumulative impact” on land use. Alternatives 1, 2 and even 3 increase density

B4-18

B4-19

B4-20

significantly and will industrialize the site. The final EIS should address the true impact on land use, both on campus and in the adjacent neighborhood and parklands.

↑ B4-20
cont.

Noise and Vibration

Noise

1. Construction noise

- **Building 36.** According to the DSEIS, “The installation of Trailer 36 would generate noise levels up to 75.2 dBA L_{eq} at the nearest off-site residence, thus exceeding the significance threshold of 65 dBA L_{eq} (based on an ambient noise level of 60 dBA plus 5 dBA) and resulting in a temporary (approximately 3 months for Trailer 36 installation) adverse impact.” (3.10-19)
 - What is the purpose of Trailer 36?
 - What other sites have been considered that would mitigate the impact on nearby residences, including vulnerable seniors and children?
 - The EIS claims that a temporary noise barrier will reduce this by a minimum of 10 dBA (thus, to about 65.2 dBA)
 - The ambient noise level at these homes is well below the 60 dBA described. Before the commencement of increased HVAC noise from the VA campus in the last one-two years, it was possible to hear waves breaking and seals barking from inside the houses at the eastern end of Seal Rock Drive.
 - The San Francisco Noise Ordinance (incorporated in the EIS as the standard that must be met specifies that “in no case shall the ambient be considered or determined to be less than: (1) Thirty-five dBA for interior residential noise, and (2) Forty-five dBA in all other locations.”
 - Thus by the standards adopted in this EIS (3.10.3) the impact of this activity will be adverse and not minor unless noise is attenuated to below 55 dBA, a 20.2 dBA reduction.

B4-21

2. Operation noise

- The EIS assumption and measurements of ambient noise assume that the current ambient noise generated by the facility is acceptable. In fact the current level of noise has generated a

B4-22



significant and continued stream of complaints from the residential neighbors, as admitted by the Director of Public Affairs at the SFVAMC.

- The EIS claims that new stationary sources will not exceed 5 dBA over ambient; however the ambient level is not analyzed or discussed in this section (3.10-25). Definition of ambient must conform to the San Francisco Noise Ordinance (not over 45 dBA, in any case)
- The EIS claims that no Alternative 1 short-term project is closer than 100 feet from a residence (3.10-25), yet elsewhere Trailer 36 is described as being 50 feet from residences on the north side of Seal Rock Drive (3.10-19).

B4-22
cont.

Vibration

- **Seal Rock Drive and Clement Street residences.** According to the DSEIS, ground borne noise and vibration may be as high as 78 Vdb at the residences on Seal Rock Drive (3.10-22).
 - This impact is considered “minor” based on FTA standards, yet according to 3.10-4 vibration above 75 Vdb is considered “unacceptable” in transportation by many experts.
 - If it is unacceptable in transportation it is doubly so in Richmond residents’ homes.
- **FAMSF.** The DSEIS fails to address the potential impacts on the Legion of Honor/Fine Arts Museum of San Francisco, nor the extent to which its collection may be susceptible to damage from vibration.

B4-23

Socioeconomics and Social Justice

- **Dated data.** For example, both employment and population assumptions are out of date.
 - The Greater Bay Area and San Francisco have not, as stated in the DSEIS, “experienced a notable reduction” in employment, especially construction-related employment.
 - The population of the City and County of San Francisco was 852,469 in 2014, already exceeding the DSEIS 2020 forecast of 810,000 and approaching the DSEIS 2030 forecast of 867,100.
 - The population of the City and County of San Francisco has already achieved 80% of the 2030 projected growth.
 - Use of fundamentally flawed data call into question the accuracy of a socioeconomic analysis based on these assumptions.

B4-24

- **Economic Impact.** The DSEIS identifies one criterion for impact analysis as any issue that may “result in an economic loss for affected communities or surrounding area.”
 - The DSEIS does not address the adverse economic impact of the cumulative minor impacts on property owners in either Alternative 1 or Alternative 2.
 - What mitigation measure will be provided?
- **Displacement or modification of activities.** The DSEIS defines an adverse effect as one that may cause individuals to “displace or modify existing activities as a result of the nature and duration of construction and operational activities.”
 - Yet the impact of Alternative 1 or Alternative 2 on activities engaged in by residents (enjoyment of their back yard, hours of sleep/quiet) is not mitigated.
 - Nor are potential short-term impacts on visitors to the GGNRA who during construction may be hard pressed to enjoy the outdoors.

B4-25

B4-26

Solid and Hazardous Materials and Hazards

- The NRC issued a Master Materials License (MML) to VA in 2003 that requires the SFVAMC to keep radiation exposure “as low as reasonably achievable.”
 - What is the current risk to the public from radiation exposure in clinical as well as research operations?
 - Is radiation risk expected to increase under Alternative 1, 2 and 3?
- The DEIS states that all Alternatives must to adhere to the regulations set forth under EPCRA, including “notifying the surrounding communities regarding potentially deleterious chemicals present at the project site.”
 - What are these chemicals?
- The SFVAMC includes a license allowing incineration of waste. What is the current baseline of emissions (including particulates) from current operations? Note that this was the subject of a Freedom of Information Act (FOIA) request submitted by the Planning Association for the Richmond in 2006.
 - How will Alternatives 1, 2 and 3 impact emissions?
- **Hazards and Public Safety: Operation.** The DSEIS states that the SFVAMC complies with the *All-Hazards Emergency Operations Plan* (SFVAMC, 2009). We have been unable to locate this document; indeed, online searches reference the DSEIS.

B4-27

B4-28

B4-29

B4-30

- What, in fact, are the procedures for mitigating the risk of hazardous materials?
- What current and new research at Biohazard Safety Level 3 (BSL 3) occur on the Fort Miley campus?
- **Biohazards.** In 2013, a UCSF researcher on the Fort Miley campus died from exposure to a virulent form of meningitis. OSHA later deemed the accident the result “of unsafe and unhealthful working conditions.”
 - The DSEIS states that the SFVAMC under Alternatives 1, 2 and 3 will continue to operate as it is currently. If so, what are the additional and cumulative biosafety risks posed by Alternatives 1, 2 and 3?

B4-30
cont.

B4-31

Transportation, Traffic and Parking

- The Planning Association for the Richmond has separately submitted comments on Transportation, Traffic and Parking, with which all other signatories of these comments fully concurs. In some cases, the following comments may duplicate elements of that document.
- The transportation and parking analysis of the SDEIS appears to be based on very limited data and erroneous assumptions and understate the parking and traffic impacts on the adjacent, off-campus neighborhoods.
 - The parking study is based upon low demand time periods instead of peak periods. At pages 3.13-23 and 3.13-28, the SDEIS states the parking data was taken between 9 – 11 AM; 1-3PM; and 7-9PM. Those three periods are relatively dormant times. The heavy parking demand time is in an entirely different window, that is, 6:40 – 9:00 AM, and 4 – 6:30 PM. The demand is created by the overlap of three coming and going groups:
 - VAMC employees, who arrive and leave work at 7 AM, 4 PM and 11 PM, so their competitive overlap is 6:40 – 7:30 AM, and 3:40 – 4:30 PM;
 - UCSF employees who park in the VAMC off-campus neighborhood and use the free jitneys to go and from their UCSF workplaces spread across the City, probably concentrating more at 7– 9 AM and 4 – 6 PM window; and
 - Local residents who leave for work between 6:45 – 8:45 AM, and return home

B4-32

between 4:30 – 6:30 PM.

- The SDEIS does not focus on the competitive parking times, and ignores the true impact of these competing groups.
- Clement Street and Seal Rock Drive are designated as sharrows; motor vehicles must share the road with cyclists. How does this impact the analysis of increased vehicular traffic?
- The impact of allocated on-street parking for vehicle sharing (e.g., ZipCar) is not addressed. San Francisco MTA has provided its own study of parking for its vehicle sharing initiatives. The final EIS should account for the projected loss of on-street parking to car sharing programs.
- Five intersections are assessed, between 34th Avenue and 43rd Avenue. The intersection at 45th/Clement Street, which is a three-way limited intersection, sees significant SFVAMC vehicle traffic during morning and evening commutes. We believe this intersection should be included in the final EIS.
- As noted elsewhere, the SDEIS uses unrealistic population growth rates resulting in understated future parking and traffic demands. San Francisco is one of the fastest growing areas in the country, and it is expanding like a wave moving westward across the city toward the outer Richmond district. This factor further undermines the SDEIS' projections that the VAMC's expansion will have little effect on the nearby neighborhoods.
- The SDEIS traffic counts appear to be based on old data and is limited to an unreasonably brief glimpse of the actual traffic levels within the impacted areas.
- If the SDEIS study, in fact, is based upon projections based on faulty assumptions, we submit that a new study must be undertaken that is based on accurate data based on a detailed analysis of each side of each street in the impacted neighborhoods.
- The area which the SFVAMC sets out as where spill over parking occurs is underestimated.
 - Figure 3.13-8 indicates the parking study excluded Seal Rock Drive to the west and the El Camino Del Mar parking lot adjacent to the Palace of the Legion of Honor. Contention

B4-32
cont.

B4-33

B4-34

B4-35

B4-36

B4-37

with residents and museum visitors for parking is significant in both these areas.

- The final EIS should be based on data that reflects the true scope of on-street parking demand by the SFVAMC.
- City street parking areas adjacent to the SFVAMC are subject to street cleaning related parking prohibitions on ten days each month. The SDEIS ignores this supply issue.
- The DSEIS does not address the impact of residential street permit parking. Neighborhood groups are currently working to obtain permit parking in response to the pressures from the SFVAMC; the permitting process has been submitted to the San Francisco government.
 - The DSEIS acknowledges that daily parking by SFVAMC employees and visitors already stresses residential streets; no alternate mitigates the parking deficit on the SFVAMC campus.
 - What impact would residential permit have to present, short- and long-term parking deficits? The final EIS should address this scenario.
- Currently some shuttle service to and from the SFVAMC is provided by large diesel powered motor-coaches.
 - Some vehicles are travel north and south on several blocks of 42nd Avenue several times a day. Along this route these coaches traverse already collision prone intersections where there are no traffic controls for east-west traffic.
 - Vehicles with over eight passengers are prohibited on Seal Rock Drive. SF MTA has recently erected additional signage to this effect. The impact of this prohibition should be factored into studies of the impact on circulation.
 - The impact on the residents and infrastructure on this otherwise lightly traveled street must be assessed and mitigated.

B4-37
cont.

B4-38

B4-39

B4-40

Utilities

No comments.

B4-41

Wildlife and Habitat

No comments.

B4-42

Submitted by:

- Richard Correia, President, Planning Association for the Richmond
- Jason Jungreis, Friends of Sutro Park/Coalition to Save Ocean Beach
- Amy Meyer, Chair, People for a Golden Gate National Recreation Area
- Julie Burns, Co-Chair, Friends of Lands End
- David Burns, Co-Chair, Friends of Lands End

Copies to:

Superintendent Christine Lehnertz, GGNRA

Senator Dianne Feinstein

Senator Barbara Boxer

Secretary Robert A. McDonald, Secretary of Veterans Affairs

Ron Miguel, Emeritus Board Member, Planning Association for the Richmond

Representative Nancy Pelosi

Raymond Holland, Immediate Past President, Planning Association for the Richmond

Patricia Lacson, Director of Facilities, Fine Arts Museums of San Francisco

Mayor Ed Lee, City and County of San Francisco

John Rahaim, Director, San Francisco Planning Department

Subj: SFVAMC Supplemental Draft EIS – Planning Association for the Richmond's (PAR) Comments

Date: May 8, 2015

From: Richard Corriea
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“SFVAMC LRDP Supplemental Draft EIS” at <http://www.regulations.gov>

The following comments and suggestions with respect to the Supplemental Draft Environmental Impact Statement (SDEIS) dated March 9, 2015 regarding the San Francisco Veterans' Affairs Medical Center's (SFVAMC's) are submitted on behalf of the Planning Association for the Richmond:

1. Alternative 4: No Action:

Alternative 4 is our recommended “preferred alternative”. Please review our subsequent comments on the reliability of the assumptions used in the analyses of and projections for parking and traffic with regard to Alternatives 1 and 2.

The SFVAMC's initial Draft Environmental Impact Statement (DEIS) issued in August 2012 estimated that the deficit in on-campus parking spaces at its Fort Miley Campus was at least 700 compared to the demand for them or, in other words, that the environmental impact on the adjacent Outer Richmond District residential neighborhood was at least 700 “spill-over vehicles” parked in it.

The late-2014 the SFVAMC opened a new Building 211 before any of the processes required by the *National Environmental Policy Act* (NEPA) or the *National Historic Preservation Act* (NHPA) had been completed. The garage in the new Building 211 provided 200 net, new on-campus parking spaces.

Alternative 4 reduces the environmental impact to the lowest number (i.e., 500 SFVAMC-associated vehicles parked in the adjacent residential neighborhood) of all four alternatives.

B5-1

There are no other current proposals in this alternative that would increase the demand for on-campus parking spaces with proposed new construction or to create or exacerbate other environmental impacts or adverse effects on the historic characters of either the campus or of the adjacent Golden Gate National Recreation Area (GGNRA).

B5-1
cont.

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

PAR acknowledges that Alternative 3 is a better alternative than Alternatives 1 and 2. By locating the SFVAMC's research activities to a Mission Bay Campus all employees would be able to commute to their work sites by public transit.

Under "Alternative 3", the facilities, functions and personnel for all of the SFVAMC's research activities are proposed to be located in an undetermined site or sites in a Mission Bay Campus in San Francisco. At a public hearing for the SDEIS on April 14, 2015, it was confirmed that discussions about this issue were still being conducted. PAR would be pleased to join the SFVAMC in those discussions.

It appears that more time is needed for deciding precisely where the SFVAMC's facilities, functions and personnel for its research activities could or should be located.

While PAR recommends Alternative 4, we acknowledge that Alternative 3 is better than the other alternatives based on the following transportation and parking environmental impacts:

B5-2

- a. There is no regional public transit in the vicinity of the SFVAMC Fort Miley Campus" (refer to paragraph at the bottom of **Page 3.13-13** of the SDEIS);
- b. 25.5% of the SFVAMC's employees live outside of the City and County of San Francisco (refer to **Table 3.13-8** on **Page 3.13-37** of the SDEIS);
- c. An undetermined, but significant, number of employees of the University of California at San Francisco (UCSF) and the Northern California Institute for Research and Education (NCIRE) assigned to the SFVAMC's research functions also live outside of San Francisco and would therefore also be dependent on either their personal vehicles or regional public transit if the SFVAMC's research activities are located at its Fort Miley Campus; and
- d. Regional public transit is accessible to those who would be assigned to work sites at a Mission Bay Campus.

It should be noted that according to Table 3.13-15 on Page 3.13-44 of the SDEIS, Alternative 3 would still increase the "Net, New Weekday Peak-Hour Parking Demand" at the SFVAMC's Fort Miley Campus by 132 spaces thereby increasing that environmental impact on the adjacent residential neighborhood from 500 to 632 "spill-over" parked vehicles).

3. Alternative 1: SFVAMC Fort Miley Campus Buildout. (Preferred by the SFVAMC), and “Alternative 2: SFVAMC Fort Miley Campus Build out” (With Longer “Phase 2 Implementation Schedules” for Some Projects)”.

These two alternatives propose that four existing buildings (14, 18, T-23 and 21, one of which, Building 18, is on the registry of historic places) be demolished and that a new Research Center Building 40 be constructed in a north-central portion of the SFVAMC’s Fort Miley Campus.

The proposed design of Building 40 has changed several times and, as of the date of these comments, it is now proposed to be a four-story-with-basement building that would comprise 110,000 GSF but with another different “foot print” and exact location on the campus.

It is clear that a new building of that size on the SFVAMC’s Fort Miley Campus would generate a significant increase in demand for additional on-campus parking spaces and, in their absence, for additional parking spaces in the adjacent residential neighborhood that is already adversely impacted by spill-over parking.

The transportation and parking analysis of the SDEIS appears to be based on very limited data and erroneous assumptions, which have the unfortunate effect of significantly understating the parking and traffic impacts on the adjacent, off-campus neighborhoods. The following is a description of these concerns:

a. The parking study is based upon low demand time periods instead of peak periods. At pages 3.13-23 and 3.13-28, the SDEIS states the parking data was taken between 9 – 11 AM; 1-3PM; and 7-9PM. Those three periods are relatively dormant times with little competition for parking and thus erroneously downplay the parking and traffic impacts on the neighboring environs.

The heavy parking demand time is in an entirely different window, that is, 6:40 – 9:00 AM, and 4 – 6:30 PM. The demand is created by the overlap of three coming and going groups:

i. VAMC employees, who arrive and leave work at 7 AM, 4 PM and 11 PM, so their competitive overlap is 6:40 – 7:30 AM, and 3:40 – 4:30 PM;

ii. UCSF employees who park in the VAMC off-campus neighborhood and use the free jitneys to go and from their UCSF workplaces spread across the City, probably concentrating more at 7– 9 AM and 4 – 6 PM window; and

B5-3

iii. Local residents who leave for work between 6:45 – 8:45 AM, and return home between 4:30 – 6:30 PM.

The SDEIS does not appear to focus at all on the competitive parking times, and instead ignores the true impact of these competing groups.

b. The SDEIS uses unrealistic, outdated population growth rates resulting in understated future parking and traffic demands. San Francisco is one of the fastest growing areas in the country, and it is expanding like a wave moving westward across the city toward the outer Richmond district. This factor further undermines the SDEIS' projections that the VAMC's expansion will have little effect on the nearby neighborhoods.

c. The SDEIS traffic counts appear to be based on old data and is limited to an unreasonably brief glimpse of the actual traffic levels within the impacted areas.

d. The study appears to assume that on each block there is space for one car for each 25 feet, rather than separately analyze each block encompassed in the study. The assumption ignores the fact that many, if not most, Richmond lots are 25 feet wide with a driveway curb-cut that is at least 8 feet wide, oftentimes 10 feet wide, leaving less than 17 feet for parking. In many instances there is insufficient space for any parking due to the location of individual curb cuts. If the SDEIS study, in fact, is based upon projections based on faulty assumptions, we submit that a new study must be undertaken that is based on accurate data based on a detailed analysis of each side of each street in the impacted neighborhoods.

e. Local residents confirm that the area which the SFVAMC sets out as where spill over parking occurs is underestimated. Moreover, all city street parking areas adjacent to the SFVAMC are subject to street cleaning related parking prohibitions which on ten days each month severely limit parking. The SDEIS ignores this supply issue and actually conducted its studies at times other than when street cleaning prohibitions are enforced by the SF Department of Parking and traffic. The SFVAMC should expand the study area and use Balboa Street as the southern boundary of the area.

f. Nothing in the EIS addresses the impact of residential street permit parking within all local areas surrounding the SFVAMC, despite that the permitting process has been submitted to the San Francisco government. Given that it is acknowledged that daily hundreds of SFVAMC employees and patients park on residential streets in the local areas surrounding the SFVAMC, the clear

B5-3
cont.

implication of a required residential permit to park would have catastrophic effect on even present on-campus parking deficits. Therefore, expansion of the campus as found in the preferred alternatives would extremely exacerbate the on-campus parking deficit, and the EIS is deeply flawed for failing to address that permit scenario.

B5-3
cont.

The cumulative impact of the above factors along with others raised by PAR and its constituents must be re-addressed and solved before the final EIS can be issued.

In order to estimate the increase in demand for on-campus parking spaces if the proposed new Research Center Building 40 is constructed on the SFVAMC's Fort Miley Campus, three methodologies based on hypothetical data and land uses summarized on Page 3.13-35 of the SDEIS were used. Why wasn't historical parking demand or supply data used?

B5-4

How would constructing Building 40 on the SFVAMC's Fort Miley Campus affect the deficit of 500 on-campus parking spaces?

Table 3.13-7 on Page 3.13-36 of the SDEIS summarizes the "Assumed Person-Trip Generation Rates" for six hypothetical land uses. And, Table 3.13-9 on Page 3.13-38 summarizes the "Assumed Vehicle Parking Demand Rates" for the same six hypothetical land uses.

None of those hypothetical land uses or the models applied to them in order to estimate the number of person-trips or vehicle parking demands generated for them appear to take into account:

B5-5

- the unique isolation of the SFVAMC Fort Miley Campus in the heavily residential Outer Richmond District surrounded by a National Park;
- Currently some shuttle service to and from the SFVAMC is provided by large diesel powered motor-coaches. These vehicles travel north and south on several blocks of 42nd Avenue several times a day. Along this route these coaches traverse already collision prone intersections where there are no traffic controls for east-west traffic. The impact on the residents and infrastructure on this usually rather lightly traveled street needs to be assessed and mitigated;
- the demographic data of the SFVAMC's employees' residential locations in Table 3.13-8 on Page 3.13-37 of the SDEIS or of the employees of the UCSF and NICRE employees who would be regularly assigned to work sites on either of the SFVAMC's potential campuses; or

- the SFVAMC's Fort Miley Campus' unique inaccessibility to ANY kind of regional public transit (refer, once again, to the paragraph at the bottom of Page 3.13-13 of the SDEIS).

For example, in Table 3.13-10 on Page 3.13-40 of the SDEIS, it is projected that, while the occupants of the proposed Building 40 would generate "963 Net-New Person-Trips Weekday Daily", Table 3.13-14 on Page 3.13-43 shows those particular persons would only generate "70 Net-New Weekday Peak-Hour Parking Demand in Spaces".

Unless they are simply sightseeing, it does not seem reasonable to assume that if 963 persons travel to the campus in their personal vehicles on a daily basis, only 70 of them would be seeking a parking space for it on or near the campus. It seems more reasonable to assume that all 963 of them would be seeking a parking space on or near the campus.

The recent construction of Building 211 is intended to reduce the deficit of on-campus parking spaces to at least 500. This will result in a like-number of spill-over SFVAMC-associated vehicles parked in the adjacent residential neighborhood. The demand for parking spaces from occupants of or visitors to the proposed new Research Center Building 40 would more reasonably increase that demand to 1,463 spaces (the sum total of 500 plus 963), which is over double the spill-over prior to June 2012.

While the proposed extensions of Buildings 209 and 211 will increase the number of on-campus parking spaces, these additions only marginally mitigate, but do not begin to eliminate, the net deficit of on-campus parking. Moreover, the proposal raises some serious issues about the collateral adverse impacts of those two building extensions on the park values and historic attributes of the West Fort Miley portion of the GGNRA.

We strongly oppose Alternatives 1 nor 2 in their present form. If they are to be considered, more credible assumptions and projections must be developed and vetted under this environmental review process with full public input.

4. Mitigations:

The SFVAMC must plan, design and construct a build-out of the campus in such a way to eliminate the "adverse environmental impacts" to the maximum extent possible. Neither Alternative 1 or 2 comes close to meeting that criterion.

The SDIES also fails to address the negative impacts occasioned by the commuting and parking behaviors of SFVAMC by employees, tenants, partners and contractors,

B5-5
cont.

B5-6

B5-7

and how modification of agreements controlling these relationships could affect such behaviors and mitigate their cumulative environmental impacts on the neighborhood.

↑
B5-7
cont.

Thank you for considering our comments in this matter.

Sincerely,

Richard L. Corriea,
President,
Planning Association for the Richmond

Raymond Holland
Planning Association for the Richmond

Cc: FOLE, People for the GGNRA, SF Planning Department, SFMTA

Submitter Information

Name: Hiroshi Takahashi

General Comment

SFVAMC LRDP Supplemental Draft EIS (San Francisco VA Hospital Long Range Planning Environmental Impact Report)

The most important issue for residents is the atrocious parking conditions caused by employees and patients. More parking spaces must be created on campus to prevent employees from blocking driveways and blocking pedestrian walkways as well as relieving the burden on the neighborhood. Conditions are currently very bad. More building and more employees will create even more stress for the neighbors. The report does not address the fact that the neighborhood has absorbed more than its fair share of the burden. The report does not state that some employees working later must walk 10 or more blocks to go to work. VA patients should not have to drive around to find a parking space in the neighborhood; they deserve more respect from the hospital and should be able to park at the hospital.

The best solution is to move more of the operation to Mission Bay.

The current situation is not sustainable and the horrible parking situation must be addressed.

B6-1

From: Preston Wong [<mailto:prestonrwong@gmail.com>]

Sent: Tuesday, March 31, 2015 8:18 PM

To: Flanagan, Robin J.

Subject: Re: [EXTERNAL] Some questions regarding the proposed research building project

Dear Ms. Flanagan,

Thank you for your response to my email. I have looked at the 2012 LRDP at the Public Library on 37th Avenue and I have looked at the 2014 EIS that you have referred me to in your email on the Internet. I did not find the answers to my specific questions within the LRDP or the EIS documents (i.e. 3.13 TRANSPORTATION, TRAFFIC, CIRCULATION, AND PARKING). I cannot find the specific answers to my questions regarding how many parking spaces will be specifically provided for the workers, the delivery trucks or the mobile equipment within the medical center DURING the entirety of the construction process. I did find this statement: "Therefore, this EIS does not fully assess delivery loading impacts with regard to the demand and supply of loading spaces or the accessibility and usability of delivery loading facilities (and any associated off-Campus effects). These impacts may require further evaluation later as each project for the selected EIS Alternative is designed in more detail." I think that in the same vein the EIS did not look at parking availability while the construction is in progress- just the total number of spaces that are supposed to be added with the next phase of proposed construction. There is no specific answer to my question about how many net parking spaces will be lost or added for the patients, staff and construction workers WHILE construction is in process.

B7-1

I would appreciate it if you would excerpt the parts of those documents (LRDP and EIS) which answer my questions, so that I can share those answers with my neighbors. While the EIS mentions that Residential Parking Permits are NOT used in the neighborhood it does not mention the contingency plans if and when the RPP is instituted by the SFMTA in the area. Or did I miss that section within 3.13 TRANSPORTATION, TRAFFIC, CIRCULATION, AND PARKING of the EIS?

What time is the discussion for the parking issues for the proposed construction scheduled for the public meeting on the 14th of April. I will be coming from the UCSF Medical Center on Parnassus and I will be leaving UCSF at 5pm. Many of the residents in the neighborhood will be coming after work so that it will no doubt be impossible for them to arrive at the very start of the meeting. Can the parking issue be put as the last agenda item of the meeting? Would you please send me a copy of the agenda for the meeting. Thank you.

B7-2

Sincerely,
Preston Wong

On Mar 31, 2015, at 4:10 PM, Flanagan, Robin J. <robin.flanagan@va.gov> wrote:

Mr. Wong:

Thank you for your email. I am sorry I did not respond yesterday but was out of the office. Welcome to the neighborhood. I think if you go to the site below and click on the LRDP and Supplemental Draft EIS many of your questions should be answered. I will also add your email to other comments received to be address. www.sanfrancisco.va.gov/planning/eis.asp Hope you are able to join us on April 14th for the Public Meeting.

Robin Flanagan
Director's Office
SFVAMC
415-750-2049

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

From: Preston Wong [<mailto:prestonrwong@gmail.com>]

Sent: Monday, March 30, 2015 12:19 PM

To: Flanagan, Robin J.

Subject: [EXTERNAL] Some questions regarding the proposed research building project

Dear Ms. Flanagan,

I live on 38th Avenue near Clement Street and have just heard about the upcoming public meeting in April regarding the proposed building of a research center and several seismic renovation projects at the VA medical center. I have some questions about the proposed plans and about the EIR and EIS report. I would appreciate your assistance in obtaining the answers to those questions or a referral to the person who can answer them.

B7-3

Is it true that the proposed construction of the research center and seismic projects will take at least seven years to complete?

How many people will ultimately be working at the proposed new research center- researchers and ancillary staff (janitorial, food services, clerical, etc.) and how many more medical center parking spaces will be available for them beyond those parking spaces currently available at the medical center? The EIR/EIS reports have described that neighborhood street parking spaces are currently often occupied at the 90-100% range during the weekdays so where are the people who will work at the research center park if medical center on-site parking is insufficient? What months were the parking/traffic surveys done?

B7-4

How many construction workers will be working at the medical center during the entirety of the projects? How much on-site medical center parking will be consistently available to accommodate all the workers, delivery trucks and mobile equipment during each working day? Will work be performed seven days a week? nights too? Will there actually be fewer parking spaces available each day at the medical center than exists now because the construction projects will take up so much space- for the new buildings, the equipment and the workers' parking?

B7-5

Recently the residents of the neighborhood were considering requiring San Francisco Municipal Transit Authority Residential Parking Permits in the area because of the longstanding difficulties we experience from the overflow of VA related cars onto the neighborhood streets. What contingency plans are being proposed by the VA should two or four hour parking time limits for non-permitted cars be instituted in the nearby areas? Where will employees, patients and families park outside the medical center if Residential Parking Permits are required?

B7-6

Thank you for your assistance.

Sincerely,
Preston Wong

From: C.K. Wai [<mailto:chi.kinwai@gmail.com>]
Sent: Monday, April 13, 2015 2:31 PM
To: Flanagan, Robin J.
Subject: [EXTERNAL] SFVAMC LRDP Supplemental Draft EIS

Hello Robin.

I appreciate that SFVAMC made an effort to prepare an EIS for us neighbors. I have some questions please.

ES-1 indicates that there are "Major" parking deficiencies at its existing Fort Miley Campus for "years ". Yet, on pg.34 Summary shows negative impact is only "Minor"? On 3.13 Parking studies, 42nd, 43rd & 34th Avenue blocks are done. Is it sufficient to have only 3 blocks to give a representative & scientific valid data? ES-3 says that SFVA will address deficiencies to "ensure" parking supply meets current & future demands. Can SFVA build more parking spaces to eliminate this defect instead of expanding on other areas?

B8-1

In the Oct. 2010 figures, the build out is 924,200 Gross sq. ft. & in Alternative I it is 322,200 Net sq.ft. Can I have a consistent unit for comparison as opposed to Gross vs. Net?

B8-2

On pg.10, there are proposed actions on the quality of the human & natural environment. The actions are probably positive. Does the public support all the expansions & constructions?

B8-3

In the summary negative reports, almost all the items are described as "Minor". What criteria are used for grading? Are they merely subjective opinions?

Noise is described as a "Minor" negative impact. There are 4 location monitors: the front lawn, parking lot, 42nd, 43rd Avenue/Pt. Lobos, making 15 minutes measurements at mid day. The campus stretches from 40th Avenue all the way to El Camino Del Mar. Does a couple of blocks & 4 sensors making 15 minutes measurements provide reliable & valid study? Does it appear to be some questionable sampling?

B8-4

In Appendix D, there are 2 incidents of accidental release or exposure of hazardous materials thereby posing a health risk to the public & the environment. It only depicts the 1994's leaking underground diesel tank & 2007's PCB drilling. What about the deadly incident that a laboratory researcher died of meningitis? OSHA cited SFVA for various workplace safety violations. If Title 29 of Code of Federal Regulation to minimize employee safety risks was followed, can the fatal accident be avoided? If the General Duty Clause was not ignored, can the death of the researcher be prevented? What measures are being implemented to mitigate such hazardous conditions? Researches on some of the pathogenic agents at SFVA may not be on the BSL's 1,2, or 3 lists, can they still pose a potential Health & Safety risk to all human & the community ?

B8-5

Under Operation: It induces population, housing, & employment growth. Do people want to live near a location that has constant construction noise, piercing back up alarms, traffic noise, blocking driveways, parking congestion , unsafe & unhealthy surroundings ?

Effective actions to address my questions & concerns will be more appreciated. Regards.

C.K Wai
10 Seal Rock Drive

B8-6

From: Raymondsnf@aol.com [<mailto:Raymondsnf@aol.com>]
Sent: Monday, April 13, 2015 2:53 PM
To: Flanagan, Robin J.
Cc: Cheary, Judi A.; a7w2m@earthlink.com; jasonjungreis@gmail.com; julieburns@sealrock.com; rlcorriea@gmail.com; rm@well.com; sfsky1@pacbell.net; raymondsnf@aol.com
Subject: INITIAL QUESTIONS In Re: "SFVAMC LRDP Supplemental Draft EIS"

Hi Robin:

Attached are some initial questions with regard to which we are seeking responses at tomorrow evening's public meeting regarding the SFVAMC's Supplemental Draft Environmental Impact Statement that was issued on March 9 of this year.

While we recognize that oral responses to all of the attached and other questions that are going to be posed will probably not be possible within the two hours scheduled for the public meeting, we are also asking for your earliest written responses to all nine of the attached questions so we can consider them in developing our final comments with regard to the SDEIS and submitting them to you by the deadline of Friday, May 8th.

Thank you for making the arrangements for these public reviews, questions and comments.

Sincerely,

Ray

Raymond R. Holland
Planning Association for the Richmond (PAR)
5758 Geary Boulevard, #356
San Francisco, CA 94121-2112
Voicemails and Faxes ONLY: 415-541-5652
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raymondsnf@aol.com

B9-1

**QUESTIONS ABOUT THE SAN FRANCISCO VETERANS' AFFAIRS MEDICAL
CENTER'S (SFVAMC'S) MARCH 2015 SUPPLEMENTAL DRAFT
ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

1. The SDEIS' executive summary describes, at the top of **Page ES-5**, seven sets of criteria that were considered in determining which SDEIS Alternatives merited further consideration and which did not. The second set of criteria that was considered was: "Location on 20-30 contiguous acres".

QUESTION: How was the SFVAMC planning to use that additional space (i.e., almost doubling the size of the campus) before that option was eliminated?

B9-2

2. The SDEIS' executive summary also describes, in the middle of **Page ES-5**, four alternatives that "were considered, deemed infeasible, eliminated from further consideration and . . . not analyzed in the EIS". However, immediately below that on the same page, there is a list of four more alternatives that "remained for further evaluation in this EIS". Exactly thirty days before the SDEIS was published, a senior SFVAMC representative announced that a proposal to acquire space at UCSF's Mission Bay Campus for the SFVAMC's research functions had just been disapproved.

QUESTION: Please confirm or clarify that announcement, explain if that means that "Alternative 3: Fort Miley Campus Plus Mission Bay Campus" in the SDEIS has been removed and please explain why it was removed as an alternative or, if not removed as an alternative, please explain why that proposal was disapproved.

B9-3

3. The "footprint" of the Research Center Building 40 and its location on the campus in **Figures ES-3 and ES-5** (on **Pages ES-8 and ES-10**) of the SDEIS' executive summary differs from the "footprints" of that same building that are displayed in Figures 3-4 and 3-8 of the January 2014 Draft "Long Range Development Plan" (LRDP) and in the plan documents for that building (i.e., that are denoted as "Appendices A., B., C. and D" presumably to the Programmatic Agreement for the following consultation process) that were published for simultaneous review during the consultation process required by Section 106 of the *National Historic Preservation Act* (NHPA). In addition, the Research Center Building 40 is described as a "five-story building" on pages 22 and 23 of Attachment B to the Programmatic Agreement for that process while in "Appendices A., B., C. and D." it is described as a "four-story building".

B9-4

QUESTION: Please clarify these contradictory descriptions of the proposed Research Center Building 40.

4. The section in the SDEIS' executive summary entitled "Supplementary Draft EIS Impacts and Mitigation" on **Pages ES-11 and ES-12** notes that: "(W)hen an adverse (environmental) impact was found, mitigation and/or management were applied to ensure that an adverse impact would be limited to minor impact or less. . . . The text of the respective mitigation measures is presented as a set of table notes at the end of Table ES-1."

Following that, it is noted that "(T)he PA (for the NHPA Section 106 Process) provides for mechanisms and processes to minimize these impacts including historic district guidelines, a historic landscape study, a public interpretation program, and a historic preservation treatment and maintenance plan".

The mechanisms and processes for mitigating environmental impacts to the campus and its surroundings are described in the *past* tense while mechanisms and processes for mitigating impacts on the historic characters of the SFVAMC and its surroundings are described in the *present* and *future* tenses; ergo, the mechanisms and processes are independent of each other.

QUESTION: Since the environmental impacts from the January 2014 Draft LRDP on the SFVAMC and its surroundings and that same draft plan's impacts on the historic characters of the SFVAMC and its surroundings are clearly related to and dependent on not only one another but also with regard to that Draft LRDP, why are those three documents proposed to be separate and independent?

5. For Alternatives 1 and 2 only, all of the "Transportation and Parking Impacts on **Pages ES-33 to ES-36** are rated "No Impact", "Minor (Impact)" or "Minor (Impact) with Mitigation". For those impacts that are rated "Minor with Mitigation", the mitigation measures suggested are limited "to conduct supplemental surveys . . . of parking . . . , (to) implement programs to prevent spillover" and "(to) use identified truck haul routes and implement a queue abatement program". Unlike the immediately preceding SDEIS citations, these are all in the *future* tense.

The admitted deficit in on-campus parking spaces and the resultant spillover of SFVAMC-associated vehicles onto the streets of the adjacent residential neighborhood and the museum parking lot are not "minor".

The claim that the impacts are "minor" is contradicted by multiple admissions by the SFVAMC. We'd be happy to identify them.

B9-5

B9-6

QUESTIONS: Why are the following more relevant, more effective and certainly more succinct mitigations not even suggested:

- a. increase the aggregate number of parking spaces on the campus even more; and
- b. decrease the aggregate demand for on-campus parking spaces from those employed on the campus by not only the SFVAMC but others;

when there are still opportunities to do so?

6. In order to estimate the total supply of parking spaces that would be needed on the SFVAMC campus, the SDEIS reports that hypothetical methodologies from three different sources (i.e., the San Francisco Planning Department, the United States Census Bureau and the Institute of Transportation Engineers) described on **Pages 3.13-35 and 3.13-36** were used.

For each thousand square feet of generic types of land use (e.g., a “hospital”, an “office”, a “research and development facility”, a “nursing home”, a “motel” and a “medical-dental office building” regardless of whether it is in a rural, suburban or urban area), an estimated “Equivalent Person-Trip Rate” was estimated.

Given the facts that the SFVAMC is a unique combined representation of all six of those generic types of land uses, it is uniquely located in one of the most-densely populated urban areas within the United States and it is uniquely inaccessible to any kind of regional public transit (see the note at the bottom of **Page 3.13-13**), it would not be unreasonable to assume that the SFVAMC campus is an outlier of an outlier and the use of any of those methodologies for purposes of estimating the supply of on-campus parking that may be needed is completely inappropriate.

More specifically, the SFVAMC has (or should have) significant amounts of empirical data defining historically what the total supply of parking spaces on its campus should be depending upon which portions of its 29.2-acre campus it decides to devote to each of those generic land uses.

In the SFVAMC’s initial Draft Environmental Impact Statement (DEIS) issued in the summer of 2012, the deficit in on-campus parking spaces was estimated to be at least 700 spaces and that was derived from repeated observations of the “spillover parking” of SFVAMC-associated vehicles in

B9-6
cont.

B9-7

the adjacent residential neighborhoods and the parking lot of the Palace of Legion of Honor museum.

QUESTION: Why is it now being proposed that the methodology for projecting the number of on-campus parking spaces that will be needed for each of the alternatives be changed from direct measurements of and projections from empirical data to three estimating methodologies that apply to only generic types of land uses that are not comprehensively representative of the SFVAMC's actual land uses? The next question also relates to this one.

7. **Table 3.13-8 on Page 3.13-37**, presents data on "Trip Distribution Patterns" for some kind of a population, but it fails to identify precisely what that population is.

QUESTIONS: Precisely who is included in the two sets of persons for whom the "Work" and "Nonwork Trips" are tabulated?

Since it would be logical to assume that the set of "work trips" includes only "employees" who work on the campus, who is or are the employers-of-record of those employees and what is or are the magnitudes of each subset of employees for each employer-of-record (i.e., for the SFVAMC, for the UCSF, for the NCIRE if it is being proposed to return to the campus, etc., etc.)?

Are comparative "trip distribution data" available for each employer's employees? If so, please provide them.

8. In the initial **June 2012 Draft LRDP**, the 5,000-GSF "Emergency Operations Center and Parking Garage **Building 211** is described as a "five-story building" with 40% of its space devoted to the EOC and the remaining 60% providing "295 net new parking spaces".

In the **January 2014 LRDP**, the 5,000-GSF **Building 211** has been reduced to a "four-story building" and the number of net new parking spaces has been reduced to "200". The construction of Building 211 was completed in late-2014 and it has since been opened and occupied.

In effect, the new **Building 211** reduced the deficit in the supply of on-campus parking spaces noted in the initial Summer 2012 DEIS from 700 to 500.

Applying the methodologies previously described in item #5 of this paper, the SDEIS notes in **Table 3.13-10 on Page 3.13-40** that the "**Net-New**

B9-7
cont.

B9-8

B9-9

Person-Trips” that would be created per weekday by the new, 110,000-GSF Research Center **Building 40** would be “963” and, in **Table 3.13-14** on **Page 3.13-43** that would result in a “**Net-New Weekday Peak-Hour Parking Demand in Spaces**” of 70.

The only relationship that figure of 70 has with empirical data on the ability of the SFVAMC to provide an adequate supply of parking spaces for employees (including, but not limited to, the SFVAMC’s own employees-of-record) working on its campus is that it is grossly understated. It is simply not realistic to assume that new employees and visitors to a new 110,000 GSF building would only require 70 net-new parking spaces.

In effect, that figure would increase the surplus in demand for parking spaces on the SFVAMC’s campus from 500 to at least 570 and, conservatively, to probably more than twice that number.

In addition, that conclusion is completely inconsistent with the SFVAMC’s own analyses and conclusions on Page 3.13-38 of the initial Draft EIS issued in the Summer of 2012. It noted that the campus was still short 297 on-campus parking spaces and that results in a 53% shortfall in code compliant parking requirements. Those are not “minor impacts”.

QUESTION: Please explain what, if anything, is wrong with this analysis of the demand for and supply of parking spaces on the SFVAMC campus.

9. Unless it was overlooked, nowhere does the SDEIS seem to propose mitigation measures that would entail the exercise of the SFVAMC’s management duties with regard to its own employees and, through their management authorities, the employees of the UCSF, the NCIRE and other collaborating organizations whose workforces would be sharing space on the campus with that of the SFVAMC.

QUESTION: Does the SFVAMC have any plans to attempt to modify the behavior of its employees and of its collaborators’ employees in commuting to and from the campus through either their employment contracts, their collecting bargaining agreements or other agreements? If not, why not?

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B9-9
cont.

Letter B10

PUBLIC SUBMISSION

As of: 4/17/15 8:28 AM
Received: April 16, 2015
Status: Posted
Posted: April 17, 2015
Tracking No. 1jz-8ibq-3o40
Comments Due: May 08, 2015
Submission Type: Web

Docket: VA-2015-VACO-0001
 Notices Requesting Comments

Comment On: VA-2015-VACO-0001-0056
 Environmental Impact Statements; Availability, etc.: San Francisco VA Medical Center Long Range Development Plan; FR Doc. 2015-05507

Document: VA-2015-VACO-0001-0067
 Comment on Environmental Impact Statements; Availability, etc.: San Francisco VA Medical Center Long Range Development Plan; FR Doc. 2015-05507; Bradner, Kay

Submitter Information

Name: kay bradner

Address:

3707 Clement Street

San Francisco, CA, 94121

Email: kaybradner@gmail.com

Phone: 415-317-7265

General Comment

as a neighbor on Clement Street, just a few blocks from the VA, I think it is crucial that when the number of employees and patients increases, the available parking on site or in the parking area in lower Fort Miley also increases. Parking has been a tremendous focus for angry action here. There was a strong movement to make this area a 4 hour permit area. I feel this is not a good solution but if parking is increasingly difficult, the neighbors may be able to establish a restricted parking zone.

B10-1

From: Denise Louie [mailto:denise_louie_sf@yahoo.com]
Sent: Monday, April 20, 2015 9:15 AM
To: Flanagan, Robin J.
Subject: [EXTERNAL] SFVAMC Supplemental Draft EIS

Hi Robin,
Below are my comments.

Thank you and have a nice day,
Denise

Dear Decision Makers,
Thank you for inviting public comment on your Long Range Development Plan and draft Environmental Impact Statement.

In reviewing the LRDP and EIS, I find alarmingly little reference to what might be growing in or on the ground. Yet, the LRDP and EIS warrant consideration of the San Francisco VA Medical Center's location in a biodiversity hotspot and proximity to the Golden Gate National Recreation Area. San Francisco is part of the California Floristic Province, an internationally recognized biodiversity hotspot with 3,500 native plant species, 61% of which live nowhere else. Many of these species are at risk of extinction due to human impacts. The GGNRA includes the Presidio, where rare and endangered plant species yet remain.

And wildlife co-evolved with these diverse plants. SF is also important as part of the Pacific flyway. Indeed, in fall 2014, Audubon released its 7-year climate study, which was reportedly done very conservatively. Up to 50% of all North American bird species are at risk of extinction by the end of the century. "By 2080,...dozens of avian species across the country could be hurling toward extinction—and not just birds that are already in trouble." (1) "314 of 588 species under review are at risk of being 'climate-endangered' or 'climate-threatened'—that is, they face losing more than half of their range by 2050 or 2080," including 9 state birds. And "110 of 310 California species would experience significant range loss by 2100," including owls, pelicans, sparrows and many more birds we otherwise take for granted. (2)

The Bay Area is particularly rich in native plant and wildlife species. However, their very existence is in jeopardy, due mainly to habitat destruction (i.e., construction, recreation and other human activities), invasive species and global climate disruption (e.g., global warming, extreme drought, more intense wildfires, etc.). The best thing we can do for birds and other wildlife is to give back habitat we've disturbed, however unwittingly. Equally important, we can stop using toxic chemicals that may be responsible for killing them.

Efforts around the City are being made to increase indigenous biodiversity, to conserve water, to eliminate or minimize synthetic chemicals that may seep into

B11-1

B11-2

groundwater or sewer systems, and more. In recent years, the City has established a Biodiversity Program within the Department of the Environment, helped launch Biophilic Cities, removed neonicotinoids from the list of permissible pesticides, and planned to mix groundwater with tap water. "Biophilia" is a new term, coined by renowned scientist E. O. Wilson. It means people are hardwired to connect with nature. Wilson refers to nature in its undisturbed form, with natural assemblages of plants and wildlife. The mission of the City's Biodiversity Program is to "conserve the biodiversity, habitats and ecological integrity of San Francisco's natural environment, in wildlands and in the urban environment, and to connect San Franciscans to their nearby nature." (3)

The SFVAMC can take this opportunity to align itself with the needs of indigenous plant species and wildlife, with the City's efforts to improve our management of our environment and to provide opportunities for San Franciscans to connect with local nature. Our Recreation and Park Department accomplishes these goals in part by leveraging off of volunteerism. I urge you to, at the very least, create policies to accomplish the following:

1. To remove and avoid invasive plants--including Monterey pine and cypress—in the ordinary course of business.
2. To plant native plants with a San Francisco heritage or pedigree by dedicating land for restoration, for increased natural biodiversity in the understory of existing trees, and for a native plant demonstration garden.
3. To follow best management practices in landscaping, including use of compost and avoidance of synthetic chemicals in landscaping.

Resources and references I recommend include:

A Natural History of California, by Allan Schoenherr

San Francisco: A Natural History, by Greg Gaar

The Sixth Extinction: An Unnatural History, by Elizabeth Kolbert

Peter Brastow, Senior Biodiversity Coordinator, SF Department of the Environment, peter.brastow@sfgov.org

plantfinder.sfplanning.org, a plant database for creating habitat

(Joe Cannon*, restorationist and ecology instructor, City College of San Francisco)

Ellen Edelson*, President, California Native Plant Society, Yerba Buena Chapter (SF)

Andrew Scavullo*, soil expert and landscaper, Nature's Acres Nursery)

* These three people are extremely busy, so I am withholding their contact information for the time being. The point is that there are consultative resources out there. And all three have native plants for sale. Furthermore, an important best practice is to stay as local as possible, in order to avoid muddying the unique local gene pool of native plants and in order to avoid species that can outcompete locals.

B11-2
cont.

Once you've had a chance to consider the importance of SFVAMC's location and landscape management practices, I urge you to reconsider the landscape portions of your LRDP and EIS. Because what you do really does matter.

Thank you again for inviting public comment. I look forward to hearing from you.

Sincerely,
Denise Louie
native of San Francisco
Volunteer, Golden Gate National Parks Conservancy
Volunteer, SF Rec and Park Department, Natural Areas Program
Member, California Native Plant Society
Member, Sustainability Committee, CCSF

- (1) <http://climate.audubon.org/>
- (2) *Audubon*, September-October 2014, p. 31
- (3) <http://www.sfenvironment.org/article/biodiversity-in-the-city/biodiversity-program-summary>

RON MIGUEL

600 De Haro St., San Francisco, CA 94107
T-415.285.0808 F-415.641.8621 E-rm@well.com C-415.601.0708

22 April 2015

To: robin.flanagan@va.gov

Following is a comment on **SFVAMC SUPPLEMENTAL DRAFT EIS** issued on 9 March 2015

When I commented on a previous VAMC EIS in the 1990's it was after 51 FOIA (Freedom of Information Act) requests. At that time the neighborhood found the 'smoking gun' – a document which proved that the VAMC administration conspired with its EIS provider to hide the true size and impact of a proposed building to be located on the historic Clement Street landscaping. Washington quickly and decisively killed that project outright.

B12-1

Now we have another EIS. This document has not been brought about by a voluntary action on the part of the VAMC. It has only been forthcoming because of the 2006 legal action filed by the Planning Association for the Richmond and Friends of Lands End in US District Court. I was a signatory to that legal action which, in reality, has not been fully satisfied.

The obvious flaw in the present EIS is not the same or as blatant as it was in the '90s; although, this time the flaw is right in front of you in black and white on page ES-1, under the heading, *PURPOSE AND NEED*. The first paragraph of that section consists of two sentences, 93 words long. It speaks of providing health care services for veterans. However, only the final 2 words of have any real meaning as to the EIS. They read, "conducting research".

This EIS is not about additional hospital beds for veterans. It is not very concerned with much additional square-footage for direct clinical services to veterans. It is totally consumed with research facilities under the auspices of NCIRE and UCSF. It is these two institutions which control the vast majority of employees, and overwhelming amount of square footage, and the preponderance of vehicles. It is these two institutions which are responsible for the drastic overcrowding of this relatively small campus. It is these two institutions which are responsible for intrusions into and degradation of both our National Parklands and the residential community surrounding the campus. This EIS is not about direct health care for veterans – it is about research facilities for NCIRE and UCSF. And yet UCSF, the major culprit of the two, has steadfastly refused to work with the neighborhood or with city officials regarding their overuse of the campus. I understand that the funding, mainly through NIS, must be done on federal property. But it does not specify the VAMC's Ft. Miley campus.

B12-2

The EIS paragraph to which I refer above speaks of our growing veteran population. If the proposed construction was actually about hospital beds and clinical services, it could and would be analyzed and discussed in an appropriate manner. However, in my opinion, AECON, which prepared the document, has been conned. I say this not only because of the language I've quoted, but because of other tell-tale signs. Take a look. Each and every time the single word 'veteran' or 'veterans' appears it is capitalized. This would be redlined by any elementary school teacher. This isn't simply bad English – it is a common usage in advertising propaganda to elevate a term and take it out of its true context. It's propaganda.

B12-3

As a former San Francisco Planning Commissioner I've probably read more EIRs and EISs than most people. Some preparers just do not understand how to approach their assigned task with total and absolute impartiality. Others are unduly influenced by their principal. In my opinion, AECON's attitude and approach is obviously prejudiced even before you finish the first page. It does not read as unbiased.

I know other commentators will deal with issues of transportation and lack thereof; about studies that highlight the over-parked campus and vehicle intrusion that negatively affects the neighborhood and the Legion of Honor; about what the carrying capacity of the campus really should be. There will be many comments as to the VAMC's use of other possible locations in and out of San Francisco including Mission Bay. You will also hear about disregard for the historicity of the campus and problems of intrusion into adjacent natural areas. It's not that I'm unconcerned as to these issues, but duplication on my part is unnecessary.

B12-4

I am, however, very concerned as to the VAMC's piecemeal construction concept. I fully understand their funding dilemma – annual appropriations. But that does not excuse or prohibit good planning. While the LRPD is an attempt at finding a solution, the record for over 30 years is one of creating projects which are in small enough dollar amounts so as not to come under congressional scrutiny and oversight.

B12-5

In conclusion: I consider this EIS just another con to be perpetuated on the citizens of San Francisco. One which, sadly, is, in my opinion, totally in keeping with the manner by which we have been treated by the ever-changing VAMC administrations during the 30-plus years I've dealt with them.

B12-6

Ron Miguel

CC:	Ray Holland	Richard Correa
	Amy Meyer	Jason Jungreis
	Gene Brodsky	Bill Shepard
	Peter Winkelstein	Julie Burns
	Dan Bernal	John Rahaim

From: andrew scoular [<mailto:andrew@blueturtlespa.com>]

Sent: Wednesday, May 06, 2015 10:47 AM

To: Flanagan, Robin J.

Cc: Eric.L.Mar@sfgov.org

Subject: SFVAMC LRDP Supplemental Draft EIS

We are opposed to any further development and expansion of the VA Medical Center on Clement St.

- This is a residential neighborhood first and foremost
- Further expansion of the VAMC brings more traffic congestion and 'Google-style' buses to our residential neighborhood
- We would like this residential neighborhood to be known as Outer Richmond District rather than VA-ville. The VA provides no benefits whatsoever to the local community, and other than Walgreens, no local business sees droves of VA employees spending money and supporting the local Outer Richmond economy.
- We would like to see a contraction of the VA rather than an expansion. VA expansion can take place S of Market in China Basin, in conjunction with UCSF, as well as at the huge VA property in Palo Alto.
- The VA and it's employees take over our residential neighborhood. Employees park on our streets from 6am during the week, and even at night and weekends (when the VA employee parking lots are empty). The neighborhood is classified by the VA as part of it's parking facilities (consultants we know have been told by VA employees to 'park in the neighborhood'). If the VA cannot accommodate all it's present employees and consultants cars on the VA property they should reduce staff here and distribute them to VA campuses that can accommodate all of their cars.
- The VA is surrounded by an exceptional natural preserve area that is important for the residents of San Francisco as well as tourists. We do not want to see more massive VA buildings diminishing the natural beauty of this area. The VA and it's buildings will fit in perfectly with the tall/large building concept for China Basin etc.
- The VA property should be donated to the city of SF to provide below market housing for San Francisco residents.
- Copy to Nancy Pelosi (with an assumption that she cares about her local constituents).

B13-1

B13-2

B13-3

B13-4

B13-5

B13-6

B13-7

Andrew and Nanci Scoular
4027 Clement St

From: Naurie [<mailto:naurie@gmail.com>]
Sent: Sunday, May 03, 2015 8:40 PM
To: Flanagan, Robin J.
Subject: SFVAMC LRDP Supplemental Draft EIS

Hello,

I've been reading the material re: the new construction at the VA hospital 4150 Clement St, parts of which are directly across the street from me on Seal Rock Drive. I am concerned about this expansion and recommend that Alternative #3 Mission Bay be selected for this project. I am already having daily weekday challenges with parking by hospital employees and visitors (regardless of the hospital having parking facilities - it seems that the majority of folks prefer to park in our neighborhood). I am a senior with developing physical challenges, and am in need of the availability of a parking space in front of my home. The current ongoing parking situation puts me in a quandary whenever I need to leave the house, and there are times when I forego leaving because I am worried that I won't be able to find a close spot on my return. What is it going to be like after your proposed expansion here? I don't want to find out.

B14-1

Naurie Morimoto
33 Seal Rock Drive
San Francisco 94121

From: Naurie [<mailto:naurie@gmail.com>]
Sent: Thursday, May 07, 2015 3:04 PM
To: Flanagan, Robin J.
Subject: Re: SFVAMC LRDP Supplemental Draft EIS

Robin,

I've been thinking that because I only outlined my parking concerns that you might think that is the only thing that concerns me about this SFVAMC expansion and I wanted to explain that this may be one of my main concerns but that it certainly is not the only one. There are daily increases in traffic during commute times, obviously being people leaving your facilities. Several residents on this street are elderly and in need of walking aids (canes and such), and therefore slower in crossing the intersections. There are have more than a few occasions whereby they've had to wait an inordinate amount of time for cars to stop (even though there is a stop sign at 45th Avenue). This is one of the reasons that we requested the help of SF Police Captain Silverman to create a traffic "sting" at that corner to catch stop sign violators. This worked fine during this enforcement, but now that the sting has ceased, the traffic is ramping up again.

If the SFVAMC expands per the favored plan, what would this do to the above situation with the associated increases in staff, transit, and traffic. I shudder to think on it.

Please locate in Mission Bay.

Naurie Morimoto

B15-1

From: Namaste Pamela [<mailto:pamelacarrara@earthlink.net>]
Sent: Thursday, May 07, 2015 4:44 PM
To: Flanagan, Robin J.
Subject: SFVAMC's plan to build out at a gross of 924,200 sq. ft.

May 7, 2015

robin.flanagan@va.gov

RE: SFVAMC's plan to build out at a gross of 924,200 sq. ft.

Dear Robin,

I am very concerned about this expansion because it can result in:

* More traffic leading to running stop signs, speeding, parking problems, & blocking driveways;

| B16-1

* More noise from trucks, bobcats, digging, in addition to the existing undesirable sound;

| B16-2

* More research on contagious pathogens leading to potential bio-hazard & even death such as the researcher who contracted & died from meningitis some time ago;

| B16-3

* More bio-security threats; &

* Property values going down more.

I Request that SFVAMC move some of the research to Mission Bay as SFVAMC's Associate Director said in January 2010 and again stated by Mayor Ed. Lee in May of 2012.

| B16-4

Please consider my concerns regarding these threats to our health, safety & well being in our neighborhood.

Reference: SFVAMC LRDP (Long Range Development Plan Supplemental Draft Environmental Impact Statement

Reference: SFVAMC LRDP Supplemental Draft EIS

Please confirm receipt of this email.

Pamela Carrara

187 Seal Rock Drive

San Francisco, CA 94121

May 8, 2015

Dear Director Flanagan, and to those considering the VA's plans:

We strongly oppose any further expansion of the VA or any net increase in activity at the SFVAMC. We already feel the impact on our residential neighborhood from the VA on a daily basis. The quiet residential character of this neighborhood should be seriously considered: designed 100 years ago as low density, zoned for single family houses, with the presence of Lincoln Park - it designated as an official bird preserve and a popular spot for cyclists. We already see the impact from the VA: noise and general disruption from increased (and often speeding) traffic, lack of parking during the week for residents and guests, and increased curb trash. There are days, especially on City street cleaning days, when residents or guests cannot park within a block or more of the houses even though there are houses only on one side of Clement Street, and very relatively few houses for such an area, at that.

We feel the VA's impact to a much greater degree than was the case when we moved here 30 years ago. While we respect the mission of the VA greatly, we feel the SFVAMC has an increasingly negative presence in our neighborhood. What used to be quiet and sleepy campus now has an impact which is felt all throughout the immediate area.

Rather than expanding facilities further, we would ask you to consider ways to lessen the current impact on our residential neighborhood. At the very least, further actions should have calming effect on the immediate neighborhood; nothing should be done which will increase the number of vehicles coming and going to the campus. If it can be lessened, it should.

If the VA continues to expand its facilities, as for instance the UCSF Parnassus campus has, this would be a huge negative for the neighborhood, and it seems we are getting closer, rather than farther away, from the type of impact that campus has on its surrounding areas.

Thank you for your attention and consideration,

The Weber Kneitel Family
3649 Clement Street
San Francisco, California 94121

B17-1

SAN FRANCISCO VA MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
SUPPLEMENTAL DRAFT
ENVIRONMENTAL IMPACT STATEMENT (SDEIS)
PUBLIC MEETING

April 14, 2015

SAN FRANCISCO VA MEDICAL CENTER
AUDITORIUM, BUILDING 7
5:00 - 7:00 P.M.

Reported by:
Kent Odell, CERT

APPEARANCES

SPEAKERS

DAVID REEL, AECOM Principal/Project Director

JUDI CHEARY, SFVAMC Director of Public Affairs

RUSH STURGES

RON MIGUEL

DAVID BURNS

AMY MEYER

CARL GRUNFELD, SFVAMC Research Associate Chief of
Staff

JASON JUNGREIS

RAYMOND HOLLAND

KELSEY BENNETT, AECOM Project Manager

KAY WEINKAM

KATHY LASSEN-HAHNE

TOM MORAN, VA NEPA Implementation Officer

PROCEEDINGS

5:30 P.M.

MS. CHEARY: Good evening. Thank for joining us. My name is Judi Cheary, the Director of Public Affairs. I'm going to do some quick introductions of VA staff, so you know who you're interacting with tonight. There are subject matter experts in the room that can talk to you about what you're going to hear tonight or any of the displays that we have in the back, so just raise your hand as I introduce you, please.

In the back we have Gita Uppal, who's our Director of Strategy and Outreach and is also a member of our Executive Leadership Team.

Michelle Millers, who is our Chief Engineer.

Chris Brazell is our Activation Section Chief. He's responsible for activating many of our projects we have on Campus.

Robin Flanagan who many of you have interacted with is the VA Project Manager for the Environmental Impact Statement, our Long Range

1 Development Plan, and (some of you that are
2 consulting parties that have engaged with us.

3 Carl Grunfeld is our Associate Chief of
4 Staff for Research. He's also your neighbor. He
5 lives in the Richmond area.

6 Also joining us from VA Central Office is
7 Tom Moran. He is an Environmental Specialist from
8 Washington, D.C. Also Doug Roaldson and Nelson
9 Cancio are both from our Health Care Network Office
10 and are environmental specialists.

11 And then our consultants who have been on
12 this project with us for many years, including David
13 Reel who will be doing a presentation in a moment.
14 He's a Vice-President and Principal and is Project
15 Director on this project. And Kelsey Bennett, who is
16 a Senior Environmental Planner and Project Manager
17 on this project.

18 So what we're going to do tonight is
19 David's going to go over the LRDP, which is our Long
20 Range Development Plan, which is the project that
21 the Environmental Impact Statement evaluates. He'll
22 also talk about what's in the Supplemental Draft EIS

1 and then we'll take public comments.

2 So David, I'll turn it over to you.

3 MR. REEL: Thanks, Judi, and welcome and
4 good evening. Thanks for taking time out of your day
5 and maintaining your interest in this project.

6 The purpose of this meeting is to receive
7 public comments on the Supplemental Draft EIS for
8 the Long Range Development Plan, and so I'm going to
9 give a brief presentation and after that we'll ask
10 you if you'd like to give a comment on record.

11 We have a court reporter over here that
12 will be recording everything that we're saying. We
13 have speaker cards that we'd like you to fill in so
14 we have your name correctly. And when you step up to
15 the microphone, we'd like you to announce your name
16 and we'll call off the names in the order that we
17 have them. That way if something needs to be
18 recorded it goes right directly into the record.

19 So just to start with, the environmental
20 process; we've been working on this for a number of
21 years. I have seen some of you at the last Draft EIS
22 public meeting in 2012. Since then we've been

1 reviewing those comments and VA has changed some of
2 the things in the LRDP. In particular the phasing
3 has changed, and we've been preparing the
4 Supplemental Draft EIS.

5 The Supplemental Draft EIS has been out for
6 circulation. The comment period will end on May 8th
7 and that gives the public 60 days to review and
8 comment. We really want to get public comments in
9 writing so that we can respond to them in writing.

10 We are here today at the public meeting and
11 after the public meeting we'll take your comments
12 here on record, but we'd like you to also continue
13 to put comments in writing if possible. And then
14 we'll respond to those comments in preparation of
15 the Final EIS. VA will make a determination and
16 prepare a record of decision at the end of this
17 process.

18 So why are we doing a Supplemental Draft
19 EIS? Some of you may have noticed that we since the
20 2012 Draft EIS VA has looked at some of their
21 projects, in particular the phasing and the timing
22 of those projects and they revised the Long Range

1 Development Plan. The supplemental document
2 addresses those changes and I'll be talking about
3 them in just a minute.

4 But VA also took those comments into
5 consideration that they received from you, the
6 public at some of the meetings as well as in writing
7 and reviewed and considered them as part of the
8 Supplemental Draft EIS process.

9 So I think you all know the SFVAMC site,
10 which is where we are. Just in case you can't see it
11 here, we are right next to the Richmond District.

12 So what is the Long Range Development Plan?
13 It's really a dynamic plan for the VA to use in
14 their conceptual planning. They use the plan to
15 establish their long term vision for the Campus.
16 This provides a baseline for the existing conditions
17 so that way VA can track their facilities as they
18 change over time. It helps them determine their
19 facility requirements and there's a lot of thought
20 that goes behind the scenes that the VA goes through
21 to make those determinations.

22 VA identifies the alternatives and looks at

1 those opportunities for development and looks at a
2 variety of alternatives.

3 And then ultimately VA has to look at the
4 estimated time for implementation, and a lot of that
5 is based on the funding cycle, so they often have
6 to look at things on an annual basis and that's why
7 it's a dynamic process.

8 The Long Range Development Plan was to
9 enhance the site plan of the Campus here to function
10 as a resource to serve the Veterans for now and into
11 the future for them and their families.

12 VA also needs to continue to provide
13 proactive patient-centered care to Veterans, and
14 provide appropriate space to conduct not only
15 clinical but also educational and research programs,
16 all at this Campus. It's important to have those
17 things co-located together to get the best results
18 for the VA.

19 Here's a map to orient you a little bit.
20 Most of you probably came in the main entrance next
21 to the parking structure that you see on the right
22 there. The parking flows here and has handicapped

1 parking. We're in this building here, and here is
2 Clement Street.

3 Just to point out Building 211 is a
4 recently completed parking structure, so it's
5 supplying more parking onsite and we'll talk about
6 that in a minute as we go through some of the plans.

7 There are nine objectives that the VA
8 carefully constructed and came up with, and so I'm
9 just going to read them off here.

10 Strengthen and enhance inpatient and
11 outpatient primary and specialty care. Not just San
12 Francisco Bay Area, but for North Coast Veterans.
13 That goes all the way from San Bruno up to Eureka.
14 So while VA is serving the Bay Area, the area does
15 extend quite far north.

16 Retrofitting existing buildings. Some of
17 the existing buildings don't meet the seismic
18 standards necessary to be safe and operational, and
19 along with that VA has a historic district onsite
20 and has to take that into consideration as part of
21 the design.

22 Improve the efficiency of the clinical and

1 administrative space through renovation and
2 reconstruction. So it's not just seismically
3 upgrading but through the process of having to
4 reconstruct in some cases, and in other cases build
5 a new building.

6 Meet patient privacy standards and ADA
7 compliance. Someone had mentioned earlier that you
8 can't access some of the buildings since they don't
9 have appropriate width or ramps to get into the
10 buildings. VA needs to bring their buildings up to
11 ADA standards.

12 Provide appropriate space for education and
13 research programs combined with clinical space,
14 which I mentioned earlier, is really an important
15 goal and objective for the VA.

16 Address space deficiencies. There really
17 isn't enough space to do all the programs that VA
18 has and that's why the need for this plan and need
19 to develop here onsite.

20 Improve the parking supply. We know a lot
21 of the neighbors are concerned about the parking,
22 not just now but in the future as well, and the VA

1 has resolved some of that by building more parking
2 but VA also will be adding some more parking and
3 I'll go over that in just a minute.

4 Improve internal and external Campus
5 circulation. The utilities need upgrading in some
6 cases, and improving the overall infrastructure
7 onsite is important.

8 Finally, maintaining and improving public
9 transit access to the Campus is an important
10 objective.

11 These objectives were considered in going
12 through the NEPA documentation process.

13 The Purpose and Need. This was again very
14 carefully constructed and thought out by the VA so
15 I'm just going to read through this:

16 The purpose is to meet the VA's mission of
17 providing comprehensive, high quality health care
18 services and improve the health and wellbeing of
19 Veterans and other eligible persons in the San
20 Francisco Bay Area and along the North Coast of
21 California. As I mentioned, that goes beyond the Bay
22 Area and all the way up to Eureka.

1 The need is to address the current and
2 future capacity issues brought about by the growing
3 Veteran population that need to be served here in
4 the Bay Area. And the ever-changing health care need
5 of the growing Veteran population as well, and
6 providing safe -- which deals with the seismic
7 issues -- and appropriate facilities for providing
8 health care services and conducting research at the
9 same time.

10 Alternatives. There are three build
11 alternatives and one no action alternative. No
12 action means that nothing would be built or changed,
13 and in some cases there is a need to address some
14 things on Campus. I'll talk about that a little bit
15 more later. But the three build alternatives include
16 Alternatives 1, 2, and 3, and I'm going to go
17 through this really quickly.

18 Alternative 1 basically reduced the
19 original square footage that was looked at in the
20 Institutional Master Plan that was released in 2010
21 and included quite a bit more square footage for the
22 Campus. The VA relooked at that and reduced the

1 square feet quite a bit.

2 VA also found a need to accelerate some of
3 the seismic upgrade projects so that they can
4 maintain those buildings and make them safe. And
5 this alternative as well as the other alternatives
6 looked at both the short term as well as the long
7 term projects out to about 2027.

8 Alternative 2 is just a variation of
9 Alternative 1. It basically looks at slightly
10 different construction phasing, and I'll talk about
11 that when I go through the actual plans that follow
12 here.

13 Alternative 3. Phase 1 for Alternative 3 is
14 exactly the same as Phase 1 under Alternative 1, but
15 the main difference for Alternative 3 is that the
16 long-term project moves some of the square footage
17 off to a Mission Bay site rather than on the
18 existing Campus. This would not involve building a
19 new campus but would locate some additional square
20 feet offsite.

21 As I mentioned, Alternative 4 is the no
22 action alternative, and it provides a baseline for

1 looking at what is existing to compare with the
2 future action alternatives.

3 Alternatives 1 and 2 as well as Alternative
4 3 Phase 1 would occur here on site.
5 Alternative 3Phase 2 would occur off site.

6 VA has looked within the whole area of
7 Mission Bay. A lot of this area has already been
8 developed or development is in the process of being
9 approved. One of the challenges is finding a
10 contiguous parcel to construct any kind of square
11 footage that could accommodate the VA's needs.
12 Another thing that is also required is to have
13 federally owned land.

14 So Alternatives 1 and 3 Phase 1 development
15 here; this is the map. The purple represents
16 proposed new development. And I want to point out
17 again that Building 211 parking construction was
18 just completed, but Buildings 211 and 209 would have
19 extensions to those parking structures. Circulation
20 would still allow access underneath for the road to
21 continue, so it would not block the road.

22 You can see the rest of the purple

1 development around the site. A new drop-off area,
2 and some new buildings back here.

3 The blue buildings really represent the
4 retrofits, and you'll see those shift in some of the
5 other drawings when the retrofit and seismic
6 improvements are planned.

7 And then finally the red dashed line
8 represents locations of temporary modular swing
9 space for construction. So during construction there
10 would be a need to unfortunately use part of the
11 parking lot to keep some of the construction
12 activities on site and have enough laydown area and
13 enough work area to complete the facilities. There
14 are several spaces that are dotted here in red. .

15 Once construction is complete, the parking
16 areas would return to how they are and continue to
17 be used. That is important because there is a
18 historic district and VA doesn't want to locate
19 something to upset the historic district.

20 Alternative 1 Phase 2. The main thing
21 that's added here is a new clinical building,
22 Building 213.

1 And now we're moving on to Alternative 2
2 Phase 1. As I mentioned previously the main
3 difference is (as you can see) less blue buildings,
4 those blue buildings being the retrofits, and you'll
5 see in the next slide that those would occur later,
6 in Phase 2. VA wanted to analyze that in the
7 Supplemental Draft EIS to be able to compare those
8 different scenarios and see what the potential
9 impacts would be.

10 So then there's Alternative 2, Phase 2. And
11 as I mentioned, Buildings 1, 6, and 8 are the
12 seismic retrofits that would occur in Phase 2.
13 That's the main difference in Alternative 2 and it
14 really is dependent on the VA's funding cycle.

15 So here are the environmental topics
16 analyzed. They're exactly the same topics that were
17 analyzed in the Draft EIS in 2012, but we had to
18 relook at everything because some of the phasing and
19 projects changed on the site, so the Supplemental
20 Draft EIS is in a sense a revision or an update to
21 the Draft EIS and serves almost like a second draft
22 to the 2012 Draft EIS that was released previously

1 to the public.

2 So I wanted to point out Alternative 4, the
3 no action as I mentioned earlier. If VA doesn't make
4 these improvements and they don't take the action,
5 there would not be seismic improvements, which are
6 really important for some of the facilities. Because
7 VA has to deal with a historic district that
8 provides extra challenges, especially in design.

9 Seismic improvements are important to address
10 damage, hazard, safety issues, so that VA can take
11 an action, but as part of the NEPA process and as a
12 comparison.

13 The rest of the three slides here I'm just
14 going to go over where mitigation measures were
15 identified in the SDEIS, and these are for the
16 action alternatives that require mitigation. In the
17 Supplemental Draft EIS you'll notice there are also
18 management measures that address things as well, but
19 I'm just going to summarize mitigation measures
20 related to potential adverse impacts, briefly here.

21 Air quality. During construction and
22 operation in order to address some potential impacts

1 related to air emissions, employ Tier 4 engines and
2 construction equipment for specific short-term
3 projects. In our analysis we found that it was
4 necessary that Tier 4 equipment or engines are
5 needed to reduce emissions, and so that's part of
6 the project. More detail is discussed in the
7 Supplemental Draft EIS Air Quality section, so I
8 recommend reading that.

9 Greenhouse Gas Emissions and Climate Change
10 and Community Services. Some climate change effects
11 and fire hazards were identified and require
12 maintenance of foliage and vegetation on Campus and
13 coordination with adjacent property.

14 Obviously, we're right next to the Golden
15 Gate National Recreation area, there's a lot of
16 older landscape that may need to be maintained when
17 it dies or gets dry, so there is a potential for
18 fire hazard so this is the mitigation to ensure
19 that.

20 Cultural Resources. Some of you may know
21 that there is a historic district on site. VA has
22 gone through a long process of completing a

1 Programmatic Agreement and they actually have the
2 signatures from the signatory consulting parties,
3 including the State Office of Historic Preservation,
4 the American Council on Historic Preservation, and
5 VA. VA is also collecting the rest of the signatures
6 on the Programmatic Agreement.

7 What the Programmatic Agreement contains
8 are some of the steps or stipulations to address
9 actions that could affect the historic district. So
10 VA would look in those stipulations and go through a
11 process and ensure that the next building that they
12 build on site addresses the historic district.

13 In addition, as I mentioned earlier, that
14 red dotted line represents the temporary modular
15 swing space. By removing that after the short-term
16 projects are completed, it would no longer have a
17 permanent effect on the historic district. It's
18 important to put things back the way they are and
19 keep the historic district intact.

20 Noise. For noise, obviously construction
21 causes noise and noise and vibration are often an
22 issue, and so VA worked really hard to come up with

1 some of these mitigation measures:

2 Monitor construction noise levels and
3 implement additional noise attenuating features, so
4 features that would help screen some of the noise
5 issues.

6 Conduct a pre-construction survey of
7 buildings in the vicinity of the proposed
8 construction, so prior to it starting.

9 Monitoring vibration-sensitive equipment
10 during construction, making sure that there's not an
11 impact on some of the existing buildings as
12 construction is occurring.

13 Conduct a site specific noise study to
14 inform the design of any stationary sources.

15 So in addition to these measures I
16 mentioned there are also management measures that
17 are in the document that include some of the typical
18 best management practices for addressing
19 construction as well.

20 Traffic, Transportation, and Parking. The
21 following mitigation measures were drafted to
22 address both construction and operational issues

1 related to transportation, traffic, and parking:

2 One is to identify truck haul roads and
3 implement a queue abatement program.

4 Second is to conduct supplemental surveys
5 of the parking occupancy and implement programs to
6 minimize parking spillover. I'm sure some of you
7 know about the valet parking here on site, and VA
8 continues to use that valet parking to address some
9 of those issues.

10 Implement temporary parking strategies
11 during the modular construction. So again, that red
12 dashed line that I mentioned earlier is going to be
13 taking up a lot of the handicapped parking
14 temporarily, and so VA will make sure that parking
15 is accommodated somewhere else onsite, and then once
16 that construction is complete that parking lot will
17 return to its previous use.

18 Wildlife and Habitat. The final one here is
19 to deal with wildlife and habitat to address any
20 species of concern. Prior to construction, there is
21 a requirement to go out and do pre-construction
22 surveys, looking in particular at nesting species

1 and anything related to breeding or habitat that
2 could be affected, and addressing that prior to
3 construction starting. As you know, a lot of the
4 Campus is pretty developed near the center but there
5 is a lot of landscape on the exterior edge of the
6 site.

7 So that is the brief presentation. We're
8 going to open up for public comments now and so we'd
9 really like you to come up. Again, if you could
10 write your name on a speaker card. If you don't have
11 one, please grab one from the back and fill it out.
12 And then come up and speak into the microphone once
13 I call your name.

14 We'd like to limit it to about five minutes
15 each so that everyone gets a chance to speak.

16 So the first one is Rush Sturges.

17 MR. STURGES: There's quite a lot of work
18 here, and as a retired member of the Carpenters
19 Union I'm very glad to see that.

20 It's come to our attention that some of
21 this work, such as the helicopter landing place, the
22 cafeteria, and some other one of the buildings near

1 Clement Street were done outside the Davis-Bacon
2 Act. Union wages, as mandated by the Davis-Bacon
3 Act, or their equivalent, were not paid.

4 I would like to make sure this project is
5 in strict conformity with the Davis-Bacon Act and
6 union wages or their equivalents are paid. Thank
7 you.

8 MR. REEL: Okay. Thank you for your
9 comment.

10 The next person is Ron Miguel.

11 MR. MIGUEL: I am Ron Miguel. I've decided
12 I'm actually going to submit in writing because very
13 truthfully I'd be insulting you and too many of the
14 other people here in person tonight, so I will
15 submit in writing.

16 MR. REEL: Okay. Thank you.

17 David Burns is next.

18 MR. BURNS: Well, I'm going to submit my
19 main comments in writing as well, but I just want to
20 say that you alluded slightly to it, but if you
21 zoomed out on that picture you showed of the SFVAMC,
22 the neighborhood here is overwhelmingly natural and

PM2-1
cont.

PM2-2

PM2-3

1 historic resources that are being enjoyed more and
2 more by the public as those resources are being
3 developed more.

4 And it's my opinion that the VA presence
5 here in the size and intensity that it exists right
6 now is inconsistent with the continued quality of
7 those resources.

8 In addition, the neighborhood, the
9 residential neighborhood is overwhelmingly single
10 family and two family low density housing.

11 Just as an example, there has been a
12 longstanding noise problem in our neighborhood 24
13 hours a day coming from the top of one of the VA
14 buildings. The neighborhood has been extremely
15 patient about this. We've notified multiple times in
16 writing about this noise and no abatement has
17 occurred. Or there may have been some temporary
18 abatement but it has continued to go on.

19 This noise is inconsistent with even the
20 use of a backyard. I measure it at anywhere from 56
21 to 60 decibels 24 hours a day.

22 So the bottom line is I think the VA, in

PM-2-3
cont.

1 the intensity that exists here, for whatever reason
2 is unable to meet basic commitments to environmental
3 responsibility, and I think that the SFVAMC will be
4 unable to meet these unless the density is lowered,
5 not increased.

6 MR. REEL: Okay. Thank you for your
7 comments.

8 Amy Meyer is next.

9 MS. MEYER: I have a series of short
10 statements, so I'll work my way through them.

11 My interests are land use here, and
12 especially in relationship to the national parkland
13 that surrounds you and I'm just generally very
14 positive about any of the seismic or internal
15 improvements that you would make.

16 We all say the SFVAMC Campus is 29 acres,
17 but it's not 29 useable acres. The slide area in
18 particular diminishes its size. Should you indicate
19 that your Campus is smaller than you have been
20 saying, or to say that only a portion of your
21 acreage is useable?

22 Two. The SFVAMC intends to move the water

PM-2-3
cont.

PM-2-4

PM-2-5

1 tower. It was not shown or pointed out in the maps
2 that you brought out a few minutes ago. The maps
3 show its new place next to the west Fort Miley fence
4 and there's a fuzzy photo on Page 3.1-37 12B that
5 shows it would be very prominent on a clear day even
6 though the photo shows what looks like a slightly
7 foggy condition.

8 Because the tower is so high, that change
9 would have a significant adverse affect on the
10 Golden Gate National Recreation Area in general and
11 west Fort Miley in particular.

12 What alternatives were considered for this
13 move of the water tower so as to avoid these adverse
14 effects? I have been told that you did not consult
15 with the National Park Service about this, and there
16 is no site analysis in the Supplemental Draft EIS.

17 Three. I understand from GGNRA staff that
18 the design for Building 24 has been reduced in
19 height from three stories to two stories. Thank you.

20 Park staff tells me they expressed an
21 interest directly to VA's planners to make the
22 building's back side, facing east Fort Miley, more

PM-2-5
cont.

PM-2-6

1 interesting than what was previously designed. They
2 expressed that, though the building site plan had
3 already been planned, there may still be room to
4 dress up the back side slightly as the façade
5 materials and surface design had not yet been
6 finalized. Please tell us about this.

7 Four. The SFVAMC has done a land use study
8 which included the national parklands next-door.
9 Neither of those park areas are fully accessible for
10 physically impaired patients or staff because either
11 of the upward slope going into east Fort Miley or
12 the downward slope going into west Fort Miley.

13 We'd like everyone to be able to come to
14 the park. Will the SFVAMC cooperate in design, slope
15 modification, and funding with the GGNRA to make
16 that possible?

17 Building 23 has not yet been designed, and
18 park staff feels that its location could provide
19 better opportunities for the development of a more
20 accessible pedestrian interface between the park and
21 the VA than where the current sidewalk planned path
22 enters the VA farther south behind the proposed

PM-2-6
cont.

PM-2-7

1 Building 24.

2 Five. The photos comparing the row of
3 buildings to be seen from east Fort Miley show no
4 change between Figure 3.1-6B and Figure 3.1-20B, but
5 the new buildings, 22, 23, and 24, are a couple of
6 stories taller than the ones they replace. Please
7 explain.

8 Six. In general, in the past, building
9 designs have progressed too far by the time we see
10 them to have input. We have been told that because
11 the designs were pre-decisional we could not see
12 them. By the time we could see them they were too
13 far along to make adjustments. We've had some awful
14 fights between the neighborhood and VA because of
15 this.

16 I know that is not what the present
17 administration intends. Where the historic buildings
18 on the National Register District of the VA are
19 concerned, the process is worked out well in the
20 programmatic agreement. However, a lot of VA
21 construction does not concern the historic district.

22 What will be the process for reviewing the

PM-2-7
cont.

PM-2-8

PM-2-9

1 designs of other buildings? I'm especially concerned
2 with Building 40.

3 Seven. Building 18 is a graceful historic
4 building. It would be lost in the construction of
5 Building 40. Have you made any effort to incorporate
6 Building 18 or some of its features in the design of
7 Building 40? What is the design stage of Building
8 40? At what stage will the design be shared with the
9 public?

10 I think the rest of these I can put in
11 writing.

12 MR. REEL: Okay, great, thank you.

13 Just to point out one thing. You're right,
14 I didn't point out the tower. As you can see here,
15 as Amy pointed out, the existing tower is located
16 here. VA is proposing to move it over here. I know
17 VA hasn't yet worked out the design and height.
18 Maybe someone from VA can speak to that, but I
19 understand that that is in process still. Your input
20 and your comment is going to be helpful for VA to
21 look at that.

22

PM-2-9
cont.

PM-2-10

1 DR. GRUNFELD: So we actually have taken
2 that into consideration and there is a possibility
3 that we will not be having a water tower, that we'll
4 deal with it a different way, but nothing is settled
5 yet. I'll add that stuff is at SHPO and we will
6 inform you when it goes there, so we're working on
7 that.

8 Several of the things you mentioned,
9 actually we're getting very close to, including
10 consultations with the Park Service on those
11 buildings.

12 MR. REEL: And I do believe that the
13 technology, even if there was a need for a water
14 tower, my understanding is that it wouldn't have to
15 be as high as it is currently.

16 So the second thing just to address
17 quickly, the PA, since I didn't mention it earlier,
18 the Programmatic Agreement is on VA's website for
19 the public to view along with the Long Range
20 Development Plan, the Supplemental Draft EIS along
21 with the Draft EIS from 2012; they're all accessible
22 for you to look at.

1 Pretty much any building that's proposed on
2 the site, because the historic district takes up so
3 much of the site, would have to go through the
4 process outlined in the PA of looking at how a
5 building could affect the historic district onsite
6 because it is such a large part of the Campus. But
7 that's great input, thanks for the comment.

8 Raymond Holland is next.

9 MR. HOLLAND: My name's Raymond Holland,
10 speaking on behalf of the Planning Association for
11 Richmond, PAR. I submitted nine questions in writing
12 yesterday and asked for written responses to them.
13 I'd like to just share two or three of them today.

14 The first one has to do with the whole
15 issue about Alternative 3. You had that in the Draft
16 EIS as basically still in force, yet we were told a
17 month before the EIS was issued that a proposal for
18 the UCSF campus, I believe, at Mission Bay had been
19 disapproved.

20 What we'd just like to know is whether
21 Alternative 3 is still alive. And if not, could we
22 know what the reasons for disapproval of that

1 proposal was and whether it was the proposal from
2 the Bay Area Council and the Northern California
3 Institute of Research and Education.

4 MR. REEL: Okay. So Alternative 3, at least
5 in the Supplemental Draft EIS is still looking at
6 that proposal, so the potential Mission Bay campus
7 in this case, it would be about 170,000 square feet
8 that would be located off site rather than on site.
9 So basically something about the size of Building
10 213, for example. It's about that much square
11 footage what the current Alternative 3 looks like
12 for Phase 2.

13 So Alternative 3 is still a possibility and
14 is analyzed in the Supplemental Draft EIS. I don't
15 know if Dr. Grunfeld wants to say anything further
16 about that.

17 DR. GRUNFELD: It's a subtle thing. It
18 wasn't disapproved; it just hasn't been approved. So
19 we're still working on it, and we could use some
20 political help with that.

21 MR. HOLLAND: If it wasn't approved, we'd
22 like to know what the reasons are. We'd be happy to

PM-2-11
cont.

1 talk to you about that later.

2 DR. GRUNFELD: Okay.

3 MR. HOLLAND: Thanks. We also thought it
4 would probably make moot the question about proposed
5 Building 40, the research center, because that would
6 probably be what would be out at Mission Bay, that's
7 our understanding.

8 MS. BENNETT: It is not correct to assume
9 that the research center would be the VA use that
10 could be built at Mission Bay.

11 MR. HOLLAND: If that's so, we would like
12 to go back to -- there are many environmental
13 impacts to be considered, but one of the most
14 significant ones has been for a long, long time
15 parking, off-campus parking versus on-campus
16 parking, and supply and demand.

17 And we're just wondering why the EIS,
18 number one, used some hypothetical methodologies
19 when they should have enormous amounts of data
20 available over the last 30 years that could look at
21 that issue, since it's really more particularized
22 toward the Campus.

PM-2-11
cont.

PM-2-12

PM-2-13

1 And two, there are two buildings, Building
2 211, and we appreciate that. That was basically done
3 this last year. It opened, I believe, in November,
4 correct?

5 MR. REEL: Yes.

6 MR. HOLLAND: And you've increased that.
7 That was our comment with regard to the first of the
8 EIS's and that is very helpful.

9 You don't have the extensions built yet. We
10 do have some concerns about the extensions affecting
11 West Fort Miley and parts of GGNRA. It's pretty
12 imposing right now. It would be very imposing if it
13 goes right on to the border. So we reserve our
14 comments with regard to that.

15 But the other one is Building 40, that's
16 your demand side. And I'm sorry but the stuff that's
17 in the EIS with regard to the demand that would be
18 generated by Building 40, either we don't understand
19 it well or something's going wrong. You have 70
20 additional parking slots in there, and I'm sorry,
21 that's just really unbelievable when you have
22 110,000 square feet. You've already got the person

PM-2-14

1 trips per day down to 963. I don't know how you get
2 that precise. And you come out with 70 additional
3 slots.

4 Our fear is that even though you've
5 mitigated the overall 700 parking space deficit that
6 existed back in 2012 with the first EIS, but you
7 started out the proposed building for 211 would have
8 taken 300 off that 700, but the building that's
9 actually been built only provides 200 slots, so
10 you've reduced it by a third.

11 Building 40 is going to be ten times that
12 amount. I'd like to start out the discussion that
13 way and work backwards and just look at those two
14 buildings when you talk about parking supply and
15 demand. And talk about actual figures, because the
16 parking thing is really out of control in this
17 environment. Thank you.

18 MR. REEL: Okay. Thank you for your
19 comment.

20
21 Jason is next.

22 MR. JUNGREIS: Sure, thanks. So this is

PM-2-14
cont.

PM-2-15

1 again with regard to Alternative 3. I want to make
2 sure I heard you and understood you correctly. When
3 you were saying that there were no federal lands
4 available in Mission Bay, first, does it mean that
5 you need to have federal lands in order to move
6 anything that's research based that has anything to
7 do with this campus off this campus? And secondly,
8 is that what you meant, that there are no federal
9 lands available?

10 MR. REEL: I don't think that's what I
11 said.

12 MR. JUNGREIS: Okay. Well, please go over
13 it.

14 MR. REEL: So in order for the VA to
15 establish some kind of campus offsite rather than
16 what you may be referring to as renting space or
17 getting space that's owned by somebody else, it has
18 to be federally owned in terms of being part of this
19 campus, being connected to what VA owns and
20 operates.

21 MR. JUNGREIS: So, okay, so that's a yes if
22 it were a "campus" quote/unquote, then it would have

PM-2-15
cont.

1 to be on federal land. Am I hearing that part right? ↑

2 MR. REEL: I don't know. Does anybody from
3 VA want to speak to this one in terms of federal
4 facilities around the U.S. for the VA that have
5 federal land and what that requires.

6 MR. JUNGREIS: Yeah, can anyone in this
7 room speak to this point?

8 MR. MORAN: It also applies to acquisition

9 MR. JUNGREIS: Just assume I don't know
10 anything, just go ahead.

11 MR. MORAN: Right. If we move, it would be
12 federal land so either through existing or through
13 acquisition. And just as a general concept it's a
14 very busy area in Mission Bay and getting busier and
15 busier, so that's why we're concerned with if we
16 would be able to acquire either through a federal
17 land transfer or acquired directly on our own.
18 Acquisition itself is a big cumbersome process and
19 different process itself.

20 MR. JUNGREIS: And with regard to Mission
21 Bay have any discussions taken place with regard to
22 acquisition on a federal basis of any lands? ↓

PM-2-15
cont.

1 MR. REEL: Well, we haven't been directly
2 involved in that. We're working with the VA as a
3 consultant, and we haven't been engaged in those
4 kinds of discussions.

5 MR. JUNGREIS: And that's why I'm asking,
6 because I didn't see it in the alternative as being
7 an issue. It's not in there. So if you're really
8 looking at Alternative 3 thoroughly, which is one of
9 my fundamental comments, Alternative 3 is not
10 flushed out nearly to the extent that the other two
11 alternatives are, and it must be. If you're going to
12 have a real alternative, you really have to flush it
13 out.

14 MR. REEL: There is a statement in -the
15 Supplemental Draft EIS about federal land.

16 MR. MORAN: I hear what you're saying. We
17 actually had lots of those arguments internally as
18 to how to present that in the EIS, but one of the
19 things that we've run up against is the rules and
20 requirements for acquiring a piece of property
21 looking at years and years ahead. And we haven't
22 started any of the negotiation process yet.

1 We know in general this much space and
2 these kinds of services will go in down there, and
3 this is kind of what we're dealing with. We don't
4 know what it's going to be. That is just a long
5 process, which is determined by our acquisition
6 process.

7 MR. JUNGREIS: So is it fair to sum it up
8 and say it's still a possible alternative?

9 MR. MORAN: Absolutely.

10 MR. JUNGREIS: Okay.

11 MR. REEL: And that's stated in the EIS,
12 and it's stated that one of the requirements is
13 federally owned land.

14 MR. JUNGREIS: Okay. Now, the second part
15 of the same issue is with regard to research, does
16 research related to the VA have to take place in a,
17 quote, "campus" in a VA-related campus.

18 Let me give you a for instance. If for
19 instance, NCIRE were to build its facility in
20 Mission Bay, private entity, NCIRE, not a federal VA
21 facility, can't some of the research done here move
22 over to that private NCIRE research facility?

PM-2-15
cont.

PM-2-16

1 MR. REEL: I can't answer that. I don't
2 know if anybody else from the VA can answer that
3 question.

4 DR. GRUNFELD: NCIRE does not have the
5 wherewithal to buy or create a building like that in
6 terms of the resources. People are working on
7 alternatives.

8 MR. JUNGREIS: But yet the nature of
9 Building 40 is that NCIRE would be (inaudible).

10 DR. GRUNFELD: It is not an NCIRE building.
11 Building 40 is a VA building. NCIRE only sponsors,
12 only is the funding agency for part of our research.
13 Part of our research is VA funded, part of our
14 research is UCSF funded. So NCIRE can't build a
15 building like that.

16 MS. CHEARY: NCIRE does not conduct
17 research.

18 MR. JUNGREIS: Right. No, I understand
19 that. It provides grants for enabling research.

20 DR. GRUNFELD: It's a funding vehicle, so
21 NCIRE cannot do that. But Mission Bay is still in
22 play; we're working on it. It's just that I as a VA

PM-2-16
cont.

1 employee can't go out and arrange to buy land and
2 rent. I'm not the person who can do that, but we are
3 working on trying to do that.

4 MR. JUNGREIS: The last comment I have on
5 the subject, I know my time is running out. We are a
6 number of neighborhood organizations, and we'd be
7 happy to try to help you in that process. You say
8 you're looking for a little assistance on the
9 political side. Let us help.

10 MR. REEL: Thank you for your comment.

11 MR. JUNGREIS: Thank you.

12 MR. REEL: Kay Weinkam is next.

13 MS. WEINKAM: Thank you and good evening.
14 My name is Kay Weinkam, and I'd like to address
15 three different issues, and one's a request for
16 information more than a comment.

17 The first relates to looking at the bed
18 capacity for inpatients is 124 stated and the
19 community living center is 120. I wasn't able to
20 find reference in the supplemental document or the
21 original related to whether it's projected that the
22 bed capacities will have to increase for both

PM-2-16
cont.

PM-2-17

1 facilities. And if so, if we're talking about years
2 into the future, I don't really see all that
3 addressed in the current plans.

4 Secondly, in terms of Mission Bay, looking
5 at Mission Bay in the alternatives as being proposed
6 for an ambulatory care center, to me with the
7 location of so much of UCSF's research now being at
8 Mission Bay and plus proximity to those three
9 hospitals, it would seem logical to me to have the
10 ambulatory care center facilities be here on Campus
11 and have research be done at Mission Bay.

12 And thirdly, in terms of comments related
13 to the noise especially after the construction and
14 modifications of Building 16 and 42, the noise is
15 still an ongoing issue. Thank you.

16 MR. REEL: Okay. Thank you.

17 Does anybody else out there have a comment?

18 MS. LASSEN-HAHNE: I just had a question. I'm Kathy

19 MS. BENNETT: Would you please come up to
20 the microphone?

21 MR. REEL: Just so we can have you on
22 record.

PM-2-17
cont.

PM-2-18

PM-2-19

PM-2-20

1 MS. BENNETT: And we'll have you fill out a
2 speaker card just to get the correct spelling of
3 your name.

4 MS. LASSEN-HAHNE: I'm Kathy Lassen-Hahne.
5 I just wanted to understand what your projected date
6 now is for making this decision. Is there a target
7 date when you're going to come to an agreement on
8 which of the alternatives to proceed with?

9 MR. REEL: My understanding right now is
10 that VA's preferred alternative is Alternative 1. We
11 are going to be working through the comments after
12 May 8th to respond to those and finalize the EIS.
13 We're aiming for sometime this summer to be able to
14 finalize that and the process will go on from there
15 in terms of getting a record of decision.

16 MS. LASSEN-HAHNE: Okay, this summer. Okay,
17 thank you.

18 MR. REEL: Thanks. Anybody else have a
19 comment?

20 Okay, we'll be here until 7:00 o'clock if
21 you have any questions or side comments. If you
22 didn't feel comfortable coming up to speak, you can

PM-2-20
cont.

1 write down your comment or you can even have the
2 court reporter, if you want to talk to him, record
3 something on record if you didn't want to do it in
4 front of everybody, we're open to doing that as
5 well.

6 We really appreciate your comments, your
7 input, and taking time to leave work a little bit
8 earlier to get here. But the best thing for us is to
9 get your comments in writing so that we can respond
10 to them thoughtfully in writing as well.

11 Thank you.

12 (Adjourned at 7:00 p.m.)

13 --o0o--

Responses to Comments Received on the SFVAMC LRDP Draft EIS and the SFVAMC LRDP Supplemental Draft EIS

This response to comments (RTCs) document in this Environmental Impact Statement (EIS) Appendix A includes public comments received on the Long Range Development Plan (LRDP) Draft Environmental Impact Statement (DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS), and responses to the comments.

Draft EIS

An LRDP DEIS was prepared pursuant to the National Environmental Policy Act (NEPA), in which the the U.S. Department of Veterans Affairs (VA) analyzed LRDP effects on the physical and human/ socioeconomic environments. That document analyzed three EIS alternatives and was distributed for public review and comment from August 17, 2012 through October 31, 2012 (see Table 1). Eleven comment letters were received. A DEIS public meeting was held on September 20, 2012, during which verbal comments were also received and recorded.

Changes to the LRDP

After public circulation of the DEIS, master planning continued, and individual project designs and schedules were refined. Public and agency comments submitted to VA at public meetings and during public comment periods were taken into consideration, as refinements were made to individual project design, phasing, and the overall master plan, resulting in a revised 2014 LRDP. The SDEIS was prepared to analyze the LRDP, including proposed phasing, which changed based on funding cycles.

The Alternative numbers changed between the DEIS and SDEIS due to the addition of an EIS alternative. Two construction-phasing scenarios, instead of one, were analyzed in the SDEIS: Alternatives 1 and 2. Alternative 2 in the DEIS (which includes a partial off-site alternative) is now Alternative 3 in the SDEIS; and the No Action Alternative is now Alternative 4 EIS (previously DEIS Alternative 3).

Supplemental Draft EIS

The SDEIS was prepared because some of the LRDP revisions warranted further environmental review. Therefore, the public was afforded an opportunity to review and comment on the updated LRDP environmental effects when the SDEIS was circulated, from March 9, 2015 through May 8, 2015 (see Table 1), during which time 17 letters were received. An SDEIS public meeting was held on March 14, 2015, during which verbal comments were also received and recorded.

Responses to Public Comments Received on DEIS and SDEIS

This RTC document addresses both written comments received during the DEIS and SDEIS public comment periods, as well as verbal comments received at two public meetings. The comments were taken into consideration during preparation of the San Francisco Veterans Affairs Medical Center (SFVAMC) LRDP Final EIS. The responses are organized by author “type”; i.e., Federal Agency, Local Agency, Local Group, and Individual/Petition. These responses to written comments are followed by responses to verbal comments received at the public meetings.

RTCs received on the DEIS have been drafted to reflect the most recent (2014) LRDP and the most recent (March 2015) EIS analysis. Tables 1 and 2 list each written comment letter and transcripts from the public

meetings related to the DEIS and SDEIS, respectively. For each comment letter, comments on different topics areas have been identified using brackets in the margin of the letter coded with a discrete number. Responses are provided for each comment letter and for each bracketed, numbered topic area.

Table 1: SFVAMC LRDP DEIS Comment Letters

<i>Label</i>	<i>Type</i>	<i>Report</i>	<i>Author</i>	<i>Date</i>
A1	Federal Agency	DEIS	U.S. Department of the Interior (USDOI), Office of Environmental Policy and Compliance	October 18, 2012
A2	Federal Agency	DEIS	USDOI, National Park Service	October 21, 2012
A3	Federal Agency	DEIS	U.S. Environmental Protection Agency	October 30, 2012
A4	Local Agency	DEIS	San Francisco Recreation and Parks Department	October 25, 2012
A5	Local Group(s)	DEIS	Planning Association for the Richmond (PAR), Friends of Lands End (FLE), Coalition to Save Ocean Beach (CSOB), Friends of Sutro Park (FSP), and People for a Golden Gate National Recreation Area (PGGNRA)	October 31, 2012
A6	Individual	DEIS	Robert Hollis	Undated (by October 16, 2011)
A7	Individual	DEIS	Jason Jungreis (first letter)	Undated (by October 16, 2011)
A8	Individual	DEIS	Jason Jungreis (second letter)	October 31, 2012
A9	Individual	DEIS	Anne Sun/Bill Kaktis	October 4, 2012
A10	Individual	DEIS	Anonymous Neighbor	Undated
A11	Petition	DEIS	change.org	September 17–October 30, 2012
PM1	DEIS Public Meeting	DEIS	Verbal comments provided by nine persons	September 20, 2012

Table 2: SFVAMC LRDP Supplemental DEIS Comment Letters

<i>Label</i>	<i>Type</i>	<i>Report</i>	<i>Author</i>	<i>Date</i>
B1	Federal Agency	SDEIS	USDOI, Office of Environmental Policy and Compliance	May 18, 2015
B2	Federal Agency	SDEIS	USDOI, National Park Service	May 8, 2015
B3	Federal Agency	SDEIS	U.S. Environmental Protection Agency	May 8, 2015
B4	Local Group(s)	SDEIS	PAR, FLE, CSOB, FSP, and PGGNRA	May 8, 2015
B5	Local Group	SDEIS	Planning Association for the Richmond	May 8, 2015
B6	Individual	SDEIS	Hiroshi Takahashi	Undated
B7	Individual	SDEIS	Preston Wong	March 31, 2015
B8	Individual	SDEIS	C. K. Wai	April 13, 2015
B9	Individual	SDEIS	Raymond Holland	April 13, 2015
B10	Individual	SDEIS	Kay Bradner	April 16, 2015
B11	Individual	SDEIS	Denise Louie	April 20, 2015
B12	Individual	SDEIS	Ron Miguel	April 22, 2015
B13	Individual	SDEIS	Andrew Scoular	May 6, 2015
B14	Individual	SDEIS	Naurie Morimoto (first letter)	May 3, 2015
B15	Individual	SDEIS	Naurie Morimoto (second letter)	May 7, 2015
B16	Individual	SDEIS	Pamela Carrara	May 7, 2015
B17	Individual	SDEIS	Weber Kneitel	May 8, 2015
PM2	SDEIS Public Meeting	SDEIS	Verbal comments provided by eight persons	April 14, 2015

Response to Comments on DEIS

The following section includes responses to the eleven written letters as well as to verbal comments from the transcript recorded at the public meeting on the DEIS. A copy of the letters received and the transcripts from the DEIS public meeting are provided in their entirety in Appendix A. The following responses correspond to individual comments, as marked by brackets in Appendix A (e.g., A1-1).

Federal Agency Written Comments on DEIS

A1) Responses to U.S. Department of the Interior, Office of Environmental Policy and Compliance Comments on DEIS

RTC A1-1: VA appreciates your letter informing us that you have no comments on the DEIS.

A2) Responses to U.S. Department of the Interior, National Park Service Comments on DEIS

RTC A2-1: Thank you for your comments on the DEIS. Proposed Buildings 22, 23, and 24 are sited along the eastern boundary of the existing SFVAMC Fort Miley Campus because their programmed uses are associated with the programmed use of existing buildings in this part of the Campus. The existing buildings are contributors to the National Register of Historic Places (NRHP)–listed SFVAMC Historic District; therefore, the need to expand their program capacity is being met by constructing additional new buildings rather than demolishing the existing buildings and constructing larger buildings along this border. Likewise, because the eastern portion of the Campus has been identified as having the highest levels of historical integrity in the SFVAMC Historic District, the new construction is sited to the rear of the historic contributing buildings to minimize the potential for adverse effects on the historic district. The proposed new construction is of similar height and scale as the existing buildings, resulting in a minimal change to the visual context of the SFVAMC Historic District. Likewise, because SFVAMC (built in the 1930s) has had a row of buildings along this border, with the rear of the buildings facing the National Park Service (NPS) lands, the addition of buildings of similar height and massing along the same border is consistent with the visual context of NPS lands in this area for the past 80 years.

The SDEIS addresses the finding that these buildings would not result in an adverse impact on the Fort Miley Military Reservation Historic District. This includes incorporation of SFVAMC’s analysis of the cultural landscape report that NPS/Golden Gate National Recreation Area (GGNRA) provided following publication of the DEIS. The increased density along the eastern edge of the SFVAMC Fort Miley Campus (western edge of the eastern portion of the Fort Miley Military Reservation Historic District) would not substantially alter any of the qualities identified in that report that qualify it for listing as an NRHP historic district.

Due to NPS’s interest in cooperating, and supporting a design process that respects NRHP historic districts, NPS participated as a consulting party in the development of a programmatic agreement (PA) that laid out a method for resolution of potential adverse effects on historic properties that were identified and coordinated in compliance with

Section 106 of the National Historic Preservation Act (NHPA) (Section 106). The PA requires that SFVAMC (1) prepare and apply historic-district design guidelines interpreting the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for the SFVAMC Historic District, and as applicable, for the Fort Miley Military Reservation Historic District; (2) prepare a historic-landscape study for the SFVAMC Historic District; (3) design and implement a public interpretation program related to SFVAMC's history; (4) prepare a historic preservation treatment and maintenance plan applicable to contributing resources in the SFVAMC Historic District; and (5) follow a process for ongoing consultation on individual LRDP projects that includes opportunities for NPS and other consulting parties to review and comment on proposed designs.

See Sections 3.1, "Aesthetics," and 3.3, "Community Services," for a discussion of scenic and recreational impacts, including how they relate to nearby NPS lands. Existing dense vegetation and mature tree cover provide a screening effect that helps to create a sense of separation between the SFVAMC Fort Miley Campus and the surrounding parklands. To see renderings that provide an aerial view of the proposed facility massing relative to adjacent East and West Fort Miley, see SDEIS pp. 3.1-20 through 3.1-40.

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, including publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sites near the existing SFVAMC Fort Miley Campus and the GGNRA East Fort Miley boundary. The visual simulations are depicted in SDEIS Section 3.1, "Aesthetics." Views 9 and 10 show that the LRDP would not result in an adverse impact to views from East Fort Miley and other nearby GGNRA land. As shown in the existing views and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

RTC A2-2: In addition to the NEPA Proposed Action (the SFVAMC LRDP, also known as Alternative 1), Alternative 2 was included in the EIS as a changed construction-phasing variation of Alternative 1. Alternative 3, which provides for reduced density at the SFVAMC Fort Miley Campus, was also included as a feasible action alternative.

Under Alternative 3, the LRDP's long-term (Phase 2) space would be planned off-site somewhere in the Mission Bay area of San Francisco. It should be noted that development of the Mission Bay portion of the planned future SFVAMC space must be assumed to occur in the long term. It would take VA many years to obtain federal ownership of off-site land currently owned by others in the jurisdiction of the City and County of San Francisco, and to develop that land. Also, because many interrelated facilities and services already exist at the SFVAMC Fort Miley Campus, it would take many (10+) years to develop a portion of the Campus at another location and make it efficient enough to functionally serve the needs of Veterans. Therefore, Mission Bay cannot feasibly support LRDP short-term (Phase 1) projects. Also as discussed in SDEIS Section 2.1, "Alternatives Development Process," the

only three feasible NEPA action alternatives are Alternative 1, the current LRDP (the Proposed Action); Alternative 2, which represents a construction-phasing variation of Alternative 1; and Alternative 3, which includes long-term space expansion at a to-be-determined location in the Mission Bay area of San Francisco.

NPS, other agencies, and the public have been invited to participate in the NEPA process for the proposed SFVAMC LRDP EIS. This has included invitations to attend both NEPA scoping meetings and the DEIS and SDEIS public meetings. In addition, SFVAMC meets regularly with NPS/GGNRA. Furthermore, no adverse impacts on adjacent NPS lands have been identified in the EIS.

RTC A2-3: NPS, other agencies, and the public have been invited to participate in the NEPA process for the proposed SFVAMC LRDP EIS. This has included invitations to attend both NEPA scoping meetings and the DEIS and SDEIS public meetings. SDEIS Section 1.7, “NEPA Process and Public Involvement,” provides a detailed account of the public meetings held with regard to the NEPA process. The long-range planning document for the SFVAMC Fort Miley Campus evolved from an institutional master plan (IMP) to an LRDP after the first NEPA scoping meeting. As part of facility master planning and in accordance with the result of the settlement agreement (amended, No. CB06B02321), VA compiled an IMP, which was shared with the public in 2010. This IMP is also referred to as the “Full Buildout” plan in SDEIS Chapter 2.0, “Alternatives.” Based on a combination of feedback and further master-planning development over the next 2 years, the IMP was revised into the LRDP. The LRDP further developed and refined a longer-range master plan at a substantially reduced scope than was presented in the IMP. The 2014 LRDP was the basis for the Proposed Action evaluated in the SDEIS.

The term “LRDP” has become an industry-standard term affiliated with medical and academic campus planning across the United States. The timing of switching the terminology to “LRDP” also correlated with changes to the proposed development on the SFVAMC Fort Miley Campus. The purpose of preparing the LRDP is to provide a strategic and organized approach to planning to enhance the SFVAMC Fort Miley Campus, so that it can continue to be a state-of-the-art medical facility to serve Veterans now and into the future. To achieve this goal, SFVAMC must modernize existing facilities; retrofit or replace seismically threatened buildings; create new structures that house patient care, education, administrative, hoptel, and research functions; and provide increased parking for Veterans, staff members, and visitors for the next 15 years. The NEPA process allows alternatives to evolve, with the goal of reducing potential impacts by modifying the LRDP and related design details to be more responsive to the environment. The DEIS evaluated the LRDP details at the time the DEIS was released in August 2012, and the SDEIS evaluates the latest LRDP details. Furthermore, no adverse impacts on adjacent NPS lands have been identified in the EIS.

RTC A2-4: The facility options study was an internal pre-decisional document that VA prepared to explore locations in San Francisco where land was available to develop potential off-site SFVAMC facilities in the long term. Public comment, as part of the NEPA public process,

was solicited on the SFVAMC LRDP DEIS and SDEIS. NEPA does not require solicitation of public comment on the LRDP document, the previous IMP, or the facility options study. Input provided on the LRDP and IMP at the public scoping meetings was considered in refining the LRDP.

Development of the proposed new SFVAMC Mission Bay Campus must be assumed to occur in the long term. It would take VA many years (10+) to procure off-site land from the City and County of San Francisco, and develop a Campus with the necessary facilities to provide adequate services for Veterans. Therefore, Mission Bay cannot feasibly support LRDP short-term (Phase 1) projects. As discussed in SDEIS Section 2.1, “Alternatives Development Process,” the only three feasible NEPA action alternatives are Alternative 1, the current LRDP (the Proposed Action); Alternative 2, which represents a construction-phasing variation of Alternative 1; and Alternative 3, which includes long-term space expansion at a to-be-determined location in the Mission Bay area of San Francisco.

RTC A2-5: As described on p. 3-2 of the EIS, impacts were analyzed, and the findings included in the EIS applied the following levels of significance: adverse impact, potentially adverse impact, minor impact, no impact, or beneficial impact. This terminology is typically used by VA for its NEPA documents. See the significance criteria and assessment methods subsections in each SDEIS resource area section for an explanation of impact thresholds (i.e., intensity, and whether adverse).

RTC A2-6: Lighting proposed as part of the LRDP would be directed downward onto SFVAMC property and would not spill over onto GGNRA land. In addition, as described in the responses immediately below, the visual simulations show that the LRDP would not adversely change the views from and the aesthetic character of East Fort Miley and other nearby GGNRA land.

RTC A2-7: See Section 3.3, “Community Services,” for a discussion of recreational impacts, including how they relate to nearby NPS lands. Existing dense vegetation and mature tree cover provide a screening effect that helps to create a sense of separation between the SFVAMC Fort Miley Campus and the surrounding parklands. To view renderings that provide an aerial view of the proposed facility massing relative to adjacent East and West Fort Miley, see the SDEIS (pp. 3.1-20 through 3.1-40).

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, as well as publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sited near the SFVAMC Fort Miley Campus and the GGNRA East Fort Miley boundary. The visual simulations are depicted in SDEIS Section 3.1, “Aesthetics.” Views 9 and 10 show that the LRDP would not adversely change the views from or the aesthetic character of East Fort Miley and other nearby GGNRA land. As shown in the existing views, and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

Proposed Buildings 22, 23, and 24 are sited along the eastern boundary of the existing Campus because their programmed uses are associated with the programmed use of existing buildings in this part of the Campus. The existing buildings are contributors to the NRHP-listed SFVAMC Historic District; therefore, the need to expand their program capacity is being met by constructing additional new buildings rather than demolishing the existing buildings and constructing larger buildings along this border. Likewise, because the eastern portion of the Campus has been identified as having the highest levels of historical integrity in the SFVAMC Historic District, the new construction is sited to the rear of the historic contributing buildings to minimize the potential for adverse effects on the historic district. The proposed new construction is of similar or smaller height and scale as the existing buildings, resulting in a minimal change to the visual context of the SFVAMC Historic District. Likewise, because SFVAMC (built in the 1930s) has had a row of buildings along this border, with the rear of the buildings facing the NPS lands, the addition of buildings of similar height and massing along the same border is consistent with the visual context of NPS lands in this area for the past 80 years.

RTC A2-8: See Section 3.3, “Community Services,” for a discussion of recreational impacts, including how they relate to nearby NPS lands. Existing dense vegetation and mature tree cover provide a screening effect that helps to create a sense of separation between the SFVAMC Fort Miley Campus and the surrounding parklands. To view renderings that provide an aerial view of the proposed facility massing relative to adjacent East and West Fort Miley, see the SDEIS (pp. 3.1-20 through 3.1-40).

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, including publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sited near the SFVAMC Fort Miley Campus and the GGNRA East Fort Miley boundary. The visual simulations are depicted in SDEIS Section 3.1, “Aesthetics.” Views 9 and 10 show that the LRDP would not adversely change the views from or the aesthetic character of East Fort Miley and other nearby GGNRA land. As shown in the existing views and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

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as the existing buildings, resulting in a minimal change to the visual context of the SFVAMC Historic District. Likewise, because SFVAMC (built in the 1930s) has had a row of buildings along this border, with the rear of the buildings facing the NPS lands, the addition of buildings of similar height and massing along the same border is consistent with the visual context of NPS lands in this area for the past 80 years.

RTC A2-9: See Section 3.3, “Community Services,” for a discussion of recreational impacts, including as they relate to nearby NPS lands. Existing dense vegetation and mature tree cover provide a screening effect that helps to create a sense of separation between the SFVAMC Fort Miley Campus and the surrounding parklands. To view renderings that provide an aerial view of the proposed facility massing relative to adjacent East and West Fort Miley, see the SDEIS (pp. 3.1-20 through 3.1-40).

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, including publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sited near the SFVAMC Fort Miley Campus and the GGNRA East Fort Miley boundary. The visual simulations are depicted in SDEIS Section 3.1, “Aesthetics.” Views 9 and 10 show that the LRDP would not adversely change the views from or the aesthetic character of East Fort Miley and other nearby GGNRA land. As shown in the existing views and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

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RTC A2-10: This comment relates to the definition of the Area of Potential Effect (APE) and inconsistencies of the APE that appear in the Section 106 documentation. The delineation of an APE is a required step under a separate federal law, Section 106 of the NHPA (Section 106). The circulated 2012 DEIS included the Section 106 Finding of Effect (FOE),

which was made available to the consulting parties, including NPS, and the public for comment. This comment was addressed in the revised Section 106 FOE by expanding the APE to include both East and West Fort Miley. The draft FOE only included a portion of East Fort Miley and excluded the western section. The revised FOE, which included the expanded APE, was subsequently submitted to the California State Historic Preservation Office for consultation under Section 106. The FOE discussed the effects of the LRDP on the Fort Miley Historic District as a whole. The State Historic Preservation Officer (SHPO) concurred with the FOE and the expanded APE in July 2013. Under Section 106, SFVAMC entered into discussions with the SHPO and the Section 106 consulting parties (including NPS) regarding ways to resolve adverse effects, including avoidance, minimization, and mitigation. SFVAMC has entered into a PA that defines its commitments for resolving Section 106 adverse effects. The measures and processes outlined in the PA also may serve to offset adverse impacts identified under NEPA. The PA was signed by SFVAMC, SHPO, and the Advisory Council on Historic Preservation on January 9, 2015, and is provided in Appendix C of the SDEIS.

RTC A2-11: This comment relates to the FOE that was made under a separate federal law, Section 106 of the NHPA (Section 106). The comment disagrees with the FOE findings of no adverse effect, in particular concerning the proposed siting of Buildings 22, 23, and 24 near the Fort Miley Reservation Historic District. The FOE found that the LRDP would have no adverse effect on the Fort Miley Reservation Historic District, because the Historic District will still continue to convey significance after the proposed new construction is complete. Because of the disagreement concerning effects, the comment's request was to adequately address impacts through the NHPA Section 106 process. As discussed above, the SDEIS was circulated with the Section 106 FOE, which was made available to the consulting parties, NPS, and the public for comment. The FOE was subsequently submitted to the California State Historic Preservation Office for consultation under Section 106. The SHPO concurred with the FOE in July 2013. Under Section 106, SFVAMC entered into discussions with SHPO and the Section 106 consulting parties (including NPS) regarding ways to resolve adverse effects, including avoidance, minimization, and mitigation. SFVAMC has entered into a PA that defines its commitments and responsibilities for resolving Section 106 adverse effects. The steps included in the PA are anticipated to adequately address any LRDP-related impacts.

RTC A2-12: The concern raised regarding impacts on the historic district on adjacent NPS/GGNRA lands is similar to the comments discussed above. In addition, this comment has been previously addressed during consultation under Section 106.

RTC A2-13: See Section 3.3, "Community Services," for a discussion of recreational impacts, including how they relate to nearby NPS lands. Existing dense vegetation and mature tree cover provide a screening effect that helps to create a sense of separation between the SFVAMC Fort Miley Campus and the surrounding parklands. To view renderings that provide an aerial view of the proposed facility massing relative to adjacent East and West Fort Miley, see the SDEIS (pp. 3.1-20 through 3.1-40).

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, including publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sited near the SFVAMC Fort Miley Campus and the GGNRA East Fort Miley boundary. The visual simulations are depicted in SDEIS Section 3.1, “Aesthetics.” Views 9 and 10 show that the LRDP would not adversely change the views from or the aesthetic character of East Fort Miley and other nearby GGNRA land. As shown in the existing views and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

Potential changes to the shade and shadow in the East Fort Miley area were included in this evaluation. The existing tree coverage at East Fort Miley currently provides shade and shadow effects in East Fort Miley, and these trees would continue to be the primary contributor to shading in this area.

RTC A2-14: Vehicle parking has been, and will continue to be, reviewed as part of ongoing SFVAMC Fort Miley Campus facility management. The geographical and technical scope of the data collection efforts conducted in the DEIS generally are consistent with the methodologies prescribed by the Planning Department in the *Transportation Impact Analysis Guidelines for Environmental Review* document (*SF Guidelines*) for transportation-related environmental analysis. However, in response to concerns raised about vehicle parking, a detailed parking study—incorporating additional quantitative and qualitative data collection at the Campus and in the surrounding neighborhood—has been conducted for the SDEIS to better characterize existing parking conditions at and surrounding the site.

In particular, occupancy data for both on-street (off-Campus) and off-street (on-Campus) vehicle parking were collected in quantitative field surveys on Tuesday, September 10, 2013. Supplementary surveys of off-street parking supply and occupancy were conducted on Thursday, March 13, 2014.

On-street parking was evaluated for the adjacent neighborhood, within a six-block area bounded by Clement Street to the north, Geary Boulevard (eastbound) to the south, 39th Avenue to the east, and 45th Avenue to the west. Off-street parking was evaluated for vehicle parking areas provided on the Fort Miley Campus. Data on existing parking restrictions (e.g., street cleaning), total supply, and occupancy levels were collected for both on- and off-street parking areas. These data have been incorporated into the SDEIS, together with a more robust assessment of parking demand (and guidance on parking supply from the San Francisco Planning Code) for each phase of the LRDP.

As noted in the comment, SFVAMC has worked with NPS to provide overflow parking in various NPS-owned parking areas near Lands End (including at the parking lot along El Camino del Mar adjacent to the *USS San Francisco* Memorial; along the western side of El Camino del Mar north of Point Lobos Avenue; and in the Merrie Way surface lot serving Lands End Lookout and the Sutro Baths) during SFVAMC Fort Miley Campus

construction activities. In August 2010, SFVAMC coordinated with NPS to use 120 parking spaces across these parking areas for a period of 18 months. These spaces were signed specifically for use by SFVAMC staff and patients. Because of the distance and elevation difference between these NPS-owned parking areas and the Campus, SFVAMC provided a shuttle service to connect these areas with the Campus, operating every 15 minutes during the peak periods (8 a.m. to 9:30 a.m. and 4 p.m. to 6 p.m.), and every 30 minutes during the midday period (9:30 a.m. to 4 p.m.). Based on shuttle ridership, SFVAMC estimates that occupancy of these spaces peaked at approximately 95 percent (i.e., effectively fully occupied). To control parking in areas not designated for SFVAMC use, the NPS posted 4-hour parking limit signs approximately 1 year into the agreement.

SFVAMC signed a separate, subsequent 2-year agreement with NPS in June 2013 to use 150 parking spaces across NPS parking areas near the *USS San Francisco* Memorial and at Merrie Way, with SFVAMC paying for use of these spaces. Similar to the 2010 arrangement, SFVAMC operated shuttles every 15 minutes during the morning and late afternoon, and 30 minutes during midday. Both SFVAMC police and NPS monitored and patrolled these parking areas, and SFVAMC estimates that occupancy of these spaces peaked at approximately 75 percent on Mondays and Fridays, and approximately 90 percent on Tuesdays, Wednesdays, and Thursdays, based on shuttle use and staff monitoring. Use during off-peak months (November and December) was lower because of staff vacations during the holiday season.

This agreement was in effect in early 2011 as part of the North Slope Stabilization Project, and during construction of Building 212 (parking structure for patients and visitors), which necessitated the closure of former Parking Lot A, portions of Veterans Drive, and associated parking areas between Building 6 and Building 7.

Visual observations indicate that these VA-designated spaces are generally well-used; however, parking in these areas is provided only through agreements negotiated with NPS as needed to accommodate past and ongoing construction at the SFVAMC Fort Miley Campus, and is not necessarily available to SFVAMC on a long-term or permanent basis. Furthermore, SFVAMC has no intention of making use of NPS lands as a permanent solution for Campus parking needs. With the completion of Building 212 and pending completion of Building 211, the need for overflow parking on NPS-owned lands will be greatly diminished.

Nevertheless, SFVAMC understands the sensitivity of parking concerns among residents of the surrounding neighborhood and NPS, and is committed to regularly reviewing parking conditions at and surrounding the Campus. This regular review process is not necessarily part of the LRDP; but instead, part of SFVAMC's facility management duties at the Campus. In recognition of the potential for construction-related activities to affect parking conditions, the SDEIS includes Mitigation Measure TRANS-2, which requires SFVAMC to conduct supplemental surveys of parking occupancy, and to implement programs to prevent parking spillover during construction. This includes SFVAMC coordination with construction contractors as construction plans for specific LRDP projects are developed, to

determine whether construction-related activities would result in parking deficits, and whether temporary mitigation measures or strategies would need to be implemented.

RTC A2-15: The SDEIS includes a qualitative evaluation of NPS access to GGNRA operational facilities at East Fort Miley, and the associated effects of the LRDP on this access. As discussed in the SDEIS, the LRDP would implement some changes to the SFVAMC Fort Miley Campus's roadway network to better segregate employee and Veteran/visitor traffic across the Campus's two main access points on 42nd Avenue and 43rd Avenue. These changes would result in, at most, minor changes in the total traffic volumes passing through the Veterans Drive/Fort Miley Circle intersection. The changes would not preclude NPS access into and out of East Fort Miley, which can be achieved by turning right upon entry onto the Campus. The traffic to and from the NPS land is infrequent throughout the day, and consists primarily of NPS staff members. In addition, the LRDP does not propose to physically alter the design of the Fort Miley Circle/Veterans Drive intersection in a way that would preclude GGNRA access into and out of East Fort Miley.

As described in the March 30, 2011 NPS and SFVAMC Memorandum of Understanding (MOU) 8142-410-0504 (Modification #1), the SFVAMC, in agreement with the NPS, determined that an alternative location for this access road, from Clement Street into the southeastern corner of East Fort Miley, would be prohibitively expensive; be intrusive on the natural environment; and require extensive multi-jurisdictional coordination, including the City and County of San Francisco (San Francisco Recreation and Parks Department). The SFVAMC and NPS agreed that it would be preferable to all parties to improve the existing access road location, with minor location adjustments and accessibility improvements, within the SFVAMC property. The access road was designed to accommodate the turning radius for vehicles up to 20 feet in length. Both SFVAMC and NPS agreed through the MOU that "larger vehicles will have to attempt wider turns and will have to back up and turn into the driveway as needed." The Maintenance Division of the NPS reviewed the design, and agreed that they would be able to adequately maneuver vehicles.

Given the rare frequency of this type of activity, the ability of the GGNRA to pursue the use of smaller delivery vehicles or equipment, the fact that the LRDP does not specifically propose any design modifications to this intersection or the access road, and the determination that the overall changes to circulation and traffic volumes in this portion of the Campus as a result of the LRDP would be relatively minor, the SDEIS does not identify any significant adverse effects to GGNRA access as a result of the LRDP. Consequently, no mitigation measures would be warranted.

RTC A2-16: As mentioned in the SDEIS, the *SF Guidelines* is the accepted source for empirical data on trip-making characteristics localized to the unique conditions of San Francisco—a dense, urban environment where alternative modes of travel such as transit, biking, and walking are viable options. The San Francisco Planning Department generally requires use of the *SF Guidelines* when evaluating land use development in San Francisco.

The Institute of Transportation Engineers (ITE) provides data on land use–based trip generation rates; however, the data samples comprise primarily automobile-oriented suburban sites where alternatives to driving are limited (or unavailable) and unattractive. As a result, the analysis combines the ITE’s trip generation rates with mode-share data from the *SF Guidelines* to better approximate expected travel behavior. In particular, *SF Guidelines* data on trip-making characteristics for northwestern San Francisco (including the Inner and Outer Richmond Districts) were incorporated into the analysis. The transportation impact study (TIS) has been revised to include additional detail regarding the travel demand methodology, including more information about the *SF Guidelines* and how the data on trip-making characteristics contained therein were incorporated into the LRDP’s transportation analysis.

The description of existing transit service to and from the SFVAMC Fort Miley Campus has also been augmented to better characterize the options available to Campus users. In particular, the San Francisco Municipal Railway (Muni) provides high-frequency, high-capacity bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the Transit Effectiveness/Muni Forward Project (TEP) and Geary Corridor Bus Rapid Transit (BRT) Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private shuttle services supported by the SFVAMC and affiliate organizations (SDEIS Table 3.13-5), including the following:

- Commuter shuttles operated by contract with Bauer’s Transportation, connecting to local and regional transit hubs;
- Interclinic shuttles connecting the Campus with VA clinics in Downtown San Francisco, San Bruno, and greater Northern California;
- Specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and
- Local shuttles operated jointly by SFVAMC and the University of California, San Francisco (UCSF).

In particular, ridership data provided by SFVAMC indicate that more than 1,285 patients and staff members use the commuter shuttle services operated by Bauer’s Transportation every day (see SDEIS p. 3.13-16). The mode split assumptions in the DEIS and SDEIS are designed to capture the range of transit options available to SFVAMC Fort Miley Campus users, as described above, both currently and in the future (as improvements are made to Muni service in the Geary Boulevard corridor).

It should also be noted that some variation in mode split and parking demand can be expected as a result of the availability of parking at and around the SFVAMC Fort Miley Campus. In particular, the absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits (see SDEIS p. 3.13-64).

On-street parking is not controlled by SFVAMC, which has limited ability to control the use of these spaces by SFVAMC Fort Miley Campus users. SFVAMC does not have any jurisdiction over the management of these off-Campus parking areas, which are under the purview of other public agencies such as the NPS (e.g., parking near Lands End) or the San Francisco Municipal Transportation Agency (SFMTA) (e.g., on-street parking in the surrounding residential neighborhood). Many of the areas on NPS land are already restricted to 4-hour parking during the day to discourage long-term use (whether among Campus users or other motorists) and encourage more turnover, but still attract some level of use among Campus users.

In light of the expected future changes in land use and parking supply on- and off-Campus, as well as the transit options and other alternatives to private automobiles referenced above, the mode split assumptions in the SDEIS are considered appropriate and reasonable for analyzing the expected environmental effects of the LRDP. Considering the magnitude of the changes to future-year intersection Level of Service (LOS) and transit ridership and capacity as a result of the LRDP, as disclosed in the SDEIS, minor variations in the actual mode split beyond what was assumed in the SDEIS would not be expected to increase the scope of expected operational traffic and transit impacts to levels of significance beyond the minor impacts already identified in the SDEIS.

To the extent that parking is dynamic, the availability of parking changes over time as people change their modes and patterns of travel, and therefore would not constitute a significant impact related to vehicle parking conditions (see SDEIS pp. 3.13-64 and 3.13-71). Similarly, minor variations in the actual mode split beyond what was assumed in the SDEIS would also not be expected to increase the scope of expected operational parking impacts to levels of significance beyond the minor impacts already identified in the SDEIS.

RTC A2-17: Please see RTC A2-15 for a discussion of potential impacts to NPS access to GGNRA operational facilities at East Fort Miley.

The evaluation of the LRDP's construction impacts from the DEIS has been augmented in the SDEIS with a discussion of designated haul truck routes to and from the SFVAMC Fort Miley Campus, and estimates of the temporary traffic and parking demand that would be generated by construction-related activities (including haul truck and construction worker traffic). In particular, the SDEIS identifies management measures to minimize any potential disruption or safety issues (Management Measures TRANS-1, TRANS-2, and TRANS-3), which include strategies such as development of detour routes, improvements to signage and striping, and other measures.

This impact and mitigation measure would apply to all parts of the Campus, including the NPS access to East Fort Miley, provided just south of Building 212.

RTC A2-18: As discussed above in RTC A2-17, the evaluation of LRDP construction impacts from the DEIS has been augmented in the SDEIS with estimates of parking demand and (on-Campus) supply by phase, which have been prepared as part of the construction traffic and

parking management plan for the LRDP. Based on these estimates, on-site parking capacity at the SFVAMC Fort Miley Campus would likely be sufficient to accommodate the temporary increase in parking demand generated by construction-related activities.

Please see RTC A2-14 for a discussion of mitigation measures to minimize parking-related effects during construction activities at the Campus.

If a major parking deficit during construction on the SFVAMC Fort Miley Campus is identified, SFVAMC would be required to ensure that the spillover parking demand into the surrounding neighborhood (i.e., outside of the Campus, including NPS-owned parking areas) would not increase beyond current conditions. Potential strategies to achieve this goal may include expanding the Campus's valet program and requiring general contractors to establish carpool/vanpool programs, encouraging transit use, optimizing staging-area needs, and coordinating vendor arrival schedules.

RTC A2-19: Please see RTC A2-14 and RTC A2-18 for a discussion of construction-related parking impacts, including spillover into NPS-owned parking areas.

The methodology for estimating parking demand in the DEIS is based on parking demand rates published in *Parking Generation* by the ITE, which maintains a database of empirical data on parking demand for sites across the United States, categorized by land use. The parking demand rates published by the ITE are considered industry-accepted sources for estimating parking demand for land use development and associated environmental review.

Based on this methodology, the DEIS estimates that the net new development under LRDP Alternatives 1 and 2 at the SFVAMC Fort Miley Campus would generate a total demand for approximately 730 spaces, when considering both short-term (Phase 1) and long-term (Phase 2) elements. The Proposed Action would provide 263 net new off-street parking spaces at the Campus, adding to the existing parking supply of 1,253 spaces, for a total of 1,516 parking spaces provided for employees, visitors, and patients by 2020. The resulting deficit can then be calculated as the difference between the estimated demand (730 spaces) less the proposed net increase in parking supply at the Campus (263 spaces), or 467 spaces.

Although the parking demand estimates in the DEIS are extremely conservative, the SDEIS updates the methodology to arrive at a more realistic estimate of the parking demand. This methodology takes into account the following factors:

- Empirical mode-share data specific to the LRDP's location in San Francisco, which recognizes other transportation modes (e.g., transit, walking, biking, etc.) of accessing SFVAMC. The ITE demand rates are based on suburban locations where the automobile mode share is effectively 100 percent, due to segregated land use patterns and roadway designs that encourage and facilitate the use of personal automobiles, but discourage alternative modes such as transit, biking, and walking. This conservative approach was applied to the DEIS. Automobile mode shares in northwestern San Francisco are closer to 50 percent, with the remaining 50 percent spread across these alternative modes. The average occupancy of personal automobiles is also typically

higher in San Francisco due to a higher trend toward carpooling and ridesharing, so that each vehicle on the road (and, consequently, each parked vehicle) ends up carrying more people per trip, on average, than the same vehicle in a suburban location. This assumption was included only in the SDEIS, resulting in a change in the estimate.

- The “campus” nature of the site, which provides co-located research, clinical, and educational facilities at a single campus, and reduces on-site automobile circulation. The ITE demand rates consider each land use or facility in isolation, with every facility-user driving to, from, and between the facilities; and each facility providing its own parking and generating its own parking demand. In a campus environment, however, parking is typically shared among buildings, and employees and visitors can walk between the various campus buildings, so anyone driving to the campus only needs one parking space total, not one parking space at each campus building. This assumption was included only in the SDEIS, resulting in a change in the estimate.
- Improvements in transit service along Geary Boulevard as a result of the TEP and the BRT Project, which would reduce travel times and increase incentives for using transit compared to driving. The BRT Project alone will reduce travel times by 25 percent, improve reliability by 20 percent, and increase ridership by 10 to 20 percent for bus service along Geary Boulevard, which could feasibly increase the transit mode share at the Campus by at least 5 percent (a shift from personal automobiles to transit). The SDEIS included this assumption, but the DEIS did not, resulting in a change in the estimate.

The refined estimates of parking demand for the net new development under the LRDP indicate that Alternatives 1 and 2 would generate a total demand for approximately 426 spaces when considering both short-term (Phase 1) and long-term (Phase 2) elements. The LRDP would provide 306 net new off-street parking spaces at the SFVAMC Fort Miley Campus, adding to the existing parking supply of 1,253 spaces, for a total of 1,559 parking spaces provided for employees, visitors, and patients by 2020.

The resulting deficit reported in the SDEIS can then be calculated as the difference between the estimated demand (426 spaces) less the proposed net increase in parking supply at the Campus (306 spaces), or 120 spaces.

As discussed in the SDEIS, however, the LRDP would provide on-site parking at higher provision ratios than currently exist on the SFVAMC Fort Miley Campus for existing uses at the site. In addition, a deficit in the LRDP’s parking supply relative to the estimated parking demand, in and of itself, would not constitute a significant impact related to vehicle parking conditions.

In particular, parking conditions are not static—parking supply and demand varies from day to day, from day to night, from month to month, etc. The availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel.

The absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits. In this particular case, SFVAMC Fort Miley Campus users have several options at their disposal when traveling to and from the Campus by transit (please see RTC A2-16 and SDEIS pp. 3.13-46 through 3.13-47). Options for automobile travel that do not require SFVAMC employees or visitors to park a vehicle at or near the Campus (such as taxis, rideshares, and private vehicle pick-up/drop-off) are also available.

Although the 120-space parking deficit referenced above could result in parking spillover into the surrounding neighborhood, it is more likely that these motorists would switch to alternative modes (such as the transit options discussed above), or make other changes in their travel and parking behavior that would reduce this shortfall in parking demand, given that the total supply of on-street parking in the areas surrounding the SFVAMC Fort Miley Campus is unlikely to change substantially in the future, and is currently at or near capacity during peak demand periods.

Furthermore, even if the secondary effects of a parking deficit—such as delays or disruptions to traffic, transit, bicycle, or pedestrian circulation—were to cause concern, the SFVAMC has additional measures at its disposal to manage parking demand and minimize these secondary effects. Valet parking, in particular, could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP (and therefore reduce the parking deficit) by increasing the space efficiency of parking facilities. For example, the existing valet parking program could be expanded to include the additional parking structures proposed to be constructed under Alternatives 1 and 2. This could increase the on-site parking capacity by as many as 150 additional spaces, thereby exceeding the estimated parking deficit of 120 spaces referenced above.

Based on these considerations, the SDEIS concluded that the estimated deficit of 120 spaces would result in minor effects related to parking.

RTC A2-20: The Mental Health Patient Parking Addition Project, which was completed in December 2011, has been added to SDEIS Table 4-1, and has also been considered in the cumulative impact analyses. It should be noted that this project was considered part of the existing conditions in the LRDP SDEIS.

RTC A2-21: As described on p. 3.8-17 of the SDEIS, the short-term projects would add approximately 0.69 acre of impervious surface, a 4 percent increase in impervious area compared to the existing condition. Page 3.8-21 of the SDEIS states that long-term projects would add 0 acres of impervious surface, because this phase would only involve the replacement of an existing building. Stormwater design for the LRDP would be required to maintain the site's predevelopment stormwater discharge rates and volumes by using design techniques that infiltrate, filter, store, evaporate, and detain runoff to comply with Section 438 of the Energy Independence and Security Act (EISA). Compliance with Article 4.2 of the San Francisco Public Works Code, which requires submittal of a stormwater control plan that

meets San Francisco Public Utilities Commission (SFPUC) guidelines, also would be required for the LRDP. As described in the SDEIS, the area of the Campus in the separate sewer areas, including the northern slopes of the Campus, would be required to capture and treat the rainfall from a design storm of 0.75 inch.

Management Measure HYD-1, provided on p. 3.8-18 of the SDEIS, requires SFVAMC to submit final drainage plans to SFPUC for all phases of construction, demonstrating that off-site upgradient runoff would be conveyed through the project site, and that LRDP-related on-site runoff would be appropriately contained to reduce flooding impacts. The conveyance amounts associated with the LRDP have not yet been determined. The system capacity of the separate storm drain system that drains areas to the north of the SFVAMC Fort Miley Campus would be determined as part of a hydrologic and hydraulic analysis of stormwater flows during projects design. Drainage and storm sewer systems would be designed in accordance with VA's Site Utility Design Manual, which requires that a hydrologic assessment be conducted for the 2-, 5-, 10-, 50- and 100-year storm events, and that the system be sized for a minimum 10-year, 1-hour storm event.

As described in the final environmental assessment and RTC document completed for the North Slope Seismic/Geologic Stabilization Project and dated November 9, 2010, the potential impacts of discharging stormwater onto the northern slope were evaluated in geotechnical investigations performed for that project. The recommendations were incorporated into the design of the outfalls to reduce the potential for slope failure on both VA and NPS properties. A long-term monitoring and maintenance plan has been put into effect to maintain the drainage system in good repair so that it is effective in controlling localized erosion. The monitoring and maintenance plan is intended to identify any local erosion at an early stage so that repairs can be initiated before it becomes a significant problem.

As described in the SDEIS on p. 3.8-19, with implementation of Management Measure HYD-1, the LRDP would not increase the risk of flooding either on the SFVAMC Fort Miley Campus or downgradient on NPS properties. Therefore, VA does not consider evaluating an alternative means of stormwater disposal to be necessary. In addition, the North Slope Seismic/Geologic Stabilization Project was implemented in 2011 to reduce the potential for slope failure, and a long-term monitoring and maintenance plan has been put into effect to maintain the drainage system in good repair so that it is effective in controlling localized erosion. As requested by the comment, additional discussion has been added to the "Affected Environment" and "Environmental Consequences" discussions to describe stormwater in the northern slope area.

Text was previously added in SDEIS Section 3.8.1, "Affected Environment," under "Local Hydrologic Features," "Existing SFVAMC Fort Miley Campus":

Major and minor landslides and surface slumping have historically occurred on the slope below the northern portion of the SFVAMC Fort Miley Campus as a result of high rainfall, seismic movement, and land erosion. The North Slope Seismic/Geologic Stabilization Project recently completed at the Campus included replacement of the

storm drain system that discharges stormwater onto the north slope. The impacts of discharging stormwater onto the north slope were included in geotechnical investigations performed for the North Slope Seismic/Geologic Stabilization Project, and the recommendations were incorporated into the design of the outfalls to reduce the potential for slope failure on both the VA and NPS properties (VA, 2010a). Storm drain improvements as part of this project included replacement of the existing catch basins, manholes, and storm drain piping to the north slope, which were old and damaged. The new pipelines were placed above ground to allow monitoring for potential damage or movement of the pipe over time, and to facilitate maintenance. The pipelines discharge to energy dissipaters that reduce the erosional forces of the water. The energy dissipaters consist of rock riprap embedded in concrete and underlain by overlapping sheets of a puncture-resistant vapor barrier. The project also reduced the slope gradient, which reduced slide potential and eliminated areas where water previously ponded. Two retaining walls were installed as part of the project; native shrubs and trees were planted below the retaining walls after construction. A long-term monitoring and maintenance plan has been put into effect to maintain the drainage system in good repair so that it is effective in controlling localized erosion (VA, 2010a). The management measure states the following (VA, 2010a:27):

A long-term monitoring and maintenance program shall be established for continued stormwater discharge to the north slope. The program shall include periodic monitoring and maintenance of the aboveground stormwater outfall pipes for movement and damage, as well as the discharge areas for erosion.

Text was previously added in SDEIS Section 3.8.3, “Environmental Consequences,” under “Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative,” “Short-Term Projects,” “Operation,” “Downstream Flooding or Increase in the Frequency or Severity of Combined Sewer Overflow Events as a Result of Altered Drainage Patterns or an Increase in Impervious Surfaces”:

The area of the project site located in the separate sewer areas would be required to capture and treat the rainfall from a design storm of 0.75 inch. Stormwater that drains to the north slope would be conveyed via surface piping that was constructed as part of the North Slope Seismic/Geologic Stabilization Project (completed in 2011). As part of that project, discharge points were armored and constructed to spread out the flows and dissipate energy, reducing erosion risk. Discharge piping is surface-mounted and was designed to remain effective under minor slope movements. The project also regraded a large portion of the slope, eliminating areas where water previously ponded.

A3) Responses to U.S. Environmental Protection Agency Comments on Draft DEIS

RTC A3-1: VA appreciates and thanks you for your comments. We understand that the EC-2 rating is typically applied to environmental documents when additional clarity is being requested. As explained above under RTCs 2-2 and 2-4, Alternative 2 explores a partial off-site alternative in the long term as a reasonable alternative. VA took into account both your written comments and those discussed in person. Additional analysis and clarity were

provided in the corresponding SDEIS sections to address comments related to noise, aesthetics, air quality, stormwater management, and transportation.

RTC A3-2: VA will provide a CD copy of the Final EIS to the local United States Environmental Protection Agency (EPA) office at 75 Hawthorne Street, San Francisco; and will provide information in a format that allows EPA to upload an electronic copy of the Final EIS to post at the EPA Web site.

RTC A3-3: EPA has correctly stated that short-term projects are the same under both action alternatives, although long-term projects differ in their location and details related to amount and type of planned space.

SFVAMC requires health care facilities on federal land in San Francisco to continue to provide combined clinical, research, and educational services at one location to serve Veterans. SFVAMC identified a deficiency of 589,000 gross square feet (gsf) of building space needed to continue to adequately and effectively serve San Francisco Bay Area and North Coast Veterans through the year 2030.

The purpose of the Proposed Action is to meet the Veterans Health Administration (VHA's) mission of providing comprehensive, high-quality health care services that improve the health and well-being of Veterans, and other eligible persons in the San Francisco Bay Area and Northern California, by providing necessary medical center and research space. The need for the Proposed Action is to address the area's current and future capacity issues brought about by the growing Veteran population, to better serve the ever-changing health care needs of the growing Veteran population, and to provide safe and appropriate facilities for providing health care services and conducting research. See the SFVAMC LRDP goals and objectives in SDEIS Section 1.4, "Purpose of and Need for the Proposed Action."

SFVAMC reviewed a reasonable range of alternatives as part of its planning and NEPA process. VA developed and followed its internal planning process by reviewing its program requirements for each facility, and determined any changes that resulted in modifications in size, scale, and implementation timing. Originally, VA estimated that nearly 1 million net new gsf of space would be needed on the SFVAMC Fort Miley Campus to serve Veterans through approximately 2030. In response to concerns expressed by neighbors, and as a result of the evolving planning process for the Campus, VA reevaluated its space needs by preparing an LRDP. VA has reduced the expansion at the SFVAMC Fort Miley Campus by approximately half the amount of net new space originally proposed, including the buildout of Alternative 1 (the Proposed Action), with less square feet and density. Alternative 2 includes the same proposed square footage as Alternative 1, but represents a different construction phasing of the facilities. Alternative 3 was formulated as another feasible SFVAMC action alternative, and includes most of the same proposed changes as Alternative 1, but with off-site long-term space planned for somewhere in the Mission Bay area of San Francisco.

It should be noted that development of the Mission Bay portion of the planned future SFVAMC space must be assumed to occur in the long term, because it would take VA many years (10+) to procure off-site land from the City and County of San Francisco that would be developed into a new SFVAMC Campus. The ability to expand existing SFVAMC Fort Miley Campus beyond the existing border is limited because the Campus is adjacent to land under NPS jurisdiction that is not available for use by VA. Furthermore, no other contiguous piece of land in San Francisco is available that could accommodate a new SFVAMC Campus approximately the same size as the existing Fort Miley Campus.

As required under NEPA, a No Action Alternative was also analyzed in the EIS. As discussed in SDEIS Section 2.1, “Alternatives Development Process,” the only three feasible NEPA action alternatives are Alternative 1, the current LRDP (the Proposed Action); Alternative 2, which represents a construction phasing variation of Alternative 1; and Alternative 3, which includes long-term space expansion at a to-be-determined location in the Mission Bay area of San Francisco. The EIS analyzed the long-term space at a programmatic level. Because VA has not yet acquired or identified a specific site in the Mission Bay area that could be transferred into federal ownership for development of a proposed new Campus under Alternative 3, additional supplemental NEPA analysis may need to be conducted to fully assess future site-specific environmental impacts in the Mission Bay area.

RTC A3-4: The criteria listed in SDEIS Section 1.4, “Purpose of and Need for the Proposed Action,” specifically the LRDP goals and objectives, were developed by VA and applied during the planning process to develop feasible alternatives to be carried through the EIS analysis. VA has determined that it needs a minimum of 589,000 net new gsf to serve Veterans through 2030 at SFVAMC. The updated LRDP proposes 554,452 net new gsf at Fort Miley, which would allow VA to achieve 94 percent of the gross square footage needed at SFVAMC. Alternative 2 proposes the same square footage with a variation of the construction phasing of facilities. Alternative 3 also includes a plan for 554,452 net new gsf, with 170,000 of the 554,452 net new gsf located off-site in the Mission Bay area. However, to implement Alternative 3, VA would have to acquire enough land in the Mission Bay area to fit this amount of development. SFVAMC used the following screening criteria to determine its planning and programming requirements.

SDEIS Section 2.2, “Alternatives Considered But Eliminated From Further Review,” was previously modified to include these criteria as part of the first paragraph in the section:

- Location within the City and County of San Francisco
- Location on 20 to 30 contiguous acres
- Avoidance of locations under an airport flight path due to aircraft noise issues
- Ability of VA to own the property
- Access to public transit services

- Ability to continue to provide combined clinical, research, and educational services for Veterans
- Improvement of functional relationships between facilities and programs with the right balance of building density and space allocation for programs that require interaction so that facilities and personnel can function more efficiently into the future

RTC A3-5: SFVAMC is the only VA medical center in San Francisco, and has major space and parking deficiencies at its Fort Miley Campus. As described in SDEIS Section 1.2, “Overview and Background,” SFVAMC has identified a deficiency of 589,000 square feet of building space. This amount of space is needed to serve San Francisco Bay Area and North Coast Veterans through the year 2030. The screening criteria are listed in RTC A3-4.

VA has modified SDEIS Section 2.2, “Alternatives Considered but Eliminated from Further Review,” to include these criteria as part of the first paragraph in the section.

Moving SFVAMC to the Mission Bay area of San Francisco is infeasible at this time because it would take VA many years (10+) to procure off-site land from the City and County of San Francisco. Furthermore, no other contiguous piece of land in San Francisco is available that could accommodate a new SFVAMC Campus approximately the same size as the existing Fort Miley Campus. The LRDP currently proposes 554,452 net new gsf, which allows VA to achieve 94 percent of its determined need of 589,000 net new gsf.

As described in SDEIS Section 1.4, “Purpose of and Need for the Proposed Action,” the mission of SFVAMC is to continue to be a major primary and tertiary care medical center providing high-quality care to eligible Veterans in the San Francisco Bay Area and North Coast. SFVAMC strives to deliver needed care to Veterans while contributing to health care knowledge through research. A discussion of the benefits of providing all medical, educational, and research services in a single location was previously added to SDEIS Section 1.4. Specifically, VA can better meet its mission by integrating clinical care, education, and research at one location, because such integration of facilities provides more efficient and progressive overall care for Veterans. Moving some of the facilities to a location other than the SFVAMC Fort Miley Campus would separate and change the functional relationship between building space and VA programs, which would limit VA’s ability to carry out SFVAMC’s mission.

RTC A3-6: The criteria listed in SDEIS Section 1.4, “Purpose of and Need for the Proposed Action,” specifically the LRDP goals and objectives, were developed by VA and applied during the planning process to develop feasible alternatives to be carried through the EIS analysis. VA has determined that it needs a minimum of 589,000 net new gsf to serve Veterans through 2030 at SFVAMC. The updated LRDP proposes 554,452 net new gsf at Fort Miley, which would allow VA to achieve 94 percent of the gross square footage needed at SFVAMC. Alternative 2 proposes the same square footage with a variation of the construction phasing of facilities. Alternative 3 also includes a plan for 554,452 net new gsf, with 170,000 of the 554,452 net new gsf located off-site in the Mission Bay area. However, to implement

Alternative 3, VA would have to acquire enough land in the Mission Bay area to fit this amount of development.

VA screening criteria are listed in RTC A3-4.

VA has modified SDEIS Section 2.2, “Alternatives Considered But Eliminated From Further Review,” to include these criteria as part of the first paragraph in the section. In addition, a new section, Section 1.6, “Master Planning at the SFVAMC Fort Miley Campus,” was previously added to Chapter 1.0, “Introduction” of the SDEIS. This new section describes how, in accordance with the result of the settlement agreement (amended, No. CB06B02321), VA compiled an IMP that was shared with the public in 2010. The IMP evolved into the LRDP in 2012, and the LRDP was most recently updated in 2014. This IMP is also referred to as the “Full Buildout” plan in SDEIS Chapter 2.0, “Alternatives.” Based on a combination of feedback and further master-planning development over the next 2 years, the IMP was revised into the LRDP. The LRDP further developed and refined a longer-range master plan at a substantially reduced scope than was presented in the IMP. The 2014 LRDP was the basis for the Proposed Action evaluated in the SDEIS.

RTC A3-7: The updated construction-noise analysis in SDEIS Section 3.10, “Noise and Vibration,” includes applicable federal noise standards and guidelines, including EPA’s recommended noise levels for both on-site and off-site noise-sensitive receptors. Although EPA’s recommended noise-level standards for exterior use are represented in terms of the sound energy averaged over a 24-hour period, equivalent noise level ($L_{eq(24)}$), the construction noise impact threshold is based on a 1-hour average, $L_{eq(1hr)}$, to represent a more conservative analysis, and to be consistent with anticipated construction hours. In addition, the San Francisco Noise Ordinance was reviewed, and applied to evaluating potential noise impacts during construction activities, as relevant.

RTC A3-8: The nearest off-site sensitive receptor to the LRDP construction area is the residence on the northern side of Sea Rock Drive (west of 45th Avenue). This residence is approximately 50 feet from the nearest LRDP construction component, the new modular Trailer 36, and is identified on SDEIS Figure 3.10-2. Note that modular Trailer 36 would arrive on the site as a finished unit, and only minimal temporary construction lasting 3 months would be required to install and secure it in place. The SDEIS previously included text modifications that incorporate these distances.

Other LRDP construction components (construction areas) would be farther north, within the project site, and would be a minimum of 175 feet (i.e., for the Patient Welcome Center and Drop-off Area) from the nearest off-site residence. In addition, construction activities at the interior of the project site would be shielded from the off-site sensitive receptors by the existing on-site building structures. The updated noise analysis in the SDEIS includes an evaluation of these off-site sensitive receptors. LRDP construction activities for installation of the modular building would generate noise levels up to 75 A-weighted decibels (dBA) L_{eq} at the nearest off-site residence, which would exceed the significance threshold of 65 dBA L_{eq} before mitigation. This is based on an estimated ambient noise level of 60 dBA (from nearby ambient measurement) + 5 dBA. Construction noise from the

Patient Welcome Center and Drop-off Area would generate noise levels up to 73.6 dBA L_{eq} at the nearest off-site sensitive receptor (the residence on the southern side of Clement Street, east of 43rd Avenue). The construction noise would exceed the significance threshold of 66.8 dBA L_{eq} by approximately 7 dBA. Implementation of Mitigation Measure NOI-1 (i.e., temporary noise barrier between the construction equipment and the sensitive receptor) would reduce the construction-related noise impacts by a minimum of 10 dBA, reducing impacts to a minor level. To complete all individual LRDP projects, construction would have to extend up to 85 months (Alternative 1 or Alternative 3) or 73 months (Alternative 2) under Phase 1; and up to 24 months (Alternative 1), 65 months (Alternative 2), or 42 months (Alternative 3) under Phase 2. However, the noise impacts from construction of each VA facility would be of much shorter duration within these time frames. Most of the individual project components are anticipated to take less than 24 months. For example, the temporary construction and installation of modular Trailer 36 would take only 3 months. Also note that construction noise would be reduced when the construction activities are shifted to another area farther away in the SFVAMC Fort Miley Campus. The existing and new structures also would help shield noise. VA has programmed implementation of the LRDP to limit concurrent construction activities, when possible.

RTC A3-9: The updated construction-noise analysis in SDEIS Section 3.10, “Noise and Vibration,” includes applicable federal noise standards and guidelines, including EPA’s recommended noise levels for both on-site and off-site noise-sensitive receptors. Although EPA’s recommended noise-level standards for exterior use are represented in terms of the sound energy averaged over a 24-hour period, $L_{eq(24)}$, the construction noise impact threshold is based on a 1-hour average, $L_{eq(1hr)}$, to represent a more conservative analysis and to be consistent with anticipated construction hours. In addition, the San Francisco Noise Ordinance was reviewed and applied to evaluating potential noise impacts during construction activities, as relevant. The Proposed Action significance criteria have been updated in the SDEIS, which specified the noise descriptors (i.e., units) used to evaluate noise impacts from LRDP construction (i.e., 1-hour L_{eq}) and operation (24-hour day/night average sound level). Estimated noise levels for both LRDP construction and operation are provided with the same units as the significance criteria. For example, Table 3.10-10 has been added in the SDEIS to describe the potential noise impacts from the short-term construction noise, which show the same units for the construction noise levels and the significance criteria.

The updated noise analysis in the SDEIS includes an evaluation of the nearest off-site sensitive receptors. Additions that discuss this issue have been made to SDEIS Section 3.10, “Noise and Vibration,” and Figure 3.10-1 has been included to indicate the locations of nearby sensitive receptors.

RTC A3-10: Noise impacts from LRDP-related construction and operational activities on the on-site childcare center (including outdoor play areas) have been evaluated in the updated noise analysis section in SDEIS Section 3.10, “Noise and Vibration.” The existing on-site childcare center is at the northeastern boundary of the SFVAMC Fort Miley Campus (near

Building 32). The nearest construction activity areas would include Building 22 construction (approximately 110 feet from Building 32) and the retrofitting construction of Building 10 (approximately 50 feet from Building 32). The construction-related noise level at the exterior of the childcare center (Building 32) is anticipated to be up to 75 dBA L_{eq} . The building façade would provide approximately 25 dBA noise reduction with the window closed, and 15 dBA with the windows open (see the EPA Levels document), which would result in an interior noise level of 50 dBA L_{eq} with the window closed, or 60 dBA with the window open (EPA, 1974). The estimated noise levels at the interior of the childcare center would exceed the significance threshold of 45 dBA L_{eq} for classrooms. Therefore, noise impacts at the interior of the childcare center would be adverse during the LRDP construction hours.

The childcare center's outdoor play area would be shielded from the construction activities by existing Buildings 11 and 32. LRDP construction activities (retrofitting of Building 10 and construction of Building 32) would generate noise levels up to 60 dBA L_{eq} at the outdoor play area before mitigation, which would exceed the significance threshold of 55 dBA L_{eq} . Implementation of Mitigation Measure NOI-1 would reduce the construction-related noise impacts by a minimum of 5 dBA, and impacts would be minor and temporary (approximately 13 months for the construction of Building 22 and retrofitting of Building 10).

RTC A3-11: As indicated in the SDEIS, the LRDP would comply with VA Specification Section 01568, "Environmental Protection," and Section 015719, "Temporary Environmental Controls," which would include all feasible noise mitigation measures. Furthermore, the LRDP-specified noise mitigation measures include construction noise monitoring at both on-site and off-site affected locations.

RTC A3-12: The noise analysis in the SDEIS has been updated with the anticipated maximum number of pieces of construction equipment that could operate simultaneously, based on the updated LRDP. This is a conservative approach represented by a worst-case scenario.

RTC A3-13: As indicated in the SDEIS, the LRDP would comply with VA Specification Section 01568, "Environmental Protection," and Section 015719, "Temporary Environmental Controls," which would include all feasible noise mitigation measures. Furthermore, the LRDP-specified noise mitigation measures include construction noise monitoring at both on-site and off-site affected locations. In addition, EPA's suggested additional measures are best management practices (BMPs), which are included in VA's Specification Sections 01568 and 01579, and include all feasible noise mitigation measures. Furthermore, EPA's suggestion of a noise disturbance coordinator is included in Management Measure NOI-1, because VA would manage and monitor noise disturbance during construction.

RTC A3-14: The SDEIS includes conceptual visual simulations that were formulated in combination with computer-simulated building massing with photographs to create photomontages of the Proposed Action. These were created using the same 12 viewpoints included in the DEIS. In addition, the visual simulations reflect the removal of trees planned for in the LRDP. Note that the LRDP's tree removal plan is the same tree removal plan that was

included in the IMP. It is possible that trees would be replanted at this location in the future, which would help screen the buildings when viewed from outside the Campus. VA will discuss and coordinate with NPS regarding tree plantings. See SDEIS Section 3.1, “Aesthetics,” for these visual simulations.

RTC A3-15: SDEIS Section 3.2, “Air Quality,” includes an air quality and health risk assessment analysis related to the on-site childcare center.

RTC A3-16: The SDEIS has added a construction emissions mitigation plan to the mitigation measures that includes all necessary construction control measures from—but is not limited to—EPA’s comment letter, Bay Area Air Quality Management District (BAAQMD) Basic Construction Control Measures, and the City and County of San Francisco’s Article 31. Therefore, the construction emissions mitigation plan will be included in the EIS Record of Decision.

RTC A3-17: The SDEIS has removed approximately 10 percent of the regional emissions provision and analysis in the conformity analysis. The new conformity analysis reflects the most recently adopted general conformity requirements.

RTC A3-18: Page 4-7 of the 2014 LRDP states that a part of one of the goals and objectives guiding future landscape improvements is to “Promote stormwater quality and reduce runoff with integrated vegetated stormwater management strategies.” Figure 4-2 on p. 4-8 of the 2014 LRDP shows the proposed landscape zones: gateway landscape, buffer landscape, coastal landscape, healing garden, and garden landscape. However, as described on pp. 3.8-17 through 3.8-18 of the SDEIS, stormwater runoff requirements outlined in Section 438 of the EISA include performance requirements with which the LRDP must comply. The EIS acknowledges that the specifics of achieving those requirements have not yet been determined, and includes Management Measure HYD-1 to further highlight the need to achieve the requirements of Section 438 of the EISA. Item #3 in Management Measure HYD-1 on SDEIS pp. 3.8-18 and 3.8-19 states that stormwater BMPs, which may include but will not be limited to Low-Impact Development (LID) techniques, will be implemented to infiltrate, evaporate, and detain stormwater, and achieve predevelopment stormwater runoff conditions at the site after construction.

Figure 4-2 on p. 4-8 of the LRDP illustrates the proposed landscape zones at the SFVAMC Fort Miley Campus: gateway landscape, buffer landscape, coastal landscape, healing garden, and garden landscape. These different zones are described further on pp. 4-9 through 4-11 of the LRDP, and may provide opportunities for stormwater management through LID. In addition, Figure 4-3 on p. 4-12 of the LRDP illustrates the proposed landscape concept, including plantings. At this time, however, the location, sizing, and performance of specific LID techniques have not been determined.

RTC A3-19: Parking conditions are not static—parking supply and demand varies from day to day, from day to night, from month to month, etc. The availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel.

The absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits.

In this particular case, SFVAMC Fort Miley Campus users have several options when traveling to and from the Campus by transit. Muni provides high-frequency, high-capacity bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the TEP and BRT Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private shuttle services supported by the SFVAMC and affiliate organizations (SDEIS Table 3.13-5), including the following:

- Commuter shuttles operated by contract with Bauer's Transportation, connecting to local and regional transit hubs;
- Interclinic shuttles connecting the SFVAMC Fort Miley Campus with VA clinics in Downtown San Francisco, San Bruno, and greater Northern California;
- Specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and
- Local shuttles operated jointly by SFVAMC and UCSF.

Options for automobile travel that do not require SFVAMC employees or visitors to park a vehicle at or near the Campus (such as taxis, rideshares, and private vehicle pick-up/drop-off) are also available.

Although a deficit in the on-Campus parking supply proposed under the LRDP relative to the estimated parking demand from the net new development could result in parking spillover into the surrounding neighborhood, it is more likely that these motorists would switch to alternative modes (such as the transit options discussed above), or make other changes in their travel and parking behavior that would reduce this shortfall in parking demand, given that the total supply of on-street parking in the areas surrounding the Campus is unlikely to change substantially in the future, and is currently at or near capacity during peak demand periods.

Furthermore, even if the secondary effects of a parking deficit—such as delays or disruptions to traffic, transit, bicycle, or pedestrian circulation—were to cause concern, the SFVAMC has additional measures at its disposal to manage parking demand and minimize these secondary effects. Valet parking, in particular, could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP (and therefore reduce the parking deficit) by increasing the space efficiency of parking facilities. For example, the existing valet parking program could be expanded to include the additional parking structures proposed to be constructed under Alternatives 1 and 2. This could increase the on-site parking capacity by as many as 150 additional spaces, thereby exceeding the estimated deficit in on-Campus parking of 120 spaces under the LRDP (the estimated demand of 426 spaces generated by the net new development, less the proposed net increase in parking supply at the SFVAMC Fort Miley Campus of 306 spaces).

Based on these considerations, the SDEIS concluded that the estimated deficit of 120 spaces would result in minor effects related to parking.

Regarding the “free bus and shuttle service” referenced in the comment, SFVAMC contracts with Bauer’s Transportation to provide a frequent commuter shuttle service for SFVAMC Fort Miley Campus staff and patients (please see SDEIS Table 3.13-5). However, the LRDP does not specifically propose any improvements to the commuter shuttle services (other than circulation changes at the Campus), and does not commit to specific service levels (in terms of frequency or trips per day; routes; or origins/destinations served) because the program should remain flexible to adequately meet the needs of Campus users. SFVAMC recognizes the value of this service, and will periodically review ridership trends and evaluate the need for service enhancements, including the addition of scheduled trips or expansion of the route network or stop locations, but this process will take place outside of the long-range planning and implementation efforts of the LRDP.

A description of existing bikeways surrounding the project site is included on SDEIS pp. 3.13-19 through 3.13-21. Figure 3.13-6 on p. 3.13-20 provides a map depicting the existing bicycle network close to the SFVAMC Fort Miley Campus. There are currently no designated bikeways on the Campus, and bicyclists are expected to share Campus roads with other users, either riding in the paved right-of-way with other vehicles, or walking their bikes on sidewalks and pedestrian paths.

Currently, SFVAMC provides bicycle racks and lockers for use by SFVAMC Fort Miley Campus users traveling by bicycle. However, the LRDP does not provide specific details regarding the future provision of bicycle parking or related amenities such as showers and lockers for Campus bicyclists, because it is expected that these details will be determined as each specific component of the LRDP enters the design and implementation phases. Although the LRDP does not specifically propose bikeway improvements, SFVAMC recognizes the value of bicycle access on and to/from the Campus, and will periodically review bicycle activity and safety at the Campus, and evaluate the need for bikeway improvements, outside of the long-range planning and implementation efforts of the LRDP.

As of May 2015, the new parking structure (Building 211) was complete, which immediately increased the on-Campus supply of parking. SFVAMC has decided to continue to provide valet services for parking at Building 209 and Building 212, in efforts to improve parking conditions, including encouragement of VA staff to park on site. VA only charges a nominal monthly fee of \$12.50 per month for a parking pass, which makes this a practical option for personnel.

RTC A3-20: Please see RTC A3-19 for a discussion of improvements to the SFVAMC Fort Miley Campus shuttle service in relation to the LRDP; improvements to bicycle access, parking, and amenities at the Campus in relation to the LRDP; and the status of Building 211.

Regarding general construction-related parking effects and associated mitigation measures, the evaluation of LRDP construction impacts from the DEIS has been augmented in the SDEIS with estimates of parking demand and (on-Campus) supply by phase, which have

been prepared as part of the construction traffic and parking management plan for the LRDP. Based on these estimates, on-site parking capacity at the SFVAMC Fort Miley Campus would likely be sufficient to accommodate the temporary increase in parking demand generated by construction-related activities.

Nevertheless, SFVAMC understands the sensitivity of parking concerns among residents of the surrounding neighborhood and NPS, and is committed to regularly reviewing parking conditions at and surrounding the SFVAMC Fort Miley Campus. This regular review process is not necessarily part of the LRDP, but instead part of SFVAMC's facility management duties at the Campus. In recognition of the potential for construction-related activities to affect parking conditions, the SDEIS includes Mitigation Measure TRANS-2, which requires SFVAMC to conduct supplemental surveys of parking occupancy, and to implement programs to prevent parking spillover during construction. This includes SFVAMC coordination with construction contractors as construction plans for specific LRDP projects are developed to determine whether construction-related activities would result in parking deficits, and whether temporary mitigation measures or strategies would need to be implemented.

If a major parking deficit on the Campus is identified, SFVAMC would be required to ensure that the spillover parking demand into the surrounding neighborhood (i.e., outside of the Campus, including NPS-owned parking areas) would not increase beyond current conditions. Potential strategies to achieve this goal may include expanding the Campus's valet program and requiring general contractors to establish carpool/vanpool programs, encourage transit use, optimize staging-area needs, and coordinate vendor arrival schedules.

Local Agency Written Comments

A4) Responses to San Francisco Recreation and Parks Department Comments on DEIS

RTC A4-1: Thank you for your comments on the DEIS. Appropriate figures in the SDEIS, specifically Figures 1-3, 2-1, and 2-2 in Chapter 1.0, "Introduction," and Chapter 2.0, "Alternatives," have been updated to include the location of Lincoln Park land.

Local Group Written Comments

A5) Responses to Planning Association for the Richmond, Friends of Lands End, Coalition to Save Ocean Beach, Friends of Sutro Park, and People for a Golden Gate National Recreation Area Comments on DEIS

RTC A5-1: Thank you for your comments on the DEIS. Although UCSF and Northern California Institute of Research and Education (NCIRE) doctors, educators, and researchers often use SFVAMC Fort Miley Campus facilities, the Proposed Action is related to construction and operation of a plan on federal property only. The decision in question is whether VA would further develop the existing SFVAMC Fort Miley Campus, or whether VA needs a new additional Campus in Mission Bay for which VA would purchase land and construct a new facility. In addition, funding for construction of the facilities proposed in the LRDP is

provided only by VA, as appropriated by the U.S. Congress. Therefore, the State of California Environmental Quality Act (CEQA) Guidelines and San Francisco Planning Department CEQA Guidelines would not be applicable to the Proposed Action. VA has correctly applied NEPA and NHPA Section 106 guidelines to its analyses of the Proposed Action.

The goals and objectives of the Proposed Action are listed in SDEIS Section 1.4, “Purpose of and Need for the Proposed Action,” on p. 1-4 and include the following information.

The overarching goals of the Proposed Action include:

- Enhance the SFVAMC Fort Miley Campus function as a significant resource and facility for Veterans and their families.
- Continue to provide personalized, proactive, patient-centered care to Veterans well into the future.
- Provide appropriate space to conduct/manage clinical, administrative, educational, and research programs.

The specific objectives of the Proposed Action are as follows:

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

SDEIS Section 1.4 previously included additional clarity with the following text changes:

The purpose of the Proposed Action is to meet VHA’s mission of providing comprehensive, high-quality health care services that improve the health and well-being of Veterans and other eligible persons for care of military Veterans in the San Francisco Bay Area and Northern California by providing necessary medical center and research space. The need for the Proposed Action is to address the area’s current and future capacity issues brought about by the growing Veteran population, to better serve the ever-changing health care needs of the growing Veteran population, and to provide safe and appropriate facilities for providing health care services and conducting research.

As described in SDEIS Section 2.3.4, under Alternative 4 (the No Action Alternative), the LRDP would not be implemented. The No Action Alternative would be limited to maintenance and repair of existing SFVAMC Fort Miley Campus facilities, including emergency repairs that would be expected to occur in the foreseeable future. This alternative would include continued operations despite space, seismic, and parking deficiencies. Under Alternative 4, the only LRDP projects that would be implemented are those projects that have already achieved previous NEPA and NHPA Section 106 clearance: Building 211 (Emergency Operations Center and Parking Garage), Building 41 (Research), Building 22 (Hoptel), and Seismic Retrofit of Buildings 9, 10, and 13).

- RTC A5-2:** The LRDP represents VA's planning document, which describes habitable space and nonhabitable space (including parking garage) separately. However, because the LRDP EIS is an environmental impact document, both habitable and nonhabitable spaces have been included in the analysis, and the potential construction-related and operational impacts of the full buildout have been addressed. See the tables in SDEIS Chapter 2.0, which include footnotes attesting to this fact.
- RTC A5-3:** As described in the SDEIS, the LRDP long-term (Phase 2) projects were analyzed at a programmatic level. Additional site-specific, project-level supplemental NEPA analysis would still need to occur before any LRDP-related construction in the Mission Bay area.
- RTC A5-4:** Views from the Marin Headlands are from a far distance; therefore, implementation of the LRDP would result in only a minor change in these views. Furthermore, tree coverage in the nearby GGNRA area constitutes the majority of the views from East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus. See SDEIS Section 3.1, "Aesthetics," for visual simulations and further discussion regarding how the LRDP would not adversely change the views from the Marin Headlands and nearby GGNRA land.
- RTC A5-5:** The updated air quality analysis in the SDEIS includes a discussion of odor impacts associated with emissions of volatile organic compounds from asphalt paving and architectural coatings. Odor emissions are evaluated as nuisances that could affect nearby receptors. However, odor emissions are not considered toxic air contaminants when compared to toxic pollutants such as diesel particulate matter. Thus, odor emissions would not contribute to the health risk impacts of construction activities.
- RTC A5-6:** The ambient air quality data presented in the air quality analysis is not intended to represent baseline air quality conditions at the project site. Rather, data monitored at the 10 Arkansas Street station and other stations in the San Francisco Bay Area Air Basin are used by EPA to designate the attainment status of the region for ambient air quality standards. The region's attainment designations are used to determine the applicable *de minimis* thresholds used to evaluate the LRDP's construction and operational emissions. The 10 Arkansas Street station is the closest monitoring station to the project site.
- RTC A5-7:** The ambient air quality data presented in the air quality analysis are not intended to represent baseline air quality conditions at the project site. Rather, data monitored at the 10 Arkansas Street station and other stations in the San Francisco Bay Area Air Basin are

used by EPA to designate the attainment status of the region for ambient air quality standards. The region's attainment designations are used to determine the applicable *de minimis* thresholds to evaluate a project's construction and operational emissions. The 10 Arkansas Street station is the closest monitoring station to the project site. The monitoring station data are not intended to represent baseline conditions at the project site; rather, ambient air quality monitored in the region is used to determine the region's attainment status with respect to ambient air quality standards. The monitoring station data are shown for informational purposes and were not used in the analysis to evaluate the LRDP's air quality impacts.

RTC A5-8: The SDEIS includes construction-related activities that could affect air quality. The resulting emissions would be short term and temporary. BAAQMD Basic Construction Mitigation Measures would be implemented to minimize emissions of fugitive dust, which is the main pollutant with respect to visual impacts. Long-term operational activities resulting from the LRDP would not generate stationary-, area-, and mobile-source emissions to the extent that a substantial degradation of the aesthetic nature of the area (i.e., visual degradation) would result. The LRDP is not a stationary source that would generate a continuous plume of emissions that could affect the aesthetic nature of the area.

RTC A5-9: The nearest off-site sensitive receptor to the LRDP construction area is the residence on the northern side of Sea Rock Drive (west of 45th Avenue). This residence is approximately 50 feet from the nearest LRDP construction component, the new modular Trailer 36, and is identified in SDEIS Figure 3.10-2. Note that modular Trailer 36 would arrive on the site as a finished unit, and only minimal temporary construction lasting 3 months would be required to install and secure it in place. The SDEIS previously included text modifications that incorporate these distances.

Other LRDP construction components (construction areas) would be farther north, within the project site, and would be a minimum of 175 feet (i.e., for the Patient Welcome Center and Drop-off Area) from the nearest off-site residence. The updated noise analysis in the SDEIS includes quantitative noise analysis for both on-site and off-site sensitive receptors.

RTC A5-10: To complete all proposed LRDP projects, the proposed construction would have to extend up to 85 months (Alternatives 1 and 3) or 73 months (Alternative 2) during Phase 1; and up to 24 months (Alternative 1), 65 months (Alternative 2), or 42 months (Alternative 3) during Phase 2. However, the noise impacts at the individual sensitive receptors would be much shorter, with many individual LRDP project components lasting 24 months or less, depending on the facility. In some cases, the construction noise would be reduced when the construction activities shift toward the center of the site farther away from receptors, and are shielded by on-site building structures.

Regarding the truck back-up beeper or alarm, it is typically used by delivery/material-handling trucks at the construction site. Its purpose is to provide a warning that the vehicle is backing up. The Occupational Safety and Health Administration (OSHA) requires that these beepers be loud enough to be distinguishable from other sounds, for safety purposes. According to back-up beeper manufacturer Federal Signal Corporation, sound from back-

up beepers ranges from 82 to 107 dBA at a distance of 4 feet. As described in the SDEIS (Section 3.10.1), sounds attenuate at a rate of 6 decibels (dB) per doubling of distance. Therefore, the back-up beeper's sound level would attenuate to approximately 90 dBA at a distance of 30 feet (based on the standard 6 dB per doubling of distance), which is the threshold set by OSHA for occupational noise exposure limit for an 8-hour period. Back-up beepers would be used only intermittently, when a truck is backing up on the construction site. Therefore, potential hearing damage from back-up beepers would not be expected. In addition, the back-up beeper sound from the truck backing up on the project site would attenuate to 85 dBA at the nearest off-site residence (which is 50 feet from the nearest construction area), and lower levels at further residences.

RTC A5-11: The updated noise analysis in the SDEIS includes the groundborne-vibration impacts of on-site construction equipment related to potential building damage and human annoyance at on- and off-site receptors. Mitigation measures have been recommended to reduce the potential groundborne-vibration impacts to less than adverse. Construction-related trucks in route to and from the project site would generate groundborne vibration along the designated construction routes. Based on Federal Transit Administration (FTA) data, a truck traveling on a typical road would generate groundborne-vibration levels of approximately 63 vibration decibels (VdB) or 0.006 inch per second (in/sec) peak particle velocity (PPV) at a distance of 50 feet (FTA, 2006: Figure 7-3). Existing residential buildings would be approximately 25 feet from the truck travel lane, which would be exposed to groundborne vibration up to 72 VdB or 0.016 in/sec PPV. The groundborne vibration generated by the LRDP-construction-related truck would be well below the 0.12 in/sec significance threshold applicable for old building structures. Therefore, adverse building damage impacts on the residential buildings along the construction truck route would not be expected. In addition, the estimated groundborne vibration of 72 VdB would be less than the standard of 80 VdB typically associated with human annoyance. Therefore, impacts on human annoyance along the construction truck route would be minor.

RTC A5-12: The SDEIS includes computer-simulated photomontages of the Proposed Action as viewed from the same 12 existing viewpoints included in the DEIS. In addition, the visual simulations reflect the removal of trees planned for under the LRDP. See SDEIS0020 Section 3.1, "Aesthetics," for these visual simulations and further discussion of how the LRDP would not result in adverse aesthetic impacts, even with planned tree removal.

RTC A5-13: The LRDP is a planning document that does not analyze environmental impacts or make significance conclusions. The LRDP (on p. 3-3) explicitly states that the LRDP "does not contain detailed information about infrastructure improvements; however, it is assumed that all infrastructure systems will be upgraded as needed to meet capacity requirements to serve the development program described in this plan." One of the specific objectives of the LRDP, as described on p. 1-9 of the LRDP, is to "improve internal and external Campus circulation, utilities, and infrastructure." In regard to the ability of providers to supply the increase in demand, or handle the increase in waste, Section 3.14, "Utilities," of the EIS addresses that topic for water supply, wastewater, stormwater, electricity, and natural gas.

In the case of water supply, communication with SFPUC confirmed that the LRDP would not require a major expansion of the existing water utility system. In regard to wastewater, the EIS summarizes the estimated increase in wastewater generation and compares it to the overall capacity of the Oceanside Water Pollution Control Plant (OSP). Short-term LRDP projects under Alternatives 1 and 2 would result in a 0.104 percent increase in dry-weather flows at the OSP, and long-term LRDP projects would result in a 0.116 percent increase in dry-weather flows. Each alternative would result in a 0.219 percent increase in dry-weather flows with achievement of the reduction target goals in the *Department of Veteran Affairs Strategic Sustainability Performance Plan*, which would not require expansion of existing water treatment facilities. As under Alternatives 1 and 2, Alternative 3 short-term projects would result in the same estimated 0.104 percent increase in dry-weather flows at the OSP; however, Alternative 3 long-term projects would be located at the potential new SFVAMC Mission Bay Campus, which sends wastewater to the Southeast Water Pollution Control Plant. Development at the potential new Campus would result in an estimated increase in dry-weather flows of 0.016 million gallons per day at the Southeast Water Pollution Control Plant. This impact was reduced to a minor level with implementation of Management Measure HYD-1, as well as compliance with Section 438 of the EISA and Article 4.2 of the San Francisco Public Works Code.

The SDEIS states that Alternative 3 would not significantly alter land use or impervious site characteristics, and that stormwater runoff would be conveyed in a manner similar to existing conditions. The SDEIS describes how the LRDP would be designed to minimize stormwater runoff to the extent practicable, and that sustainability features would be implemented to provide for increased stormwater infiltration and treatment. With regard to electricity, the SDEIS states that the Electrical Systems Upgrades Project would accommodate the increase in electricity use, and no further system upgrades or infrastructure modifications would be necessary. For natural gas, existing infrastructure capacity is considered adequate to accommodate the anticipated demand at the potential new SFVAMC Mission Bay Campus. The SDEIS further states that if on-site improvements and connections are required, such improvements would be coordinated with Pacific Gas and Electric Company during the continued planning and design refinements of the LRDP. Only minor changes were made in the SDEIS as a result of changes to the LRDP; no changes were made to the impact findings.

RTC A5-14: The SDEIS (p. 3.3-17) states that “Access to all buildings by fire trucks and emergency vehicles would be maintained during construction.” However, the SDEIS does not include language stating that the minimum turning radius is not currently met at Buildings 16 and 42. According to the San Francisco Fire Department, in regard to access to Building 16 and 42, there are no obstructions to delay or compromise the response time of Stations 34 and 14, which are the first due engines and truck companies which will arrive on the scene. First arriving units will have immediate access to two hydrants that will supply master streams or quick-deployed attack lines. Furthermore, the SDEIS (p. 3.3-3) goes on to say that “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.” It is expected that all site improvements would meet the minimum requirements for fire access stipulated in the San Francisco Fire Code and required by the San Francisco Fire Department.

RTC A5-15: SFVAMC recognizes local concerns regarding construction activities, and has notified contractors in the past about the need to be responsible members of the community to ensure good standing with neighbors. SFVAMC recognizes that some issues remain and VA is continuing to work diligently with contractors to encourage and enforce compliance among the construction workforce.

With regard to impacts and mitigation measures, the SDEIS identifies an LRDP impact related to haul truck traffic generated by construction-related activities at the SFVAMC Fort Miley Campus, which could result in temporary but significant impacts related to traffic and transportation, vehicle parking, air quality, noise, vibration, and visual resources and aesthetics at or in the immediate vicinity of the Campus. To mitigate this impact, the EIS explains that VA is required to use only identified haul truck routes, monitor truck arrivals, and implement queue abatement programs.

The evaluation of LRDP construction impacts from the DEIS has been augmented in the SDEIS with estimates of parking demand and (on-Campus) supply by phase, which have been prepared as part of the construction traffic and parking management plan for the LRDP. Based on these estimates, on-site parking capacity at the Campus would likely be sufficient to accommodate the temporary increase in parking demand generated by construction-related activities.

Nevertheless, SFVAMC understands the sensitivity of parking concerns among residents of the surrounding neighborhood and NPS, and is committed to regularly reviewing parking conditions at and surrounding the SFVAMC Fort Miley Campus. This regular review process is not necessarily part of the LRDP but instead part of SFVAMC’s facility management duties at the Campus. In recognition of the potential for construction-related activities to affect parking conditions, the SDEIS includes Mitigation Measure TRANS-2, which requires SFVAMC to conduct supplemental surveys of parking occupancy, and to implement programs to prevent parking spillover during construction. This includes SFVAMC coordination with construction contractors as construction plans for specific LRDP projects are developed to determine whether construction-related activities would result in parking deficits, and whether temporary mitigation measures or strategies would need to be implemented.

If a major parking deficit on the SFVAMC Fort Miley Campus is identified, SFVAMC would be required to ensure that the spillover parking demand into the surrounding neighborhood (i.e., outside of the Campus, including NPS-owned parking areas) would not increase beyond current conditions. Potential strategies to achieve this goal may include expanding the Campus’s valet program and requiring general contractors to establish carpool/vanpool programs, encourage transit use, optimize staging-area needs, and coordinate vendor arrival schedules.

Lastly, the SDEIS identifies temporary and adverse effects on traffic, transit, and pedestrian circulation within or near the SFVAMC Fort Miley Campus as a result of construction-related activities. To mitigate these effects, SFVAMC would implement protective measures to ensure the safety of bicyclists and pedestrians and minimize disruptions.

The following management measures have also been included in the SDEIS to improve conditions:

- Management Measure TRANS-1, “Implement Protective Measures for Traffic, Transit, and Pedestrians if Pedestrian Facilities or Travel Lanes Require Closure during Construction”
- Management Measure TRANS-2, “Implement Protective Measures for Traffic, Transit, and Pedestrians during the Presence of Temporary Modular Structures on Campus”
- Management Measure TRANS-3, “Implement Protective Measures for Traffic, Transit, and Pedestrians during Overlapping Construction Projects Located Close to Each Other on Campus”

Any changes within right-of-way owned and maintained by the City and County of San Francisco would be cleared through the SFMTA Interdepartmental Staff Committee on Traffic and Transportation. SFVAMC would also adhere to the *Regulations for Working in San Francisco Streets* (also known as *The Blue Book*), and would reimburse SFMTA for the costs of installation and removal of any temporary striping and signage changes required during LRDP construction.

RTC A5-16: The SDEIS includes detailed routes to and from the SFVAMC Fort Miley Campus from points north, south, and east of the Campus for haul truck traffic generated by construction-related activities. Mitigation Measure TRANS-1 of the SDEIS identifies an LRDP impact related to haul truck traffic at the Campus, along with an associated mitigation measure that requires SFVAMC to use only identified haul truck routes and to monitor truck arrivals and implement queue abatement programs.

Specifically, haul trucks would use major freeways (e.g., U.S. Highway 101, Interstate 280) and local arterials (e.g., 19th Avenue/Crossover Drive/Park Presidio Boulevard, Van Ness Avenue) identified in the *San Francisco Truck Traffic Routes* map published by SFMTA when traveling between the Campus and regional origins or destinations. Locally, trucks would use Geary Boulevard and Point Lobos Avenue, entering and exiting the Campus via the two existing access points at 42nd Avenue and 43rd Avenue. These routes are described in detail in the SDEIS.

Please see RTC A5-15 for a discussion of the temporary and adverse effects on traffic, transit, and pedestrian circulation in or near the Campus as a result of construction-related activities and associated mitigation measures. Please also see RTC A5-15 for a discussion of additional management measures to improve traffic (including bicycle), transit, and pedestrian circulation and safety during Campus construction.

RTC A5-17: The LRDP is a planning document that does not analyze environmental impacts or make significance conclusions. The LRDP SDEIS adequately analyzed all topics required under NEPA. Even with identification in the EIS of significant adverse impacts related to historic resources (despite inclusion of feasible mitigation), such identification of a significant adverse impact does not mean that the EIS cannot be finalized.

Although UCSF and NCIRE doctors, educators, and researchers often use SFVAMC Fort Miley Campus facilities, the Proposed Action is related to construction and operation of a plan on federal property only. The decision in question is whether VA would further develop the existing SFVAMC Fort Miley Campus, or whether VA needs a new additional Campus in Mission Bay for which VA would purchase land and construct a new facility. In addition, funding for construction of the facilities proposed in the LRDP is provided only by VA, as appropriated by the U.S. Congress. Therefore, the State CEQA Guidelines and San Francisco Planning Department CEQA Guidelines would not be applicable to the Proposed Action. VA has correctly applied NEPA and NHPA Section 106 guidelines to its analyses of the Proposed Action.

RTC A5-18: SFVAMC, although affiliated with the UCSF School of Medicine, is an independent federal government facility. UCSF has no oversight of or authority over the Fort Miley Campus and has no influence on planning activities. As described in SDEIS Section 1.4, “Purpose of and Need for the Proposed Action,” the mission of SFVAMC is to continue to be a major primary and tertiary care medical center providing high-quality care to eligible Veterans in the San Francisco Bay Area and North Coast. SFVAMC strives to deliver needed care to Veterans while contributing to health care knowledge through research. A discussion of the benefits of providing all medical, educational, and research services in a single location was previously added to SDEIS Section 1.4. Specifically, VA can better meet its mission by integrating clinical care, education, and research at one location, because such integration of facilities provides more efficient and progressive overall care for Veterans. Moving some of the facilities to a location other than the SFVAMC Fort Miley Campus would separate and change the functional relationship between building space and VA programs, which would limit VA’s ability to carry out SFVAMC’s mission. VA received public comments on its notice of intent to prepare an EIS on the previous Proposed Action, and revisited its plans. VA determined that some facility space proposed could be reduced at the SFVAMC Fort Miley Campus.

The long-range planning document for the SFVAMC Fort Miley Campus evolved from an IMP to an LRDP after the first NEPA scoping meeting. As part of facility master planning in general, and in accordance with the result of the settlement agreement (amended, No. CB06B02321), VA compiled an IMP that was shared with the public in 2010. This IMP is also referred to as the “Full Buildout” plan in SDEIS Chapter 2.0, “Alternatives.” Based on a combination of feedback and further master-planning development over the next 2 years, the IMP was revised into the LRDP. The LRDP further developed and refined a longer-range master plan at a substantially reduced scope than was presented in the IMP. The 2014 LRDP was the basis for the Proposed Action evaluated in the SDEIS.

VA reviewed public comments on the LRDP DEIS and modified the LRDP to address comments requesting additional parking on the SFVAMC Fort Miley Campus. The 2014 LRDP increases the amount of net new parking provided on the Campus to 306 net new parking spaces. Additional parking analysis has been performed, and related potential impacts are discussed in the SDEIS. It is unclear where the on-Campus deficiency number of 700 parking spaces was obtained, and VA is not aware of information pertaining to this comment.

The LRDP SDEIS analyzed all required topics under NEPA. With implementation of mitigation measures included in the EIS, no significant adverse impacts related to adjacent NPS land or the surrounding neighborhood were identified.

RTC A5-19: This comment relates to public involvement under a separate federal law, Section 106 of the NHPA (Section 106). The DEIS was circulated at the same time that the Section 106 FOE was made available to the consulting parties, including NPS, and the public for comment. SFVAMC has had an extensive public involvement and consultation process for Section 106. Letters were sent on June 15, 2012, inviting the following parties with demonstrated interest in the heritage of the SFVAMC Fort Miley Campus and vicinity to participate in the Section 106 process:

- City and County of San Francisco
- San Francisco Veterans Affairs Commission
- NPS
- GGNRA
- Planning Association for the Richmond
- Friends of Lands End
- California Preservation Foundation
- National Trust for Historic Preservation
- NCIRE Board of Directors
- UCSF School of Medicine
- Legion of Honor
- Presidio Trust
- San Francisco County Veterans Service Officers

The Section 106 FOE correctly stated that, as of the release of the SDEIS, no comments on Section 106 had been received.

RTC A5-20: This comment cites pages and text from the Section 106 FOE (not the LRDP as the comment states), which was circulated at the same time as the DEIS, and relates to the findings made under that law which is a separate action. However, the concern raised regarding impacts on the historic district located on adjacent NPS/GGNRA lands is similar to other comments received.

This comment has been addressed during consultation under Section 106.

See Section 3.3, “Community Services,” for a discussion of recreational impacts, including how they relate to nearby NPS lands. Existing dense vegetation and mature tree cover provide a screening effect that helps to create a sense of separation between the SFVAMC Fort Miley Campus and the surrounding parklands. To view renderings that provide an aerial view of the proposed facility massing relative to adjacent East and West Fort Miley, see the SDEIS (pp. 3.1-20 through 3.1-40).

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, including publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sited near the SFVAMC Fort Miley Campus and the GGNRA East Fort Miley boundary. The visual simulations are depicted in SDEIS Section 3.1, “Aesthetics.” Views 9 and 10 show that the LRDP would not adversely change the views from or the aesthetic character of East Fort Miley and other nearby GGNRA land. As shown in the existing views and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

Proposed Buildings 22, 23, and 24 are sited along the eastern boundary of the existing SFVAMC Fort Miley Campus, because their programmed uses are associated with the programmed use of existing buildings in this part of the Campus. The existing buildings are contributors to the NRHP-listed SFVAMC Historic District; therefore, the need to expand their program capacity is being met by constructing additional new buildings, rather than demolishing the existing buildings and constructing larger buildings along this border. Likewise, because the eastern portion of the Campus has been identified as having the highest levels of historical integrity in the SFVAMC Historic District, the new construction is sited to the rear of the historic contributing buildings to minimize the potential for adverse effects on the historic district. The proposed new construction is of similar height and scale as the existing buildings, resulting in a minimal change to the visual context of the SFVAMC Historic District. Likewise, because SFVAMC (built in the 1930s) has had a row of buildings along this border, with the rear of the buildings facing the NPS lands, the addition of buildings of similar height and massing along the same border is consistent with the visual context of NPS lands in this area for the past 80 years.

The SDEIS addresses the finding that these buildings would not result in an adverse impact on the Fort Miley Military Reservation Historic District. This includes incorporation of SFVAMC’s analysis of the cultural landscape report that NPS/GGNRA provided following publication of the DEIS. The increased density along the eastern edge of the SFVAMC Fort Miley Campus (western edge of the east portion of the Fort Miley Military Reservation Historic District) would not substantially alter any of the qualities identified in that report that qualify it for listing as an NRHP historic district.

In light of NPS’s interest in cooperation and support of a design process that respects NRHP historic districts, NPS participated as a consulting party in the development of a PA

that resolves adverse effects on historic properties that were identified and coordinated in compliance with Section 106 of the NHPA (Section 106). The PA requires that SFVAMC (1) prepare and apply historic-district design guidelines interpreting the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for the SFVAMC Historic District, and as applicable, for the Fort Miley Military Reservation Historic District; (2) prepare a historic-landscape study for the SFVAMC Historic District; (3) design and implement a public interpretation program related to SFVAMC's history; (4) prepare a historic preservation treatment and maintenance plan applicable to contributing resources in the SFVAMC Historic District; and (5) follow a process for ongoing consultation on individual LRDP projects that includes opportunities for NPS and other consulting parties to review and comment on proposed designs.

RTC A5-21: See Section 3.3, "Community Services," for a discussion of recreational impacts, including how they relate to nearby NPS lands. Existing dense vegetation and mature tree cover provide a screening effect that helps to create a sense of separation between the SFVAMC Fort Miley Campus and the surrounding parklands. To view renderings that provide an aerial view of the proposed facility massing relative to adjacent East and West Fort Miley, see the SDEIS (pp. 3.1-20 through 3.1-40).

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, with publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sited near the SFVAMC Fort Miley Campus and the GGNRA East Fort Miley boundary. The visual simulations are depicted in SDEIS Section 3.1, "Aesthetics." Views 9 and 10 show that the LRDP would not adversely change the views from or the aesthetic character of East Fort Miley and other nearby GGNRA land. As shown in the existing views and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

Proposed Buildings 22, 23, and 24 are sited along the eastern boundary of the existing SFVAMC Fort Miley Campus, because their programmed uses are associated with the programmed use of existing buildings in this part of the Campus. The existing buildings are contributors to the NRHP-listed SFVAMC Historic District; therefore, the need to expand their program capacity is being met by constructing additional new buildings, rather than demolishing the existing buildings and constructing larger buildings along this border. Likewise, because the eastern portion of the Campus has been identified as having the highest levels of historical integrity in the SFVAMC Historic District, the new construction is sited to the rear of the historic contributing buildings to minimize the potential for adverse effects on the historic district. The proposed new construction is of similar height and scale as the existing buildings, resulting in a minimal change to the visual context of the SFVAMC Historic District. Likewise, because SFVAMC (built in the 1930s) has had a row of buildings along this border, with the rear of the buildings facing the NPS lands, the

addition of buildings of similar height and massing along the same border is consistent with the visual context of NPS lands in this area for the past 80 years.

The SDEIS addresses the finding that these buildings would not result in an adverse impact on the Fort Miley Military Reservation Historic District. This includes incorporation of SFVAMC's analysis of the cultural landscape report that NPS/GGNRA provided following publication of the DEIS. The increased density along the eastern edge of the SFVAMC Fort Miley Campus (western edge of the east portion of the Fort Miley Military Reservation Historic District) would not substantially alter any of the qualities identified in that report that qualify it for listing as an NRHP historic district.

In light of NPS's interest in cooperation and support of a design process that respects NRHP historic districts, NPS participated as a consulting party in the development of a PA that resolves adverse effects on historic properties that were identified and coordinated in compliance with Section 106 of the NHPA (Section 106). The PA requires that SFVAMC (1) prepare and apply historic-district design guidelines interpreting the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for the SFVAMC Historic District, and as applicable, for the Fort Miley Military Reservation Historic District; (2) prepare a historic-landscape study for the SFVAMC Historic District; (3) design and implement a public interpretation program related to SFVAMC's history; (4) prepare a historic preservation treatment and maintenance plan applicable to contributing resources in the SFVAMC Historic District; and (5) follow a process for ongoing consultation on individual LRDP projects that includes opportunities for NPS and other consulting parties to review and comment on proposed designs.

RTC A5-22: This comment cites pages and text from the Section 106 FOE (not the LRDP), which was circulated at the same time as the DEIS and relates to the findings made under that law, which is separate from the NEPA process. However, the concern raised regarding impacts on the Fort Miley Military Reservation Historic District located on adjacent NPS/GGNRA lands is similar to other comments received. This comment was addressed during consultation under the Section 106 process.

RTC A5-23: This comment cites pages and text from the Section 106 FOE (not the LRDP), which was circulated at the same time as the DEIS, and relates to the findings made under that law, which is separate from the NEPA process. The concern raised regarding adverse effects on the SFVAMC Historic District, including cumulative effects, was addressed during consultation under the Section 106 process.

RTC A5-24: Although the periods of significance for the two historic districts overlap, their boundaries do not. Many historic districts in San Francisco share periods of significance that overlap with the years 1895 to 1950, but that does not create an association between them and the Fort Miley Military Reservation Historic District. When a historic district is documented for listing in the NRHP, federal criteria are applied, and documentation standards must be met. At the time that GGNRA prepared and submitted the application for listing the Fort Miley Military Reservation Historic District in the NRHP, GGNRA chose to draw the boundaries to exclude the SFVAMC Campus. Likewise, when VA prepared and submitted

the application for listing the SFVAMC Historic District in the NRHP, VA drew the boundaries to include only the SFVAMC Campus. These boundaries, and the NRHP's acceptance of those boundaries, reflect the fact that the significance and integrity of these two districts are separate and not historically associated to each other, at least in regard to their NRHP listings as historic districts.

See also RTCs A5-20 and A5-21 regarding a response to the effects on GGNRA lands.

In light of NPS's interest in cooperation and support of a design process that respects NRHP historic districts, NPS participated as a consulting party in the development of a PA that resolves adverse effects on historic properties that were identified and coordinated in compliance with Section 106 of the NHPA (Section 106). The PA requires that SFVAMC (1) prepare and apply historic-district design guidelines interpreting the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for the SFVAMC Historic District, and as applicable, for the Fort Miley Military Reservation Historic District; (2) prepare a historic-landscape study for the SFVAMC Historic District; (3) design and implement a public interpretation program related to SFVAMC's history; (4) prepare a historic preservation treatment and maintenance plan applicable to contributing resources in the SFVAMC Historic District; and (5) follow a process for ongoing consultation on individual LRDP projects that includes opportunities for NPS and other consulting parties to review and comment on proposed designs.

RTC A5-25: See RTCs A5-20 and A5-21 regarding a response to the aesthetic effects on GGNRA lands.

Potential changes to the shade and shadow in the East Fort Miley area were included in this evaluation. The existing tree coverage at East Fort Miley currently provides shade and shadow effects in East Fort Miley, and these trees would continue to be the primary contributor to shading in this area.

RTC A5-26: VA proposed action will not have an impact on recreational activities on GGNRA lands, including camping programs, picnic, and play areas. The California Coastal Commission (CCC) has confirmed this in their Consistency Determination, CD-0003-15, which they adopted on June 12, 2015. Recreation is addressed in Section 3.3, "Community Services." Visual simulations and depictions of the proposed building massing are included in Section 3.1, "Aesthetics." See also RTCs A5-20 and A5-21 regarding a response to the effects on GGNRA lands.

RTC A5-27: The SDEIS agrees that the Proposed Action, along with the impacts of other projects, would result in a considerable cumulative impact on the SFVAMC Historic District, as concluded on pp. 4-27 to 4-28. Section 1508.7 of the Council on Environmental Quality regulations for the implementation of NEPA defines a cumulative impact as the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. However, the SDEIS has concluded that the Proposed Action would have no impact on the Fort Miley Military Reservation Historic District, and therefore, in accordance with the Cumulative Impact

Methodology in Section 4.2.3, there would be no potential for the Proposed Action to contribute to cumulative impacts on that resource. See RTC A5-20 and RTC A5-21 regarding a response to historic districts. In addition, the Consistency Determination CD-0003-15, adopted by CCC on June 12, 2015, found the LRDP consistent with public access, recreation, and visual policies.

RTC A5-28: Vehicle parking has been, and will continue to be, reviewed as part of ongoing SFVAMC Fort Miley Campus facility management. In response to concerns raised about vehicle parking, however, a detailed parking study has been conducted for the Campus to better characterize existing parking conditions at and surrounding the site.

In particular, occupancy data for both on-street (off-Campus) and off-street (on-Campus) vehicle parking were collected in field surveys on Tuesday, September 10, 2013. Supplementary surveys of off-street parking supply and occupancy were conducted on Thursday, March 13, 2014.

On-street parking was evaluated for the adjacent neighborhood, within a six-block area bounded by Clement Street to the north, Geary Boulevard (eastbound) to the south, 39th Avenue to the east, and 45th Avenue to the west. Off-street parking was evaluated for vehicle parking areas provided on the Fort Miley Campus. Data on existing parking restrictions (e.g., street cleaning), total supply, and occupancy levels were collected for both on- and off-street parking areas. These data have been incorporated into the SDEIS, together with a more robust assessment of parking demand (and guidance on parking supply from the San Francisco Planning Code) for each phase of the LRDP. The study results are still relevant to the SDEIS.

SFVAMC recognizes that parking spillover into residential neighborhoods is an existing concern for SFVAMC Fort Miley Campus neighbors. SFVAMC constructed a new on-site structure—Building 211, the Parking and Emergency Response Structure—to help meet existing Campus parking deficiencies, and provide additional supply for future Campus facilities proposed under the LRDP. During construction of that structure, SFVAMC implemented a valet parking program to increase space efficiency in the Campus’s remaining parking areas and minimize spillover resulting from the loss of spaces in Lot J. This valet program will remain in place to make it easier for personnel to park on-site, and reduce recirculation on Campus.

As the comment references “flawed” assumptions in the Transportation Impact Study, the following discussion explains the methodology and rationale behind the travel and parking demand estimates calculated for the LRDP, and the determination of impact significance for parking effects. Specifically, the SDEIS adopts an approach that blends ITE trip generation and parking demand rates with mode share and trip distribution data from *SF Guidelines*.

The ITE maintains a database of empirical data on travel and parking demand for sites across the United States, categorized by land use. The trip generation and parking demand rates published by the ITE are considered industry-accepted sources for estimating travel

and parking demand for land use development and associated environmental review. Similarly, the *SF Guidelines* are the accepted source for empirical data on trip-making characteristics localized to the unique conditions of San Francisco—a dense, urban environment where alternative modes of travel such as transit, biking, and walking are viable options. The San Francisco Planning Department generally requires use of the *SF Guidelines* when evaluating land use development in San Francisco. Information from these two data sources is frequently blended when developing travel and parking demand estimates for land use development in San Francisco, particularly when there are unique or specialized considerations that make reliance on only one or the other data source difficult.

An approach that relies solely on trip generation and parking demand rates provided by the ITE, for example, does not account for the unique, localized trip-making characteristics found in San Francisco. In particular, the ITE demand rates are based on suburban locations where the automobile mode share is effectively 100 percent, due to segregated land use patterns and roadway designs that encourage and facilitate the use of personal automobiles, but discourage alternative modes such as transit, biking, and walking. In contrast, automobile mode shares in northwestern San Francisco are closer to 50 percent, with the remaining 50 percent spread across these alternative modes. The average occupancy of personal automobiles is also typically higher in San Francisco due to a higher trend toward carpooling and ridesharing, so that each vehicle on the road (and, consequently, each parked vehicle) ends up carrying more people per trip, on average, than the same vehicle in a suburban location. Likewise, incorporating the ITE trip generation and parking demand rates balances the empirical *SF Guidelines* mode share data to help account for the unique, localized conditions found specifically at the SFVAMC Fort Miley Campus, a relatively isolated location surrounded by a lower-density land use pattern. Thus, the travel demand methodology accounts for the “unique isolation” of the Campus in a relevant manner.

With respect to the parking demand estimates in the DEIS, however, the analysis approach adopted was extremely conservative; it did not consider the mode share effects discussed above, nor other factors that would generally reduce the expected parking demand. In particular, the SDEIS updates the methodology for calculating parking demand to arrive at a more realistic estimate, taking into account the following factors:

- The “campus” nature of the site, which provides co-located research, clinical, and educational facilities at a single campus, and reduces on-site automobile circulation. The ITE demand rates consider each land use or facility in isolation, with every facility user driving to, from, and between the facilities, and each facility providing its own parking and generating its own parking demand. In a campus environment, however, parking is typically shared among buildings, and employees and visitors can walk between the various campus buildings, so anyone driving to the campus only needs one parking space total, not one parking space at each campus building.
- Improvements in transit service along Geary Boulevard as a result of the TEP and the BRT Project, which would reduce travel times and increase incentives for using transit compared to driving. The BRT Project alone will reduce travel times by 25 percent,

improve reliability by 20 percent, and increase ridership by 10 to 20 percent for bus service along Geary Boulevard, which could feasibly increase the transit mode share at the Campus by at least 5 percent (a shift from personal automobiles to transit).

The refined estimates of parking demand for the net new development under the LRDP indicate that Alternatives 1 and 2 would generate a total demand for approximately 426 spaces when considering both short-term (Phase 1) and long-term (Phase 2) elements. The LRDP would provide 306 net new off-street parking spaces at the SFVAMC Fort Miley Campus, adding to the existing parking supply of 1,253 spaces, for a total of 1,559 parking spaces provided for employees, visitors, and patients by 2020. The resulting deficit reported in the SDEIS can then be calculated as the difference between the estimated demand (426 spaces) less the proposed net increase in parking supply at the campus (306 spaces), or 120 spaces.

As discussed in the SDEIS, however, the LRDP would provide on-site parking at higher provision ratios than currently exist on the SFVAMC Fort Miley Campus for existing uses at the site. In addition, a deficit in the LRDP's parking supply relative to the estimated parking demand, in and of itself, would not constitute a significant impact related to vehicle parking conditions.

In particular, parking conditions are not static—parking supply and demand vary from day to day, from day to night, and from month to month. The availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel.

The absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits.

In this particular case, SFVAMC Fort Miley Campus users have several options when traveling to and from the Campus by transit. Muni provides high-frequency, high-capacity bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the TEP and BRT Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private shuttle services supported by the SFVAMC and affiliate organizations (SDEIS Table 3.13-5), including the following:

- Commuter shuttles operated by contract with Bauer's Transportation, connecting to local and regional transit hubs;
- Interclinic shuttles connecting the Campus with VA clinics in Downtown San Francisco, San Bruno, and greater Northern California;
- Specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and
- Local shuttles operated jointly by SFVAMC and UCSF.

Options for automobile travel that do not require SFVAMC employees or visitors to park a vehicle at or near the Campus (such as taxis, rideshares, and private vehicle pick-up/drop-off) are also available.

Although the 120-space parking deficit referenced above could result in parking spillover into the surrounding neighborhood, it is more likely that these motorists would switch to alternative modes (such as the transit options discussed above), or make other changes in their travel and parking behavior that would reduce this shortfall in parking demand, given that the total supply of on-street parking in the areas surrounding the Campus is unlikely to change substantially in the future, and is currently at or near capacity during peak demand periods.

Furthermore, even if the secondary effects of a parking deficit—such as delays or disruptions to traffic, transit, bicycle, or pedestrian circulation—were to cause concern, the SFVAMC has additional measures at its disposal to manage parking demand and minimize these secondary effects. Valet parking, in particular, could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP (and therefore reduce the parking deficit) by increasing the space efficiency of parking facilities. For example, the existing valet parking program could be expanded to include the additional parking structures proposed to be constructed under Alternatives 1 and 2. This could increase the on-site parking capacity by as many as 150 additional spaces, thereby exceeding the estimated deficit in on-Campus parking of 120 spaces under the LRDP (the estimated demand of 426 spaces generated by the net new development, less the proposed net increase in parking supply at the Campus of 306 spaces).

Based on these considerations, the SDEIS concluded that the estimated deficit of 120 spaces would result in minor effects related to parking.

With regard to current parking spillover into the surrounding neighborhoods, existing spillover is addressed separately as part of existing parking conditions (please see SDEIS pp. 3.13-23 through 3.13-28). The SDEIS, and the NEPA environmental process as a whole, are not designed to serve as mechanisms for addressing existing concerns or issues, which should be raised separately outside of the NEPA process with the appropriate government authorities. Rather, NEPA focuses on environmental impacts of a proposed action (in this case, the LRDP), as determined by the significance of adverse changes with respect to future conditions without the proposed action.

The comment also references a “parking demand of over 700 additional vehicles on a daily basis beyond what the SFVAMC facility can accommodate,” but the source of this value is unclear. The DEIS calculates an estimated *parking demand* for 730 spaces for the net new development at the Campus proposed under the LRDP (please see DEIS p. 3.13-38). Starting with this number, the *parking deficit* may be calculated by subtracting the proposed net increase in parking supply at the Campus (263 spaces) from the estimated demand (730 spaces). The resulting on-site parking deficit for the net new development at the Campus is 467 spaces.

However, the methodology for estimating parking demand in the DEIS has since been refined for the SDEIS to more accurately characterize expected conditions in the future, as explained above. As a result, the refined estimate of the parking deficit for the net new development at buildout of the LRDP, not accounting for current and existing spillover effects, would be approximately 120 spaces (please see SDEIS p. 3.13-75).

RTC A5-29: Please see RTC A5-28 for a discussion of the ambiguity regarding the “700 parking spaces” referenced in the comment. The refined estimate of the parking deficit for the net new development at buildout of the LRDP, not accounting for current and existing spillover effects, would be approximately 120 spaces (see SDEIS p. 3.13-75).

Please also see RTC A5-28 for a discussion of the methodology behind the parking demand estimates and the determination that parking effects under the LRDP would be minor. In particular, the comment suggests a recommended parking provision ratio based on the existing parking supply and habitable building inventory at the SFVAMC Fort Miley Campus. However, this approach does not consider the variability of parking demand and other factors that would likely reduce the parking demand, as discussed in RTC A5-28.

RTC A5-30: In response to concerns raised in the comment regarding the characterization of existing parking conditions at the Campus and in the surrounding neighborhood, a detailed parking study has been conducted specifically for the SDEIS. The results of occupancy surveys of both on-street (off-Campus) and off-street (on-Campus) parking supply indicated that occupancy typically peaks during the weekday morning period, reaching an average of 87 percent in on-street parking spaces, and close to 100 percent in off-street parking areas, although additional capacity is available in valet parking in Building 212. In particular, the use of valet parking in Building 212 peaked during the midday period under 50 percent, meaning that more than 30 additional spaces are available for patient and visitor use.

RTC A5-31: Please also see RTC A5-28 for a discussion of the methodology behind the parking demand estimates and the determination that parking effects under the LRDP would be minor.

Specifically, the comment is correct that a direct application of parking-demand rates published by ITE may not represent a valid comparison for the LRDP context, given ITE’s heavy reliance on data samples comprising primarily suburban sites. However, this would not necessarily lead to a conclusion that the parking-demand calculations provided in the DEIS and SDEIS *underestimate* the actual demand that would be observed with the LRDP. Although suburban environments generally conform to lower population and employment densities, they also exhibit higher automobile dependence because of a lack of viable alternatives to driving, such as transit, walking, and biking. In San Francisco, however, these alternatives are viable choices, as reflected in the mode-share data summarized in the San Francisco Planning Department’s *SF Guidelines*, the preferred data source for localized data on trip-making characteristics.

The parking ratios and associated calculations presented in Section 2.1.2 and Section 2.2.3 of the TIS do not represent estimates of parking demand. Instead, they represent guidance from the San Francisco Planning Code regarding the provision of off-street parking spaces,

and are not specific to downtown or “commercial areas” of San Francisco. Because it is on land owned and administered by the federal government, the SFVAMC Fort Miley Campus is not subject to the provisions of the San Francisco Planning Code, but the calculations are presented in the SDEIS for guidance in assessing the adequacy of the LRDP’s proposed parking supply. It should be noted, however, that the Planning Commission frequently grants exceptions for providing less than the number of parking spaces prescribed by the Planning Code, recognizing the multimodal nature of travel in San Francisco and its “Transit First” policy.

It should be also noted that the comment is incorrect in several assertions regarding the Planning Code and its applications to the guidance for parking supply at the Campus under the LRDP. First, the comment states that the DEIS Transportation Impact Study “assumes that a high percentage of the new construction will be office space.” However, the methodology and assumptions for calculating Planning Code guidance regarding parking supply provided in Appendix D to the DEIS Transportation Impact Study do not support this statement. Specifically, under DEIS Alternative 1 in the long-term time frame (i.e., Campus buildout), only 20,450 square feet of space (approximately 9 percent) were assumed to function as office space, with 138,600 square feet assumed to function as hospital use (approximately 61 percent), and 69,900 square feet were assumed to function as research and development use (approximately 30 percent).

Second, the comment is also incorrect in assuming that the Planning Code only applies to development in downtown San Francisco—instead, the Planning Code generally applies anywhere in San Francisco, aside from a small set of special cases such as the SFVAMC Fort Miley Campus, which has unique jurisdictional considerations due to its location on federal land. The comment is also incorrect in characterizing the Planning Code parking ratio of “1,000 sq. ft. of office space” as specific to Downtown. This ratio is an older parking ratio that remains in effect in most of the outer neighborhoods of the city, including the neighborhoods surrounding the Campus. Downtown areas, including the Transbay District and Financial District, as well as many neighborhoods outside of Downtown that have undergone recent rezoning efforts, such as the Mission District and Hayes Valley, are generally subject to much stricter requirements that limit the maximum amount of off-street parking to levels far lower than what would typically be required using the cited parking ratio.

Please see RTC A5-28 for a discussion of the transit options available to SFVAMC staff, patients, and visitors when accessing the Campus. Both Muni and private shuttle services provide regional transit access to and from the Campus by connecting to regional transit hubs such as the Ferry Building, the Transbay Terminal, the Caltrain San Francisco terminal at Fourth and King Station, the Civic Center area (Bay Area Rapid Transit connection), and the Golden Gate Bridge toll plaza.

RTC A5-32: Please see RTC A5-28 for a discussion of the methodology behind the parking demand estimates and the determination that parking effects under the LRDP would be minor.

Specifically, the comment's assertion that "those who have no option but to drive to work visit the SFVAMC" must quit their job or not visit SFVAMC is speculative and does not reflect the fact that a substantial share of existing employees and visitors already use public transit to access the Campus. Whether or not employees and visitors choose to take advantage of transit and other alternative travel options that do not require parking a vehicle at the Campus is a personal travel choice determined individually, and is not an impact under NEPA.

RTC A5-33: Although San Francisco as a whole is experiencing rapid development growth, most growth is occurring or projected in redevelopment zones and community plan areas covering most of the eastern portion of the city—including the extensive Eastern Neighborhoods rezoning effort, the Market and Octavia Neighborhood Plan, the Rincon Hill Plan, the Transit Center District Plan, and the Transbay and Mission Bay redevelopment programs—and in three major redevelopment areas (Candlestick Point/Hunters Point Shipyard, Treasure Island/Yerba Buena Island, and Parkmerced). Outside of these areas, future growth is also expected to take place in Central SoMa and Mid-Market, and in large-site redevelopments such as Visitacion Valley (Schlage Lock site), Pier 70, Executive Park, public housing sites (Sunnydale–Velasco and Potrero Terrace and Annex), and unused or disused publicly owned sites such as the Balboa Reservoir site. Specifically, the San Francisco Planning Department forecasts that 80 percent of the city's expected growth will be concentrated in neighborhoods occupying just 20 percent of the land, none of which are near the Richmond District. The Planning Department is not currently undertaking any efforts to rezone or increase the density or scale of development in the neighborhoods surrounding the SFVAMC Fort Miley Campus, beyond what is already allowed by existing zoning regulations.

The population projections from these and other future developments have already been captured in the SDEIS's future-year transportation analyses through the use of growth factors derived from the San Francisco Chained Activity Modeling Process (SF-CHAMP) travel demand forecasting model maintained by the San Francisco County Transportation Authority, as discussed on SDEIS pp. 3.13-44 through 3.13-45. SF-CHAMP incorporates growth from the developments described above (estimated in the form of changes in population and employment for zones covering the entire geographical scope of the city and region, with each zone encompassing one or more city blocks), and uses a sophisticated forecasting and assignment methodology to assign future travel demand to the City's transportation network, including roadways and transit infrastructure and services. The land use projections incorporated into SF-CHAMP are maintained by the San Francisco Planning Department, which generally requires all transportation-related environmental analysis (including transportation impact studies and environmental impact reports) to make use of SF-CHAMP when forecasting future transportation conditions.

In addition to the aforementioned specific land use developments, SF-CHAMP also assumes marginal to moderate levels of growth in remaining parts of the city, including the Outer Richmond. As a result, the SDEIS's population growth rates for the Outer Richmond are appropriate and consistent with forecasts by the San Francisco Planning Department.

RTC A5-34: Please see RTC A5-28 for a discussion of the methodology behind the parking demand estimates and the determination that parking effects under the LRDP would be minor. Please also see RTC A5-28 for a discussion of existing spillover at the SFVAMC Fort Miley Campus and its relationship to the NEPA environmental review process for the LRDP.

Regarding the comment's references to cumulative parking effects, to the extent that the parking supply remains fixed both on the SFVAMC Fort Miley Campus (the Proposed Action does not propose changes to parking supply in the cumulative time frame up to 2040 that would not be included in the long-term time frame up to 2023) and off the Campus (the supply of on-street spaces is generally fixed, and there are no foreseeable plans to provide new off-street spaces located off Campus), and to the extent that these parking facilities operate at or close to capacity, then cumulative parking effects would naturally be expected to be similar to long-term parking effects. As a result, Section 5.3.5 and Section 5.4.5 of the TIS refer the reader to the discussions of parking conditions under the long-term time frame in Section 4.2.5 and Section 4.3.5, respectively.

RTC A5-35: Please see RTC A5-28 for a discussion of the methodology behind the parking demand estimates and the determination that parking effects under the LRDP would be minor. In particular, the comment does not consider the variability of parking demand, particularly with respect to mode shifts or other changes in travel and parking behavior, or the availability of strategies such as valet parking to increase parking supply at the Campus.

With regard to parking spaces along El Camino del Mar near the Legion of Honor referenced in the comment (as well as public parking in other areas outside of the Campus), these facilities are public parking on land or rights-of-way not controlled by SFVAMC, and VA has limited ability to control the use of these spaces by SFVAMC Fort Miley Campus users. SFVAMC does not have any jurisdiction over the management of these off-Campus parking areas, which are under the purview of other public agencies such as the NPS (e.g., parking near Lands End) or the SFMTA (e.g., on-street parking in the surrounding residential neighborhood). Many of the areas on NPS land are already restricted to 4-hour parking during the day to discourage long-term use (whether among Campus users or other motorists) and encourage more turnover, but these still may attract some level of use among Campus users.

RTC A5-36: Please see RTC A5-28 for a discussion of the ambiguity regarding the “700+ existing parking shortfall” referenced in the comment. Please also see RTC A5-28 for a discussion of the methodology behind the parking demand estimates and the determination that parking effects under the LRDP would be minor. In particular, the comment references the SFVAMC's Institutional Master Plan, published in 2010, when suggesting a parking provision ratio for the new development proposed under the LRDP. However, this approach does not consider the variability of parking demand and other factors that would likely reduce the parking demand, as discussed in RTC A5-28.

Specifically, although SFVAMC has the ability to increase the on-Campus parking supply to help reduce spillover effects, it cannot be expected that overall parking issues in the

areas surrounding the SFVAMC Fort Miley Campus can be substantially resolved by SFVAMC building more on-Campus parking, given the variability and dynamic (i.e., non-static) nature of parking (see SDEIS p. 3.13-64). Campus users are not the only users of these parking areas, which also accommodate parking demand generated by a variety of other users including local residents, users of express buses from outside the local area, recreational users, tourists, and visitors to the Legion of Honor. A shift of some or all of the Campus users who currently park off-Campus into on-Campus parking accommodations would free up the supply of existing off-Campus parking for these other users and could attract additional traffic and resulting parking demand. In particular, it may potentially induce other Campus users who currently choose transit, walking, bike, rideshare, or other modes that do not increase vehicular traffic or parking demand at the Campus to switch to driving, or increase the attractiveness of automobile ownership and/or use among local residents by increasing the supply of (essentially) free parking available to households.

RTC A5-37: Please see RTC A5-28 for a discussion of the methodology behind the parking demand estimates, and the determination that parking effects under the LRDP would be minor. Please also see RTC A5-28 for a discussion of existing spillover at the Campus and its relationship to the NEPA environmental review process for the LRDP.

The remainder of the comment discusses the merits and demerits of specific LRDP alternatives, but is not specifically related to the integrity of the SDEIS or its analyses. No further response is required.

RTC A5-38: This comment correctly states that VA extended the public review and comment period on the SFVAMC LRDP DEIS beyond the 60-day period to 75 days in total length. Comments were not solicited on the LRDP itself, as the LRDP is a planning document that does not require circulation to the public for comment.

RTC A5-39: The SFVAMC LRDP is indeed a living document that will continue to evolve in the future to meet the changing needs of Veterans. The planning process at a complex Campus such as the SFVAMC Fort Miley Campus is dynamic; however, the LRDP provides a framework for development. The 2010 IMP evolved into the 2012 LRDP, which was updated again in 2014, as explained further under RTC 2-3. The LRDP and its updates have been posted on SFVAMC's Web site (<http://www.sanfrancisco.va.gov/planning>) for public viewing. In addition, the LRDP SDEIS and draft FOE have been posted on SFVAMC's Web site for public review and comment. The public meeting on the SDEIS was communicated via the *Federal Register*, the *San Francisco Chronicle*, email, and a mailing to community residents approximately 1 month ahead of time. Finally, the Final EIS, which includes this response to public comments document and addresses comments received on the SDEIS, has been posted on SFVAMC's Web site. For a more detailed discussion of the NEPA process and public involvement, see Section 1.7 of the SDEIS.

The meeting dates for the NHPA Section 106 PA consulting parties were communicated to the consulting parties in advance. Meetings with consulting parties occurred on December 10, 2013, and March 13, 2014. The SFVAMC LRDP NHPA Section 106 PA was completed and fully executed on January 9, 2015.

RTC A5-40: The SFVAMC LRDP EIS focuses on the construction and operation of the future development planned for the SFVAMC Fort Miley Campus. It does not include off-site UCSF facilities or any future development at such UCSF facilities. UCSF and NCIRE, like all public entities and public individuals, have had the opportunity to comment on the SFVAMC LRDP SDEIS. In addition, UCSF and NCIRE are participating as consulting parties with regard to the NHPA Section 106 PA for the SFVAMC LRDP. There is no requirement, however, for UCSF and NCIRE to participate in the SFVAMC planning process.

RTC A5-41: The LRDP is a planning document that does not analyze environmental impacts or make significance conclusions. The LRDP SDEIS adequately analyzed all topics required under NEPA. Even with identification in the EIS of significant adverse impacts related to historic resources (despite inclusion of feasible mitigation), such identification of a significant adverse impact does not mean that the EIS cannot be finalized. The LRDP SDEIS also adequately analyzed potential cumulative impacts. The only adverse cumulative impact identified was the cumulative historic-resources impact on the SFVAMC Historic District. See SDEIS pp. 4-59 through 4-62 for a detailed discussion of this cumulative historic-resources impact.

RTC A5-42: The LRDP is a planning document that does not analyze environmental impacts or make significance conclusions. The LRDP (on p. 3-3) explicitly states that the LRDP “does not contain detailed information about infrastructure improvements; however, it is assumed that all infrastructure systems will be upgraded as needed to meet capacity requirements to serve the development program described in this plan.” One of the specific objectives of the LRDP, as described on p. 1-9 of the LRDP, is to “improve internal and external Campus circulation, utilities, and infrastructure.” In regard to the ability of providers to supply the increase in demand, or handle the increase in waste, Section 3.14, “Utilities,” of the EIS addresses that topic for water supply, wastewater, stormwater, electricity, and natural gas.

In the case of water supply, communication with SFPUC confirmed that the LRDP would not require a major expansion of the existing water utility system. In regard to wastewater, the EIS summarizes the estimated increase in wastewater generation and compares it to the overall capacity of the OSP. Short-term LRDP projects under Alternatives 1 and 2 would result in a 0.104 percent increase in dry-weather flows at the OSP, and long-term LRDP projects would result in a 0.116 percent increase in dry-weather flows. Each alternative would result in a 0.219 percent increase in dry-weather flows with achievement of the reduction target goals in the *Department of Veteran Affairs Strategic Sustainability Performance Plan*, which would not require expansion of existing water treatment facilities. As under Alternatives 1 and 2, Alternative 3 short-term projects would result in the same estimated 0.104 percent increase in dry-weather flows at the OSP; however, Alternative 3 long-term projects would be located at the potential new SFVAMC Mission Bay Campus, which sends wastewater to the Southeast Water Pollution Control Plant. LRDP projects at the potential new Campus would result in an estimated increase in dry-weather flows of 0.016 million gallons per day at the Southeast Water Pollution Control Plant. This impact was reduced to a minor level with implementation of Management

Measure HYD-1, as well as compliance with Section 438 of the EISA and Article 4.2 of the San Francisco Public Works Code.

The SDEIS states that Alternative 3 would not significantly alter land use or impervious site characteristics, and that stormwater runoff would be conveyed in a manner similar to existing conditions. The SDEIS describes that the LRDP would be designed to minimize stormwater runoff to the extent practicable, and that sustainability features would be implemented to provide for increased stormwater infiltration and treatment. With regard to electricity, the SDEIS states that the Electrical Systems Upgrades Project would accommodate the increase in electricity use, and no further system upgrades or infrastructure modifications would be necessary. For natural gas, existing infrastructure capacity is considered adequate to accommodate the anticipated demand at the potential new SFVAMC Mission Bay Campus. The SDEIS further states that if on-site improvements and connections are required, such improvements would be coordinated with Pacific Gas and Electric Company during the continued planning and design refinements of the LRDP. Only minor changes were made in the SDEIS as a result of changes to the LRDP; no changes were made to the impact findings.

RTC A5-43: The SDEIS (p. 3.3-17) states that “Access to all buildings by fire trucks and emergency vehicles would be maintained during construction.” However, the SDEIS does not include language stating that the minimum turning radius is not currently met at Buildings 16 and 42. According to the San Francisco Fire Department, in regard to access to Building 16 and 42, there are no obstructions to delay or compromise the response time of Stations 34 and 14, which are the first due engines and truck companies which will arrive on the scene. First arriving units will have immediate access to two hydrants, which will supply master streams or quick deployed attack lines. Furthermore, the SDEIS (p. 3.3-3) goes on to say that “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.” It is expected that all site improvements would meet the minimum requirements for fire access stipulated in the San Francisco Fire Code and required by the San Francisco Fire Department.

RTC A5-44: As described in the SDEIS (p. 3.3-17), “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.”

The fire sprinkler systems for individual buildings would meet the requirements in the latest edition of the National Fire Protection Association (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 buildings with sprinklers varies by the type of building construction, fire resistivity of construction materials, occupancy type, and 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.

Sufficient capacity is available in the existing SFVAMC Fort Miley Campus's existing fire flow system to meet NFPA Fire Code requirements. 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 vary depending on the specifics of each LRDP project or new building.

RTC A5-45: Assessments of transportation impacts from land use developments typically focus on conditions during the commute periods, defined as two 2-hour windows from 7:00 a.m. to 9:00 a.m. (the "weekday a.m. peak period") and from 4:00 p.m. to 6:00 p.m. (the "weekday p.m. peak period"). Some land uses exhibiting unusual trip-making characteristics such as performance or event venues are generally considered exceptions, as they may exhibit peaking at different times of the day or at different days. In general, however, the weekday a.m. and p.m. peak periods as defined above are generally considered the standard for analyzing the transportation impacts of land use developments. In the case of San Francisco, the San Francisco Planning Department generally considers the weekday p.m. peak period as the focus of any traffic-related impacts, as described in the *SF Guidelines*, which prescribe the basic methodologies for performing transportation analysis as part of environmental review of projects in the City and County of San Francisco. As a result, the TIS focuses primarily on this time period in its analysis of transportation impacts due to the LRDP.

The TEP and the *San Francisco Bicycle Plan* represent approved projects and plans. Standard practice in evaluating the transportation impacts of land use developments generally requires that approved plans or projects be incorporated into the assessment in the same way that expected growth in land uses (and associated changes such as increased residential and employment population) are incorporated into the analysis. Both of these projects have been approved and are currently under implementation.

The *Ocean Beach Master Plan*, however, was not an approved plan or project at the time work commenced on the impact analysis for this project. As a result, the analysis does not assume any potential changes to the transportation network proposed under the *Ocean Beach Master Plan*. In fact, SPUR has since shelved the proposed road diet for the Great Highway, and is no longer pursuing that component in the program of improvements proposed for implementation under the *Ocean Beach Master Plan*.

In addition, the analysis of traffic-related impacts focuses primarily on those facilities where the LRDP could potentially be expected to result in an impact. The trip distribution analysis conducted for the LRDP, however, did not indicate that a substantial share of the vehicular traffic generated by the LRDP would be expected to use the Great Highway.

The study intersections analyzed in the DEIS and SDEIS were selected because they represent the locations where the LRDP is most likely to result in traffic-related impacts when considering proximity to the project site (a project's traffic effects generally decrease

with distance as a result of dispersal), and the expected trip distribution (based on access to and connectivity with major local and regional roadways). The LRDP's effects to traffic conditions along the Great Highway, however, are expected to be relatively minor, because it does not represent a major vehicle route expected to serve new LRDP-generated traffic.

Given these considerations, it is unlikely that the magnitude of the increase in expected traffic along the Great Highway as a result of the LRDP would be sufficient enough to cause or contribute (particularly given the volume of background traffic not related to SFVAMC) to LOS-based impacts on intersection operations at any locations along the Great Highway, even assuming the proposed road diet for the Great Highway.

RTC A5-46: The comment incorrectly assumes that the affiliation of SFVAMC employees has any basis on whether the LRDP is subject to environmental review under CEQA (state and local level) or NEPA (federal level). The TIS instead describes the LRDP as a “federal action” generally not subject to local policies and guidelines, including the San Francisco Planning Code and the parking provisions for land use developments prescribed therein. The TIS elaborates, however, that guidance from the Planning Code regarding the provision of parking spaces at the SFVAMC Fort Miley Campus has been included in the analysis, recognizing that any deficit in on-Campus parking may manifest into spillover into the surrounding neighborhood.

In addition, the comment incorrectly assumes that the TIS has used the LRDP's status as a federal action as basis to overlook potential spillover effects. Instead, the approach and methodology of the TIS adopts local policies and guidelines established by the City and County of San Francisco for most of the components of the transportation analysis, including the analysis of potential parking effects of the LRDP. An approach that adopts localized standards is fairly common in the NEPA environmental review of federal projects, and reflects the fact that many of the effects of projects initiated by the federal government are distinctly felt at local, neighborhood levels. In addition, the determination of the level of significance of a given effect or impact typically requires the use of significance thresholds, which are typically established at a local level.

The methodology for assessing parking effects of the LRDP incorporates analysis guidelines and transportation policies adopted at the local level. and is therefore, fully compliant with how the LRDP would be analyzed if it were subject to State-level environmental review (i.e., CEQA) instead of NEPA, and the analysis of potential spillover effects is consistent with the approaches adopted locally by the City and County of San Francisco for CEQA-related environmental review.

Please see RTC A5-28 for a discussion of the methodology behind the parking demand estimates and the determination that parking effects, including spillover-related effects, under the LRDP would be minor. Please also see RTC A5-28 for a discussion of existing spillover at the Campus and its relationship to the NEPA environmental review process for the LRDP. Please also see RTC A5-35 for a discussion of the limited ability of SFVAMC to manage parking conditions in public parking areas outside of the Campus.

RTC A5-47: As indicated on Figure 9 and the accompanying discussion in the TIS, the section of Clement Street in question is designated as a Class III facility, typically referred to as a “bicycle route.” Class III bikeways require bicyclists to share the travel lane with motorists, and may be indicated by signage and striping (including the sharrows mentioned in the comment), although neither of these are specifically required for a bikeway to be designated as a Class III facility. The SDEIS includes expanded descriptions of the bikeway network near the project site that specifically denote the presence (or lack thereof) of signage and striping on Class III routes.

The SDEIS also addresses the impacts of heavy construction vehicles on Seal Rock Drive, and is fully compliant with the requirements of NEPA environmental review and local plans, policies, and guidelines.

Please see RTC A5-16 for a discussion of the designated haul truck routes described in Mitigation Measure TRANS-1 of the SDEIS. Clement Street is not designated on any of the identified haul truck routes.

Please see RTC A5-15 for a discussion of the temporary and adverse effects on traffic, transit, and pedestrian circulation in or near the SFVAMC Fort Miley Campus as a result of construction-related activities, and associated mitigation measures.

Please also see RTC A5-15 for a discussion of additional management measures to improve traffic (including bicycle), transit, and pedestrian circulation and safety during Campus construction.

RTC A5-48: The SDEIS addresses the impacts of heavy construction vehicles on Seal Rock Drive and is fully compliant with the requirements of NEPA environmental review and local plans, policies, and guidelines.

Please see RTC A5-16 for a discussion of the designated haul truck routes described in Mitigation Measure TRANS-1 of the SDEIS. Seal Rock Drive is not designated on any of the identified haul truck routes.

Please see RTC A5-15 for a discussion of the temporary and adverse effects on traffic, transit, and pedestrian circulation in or near the SFVAMC Fort Miley Campus as a result of construction-related activities and associated mitigation measures. Please also see RTC A5-15 for a discussion of additional management measures to improve traffic (including bicycle), transit, and pedestrian circulation and safety during Campus construction.

RTC A5-49: The following federal agencies and departments submitted comments related to transportation and parking: the U.S. Department of the Interior (Office of Environmental Policy and Compliance), NPS, and EPA. Their comments and concerns have been addressed in these responses and appropriate revisions were incorporated into the LRDP SDEIS.

In addition, the assessment of LRDP-related transportation impacts was undertaken using the standard analysis guidelines and methodologies typically adopted by the San Francisco

Planning Department and SFMTA. Although the LRDP represents a federal action and is generally not subject to local transportation policies and guidance, such policies and guidance have been assumed regardless, recognizing the context of the SFVAMC Fort Miley Campus, and historical neighborhood concerns regarding SFVAMC and its existing operations and past development plans.

Please see RTC A5-15 for a discussion of parking demand and supply during LRDP-related construction activities at the Campus, and associated mitigation measures to minimize spillover into the surrounding neighborhood.

Please also see RTC A5-16 for a discussion of the designated haul truck routes described in Mitigation Measure TRANS-1 of the SDEIS.

RTC A5-50: The evaluation of LRDP-related transportation impacts has been conducted in a manner consistent with the standard analysis guidelines and methodologies typically adopted by the San Francisco Planning Department and SFMTA, despite the fact that the LRDP represents a federal action, and therefore, is generally not subject to local transportation policies and guidance.

Recognizing the sensitivity of neighborhood concerns, however, the impact assessment has been substantially augmented by additional data collection and analysis efforts in RTCs received on the 2012 DEIS. Specifically, the following additional data collection and analysis efforts were undertaken as part of the preparation of the SDEIS:

- Supply and occupancy survey of on- and off-street parking areas and facilities
- Evaluation of NPS access to GGNRA operational facilities at East Fort Miley
- Characterization of existing transit service at the SFVAMC Fort Miley Campus
- Expanded assessment of transportation and parking impacts during construction
- Reassessment of operational parking impacts
- Characterization of existing on-Campus bicycle facilities and amenities
- Analysis of roadway segment capacity and level of service
- Analysis of transportation conditions for a revised set of horizon years

Individual(s) Written Comments

A6) Responses to Robert Hollis Comment on DEIS

RTC A6-1: The comment supports the SFVAMC LRDP. No further response is required.

A7) Responses to Jason Jungreis (1) Comments on DEIS

RTC A7-1: Thank you for your comments on the DEIS. In response to the request, SFVAMC extended the public comment period for the 2012 DEIS by 15 days, from 60 to 75 days in total length. This changed the end of the public comment period from October 16, 2012, to October 31, 2012.

RTC A7-2: SFVAMC is the only VA medical center in San Francisco and has major space and parking deficiencies at its Fort Miley Campus. As described in SDEIS Section 1.2, “Overview and Background,” SFVAMC has identified a deficiency of 589,000 square feet of building space. This amount of space is needed to serve San Francisco Bay Area and North Coast Veterans through the year 2030. VA used the following screening criteria to determine its planning and programming requirements at SFVAMC:

- Location in the City and County of San Francisco
- Location on 20 to 30 contiguous acres
- Avoidance of locations under an airport flight path due to aircraft noise issues
- Ability of VA to own the property
- Access to public transit services
- Ability to continue to provide combined clinical, research, and educational services for Veterans
- Improvement of functional relationships between facilities and programs with the right balance of building density and space allocation for programs that require interaction so that facilities and personnel can function more efficiently into the future

VA has modified SDEIS Section 2.2, “Alternatives Considered but Eliminated from Further Review,” to include these criteria as part of the first paragraph in the section.

Moving SFVAMC to the Mission Bay area of San Francisco is infeasible at this time because it would take VA many years (10+) to procure off-site land from the City and County of San Francisco. Furthermore, no other contiguous piece of land in San Francisco is available that could accommodate a new SFVAMC Campus approximately the same size as the existing SFVAMC Fort Miley Campus. The LRDP currently proposes 554,452 net new gsf, which allows VA to achieve 94 percent of its determined need of 589,000 net new gsf.

As described in SDEIS Section 1.4, “Purpose of and Need for the Proposed Action,” the mission of SFVAMC is to continue to be a major primary and tertiary care medical center providing high-quality care to eligible Veterans in the San Francisco Bay Area and North Coast. SFVAMC strives to deliver needed care to Veterans while contributing to health care knowledge through research. A discussion of the benefits of providing all medical, educational, and research services in a single location was added to SDEIS Section 1.4. Specifically, VA can better meet its mission by integrating clinical care, education, and research at one location, because such integration of facilities provides more efficient and progressive overall care for Veterans. Moving some of the facilities to a location other than the SFVAMC Fort Miley Campus would separate and change the functional relationship between building space and VA programs, which would limit VA’s ability to carry out SFVAMC’s mission.

RTC A7-3: *Item (a):* Parking conditions are not static—parking supply and demand vary from day to day, from day to night, from month to month, etc. The availability of parking spaces is not

a permanent condition, but one that changes over time as people change their modes and patterns of travel.

The absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits.

In this particular case, SFVAMC Fort Miley Campus users have several options when traveling to and from the Campus by transit. Muni provides high-frequency, high-capacity bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the TEP and BRT Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private shuttle services supported by the SFVAMC and affiliate organizations (SDEIS Table 3.13-5), including the following:

- Commuter shuttles operated by contract with Bauer's Transportation, connecting to local and regional transit hubs;
- Interclinic shuttles connecting the Campus with VA clinics in Downtown San Francisco, San Bruno, and greater Northern California;
- Specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and
- Local shuttles operated jointly by SFVAMC and UCSF.

Options for automobile travel that do not require SFVAMC employees or visitors to park a vehicle at or near the Campus (such as taxis, rideshares, and private vehicle pick-up/drop-off) are also available.

Although a deficit in the on-Campus parking supply proposed under the LRDP relative to the estimated parking demand from the net new development could result in parking spillover into the surrounding neighborhood, it is more likely that these motorists would switch to alternative modes (such as the transit options discussed above), or make other changes in their travel and parking behavior that would reduce this shortfall in parking demand, given that the total supply of on-street parking in the areas surrounding the Campus is unlikely to change substantially in the future, and is currently at or near capacity during peak demand periods.

Furthermore, even if the secondary effects of a parking deficit—such as delays or disruptions to traffic, transit, bicycle, or pedestrian circulation—were to cause concern, the SFVAMC has additional measures at its disposal to manage parking demand and minimize these secondary effects. Valet parking, in particular, could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP (and therefore reduce the parking deficit) by increasing the space efficiency of parking facilities. For example, the existing valet parking program could be expanded to include the additional parking structures proposed to be constructed under Alternatives 1 and 2. This could increase the on-site parking capacity by as many as 150 additional spaces, thereby exceeding the estimated deficit in on-Campus parking of 120 spaces under the LRDP (the estimated

demand of 426 spaces generated by the net new development, less the proposed net increase in parking supply at the Campus of 306 spaces).

Based on these considerations, the SDEIS concluded that the estimated deficit of 120 spaces would result in minor effects related to parking.

Item (b): The evaluation of the LRDP's transit impacts has been conducted according to the standard analysis guidelines and methodologies typically adopted by the San Francisco Planning Department and SFMTA. Specifically, the transit impacts for a project outside of downtown San Francisco are typically assessed through a quantitative analysis of ridership and capacity for bus lines serving the project site. This quantitative analysis was included in the SDEIS, focusing on bus services in the Geary Boulevard corridor.

Additional qualitative assessments are sometimes also conducted to determine whether a project or its design features would affect transit operations, such as by introducing potential sources of delay to transit vehicles or requiring changes to transit routes. The SDEIS includes a more detailed evaluation of these LRDP effects, but concludes that the LRDP would not result in adverse transit impacts.

Item (c): See Section 3.3, "Community Services," for a discussion of recreational impacts, including how they relate to nearby NPS lands. Existing dense vegetation and mature tree cover provide a screening effect that helps to create a sense of separation between the SFVAMC Fort Miley Campus and the surrounding parklands. To view renderings that provide an aerial view of the proposed facility massing relative to adjacent East and West Fort Miley, see the SDEIS (pp. 3.1-20 through 3.1-40).

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, including publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sited near the SFVAMC Fort Miley Campus and the GGNRA East Fort Miley boundary. Visual simulations are depicted in SDEIS Section 3.1, "Aesthetics." Views 9 and 10 show that the LRDP would not adversely change the views from or the aesthetic character of East Fort Miley and other nearby GGNRA land. As shown in the existing views and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

Proposed Buildings 22, 23, and 24 are sited along the eastern boundary of the existing Campus because their programmed uses are associated with the programmed use of existing buildings in this part of the Campus. The existing buildings are contributors to the NRHP-listed SFVAMC Historic District; therefore, the need to expand their program capacity is being met by constructing additional new buildings, rather than demolishing the existing buildings and constructing larger buildings along this border. Likewise, because the eastern portion of the SFVAMC Fort Miley Campus has been identified as having the highest levels of historical integrity in the SFVAMC Historic District, the new construction

is sited to the rear of the historic contributing buildings to minimize the potential for adverse effects on the historic district. The proposed new construction is of similar height and scale as the existing buildings, resulting in a minimal change to the visual context of the SFVAMC Historic District. Likewise, because SFVAMC (built in the 1930s) has had a row of buildings along this border, with the rear of the buildings facing the NPS lands, the addition of buildings of similar height and massing along the same border is consistent with the visual context of NPS lands in this area for the past 80 years.

The SDEIS addresses the finding that these buildings would not result in an adverse impact on the Fort Miley Military Reservation Historic District. This includes incorporation of SFVAMC's analysis of the cultural landscape report that NPS/GGNRA provided following publication of the DEIS. The increased density along the eastern edge of the SFVAMC Fort Miley Campus (western edge of the east portion of the Fort Miley Military Reservation Historic District) would not substantially alter any of the qualities identified in that report that qualify it for listing as an NRHP historic district.

Although there are no height limitations on the SFVAMC Campus and the City and County of San Francisco height limitations do not apply to this federal land, VA has not proposed any buildings for the SFVAMC Fort Miley Campus that would be greater in height than the current tallest building on the Campus. See LRDP Chapter 3 for tables indicating the height of each proposed new building.

A8) Responses to Jason Jungreis (2) Comments on DEIS

RTC A8-1: VA appreciates your comments on the DEIS. The LRDP is a planning document that does not analyze environmental impacts or make significance conclusions. The LRDP SDEIS adequately analyzed all topics required under NEPA. Even with identification in the EIS of significant adverse impacts related to historic resources (despite inclusion of feasible mitigation), such identification of a significant adverse impact does not mean that the EIS cannot be finalized. The SDEIS analyzed the fully developed short-term (Phase 1) projects under Alternatives 1, 2, and 3.

The EIS analyzed the long-term space at a programmatic level. Because VA has not yet acquired or identified a specific site in the Mission Bay area that could be transferred into federal ownership for development of a proposed new Campus under Alternative 3, additional supplemental NEPA analysis may need to be conducted to fully assess future site-specific environmental impacts in the Mission Bay area.

RTC A8-2: The comment disagrees with the stated SFVAMC mission, planning direction, and use of funding discussed in the DEIS, which remains unchanged in the SDEIS. SFVAMC is the only VA medical center in San Francisco and has major space and parking deficiencies at its Fort Miley Campus. As described in SDEIS Section 1.2, "Overview and Background," SFVAMC has identified a deficiency of 589,000 square feet of building space. This amount of space is needed to serve San Francisco Bay Area and North Coast Veterans through the year 2030. VA used the following screening criteria to determine its planning and programming requirements at SFVAMC:

- Location in the City and County of San Francisco
- Location on 20 to 30 contiguous acres
- Avoidance of locations under an airport flight path due to aircraft noise issues
- Ability of VA to own the property
- Access to public transit services
- Ability to continue to provide combined clinical, research, and educational services for Veterans
- Improvement of functional relationships between facilities and programs with the right balance of building density and space allocation for programs that require interaction so that facilities and personnel can function more efficiently into the future

SDEIS Section 2.2, “Alternatives Considered but Eliminated from Further Review,” was previously modified to include these criteria as part of the first paragraph in the section.

Moving SFVAMC to the Mission Bay area of San Francisco is infeasible at this time because it would take VA many years (10+) to procure off-site land from the City and County of San Francisco. Furthermore, no other contiguous piece of land in San Francisco is available that could accommodate a new SFVAMC Campus approximately the same size as the existing Fort Miley Campus. The LRDP currently proposes 554,452 net new gsf, which allows VA to achieve 94 percent of its determined need of 589,000 net new gsf.

As described in SDEIS Section 1.4, “Purpose of and Need for the Proposed Action,” the mission of SFVAMC is to continue to be a major primary and tertiary care medical center providing high-quality care to eligible Veterans in the San Francisco Bay Area and North Coast. SFVAMC strives to deliver needed care to Veterans while contributing to health care knowledge through research. A discussion of the benefits of providing all medical, educational, and research services in a single location was previously added to SDEIS Section 1.4. Specifically, VA can better meet its mission by integrating clinical care, education, and research at one location, because such integration of facilities provides more efficient and progressive overall care for Veterans. Moving some of the facilities to a location other than the SFVAMC Fort Miley Campus would separate and change the functional relationship between building space and VA programs, which would limit VA’s ability to carry out SFVAMC’s mission.

The LRDP EIS has adequately analyzed all topics required in accordance with NEPA guidance.

A9) Responses to Anne Sun/Bill Kaktis Comments on DEIS

RTC A9-1: Thank you for your comments on the DEIS. The LRDP is a planning document that does not analyze environmental impacts or make significance conclusions. The potential environmental impacts of activities related to implementing the LRDP are included in the EIS. The LRDP DEIS and SDEIS are posted on SFVAMC’s Web site; please see

<http://www.sanfrancisco.va.gov/planning>. Public review and comment periods have been allotted for all SFVAMC LRDP environmental documents in accordance with NEPA.

- RTC A9-2:** The LRDP is a planning document that does not analyze environmental impacts or make significance conclusions. As described on p. 3-2 of the 2014 LRDP and on p. 2-5 of the SDEIS, all new development would be designed to achieve Leadership in Energy and Environmental Design (i.e., LEED) Silver certification, and would implement the *Department of Veteran Affairs Strategic Sustainability Performance Plan*. This plan identifies VA's sustainability goals, and defines policy and strategy for achieving these goals.
- RTC A9-3:** The LRDP is a planning document that does not analyze environmental impacts or make significance conclusions. The latest version of the LRDP, the 2014 LRDP, has a date on its document cover indicating when it was completed. The LRDP is posted on SFVAMC's Web site; please see <http://www.sanfrancisco.va.gov/planning>. In addition, a new section, Section 1.6.1, "Master Planning at the SFVAMC Fort Miley Campus," was previously added to SDEIS Chapter 1.0. This new section describes how VA compiled an IMP in 2010, the IMP evolved into the LRDP in 2012, and the LRDP was updated in 2014.
- RTC A9-4:** This comment is related to the LRDP rather than the LRDP EIS. The LRDP is a planning document that does not analyze environmental impacts or make significance conclusions. The SFVAMC Director is informed of the contents of the LRDP, and as a key leader of the SFVAMC Campus, the Director agrees with the development plan represented in the LRDP.
- RTC A9-5:** The LRDP is a planning document for VA's SFVAMC, and not GGNRA land, which is owned and operated by NPS. The LRDP does not analyze environmental impacts or make significance conclusions. As described on p. 1-8 of the LRDP, SFVAMC prepared an EIS that evaluates the potential environmental impacts associated with implementing the LRDP, in compliance with NEPA.
- RTC A9-6:** Section 1.5, "Location and Setting of Existing SFVAMC Fort Miley Campus," of the LRDP SDEIS describes the proximity of the SFVAMC Fort Miley Campus to nearby residences in the Outer Richmond neighborhood. Section 3.3, "Community Services," of the LRDP SDEIS discusses the proximity of the SFVAMC Fort Miley Campus to public or otherwise open spaces within 0.5 mile of the Campus, including both the GGNRA parcels and Lincoln Park (inclusive of both the golf course and the Legion of Honor). Lafayette Elementary School is approximately 0.45 mile southeast of the SFVAMC Fort Miley Campus. The term "protected habitat" is not a standardized land use term, and cannot be addressed directly. GGNRA manages "habitat" areas near the Campus, and applies a certain level of management "protection" to these parcels, balancing many different considerations and interests. The proximity of the GGNRA parcels is described in Section 3.3.

Although the LRDP does not specifically describe the distances to major faults, Figure 3.6-1 in the LRDP SDEIS illustrates the major faults and earthquake epicenters in

the San Francisco Bay Area. In addition, the SDEIS (Table 3.6-1 on p. 3.6-4) lists the distances of the following faults from the existing SFVAMC Fort Miley Campus, and their estimated maximum moment magnitudes: the San Andreas, San Gregorio, Hayward, Point Reyes, Rodgers Creek, Calaveras, and other active and potentially active faults in the region (within 100 kilometers). The San Andreas Fault lies approximately 5.6 kilometers (3.5 miles) southwest of the existing SFVAMC Fort Miley Campus at its closest point. The Hayward Fault lies approximately 23.8 kilometers (14.8 miles) northeast of the existing Campus at its closest point.

RTC A9-7: This comment is related to the LRDP and not the LRDP EIS. See Section 3.3, “Community Services,” for a discussion of recreational impacts, including how they relate to nearby NPS lands. Existing dense vegetation and mature tree cover provide a screening effect that helps to create a sense of separation between the SFVAMC Fort Miley Campus and the surrounding parklands. To view renderings that provide an aerial view of the proposed facility massing relative to adjacent East and West Fort Miley, see the SDEIS (pp. 3.1-20 through 3.1-40).

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, including publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sited near the SFVAMC Fort Miley Campus and the Golden Gate National Recreation Area (GGNRA) East Fort Miley boundary. Visual simulation are depicted Section 3.1, “Aesthetics.” Views 9 and 10 show that the LRDP would not adversely change the views from or the aesthetic character of East Fort Miley and other nearby GGNRA land. As shown in the existing views and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

RTC A9-8: This comment is related to the LRDP and not the LRDP EIS. See Section 3.14, “Utilities,” of the LRDP SDEIS for a NEPA discussion and analysis related to utilities.

RTC A9-9: Section 3.12, “Solid and Hazardous Materials and Hazards,” of the LRDP EIS references both the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA) and Resource Conservation and Recovery Act of 1976 (RCRA), and describes sources of hazardous materials in the SFVAMC Fort Miley Campus vicinity. The results of CERCLA and RCRA database searches are presented in Table 3.12-1 of the DEIS. Of these database listings, two incidents involved the accidental release or exposure of hazardous materials. The first incident, which occurred in 1994, was caused by the structural failure of an underground leaking diesel tank on the Campus. An investigation of the underground leaking tank was performed, and no remedial action was taken. The second incident, which occurred in 2007, discovered sludge containing polychlorinated biphenyls (PCBs) from an unknown source approximately 12 to 15 feet below ground between Buildings 2 and 200 of the SFVAMC Fort Miley Campus during drilling operations. SFVAMC, working in close

coordination with EPA Region 9, performed extensive corrective actions and cleanup to the maximum extent practicable to protect human health and the environment. After 1,688 tons of PCB-contaminated soil were excavated, and approximately 11 tons of wall coating and concrete-wall paint wastes were generated from the concrete-wall mitigation, the case was closed. These incidents are discussed further on p. 3.12-5 of the DEIS.

An Environmental Data Resources, Inc. (EDR) report discussed on p. 3.12-3 of the DEIS and included in DEIS Appendix D, “EDR DataMap Environmental Atlas for the Existing SFVAMC Campus,” provides information on the project site and nearby properties obtained from federal, State, regional, and local regulatory databases. The impact discussion of hazardous materials generated by the proposed project begins on p. 3.12-12 of the DEIS, and states that all hazardous materials would be stored, used, transported, and disposed of 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. In addition, coverage under the Statewide National Pollutant Discharge Elimination System (NPDES) Construction General Permit, including preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), would be required for the Proposed Action. In the case of Alternative 3, long-term projects at the potential new SFVAMC Mission Bay Campus, if a SWPPP is not required by the San Francisco Bay Regional Water Quality Control Board because of the project’s location in the combined sewer system, an erosion and sediment control plan (ESCP) would be required to satisfy SFPUC requirements for construction-related stormwater management, and would include BMPs. The impact of hazardous materials generated by the LRDP is considered to be minor, primarily because the LRDP would comply with existing regulations, which are summarized on pp. 3.12-8 through 3.12-10 of the DEIS. Because the impact was considered to be minor, it was determined that no mitigation would be required.

RTC A9-10: The parking demand estimates have been prepared based on demand rates published by ITE in *Parking Generation*, adjusted for localized, empirical mode share data published by the San Francisco Planning Department. *Parking Generation* is the industry-accepted source for land use–based parking demand rates, and the data sample comprises suburban sites surveyed on typical weekdays. ITE provides supplementary parking data for some land uses under “atypical” conditions, such as for shopping centers during December; however, it does not provide such data for the uses proposed by the LRDP. In particular, the uses proposed under the LRDP would be expected to exhibit mostly consistent demand across weekdays. Although there may be some minor variations from one day to another, such variation would be expected to be within the acceptable margin of error of technical analysis, especially given that the ITE sample sizes generally comprise anywhere from tens to hundreds of sites, depending on the land use in question.

In addition, parking conditions are not static—parking supply and demand vary from day to day, from day to night, from month to month, etc. The availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel.

The absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits.

In this particular case, SFVAMC Fort Miley Campus users have several options when traveling to and from the Campus by transit. Muni provides high-frequency, high-capacity bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the TEP and BRT Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private transit (shuttle) services (SDEIS Table 3.13-5), including the following:

- Commuter shuttles operated by contract with Bauer's Transportation, connecting to local and regional transit hubs;
- Interclinic shuttles connecting the SFVAMC Fort Miley Campus with VA clinics in Downtown San Francisco, San Bruno, and greater Northern California;
- Specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and
- Local shuttles operated jointly by SFVAMC and UCSF.

Options for automobile travel that do not require SFVAMC employees or visitors to park a vehicle at or near the SFVAMC Fort Miley Campus (such as taxis, rideshares, and private vehicle pick-up/drop-off) are also available.

Although a deficit in the on-Campus parking supply proposed under the LRDP relative to the estimated parking demand from the net new development could result in parking spillover into the surrounding neighborhood, it is more likely that these motorists would switch to alternative modes (such as the transit options discussed above), or make other changes in their travel and parking behavior that would reduce this shortfall in parking demand, given that the total supply of on-street parking in the areas surrounding the Campus is unlikely to change substantially in the future, and is currently at or near capacity during peak demand periods.

Furthermore, even if the secondary effects of a parking deficit—such as delays or disruptions to traffic, transit, bicycle, or pedestrian circulation—were to cause concern, the SFVAMC has additional measures at its disposal to manage parking demand and minimize these secondary effects. Valet parking, in particular, could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP (and therefore reduce the parking deficit) by increasing the space efficiency of parking facilities. For example, the existing valet parking program could be expanded to include the additional parking structures proposed to be constructed under Alternatives 1 and 2. This could increase the on-site parking capacity by as many as 150 additional spaces, thereby exceeding the estimated deficit in on-Campus parking of 120 spaces under the LRDP (the estimated demand of 426 spaces generated by the net new development, less the proposed net increase in parking supply at the Campus of 306 spaces).

Based on these considerations, the SDEIS concluded that the estimated deficit of 120 spaces would result in minor effects related to parking.

It should also be noted that some variation in mode split and parking demand can be expected as a result of the availability of parking at and around the SFVAMC Fort Miley Campus. In particular, the absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits (see SDEIS p. 3.13-64).

On-street parking is not controlled by SFVAMC, which has limited ability to control the use of these spaces by Campus users. SFVAMC does not have any jurisdiction over the management of these off-Campus parking areas, which are under the purview of other public agencies such as the NPS (e.g., parking near Lands End) or the SFMTA (e.g., on-street parking in the surrounding residential neighborhood). Many of the areas on NPS land are already restricted to 4-hour parking during the day to discourage long-term use (whether among Campus users or other motorists), and encourage more turnover but still attract some level of use among Campus users.

With regard to the “space and population projection” requested by the comment, parking demand is typically estimated using dependent variables such as square footage of a given land use or the number of residential units. This is a standard approach used for any number of transportation-related analyses, including the estimation of a project’s travel demand and the calculation of San Francisco Planning Code guidance regarding the supply of off-street parking spaces.

Building 211 (Parking and Emergency Response Structure) would provide additional on-Campus parking capacity to alleviate future temporary reductions in SFVAMC Fort Miley Campus parking supply as subsequent elements of the LRDP enter the construction phase. This building has recently been completed and is now in operation. It should be noted that although Building 211 was included in the LRDP, which represents a long-term vision and framework for the future of the Campus, SFVAMC ultimately decided to pursue a separate environmental review process for Building 211, publishing a Finding of No Significant Impact (FONSI) on May 24, 2011, and an amended FONSI on December 29, 2012. Therefore, the environmental review of Building 211 was no longer subject to the environmental review process for the larger LRDP, and construction commenced and was completed independent of the progress on the LRDP.

RTC A9-11: As described in the DEIS, the analysis of traffic impacts evaluates quantitative changes to average delay at the following five study intersections:

1. 34th Avenue/Clement Street
2. 42nd Avenue/Clement Street
3. 43rd Avenue/Clement Street
4. 42nd Avenue/Point Lobos Avenue

5. 43rd Avenue/Point Lobos Avenue

These intersections were selected because they represent the locations where the LRDP is most likely to result in traffic-related impacts when considering proximity to the project site (a project's traffic effects generally decrease with distance as a result of dispersal) and the expected trip distribution (based on access to and connectivity with major local and regional roadways). For roads mentioned in the comment and not analyzed in the EIS, the LRDP's effects are expected to be relatively minor, because these do not represent major vehicle routes expected to serve new LRDP-generated traffic.

In RTCs and concerns raised in the DEIS, an additional analysis of roadway segment capacity was conducted for 42nd Avenue and 43rd Avenue between Clement Street and Point Lobos Avenue.

Regarding traffic projections, the analysis of intersection and roadway segment operations includes an evaluation of potential future impacts. In particular, the 2012 DEIS examined conditions for the short-term (2015), long-term (2023), and cumulative (2035) time frames, which have since been revised to 2020, 2027, and 2040, respectively, in the SDEIS.

Existing data sources such as previously completed studies are typically reviewed before and during the start of a transportation analysis to ensure consistency. A survey of recently completed transportation studies did not find any relevant data localized to the campus or the surrounding neighborhood in the immediate vicinity of the SFVAMC Fort Miley Campus.

Please see RTC A9-10 for a discussion of the methodology behind the parking demand estimates and the determination that parking effects under the LRDP would be minor.

Please also see RTC A-910 for a discussion of strategies such as valet parking that can readily increase the on-Campus parking capacity to address any potential secondary effects related to parking.

RTC A9-12: Detailed construction plans will be prepared as each element of the LRDP enters the construction phase.

SFVAMC recognizes local concerns regarding construction activities and has notified contractors in the past about the need to be responsible members of the community to ensure good standing with neighbors. SFVAMC recognizes that some issues remain and VA is continuing to work diligently with contractors to encourage and enforce compliance among the construction workforce.

With regard to impacts and mitigation measures, the SDEIS identifies an LRDP impact related to haul truck traffic generated by construction-related activities at the SFVAMC Fort Miley Campus, which could result in temporary but significant impacts related to traffic and transportation, vehicle parking, air quality, noise, vibration, and visual resources and aesthetics at or in the immediate vicinity of the Campus. To mitigate this impact, the

EIS explains that VA is required to use only identified haul truck routes, monitor truck arrivals, and implement queue abatement programs.

The evaluation of LRDP construction impacts from the DEIS has been augmented in the SDEIS with estimates of parking demand and (on-Campus) supply by phase, which have been prepared as part of the construction traffic and parking management plan for the LRDP. Based on these estimates, on-site parking capacity at the SFVAMC Fort Miley Campus would likely be sufficient to accommodate the temporary increase in parking demand generated by construction-related activities.

Nevertheless, SFVAMC understands the sensitivity of parking concerns among residents of the surrounding neighborhood and NPS, and is committed to regularly reviewing parking conditions at and surrounding the SFVAMC Fort Miley Campus. This regular review process is not necessarily part of the LRDP, but instead is part of SFVAMC's facility management duties at the Campus. In recognition of the potential for construction-related activities to affect parking conditions, the SDEIS includes Mitigation Measure TRANS-2, which requires SFVAMC to conduct supplemental surveys of parking occupancy, and to implement programs to prevent parking spillover during construction. This includes SFVAMC coordination with construction contractors as construction plans for specific LRDP projects are developed, to determine whether construction-related activities would result in parking deficits, and whether temporary mitigation measures or strategies would need to be implemented.

If a major parking deficit on the Campus is identified, SFVAMC would be required to ensure that the spillover parking demand into the surrounding neighborhood (i.e., outside of the Campus, including NPS-owned parking areas) would not increase beyond current conditions. Potential strategies to achieve this goal may include expanding the Campus's valet program, and requiring general contractors to establish carpool/vanpool programs, encourage transit use, optimize staging-area needs, and coordinate vendor arrival schedules.

Lastly, the SDEIS identifies temporary and adverse effects on traffic, transit, and pedestrian circulation in or near the Campus as a result of construction-related activities. To mitigate these effects, SFVAMC would implement protective measures to ensure the safety of bicyclists and pedestrians and minimize disruptions.

The following management measures were also previously included in the SDEIS to improve conditions:

- Management Measure TRANS-1, "Implement Protective Measures for Traffic, Transit, and Pedestrians if Pedestrian Facilities or Travel Lanes Require Closure during Construction"
- Management Measure TRANS-2, "Implement Protective Measures for Traffic, Transit, and Pedestrians during the Presence of Temporary Modular Structures on Campus"

- Management Measure TRANS-3, “Implement Protective Measures for Traffic, Transit, and Pedestrians during Overlapping Construction Projects Located Close to Each Other on Campus”

Any changes within right-of-way owned and maintained by the City and County of San Francisco would be cleared through the SFMTA Interdepartmental Staff Committee on Traffic and Transportation. SFVAMC would also adhere to *The Blue Book*, and would reimburse SFMTA for the costs of installation and removal of any temporary striping and signage changes required during project construction.

RTC A9-13: The SDEIS includes a description of BAAQMD’s Basic Construction Mitigation Measures that all projects must implement regardless of the level of emissions. As indicated in the SDEIS, the LRDP would comply with VA Specification Section 01568, “Environmental Protection,” and Section 015719, “Temporary Environmental Controls,” which would include all feasible noise mitigation measures. Furthermore, the LRDP-specified noise mitigation measures include construction noise monitoring at both on-site and off-site affected locations.

RTC A9-14: Lighting proposed as part of the LRDP would be directed downward onto SFVAMC property and would not spill over onto GGNRA land. In addition, the visual simulations show that the LRDP would not adversely change the views from and the aesthetic character of East Fort Miley and other nearby GGNRA land.

RTC A9-15: Section 3.6, “Geology and Soils,” in the DEIS includes the following references (p. 3.6-15) for soil investigations that were used as part of the EIS analysis:

- ENGEO. 2008 (May 27). *Geotechnical Exploration: Veterans Administration Medical Center Building 22*.
- Treadwell & Rollo. 2010. *Geotechnical Investigation; VMU Replacement and Expansion Project, San Francisco VA Medical Center (SFVAMC)*. San Francisco, California.

The comment also requests that investigations of the former landslide area along El Camino del Mar be referenced. The following references are from the final environmental assessment and RTC document for the SFVAMC North Slope Seismic/Geologic Stabilization Project, No. 662-609.

- Fugro West. 2007. *Preliminary Geotechnical Investigation, North Slope Seismic/Geologic Stabilization, San Francisco Veterans Administration Medical Center*.
- Fugro West. 2008 (November). *Geotechnical Investigation Comprehensive Slope Evaluation, San Francisco Veterans Administration Medical Center*.
- Fugro West. 2009 (November). *Alternatives Evaluation, North Slope Seismic/Geologic Stabilization, San Francisco Veterans Administration Medical Center*.

- Fugro West. 2010 (March). *Geologic and Geotechnical Investigation, North Slope Seismic/Geologic Stabilization, San Francisco Veterans Administration Medical Center.*

RTC A9-16: As shown in DEIS Figure 1-3, the SFVAMC Fort Miley Campus encompasses 29 acres, including part of the northern slope area. As described on p. 3.6-15 of the SDEIS, there are two mapped landslide scarps to the north of the Campus, and another previous landslide area on the northern slope of the Campus; however, both are outside the proposed development footprint. Major and minor landslides, as well as surface slumping, have historically occurred on the slope below the northern portion of the SFVAMC Fort Miley Campus as a result of high rainfall, seismic movement, and land erosion. VA recently completed a land stabilization plan in that area, referred to as the North Slope Seismic/Geologic Stabilization Project, to structurally stabilize the northern slope of the Campus; however, development was not considered for this area, given its risk of slope failure and landslides from seismic activity or unusually wet weather conditions.

RTC A9-17: As described on p. 1-6 in Section 1.4, “Purpose of and Need for the Proposed Action,” of the DEIS, one of the specific objectives of the Proposed Action is: “Retrofit existing buildings to the most recent seismic safety requirements to meet current VA seismic design requirements (VA Directive H-18-8), in compliance with Executive Order 12941.” Table 2-1 (on pp. 2-6 and 2-7), Table 2-3 (on pp. 2-15 and 2-16), and Table 2-4 (on p. 2-20) of the SDEIS indicate which buildings at the SFVAMC Fort Miley Campus would be seismically retrofitted as part of the Proposed Action and Alternative 2.

A background survey was performed to study the need to perform seismic upgrades to SFVAMC Fort Miley Campus structures; specifically, Buildings 1, 6, 8, and 12 (VA, 2001a, 2001b, 2001c, and 2001d). Finally, VA must comply with its Seismic Safety of VHA Directive 2005-019.

RTC A9-18: This comment is related to the LRDP rather than the LRDP EIS. However, Section 3.14, “Utilities,” of the DEIS discusses both the regional and local affected environment (Section 3.14.1) when it comes to utilities, including water supply, wastewater, stormwater, electricity, and natural gas infrastructure and existing use.

As described on p. 3.8-17 of the SDEIS, the short-term LRDP projects would add approximately 0.69 acre of impervious surface, a 4 percent increase in impervious area compared to the existing condition. Page 3.8-21 of the SDEIS states that long-term LRDP projects would add 0 acres of impervious surface, because this phase would only involve the replacement of an existing building. Stormwater design for the LRDP would be required to maintain the site’s predevelopment stormwater discharge rates and volumes by using design techniques that infiltrate, filter, store, evaporate, and detain runoff to comply with Section 438 of the EISA. Compliance with Article 4.2 of the San Francisco Public Works Code, which requires submittal of a stormwater control plan that meets SFPUC guidelines, also would be required for the LRDP. As described in the SDEIS, the area of the Campus in the separate sewer areas, including the northern slopes of the Campus, would be required to capture and treat the rainfall from a design storm of 0.75 inch.

Management Measure HYD-1, provided on SDEIS p. 3.8-18, requires SFVAMC to submit final drainage plans to SFPUC for all phases of construction, demonstrating that off-site upgradient runoff would be conveyed through the project site, and that LRDP-related on-site runoff would be appropriately contained to reduce flooding impacts. The conveyance amounts associated with the LRDP have not yet been determined. The system capacity of the separate storm drain system that drains areas to the north of the SFVAMC Fort Miley Campus would be determined as part of a hydrologic and hydraulic analysis of stormwater flows during project design. Drainage and storm sewer systems would be designed in accordance with VA's Site Utility Design Manual, which requires that a hydrologic assessment be conducted for the 2-, 5-, 10-, 50- and 100-year storm events, and that the system be sized for a minimum 10-year, 1-hour storm event.

As described in the final environmental assessment and RTC document completed for the North Slope Seismic/Geologic Stabilization Project and dated November 9, 2010, the potential impacts of discharging stormwater onto the northern slope were evaluated in geotechnical investigations performed for that project. The recommendations were incorporated into the design of the outfalls to reduce the potential for slope failure on both VA and NPS properties. A long-term monitoring and maintenance plan has been put into effect to maintain the drainage system in good repair so that it is effective in controlling localized erosion. The monitoring and maintenance plan is intended to identify any local erosion at an early stage so that repairs can be initiated before it becomes a significant problem.

As described in the SDEIS on p. 3.8-19, with implementation of Management Measure HYD-1, the LRDP would not increase the risk of flooding either on the SFVAMC Fort Miley Campus, or downgradient on NPS properties. Therefore, VA does not consider evaluating an alternative means of stormwater disposal to be necessary. In addition, the North Slope Seismic/Geologic Stabilization Project was implemented in 2011 to reduce the potential for slope failure, and a long-term monitoring and maintenance plan has been put into effect to maintain the drainage system in good repair so that it is effective in controlling localized erosion. As requested by the comment, additional discussion has been added to the "Affected Environment" and "Environmental Consequences" discussions to describe stormwater in the northern slope area.

Text was previously added in SDEIS Section 3.8.1, "Affected Environment," under "Local Hydrologic Features," "Existing SFVAMC Fort Miley Campus":

Major and minor landslides and surface slumping have historically occurred on the slope below the northern portion of the SFVAMC Fort Miley Campus as a result of high rainfall, seismic movement, and land erosion. The North Slope Seismic/Geologic Stabilization Project recently completed at the Campus included replacement of the storm drain system that discharges stormwater onto the northern slope.

The impacts of discharging stormwater onto the northern slope were included in geotechnical investigations performed for the North Slope Seismic/Geologic Stabilization Project, and the recommendations were incorporated into the design of the

outfalls to reduce the potential for slope failure on both the VA and NPS properties (VA, 2010a). Storm drain improvements as part of this project included replacement of the existing catch basins, manholes, and storm drain piping to the northern slope, which were old and damaged. The new pipelines were placed above ground to allow monitoring for potential damage or movement of the pipe over time and to facilitate maintenance. The pipelines discharge to energy dissipaters that reduce the erosional forces of the water. The energy dissipaters consist of rock riprap embedded in concrete, underlain by overlapping sheets of a puncture-resistant vapor barrier. The project also reduced the slope gradient, which reduced slide potential and eliminated areas where water previously ponded. Two retaining walls were installed as part of the project; native shrubs and trees were planted below the retaining walls after construction. A long-term monitoring and maintenance plan has been put into effect to maintain the drainage system in good repair so that it is effective in controlling localized erosion (VA, 2010a). The management measure states the following (VA, 2010a:27):

A long-term monitoring and maintenance program shall be established for continued stormwater discharge to the northern slope. The program shall include periodic monitoring and maintenance of the aboveground stormwater outfall pipes for movement and damage, as well as the discharge areas for erosion.

Text was previously added in SDEIS Section 3.8.3, “Environmental Consequences,” under “Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative,” “Short-Term Projects,” “Operation,” “Downstream Flooding or Increase in the Frequency or Severity of Combined Sewer Overflow Events as a Result of Altered Drainage Patterns or an Increase in Impervious Surfaces”:

The area of the project site located in the separate sewer areas would be required to capture and treat the rainfall from a design storm of 0.75 inch. Stormwater that drains to the northern slope would be conveyed via surface piping that was constructed as part of the North Slope Seismic/Geologic Stabilization Project (completed in 2011). As part of that project, discharge points were armored and constructed to spread out the flows and dissipate energy, reducing erosion risk. Discharge piping is surface-mounted, and was designed to remain effective under minor slope movements. The project also regraded a large portion of the slope, eliminating areas where water previously ponded.

This text includes a summary of the improvements that were made to the northern slope as part of the North Slope Seismic/Geologic Stabilization Project, as well as the long-term monitoring and maintenance plan for that area. A discussion of hazardous materials can be found in Section 3.12, “Solid and Hazardous Materials,” of the SDEIS.

One of the specific objectives of the LRDP, as described on SDEIS p. 1-7, is to improve internal and external SFVAMC Fort Miley Campus circulation, utilities, and infrastructure. The LRDP assumed that all infrastructure systems would be upgraded as needed to meet capacity requirements to serve the development program described in this plan.

RTC A9-19: There would be no temporary employee housing. No temporary or long-term housing is proposed as part of the LRDP.

RTC A9-20: SFVAMC is the only VA medical center in San Francisco, and has major space and parking deficiencies at its Fort Miley Campus. As described in SDEIS Section 1.2, “Overview and Background,” SFVAMC has identified a deficiency of 589,000 square feet of building space. This amount of space is needed to serve San Francisco Bay Area and North Coast Veterans through the year 2030. VA used the following screening criteria to determine its planning and programming requirements at SFVAMC:

- Location in the City and County of San Francisco
- Location on 20 to 30 contiguous acres
- Avoidance of locations under an airport flight path due to aircraft noise issues
- Ability of VA to own the property
- Access to public transit services
- Ability to continue to provide combined clinical, research, and educational services for Veterans
- Improvement of functional relationships between facilities and programs with the right balance of building density and space allocation for programs that require interaction so that facilities and personnel can function more efficiently into the future

VA has modified SDEIS Section 2.2, “Alternatives Considered but Eliminated from Further Review,” to include these criteria as part of the first paragraph in the section.

Moving SFVAMC to the Mission Bay area of San Francisco is infeasible at this time because it would take VA many years (10+) to procure off-site land from the City and County of San Francisco. Furthermore, no other contiguous piece of land in San Francisco is available that could accommodate a new SFVAMC Campus approximately the same size as the existing Fort Miley Campus. The LRDP currently proposes 554,452 net new gsf, which allows VA to achieve 94 percent of its determined need of 589,000 net new gsf.

As described in SDEIS Section 1.4, “Purpose of and Need for the Proposed Action,” the mission of SFVAMC is to continue to be a major primary and tertiary care medical center providing high-quality care to eligible Veterans in the San Francisco Bay Area and North Coast. SFVAMC strives to deliver needed care to Veterans while contributing to health care knowledge through research. A discussion of the benefits of providing all medical, educational, and research services in a single location has been added to SDEIS Section 1.4. Specifically, VA can better meet its mission by integrating clinical care, education, and research at one location, because such integration of facilities provides more efficient and progressive overall care for Veterans. Moving some of the facilities to a location other than the SFVAMC Fort Miley Campus would separate and change the

functional relationship between building space and VA programs, which would limit VA's ability to carry out SFVAMC's mission.

RTC A9-21: Only under Alternatives 1 and 2 is any new development (specifically in the form of a 170,000-gross-square-foot additional clinical building) envisioned for the SFVAMC Fort Miley Campus beyond 2023. Under Alternatives 1 and 2, this building would be constructed approximately during the years 2024 through 2026.

RTC A9-22: See SDEIS Section 1.7 for a detailed account of the public meetings held with regard to the NEPA process. The notice of intent to prepare an EIS and DEIS public meetings are the only public meetings required by the NEPA process. VA has made itself available to discuss questions and concerns raised by agencies or the public related to SFVAMC. VA staff members conduct meetings with the local community, Veterans groups, volunteer organizations, congressional staffers, and other community representatives and stakeholders, including NPS/GGNRA, to discuss issues related to SFVAMC on a periodic basis.

RTC A9-23: The comment requests that each acronym be spelled out. The EIS spells out each acronym or other abbreviation the first time it is used in the document or document chapter/section. In addition, a list of acronyms and other abbreviations is included starting on p. ix of the SDEIS. Therefore, the requested change has not been made.

RTC A9-24: With the implementation of changes to the internal roadway network proposed under the LRDP, Muni buses departing the SFVAMC Fort Miley Campus would no longer loop around via Fort Miley Circle and Veterans Drive to exit via 43rd Avenue. Instead, buses would loop around the Patient Welcome Center traffic circle, exiting via 42nd Avenue. Muni buses would not use the portions of the perimeter roadway (Veterans Drive) along the northern or eastern edges of the Campus.

Large delivery trucks already use portions of the perimeter roadway to service building loading docks, including the Canteen (Building 7). The LRDP does not propose specific changes to Campus access for freight loading and service/delivery vehicles, although minor changes to site circulation may affect how trucks and other service/delivery vehicles access specific facilities on the site. Because the EIS represents a programmatic-level environmental review, design and evaluation of loading-dock access at specific buildings to accommodate large vehicles would be conducted as each element of the LRDP enters the design phase and project-level environmental review.

RTC A9-25: Please see the preceding response (RTC A9-24) regarding changes to the Campus's internal roadway network and resulting changes to circulation through the SFVAMC Fort Miley Campus for Muni buses serving the Campus directly (i.e., the "Fort Miley" branch of the 38 Geary).

In particular, these buses would continue to terminate in approximately the same location, and there would be no new stops in portions of the Campus not currently served by these buses. The reroute may require eliminating the inbound stop at 43rd Avenue/Clement

Street, although this stop is not located in the Campus, and is not any closer to Campus facilities than the proposed Patient Welcome Center. Therefore, the scope of the route changes proposed is minor and would likely not affect—positively or negatively—the choice of Campus transit users with respect to taking 38 Geary buses serving the Campus directly, versus 38 Geary and 38L Geary Limited buses serving Lands End and Point Lobos Avenue/48th Avenue (and walking north to the Campus).

RTC A9-26: A discussion of the impacts on trees and species in the SFVAMC Fort Miley Campus is provided in Section 3.15, “Wildlife and Habitat,” [Section 3.15.3] of the LRDP SDEIS. This analysis discusses multiple scenarios of the plan: long-term and short-term effects, as well as construction and operational effects.

As described in the SDEIS on p. 3.6-15, there are two mapped landslide scarps to the north of the SFVAMC Fort Miley Campus, and another previous landslide area on the northern slope of the Campus; however, the mapped landslides are outside the proposed development footprint. The existing SFVAMC Fort Miley Campus is not in a designated landslide hazard zone, and slope failures would not be anticipated to result from LRDP operation.

As described in the SDEIS on p. 3.6-14, construction of LRDP project components would involve site grading and preparation, which would disturb exposed subsurface soils, including fill and underlying native soils. Erosion resulting from stormwater runoff could occur during construction, although most loosened and eroded soil would remain in the excavation pits. The SDEIS states that coverage under the NPDES Construction General Permit for stormwater discharges associated with construction activities (Order 2009-0009-DWQ, as amended by Orders 2010-0014-DWQ and 2012-0006-DWQ) would be required for implementation of the LRDP in the separate-sewer area of San Francisco. An SWPPP with specific erosion-control BMPs would be prepared and implemented. Project sites that disturb 1 acre or more and drain to the combined sewer-stormwater system must comply with SFPUC’s Construction Site Runoff Control Program, which requires the submittal of an ESCP and implementation of BMPs to prevent illicit discharges into the combined sewer systems. Development and implementation of a SWPPP or ESCP would reduce the potential for erosion and sedimentation during construction.

In the case of Alternative 3, the potential new SFVAMC Mission Bay Campus would be developed in an area that is relatively flat, with no slopes that are susceptible to landslides or other types of failure. However, the design and construction of the proposed facilities would address the potential for seismically induced ground failure through engineering and design recommendations for the proposed facilities. In addition, a geotechnical contractor would review the LRDP plans and specifications before construction to check their conformance with the recommendations of the geotechnical reports.

RTC A9-27: Although there are no height limitations on the SFVAMC Campus, and City and County of San Francisco height limitations do not apply to this federal land, VA has not proposed any buildings for the SFVAMC Fort Miley Campus that would be greater in height than the

current tallest building on the Campus. See LRDP Chapter 3 for tables indicating the height of each proposed new building.

RTC A9-28: See EIS Chapter 2.0, “Alternatives,” specifically SDEIS Tables 2-1 and 2-3 and Figures 2-1 and 2-3, for a description of permanent removal of structures. See also the text on SDEIS p. 2-8 for a discussion of temporary modular swing space.

RTC A9-29: See EIS Chapter 2.0, “Alternatives,” specifically the text on SDEIS p. 2-5, for a discussion of how new development and seismic retrofits would occur according to VA seismic design requirements (VA Directive H-18-8), in compliance with Executive Order 12941. EIS Table 2-2 indicates which buildings would be seismically retrofitted.

RTC A9-30: See the new Figure 1-1 included in SDEIS Chapter 1.0, “Introduction,” which indicates the location of SFVAMC and other VA facilities in the region.

RTC A9-31: Information regarding the expected use of SFVAMC Fort Miley Campus parking facilities by Campus user type is provided in Table 3 of the Transportation Impact Study for the LRDP (SDEIS Appendix E), but has been reproduced below for convenience.

Facility	Configuration	Existing ⁽¹⁾		Future ⁽²⁾	
		Function/ User	Capacity (spaces)	Function/ User	Capacity (spaces)
Building 209	Structure	Employee/ Visitor	422	Employee	588
Building 211	Structure	<i>Under construction</i>		Employee	461
Building 212	Structure	Patient	160	Patient/Visitor	160
Lot B	Surface lot	Patient/Visitor	102	Patient/Visitor	102
Lot C	Surface lot	Employee	13	Employee	13
Lot D	Surface lot	GSA/ Employee	142	Employee	122
Lot E	Surface lot	Patient	23	<i>Eliminated</i>	
Lot F	Surface lot	Employee	2	Employee	2
Lot G	Surface lot	Employee	87	Employee	87
Lot H	Surface lot	Patient/Visitor	17	<i>Eliminated</i>	
Lot J	Surface lot	Employee	270	Employee	24
Lot K	Surface lot	Employee	7	<i>Eliminated</i>	
Lot L	Surface lot	Employee	8	<i>Eliminated</i>	
Total			1,253		1,559

Notes:

GSA = General Services Administration.

⁽¹⁾ “Existing” reflects status as of 2012.

⁽²⁾ Future parking inventory reflects approximate numbers.

Transit stops (for Muni buses and shuttles) and pick-up/drop-off locations, as well as freight loading (i.e., delivery truck) and emergency vehicle (i.e., ambulance and fire)

access, are conceptually depicted on Figure 3 of the Transportation Impact Study for the LRDP (SDEIS Appendix E). The effects of these changes are discussed on SDEIS pp. 3.13-61 through 3.13-62 (public transit and shuttles), on SDEIS p. 3.13-63 (freight loading), and SDEIS p. 3.13-64 (emergency vehicles).

Please see RTC A9-24 for a discussion of site circulation and access for Muni buses and freight loading and service/delivery vehicles.

The SDEIS discusses emergency-vehicle access in greater detail, including both fire response at the SFVAMC Fort Miley Campus, and emergency ambulances delivering patients to the Campus (SFVAMC provides only limited emergency medical services). Patients being transported by ambulance are typically delivered to the western side (“D” Wing) of Building 200. Although the LRDP would redirect all ambulances to the 43rd Avenue entrance, no other specific changes to ambulance access or provisions are proposed.

The space required for emergency vehicles depends on the vehicle type. Ambulances have relatively similar dimensions and turning radii to personal automobiles and other common vehicle types such as vans and light trucks (e.g., “pick-ups”). Fire response vehicles are larger, but their dimensions and turning radii are similar to buses or single-unit delivery trucks (for fire engines) or standard tractor-semitrailer combination trucks such as the American Association of State Highway Transportation Officials WB-40 and WB-50 (for fire trucks, i.e., “ladder trucks”).

RTC A9-32: In the past, SFVAMC has worked with NPS to provide overflow parking in various NPS-owned parking areas near Lands End (including at the parking lot along El Camino del Mar adjacent to the *USS San Francisco* Memorial; along the western side of El Camino del Mar north of Point Lobos Avenue; and in the Merrie Way surface lot serving Lands End Lookout and the Sutro Baths) during SFVAMC Fort Miley Campus construction activities. In August 2010, SFVAMC coordinated with NPS to use 120 parking spaces across these parking areas for a period of 18 months. These spaces were signed specifically for use by SFVAMC staff and patients. Because of the distance and elevation difference between these NPS-owned parking areas and the Campus, SFVAMC provided a shuttle service to connect these areas with the Campus, operating every 15 minutes during the peak periods (8 a.m. to 9:30 a.m. and 4 p.m. to 6 p.m.) and every 30 minutes during the midday period (9:30 a.m. to 4 p.m.). Based on shuttle ridership, SFVAMC estimates that occupancy of these spaces peaked at approximately 95 percent (i.e., effectively fully occupied). To control parking in areas not designated for SFVAMC use, the NPS posted 4-hour parking limit signs approximately 1 year into the agreement.

SFVAMC signed a separate, subsequent 2-year agreement with NPS in June 2013 to use 150 parking spaces across NPS parking areas near the *USS San Francisco* Memorial and at Merrie Way, with SFVAMC paying for use of these spaces. Similar to the 2010 arrangement, SFVAMC operated shuttles every 15 minutes during the morning and late afternoon, and 30 minutes during the midday. Both SFVAMC police and NPS monitored and patrolled these parking areas, and SFVAMC estimates that occupancy of these spaces

peaked at approximately 75 percent on Mondays and Fridays, and approximately 90 percent on Tuesdays, Wednesdays, and Thursdays, based on shuttle use and staff monitoring. Use during off-peak months (November and December) was lower because of staff vacations during the holiday season.

These spaces are intended for recreational users and are underused during most of the work week. SFVAMC negotiates agreements with NPS to use these spaces on a temporary basis from time to time, to offset the temporary loss in on-Campus parking supply as a result of construction-related activities. Such provisions were in effect in early 2011 as part of the North Slope Stabilization Project and during construction of Building 212 (parking structure for patients and visitors), which necessitated the closure of the former Parking Lot A, portions of Veterans Drive, and associated parking areas between Building 6 and Building 7.

Visual observations indicate that these VA-designated spaces are generally well-used; however, parking in these areas is provided only through agreements negotiated with NPS as needed to accommodate past and ongoing construction at the Campus, and is not necessarily available to SFVAMC on a long-term or permanent basis. Furthermore, SFVAMC has no intention to make use of NPS lands as a permanent solution for Campus parking needs. With the completion of Building 212 and pending completion of Building 211, the need for overflow parking on NPS-owned lands will be greatly diminished.

Nevertheless, SFVAMC understands the sensitivity of parking concerns among residents of the surrounding neighborhood and NPS, and is committed to regularly reviewing parking conditions at and surrounding the Campus. This regular review process is not necessarily part of the LRDP but instead part of SFVAMC's facility management duties at the Campus. In recognition of the potential for construction-related activities to affect parking conditions, the SDEIS includes Mitigation Measure TRANS-2, which requires SFVAMC to conduct supplemental surveys of parking occupancy, and to implement programs to prevent parking spillover during construction. This includes SFVAMC coordination with construction contractors as construction plans for specific LRDP projects are developed, to determine whether construction-related activities would result in parking deficits, and whether temporary mitigation measures or strategies would need to be implemented.

Please see RTC A9-10 for a discussion of the methodology behind the parking demand estimates and the determination that parking effects, including spillover-related effects, under the LRDP would be minor. Please also see RTC A9-10 for a discussion of the limited ability of SFVAMC to manage parking conditions in public parking areas outside of the SFVAMC Fort Miley Campus.

With regard to current parking spillover into the surrounding neighborhoods, existing spillover is addressed separately as part of existing parking conditions (please see SDEIS pp. 3.13-23 through 3.13-28). The SDEIS, and the NEPA environmental process as a whole, are not designed to serve as mechanisms for addressing existing concerns or issues, which should be raised separately outside of the NEPA process with the appropriate

government authorities. Rather, NEPA focuses on environmental impacts of a proposed action (in this case, the LRDP), as determined by the significance of adverse changes with respect to future conditions without the proposed action.

All SFVAMC shuttle services would serve the SFVAMC Fort Miley Campus directly, and no stops would be relocated off-Campus, either to streets surrounding the Campus or to Campus overflow parking areas (with the exception of parking shuttles that are specifically designed to connect overflow parking areas with the Campus).

Please see RTC A9-12 for a discussion of parking demand and supply during LRDP-related construction activities at the Campus, and associated mitigation measures to minimize spillover into the surrounding neighborhood.

RTC A9-33: SFVAMC and the transportation consultant preparing the EIS are not privy to comments submitted to SFMTA by passengers or others regarding service complaints or recommendations. Enhancements to Muni service in the Geary Boulevard corridor, including the TEP and BRT Project, are discussed on SDEIS pp. 3.13-46 through 3.13-48. Also see SDEIS pp. 3.13-15 through 3.13-16 for a detailed characterization of the additional private transit (i.e., shuttle) options available to Campus users.

RTC A9-34: SFVAMC and the transportation consultant preparing the EIS are not privy to petitions submitted to SFMTA by residents or others regarding on-street parking management tools and the implementation of a Residential Parking Permit (RPP) program for the neighborhood.

RTC A9-35: SFVAMC and the transportation consultant preparing the EIS are not privy to petitions submitted to SFMTA or the San Francisco Department of Public Works (DPW) by residents or others regarding construction of new Americans with Disabilities Act-compliant curb ramps. However, both ambulatory and disabled patients are provided with a wide variety of options that do not require walking between the Campus and the surrounding off-Campus area in order to meet their transportation needs. In particular, pick-up and drop-off areas for private vehicles, taxis, public transit, and private transit (i.e., shuttles) are already provided directly on the Campus, and these amenities will be enhanced with implementation of the LRDP and the creation of a new passenger loading circle and Patient Welcome Center (see SDEIS p. 2-18). ADA parking is currently provided in Lot B at the SFVAMC Fort Miley Campus, and will continue to be provided at the Campus, in compliance with the ADA.

RTC A9-36: As discussed in Section 3.3, “Community Services,” of the SDEIS, 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). 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.

As indicated on p. 2-10 of the SDEIS, as part of the Patient Welcome Center drop-off area, circulation in the SFVAMC Fort Miley Campus would be altered slightly to include a roundabout near the entrance of Clement Street and 42nd Avenue. 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 through the 43rd Avenue entrance and proceed to the new Ambulatory Care Center.

Therefore, VA being compliant with all seismic safety guidelines, including fire department access and earthquake evacuation routes, is also imposed under California State law.

RTC A9-37: The SDEIS includes detailed routes to and from the SFVAMC Fort Miley Campus from points north, south, and east of the Campus for haul truck traffic generated by construction-related activities. Mitigation Measure TRANS-1 of the SDEIS identifies an LRDP impact related to haul truck traffic at the Campus, along with an associated mitigation measure that requires SFVAMC to use only identified haul truck routes and to monitor truck arrivals and implement queue abatement programs.

Specifically, haul trucks would use major freeways (e.g., U.S. Highway 101, Interstate 280) and local arterials (e.g., 19th Avenue/Crossover Drive/Park Presidio Boulevard, Van Ness Avenue) identified in the *San Francisco Truck Traffic Routes* map published by SFMTA when traveling between the SFVAMC Fort Miley Campus and regional origins or destinations. Locally, trucks would use Geary Boulevard and Point Lobos Avenue, entering and exiting the Campus via the two existing access points at 42nd Avenue and 43rd Avenue. These routes are described in detail in the SDEIS. El Camino del Mar, Seal Rock Drive, Clement Street, and other streets near the Campus that are designated as bikeways are not identified on any of the identified haul truck routes. The SDEIS identifies temporary and adverse effects on traffic (including bicycles), transit, and pedestrian circulation in or near the Campus as a result of construction-related activities. To mitigate these effects, SFVAMC would implement protective measures to ensure the safety of bicyclists and pedestrians and minimize disruptions.

The following management measures have also been included in the SDEIS to improve conditions:

- Management Measure TRANS-1, “Implement Protective Measures for Traffic, Transit, and Pedestrians if Pedestrian Facilities or Travel Lanes Require Closure during Construction”
- Management Measure TRANS-2, “Implement Protective Measures for Traffic, Transit, and Pedestrians during the Presence of Temporary Modular Structures on Campus”

- Management Measure TRANS-3, “Implement Protective Measures for Traffic, Transit, and Pedestrians during Overlapping Construction Projects Located Close to Each Other on Campus”

Any changes in right-of-way owned and maintained by the City and County of San Francisco would be cleared through the SFMTA Interdepartmental Staff Committee on Traffic and Transportation. SFVAMC would also adhere to *The Blue Book*, and would reimburse SFMTA for the costs of installation and removal of any temporary striping and signage changes required during project construction.

RTC A9-38: All personnel and equipment would be removed from buildings before demolition and construction. It is not necessary for VA to disclose the internal contents of its SFVAMC structures for purposes of the EIS.

RTC A9-39: SFVAMC and the transportation consultant preparing the EIS are not privy to petitions submitted to the City and County of San Francisco, SFMTA, DPW, or other City agencies by residents or others regarding traffic safety improvements at intersections near the SFVAMC Fort Miley Campus. All intersections in the immediate vicinity of the Campus (at Clement Street, Point Lobos Avenue, and Geary Boulevard) are controlled by all-way stop signs, so that both north-south and east-west traffic flows are subject to stop control.

The decision to install traffic signals is based on engineering judgment and a comprehensive analysis of collision history, peak-hour and daily traffic volume variation, and other factors. Proposals to install signalized controls or implement other traffic safety improvements at intersections based on existing concerns can be raised separately with SFMTA independent of the NEPA process.

A10) Responses to Anonymous Neighbor Comment on DEIS

RTC A10-1: Thank you for your comments on the DEIS. This comment does not appear to address the integrity of the DEIS, but discusses elements (i.e., parking) under the scope of the LRDP and the associated long-range planning efforts being undertaken by SFVAMC. Although no response is required, the following response is provided to address the concerns raised by the comment.

Parking conditions are not static—parking supply and demand vary from day to day, from day to night, from month to month, etc. The availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel.

The absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits.

In this particular case, SFVAMC Fort Miley Campus users have several options when traveling to and from the Campus by transit. Muni provides high-frequency, high-capacity

bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the TEP and BRT Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private shuttle services supported by the SFVAMC and affiliate organizations (SDEIS Table 3.13-5), including the following:

- Commuter shuttles operated by contract with Bauer's Transportation, connecting to local and regional transit hubs;
- Interclinic shuttles connecting the Campus with VA clinics in Downtown San Francisco, San Bruno, and greater Northern California;
- Specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and
- Local shuttles operated jointly by SFVAMC and UCSF.

Alternative options for automobile travel that do not require SFVAMC employees or visitors to physically park a vehicle at or near the Campus (such as taxis, rideshares, and private vehicle pick-up/drop-off) are also available.

Although a deficit in the on-Campus parking supply proposed under the LRDP relative to the estimated parking demand from the net new development could result in parking spillover into the surrounding neighborhood, it is more likely that these motorists would switch to alternative modes (such as the transit options discussed above), or make other changes in their travel and parking behavior that would reduce this shortfall in parking demand, given that the total supply of on-street parking in the areas surrounding the Campus is unlikely to change substantially in the future, and is currently at or near capacity during peak demand periods.

Furthermore, even if the secondary effects of a parking deficit—such as delays or disruptions to traffic, transit, bicycle, or pedestrian circulation—were to cause concern, the SFVAMC has additional measures at its disposal to manage parking demand and minimize these secondary effects. Valet parking, in particular, could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP (and therefore reduce the parking deficit) by increasing the space efficiency of parking facilities. For example, the existing valet parking program could be expanded to include the additional parking structures proposed to be constructed under Alternatives 1 and 2. This could increase the on-site parking capacity by as many as 150 additional spaces, thereby exceeding the estimated deficit in on-Campus parking of 120 spaces under the LRDP (the estimated demand of 426 spaces generated by the net new development, less the proposed net increase in parking supply at the Campus of 306 spaces).

Based on these considerations, the SDEIS concluded that the estimated deficit of 120 spaces would result in minor effects related to parking.

It should also be noted that some variation in mode split and parking demand can be expected as a result of the availability of parking at and around the SFVAMC Fort Miley

Campus. In particular, the absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits (see SDEIS p. 3.13-64).

On-street parking is not controlled by SFVAMC, which has limited ability to control the use of these spaces by SFVAMC Fort Miley Campus users. SFVAMC does not have any jurisdiction over the management of these off-Campus parking areas, which are under the purview of other public agencies such as the NPS (e.g., parking near Lands End) or the SFMTA (e.g., on-street parking in the surrounding residential neighborhood). Many of the areas on NPS land are already restricted to 4-hour parking during the day to discourage long-term use (whether among Campus users or other motorists) and encourage more turnover, but still attract some level of use among Campus users.

Specifically, although SFVAMC has the ability to increase the on-Campus parking supply to help reduce spillover effects, it cannot be expected that overall parking issues in the areas surrounding the Campus can be substantially resolved by SFVAMC building more on-Campus parking, given the variability and dynamic (i.e., non-static) nature of parking (see SDEIS p. 3.13-64). SFVAMC Fort Miley Campus users are not the only users of these parking areas, which also accommodate parking demand generated by a variety of other users including local residents, users of express buses from outside the local area, recreational users, tourists, and visitors to the Legion of Honor. A shift of some or all of the Campus users who currently park off-Campus into on-Campus parking accommodations would free up the supply of existing off-Campus parking for these other users, and could attract additional traffic and resulting parking demand. In particular, it may potentially induce other Campus users who currently choose transit, walking, bike, rideshare, or other modes that do not increase vehicular traffic or parking demand at the Campus to switch to driving, or increase the attractiveness of automobile ownership and/or use among local residents by increasing the supply of (essentially) free parking available to households.

With regard to driveway access for local residents, field observations conducted during parking surveys in the neighborhood surrounding the SFVAMC Fort Miley Campus confirmed that access into and out of driveways is maintained despite existing curb conditions and demand for on-street parking. Although vehicles parked in on-street spaces were generally observed to occupy the entire curb length permitted for off-street parking, they did not intrude into the roadway space adjacent to curb cuts provided for local access.

With regard to parking conditions during street cleaning periods, DPW's street sweeping schedule for Clement Street in the immediate vicinity of the Campus between 39th Avenue and 45th Avenue restricts parking along the northern side on the second and fourth Thursdays of each month between 12:00 p.m. and 2:00 p.m.; and along the southern side on the second and fourth Tuesdays of each month between 10:00 a.m. and 12:00 p.m. Sweeping activities along the intermediate side streets (39th Avenue through 45th Avenue) between Clement Street and Point Lobos Avenue take place during the second and fourth

Wednesdays or Fridays each month (depending on street side), between 12:00 p.m. and 2:00 p.m. or between 1:00 p.m. and 3:00 p.m. Therefore, in this area, there are only a total of 8 days each month during which DPW conducts street sweeping, for which only a fraction (approximately a quarter) of the street sides in the area are affected on any one day, for a total duration of 2 hours during the midday period. Given these considerations, street sweeping is generally an infrequent event, outside the typical range of parking conditions expected on a given day. Transportation-related environmental review conducted in the City and County of San Francisco does not typically consider specialized effects associated with street sweeping restrictions, and any such effects would generally be considered a temporary condition, and not representative of a typical baseline condition against which project impacts can be reasonably evaluated.

The comment's assertion regarding the "tremendous burden for employees who live in areas that do not allow them to go to work using public transit" is a subjective value statement that is not supported with evidence ("tremendous burden") and based on speculation (that all SFVAMC employees live in areas not served by transit). In particular, the comment wholly dismisses the range of public transit options available for commuting to and from the Campus, and does not reflect the fact that a substantial share of existing employees and visitors already use transit to access the Campus (see SDEIS p. 3.13-16). As discussed in the preceding paragraphs, the SFVAMC Fort Miley Campus is served by several transit options, including both Muni and private shuttle services.

Petition (P) Written Comments

A11) Responses to Change.org Comments on DEIS

Thank you for your comments, VA appreciates your input. Responses to individual comment are provided below.

RTC A11-1: Thank you for your comments on the DEIS. The LRDP EIS analyzed all topics required under NEPA. With implementation of mitigation measures included in the SDEIS, no significant adverse impacts related to adjacent NPS land and neighborhood were identified.

RTC A11-2: The LRDP EIS analyzed all topics required under NEPA. With implementation of mitigation measures included in the SDEIS, no significant adverse impacts related to adjacent NPS land and neighborhood were identified.

RTC A11-3: The air quality and greenhouse gas analyses evaluated the mobile-source emissions associated with patients, employees, and delivery vehicles coming to and leaving the project site against the applicable thresholds of significance. The noise analysis evaluated the potential noise impacts of construction activities. In addition, all construction activities would comply with the City and County of San Francisco ordinances for hours of potential construction.

The LRDP development process evaluated multiple potential sites, and the current location was determined to be the most feasible. With the increasing population near the project site, future residents can be served by the selected project site.

RTC A11-4: The portion of the comment related to ability to navigate VA's health care appointment system is not related to the SFVAMC LRDP EIS or its analyses. The LRDP SDEIS analyzed all topics required to be analyzed under NEPA. With implementation of mitigation measures included in the EIS, no significant adverse impacts related to adjacent NPS land or the surrounding neighborhood were identified.

RTC A11-5: Thank you for your comment. VA is required to follow BMPs, and has included mitigation to address construction.

RTC A11-6: See Section 3.3, "Community Services," for a discussion of recreational impacts, including how they relate to nearby NPS lands. Existing dense vegetation and mature tree cover provide a screening effect that helps to create a sense of separation between the SFVAMC Fort Miley Campus and the surrounding parklands. To view renderings that provide an aerial view of the proposed facility massing relative to adjacent East and West Fort Miley, see the SDEIS (pp. 3.1-20 through 3.1-40).

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, including publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sited near the SFVAMC Fort Miley Campus and the GGNRA East Fort Miley boundary. The visual simulations are depicted in SDEIS Section 3.1, "Aesthetics." Views 9 and 10 show that the LRDP would not adversely change the views from or the aesthetic character of East Fort Miley and other nearby GGNRA land. As shown in the existing views and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

Potential changes to the shade and shadow in the East Fort Miley area were included in this evaluation. The existing tree coverage at East Fort Miley currently provides shade and shadow effects in East Fort Miley, and these trees would continue to be the primary contributor to shading in this area.

RTC A11-7: Comment noted. VA strives to maintain their SFVAMC Fort Miley Campus with respect to the surrounding natural beauty. The VA Campus has been in place since 1934, when the residential neighborhood was being established.

RTC A11-8: Comment noted; VA strives to maintain their SFVAMC Fort Miley Campus with respect to the surrounding natural beauty and has been in operation as a medical facility since 1934. The Campus is mostly developed, thus, implementation of the LRDP would not result in the destruction of San Francisco's existing natural habitats, including those located on adjacent parcels managed by NPS or the San Francisco Department of Parks and Recreation.

RTC A11-9: The LRDP does not propose any development outside of the SFVAMC Fort Miley Campus, including at Lands End. See RTC A11-6 regarding visual impacts. In addition, the

Consistency Determination CD-0003-15, adopted by CCC on June 12, 2015, found the LRDP consistent with public access, recreation, and visual policies.

Verbal Comments Received at Public Meeting on DEIS

VA appreciates the time and input provided by participants who came to the Public Meeting on the DEIS. Responses to comments made during the DEIS Public Meeting are provided below.

Responses to Julie Burns Comments Received at DEIS Public Meeting

RTC PM1-1: In response to the request, SFVAMC extended the public comment period for the 2012 DEIS by 15 days, from 60 to 75 days in total length. This changed the end of the public comment period from October 16, 2012, to October 31, 2012.

Responses to David Burns Comments Received at DEIS Public Meeting

RTC PM1-2: In response to the request, SFVAMC extended the public comment period for the 2012 DEIS by 15 days, from 60 to 75 days in total length. This changed the end of the public comment period from October 16, 2012, to October 31, 2012.

Responses to Dick Belloni Comments Received at DEIS Public Meeting

RTC PM1-3: In response to the request, SFVAMC extended the public comment period for the 2012 DEIS by 15 days, from 60 to 75 days in total length. This changed the end of the public comment period from October 16, 2012, to October 31, 2012.

Responses to Alexandra Crichlow Comments Received at DEIS Public Meeting

RTC PM1-4: The comment supports the proposed VA LRDP. No further response is required.

Responses to Brian Avila Comments Received at DEIS Public Meeting

RTC PM1-5: The LRDP DEIS and SDEIS analyzed all topics required to be analyzed under NEPA. With implementation of mitigation measures included in the EIS, no significant adverse impacts related to adjacent NPS land or the surrounding neighborhood were identified.

Responses to Eddie Ramirez Comments Received at DEIS Public Meeting

RTC PM1-6: The comment supports the proposed VA LRDP. No further response is required.

Responses to Amy Meyer Comments Received at DEIS Public Meeting

RTC PM1-7: In response to the request, SFVAMC extended the public comment period for the 2012 DEIS by 15 days, from 60 to 75 days in total length. This changed the end of the public comment period from October 16, 2012, to October 31, 2012.

Responses to Freddie Hahne Comments Received at DEIS Public Meeting

RTC PM1-8: The updated noise analysis in the SDEIS includes the construction-related noise levels at the off-site noise sensitive receptors, including the residence at the intersection of 43rd Avenue and Clement Street. The nearest on-site construction activities would be at the new Patient Welcome Center and Drop-Off Area, which is approximately 175 feet from the residence at 43rd Avenue and Clement Street. The estimated maximum construction noise level at this off-site receptor would be 73.6 dBA L_{eq} , which would be about 12 dBA above the measured daytime ambient noise level of 61.8 dBA L_{eq} . The construction noise would exceed the significance threshold of 66.8 dBA L_{eq} (ambient plus 5 dBA) by 7 dBA before mitigation. Construction noise from other LRDP project components would be lowered because of the additional distance attenuation and noise insertion loss provided by the existing on-site building structures. Implementation of Mitigation Measure NOI-1 would reduce the construction-related noise impacts by a minimum of 10 dBA and impacts would be minor.

Responses to Jason Jungreis Comments Received at DEIS Public Meeting

RTC PM1-9: In response to the request, SFVAMC extended the public comment period for the 2012 DEIS by 15 days, from 60 to 75 days in total length. This changed the end of the public comment period from October 16, 2012, to October 31, 2012.

See SDEIS Chapter 2.0 for further explanation of the SFVAMC LRDP's goals and objectives. The purpose or mission of SFVAMC is determined by VA separate from the LRDP and EIS documents.

Parking conditions are not static—parking supply and demand vary from day to day, from day to night, from month to month, etc. The availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel.

The absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits.

In this particular case, SFVAMC Fort Miley Campus users have several options when traveling to and from the Campus by transit. Muni provides high-frequency, high-capacity bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the TEP and BRT Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private shuttle services supported by the SFVAMC and affiliate organizations (SDEIS Table 3.13-5), including the following:

- Commuter shuttles operated by contract with Bauer's Transportation, connecting to local and regional transit hubs;
- Interclinic shuttles connecting the Campus with VA clinics in Downtown San Francisco, San Bruno, and greater Northern California;

- Specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and
- Local shuttles operated jointly by SFVAMC and UCSF.

Alternative options for automobile travel that do not require SFVAMC employees or visitors to physically park a vehicle at or near the Campus (such as taxis, rideshares, and private vehicle pick-up/drop-off) are also available.

Although a deficit in the on-Campus parking supply proposed under the LRDP relative to the estimated parking demand from the net new development could result in parking spillover into the surrounding neighborhood, it is more likely that these motorists would switch to alternative modes (such as the transit options discussed above), or make other changes in their travel and parking behavior that would reduce this shortfall in parking demand, given that the total supply of on-street parking in the areas surrounding the Campus is unlikely to change substantially in the future, and is currently at or near capacity during peak demand periods.

Furthermore, even if the secondary effects of a parking deficit—such as delays or disruptions to traffic, transit, bicycle, or pedestrian circulation—were to cause concern, the SFVAMC has additional measures at its disposal to manage parking demand and minimize these secondary effects. Valet parking, in particular, could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP (and therefore reduce the parking deficit) by increasing the space efficiency of parking facilities. For example, the existing valet parking program could be expanded to include the additional parking structures proposed to be constructed under Alternatives 1 and 2. This could increase the on-site parking capacity by as many as 150 additional spaces, thereby exceeding the estimated deficit in on-Campus parking of 120 spaces under the LRDP (the estimated demand of 426 spaces generated by the net new development, less the proposed net increase in parking supply at the Campus of 306 spaces).

Based on these considerations, the SDEIS concluded that the estimated deficit of 120 spaces would result in minor effects related to parking.

The SDEIS includes computer-simulated photomontages of the Proposed Action and Alternative 2, as viewed from the same 12 existing viewpoints that were included in the DEIS, including publicly accessible views from East Fort Miley. The visual simulations reflect full buildout of the LRDP, including Buildings 22, 23, and 24, which would be sited near the SFVAMC Fort Miley Campus and the GGNRA East Fort Miley boundary. The visual simulations are depicted in Section 3.1, “Aesthetics.” Views 9 and 10 show that the LRDP would not adversely change the views from or the aesthetic character of East Fort Miley and other nearby GGNRA land. As shown in the existing views and the corresponding visual simulations for these same views, tree coverage in the East Fort Miley area constitutes the majority of the views by recreational users of East Fort Miley in the areas adjacent to the SFVAMC Fort Miley Campus.

Although there are no height limitations on the SFVAMC Campus, and the City and County of San Francisco height limitations do not apply to this federal land, VA has not proposed any buildings for the SFVAMC Fort Miley Campus that would be greater in height than the current tallest building on the Campus. See LRDP Chapter 3 for tables indicating the height of each proposed new building.

Response to Comments on Supplemental Draft EIS

The following section presents responses to the 17 written letters as well as to verbal comments from the transcript recorded at the public meeting on the Supplemental Draft Environmental Impact Statement (SDEIS). Copies of the letters received and the transcripts from the SDEIS public meeting are included in their entirety in Appendix A. Table 2 is repeated here from the Introduction of this response to comments (RTC) document to identify the agencies, organizations, and individuals offering comments on the SDEIS.

Table 2: SFVAMC LRDP Supplemental DEIS Comment Letters

<i>Letter Label</i>	<i>Letter Type</i>	<i>Report</i>	<i>Letter Author</i>	<i>Date</i>
B1	Federal Agency	SDEIS	USDOJ, Office of Environmental Policy and Compliance	May 18, 2015
B2	Federal Agency	SDEIS	USDOJ, National Park Service	May 8, 2015
B3	Federal Agency	SDEIS	U.S. Environmental Protection Agency	May 8, 2015
B4	Local Group(s)	SDEIS	PAR, FLE, CSOB, FSP, and PGGNRA	May 8, 2015
B5	Local Group	SDEIS	Planning Association for the Richmond	May 8, 2015
B6	Individual	SDEIS	Hiroshi Takahashi	Undated
B7	Individual	SDEIS	Preston Wong	March 31, 2015
B8	Individual	SDEIS	C. K. Wai	April 13, 2015
B9	Individual	SDEIS	Raymond Holland	April 13, 2015
B10	Individual	SDEIS	Kay Bradner	April 16, 2015
B11	Individual	SDEIS	Denise Louie	April 20, 2015
B12	Individual	SDEIS	Ron Miguel	April 22, 2015
B13	Individual	SDEIS	Andrew Scoular	May 6, 2015
B14	Individual	SDEIS	Naurie Morimoto (first letter)	May 3, 2015
B15	Individual	SDEIS	Naurie Morimoto (second letter)	May 7, 2015
B16	Individual	SDEIS	Pamela Carrara	May 7, 2015
B17	Individual	SDEIS	Weber Kneitel	May 8, 2015
PM2	SDEIS Public Meeting	SDEIS	Verbal comments provided by eight persons	April 14, 2015

Federal Agency Written Comments Received on SDEIS

B1) Responses to U.S. Department of the Interior, Office of Environmental Policy and Compliance Comments on SDEIS

RTC B1-1: The U.S. Department of Veterans Affairs (VA) thanks you for your review of the SDEIS and the letter indicating that the U.S. Department of the Interior, Office of Environmental Policy and Compliance, has no comments on the document.

B2) Responses to U.S. Department of the Interior, National Park Service Comments on SDEIS

RTC B2-1: VA appreciates the comments from the National Park Service (NPS) on the SDEIS, and offers to maintain ongoing discussions regarding VA's planning process, development plans, and potential effects on NPS lands. Specific responses to NPS comments follow; however, it is noted that the effects of the Long Range Development Plan (LRDP) on the Fort Miley Military Reservation Historic District are considered in the Section 106 documentation, including the Finding of Effect (FOE). The FOE considered the LRDP's implications on the character-defining features of the Fort Miley Military Reservation Historic District, and determined that there would be no adverse effect on the Historic District. This finding was reviewed and concurred with by the California Office of Historic Preservation on July 22, 2013.

Regarding the LRDP projects along the western boundary of the San Francisco VA Medical Center (SFVAMC) Fort Miley Campus that are mentioned in the comment, SFVAMC has decided to remove the water tower and upgrade the system to store water underground. In addition, the garage extensions will be designed and constructed in a manner to maintain or improve access. The design of both the underground water storage and parking garage extensions will be completed in compliance with regulatory requirements, and coordinated with NPS and the California Coastal Commission (CCC).

Regarding the LRDP projects along the eastern boundary of the SFVAMC Fort Miley Campus that are mentioned in the comment, previous Section 106 consultation for Building 22 resulted in a finding of no adverse effect, and the State Historic Preservation Officer (SHPO) concurred on August 27, 2009. In accordance with the Programmatic Agreement (PA), the design of Buildings 23 and 24 will be reviewed during their Section 106 consultation with SHPO and other Consulting Parties, including NPS. Furthermore, the design of these buildings will incorporate the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

RTC B2-2: **SDEIS text on p. ES-14 has now been changed in the Final Environmental Impact Statement (EIS) under Public Involvement and Agency Coordination in response to the comment request:**

In addition, the City and County of San Francisco, as well as NPS/GGNRA and other consulting parties, has provided information, comments, and input during the EIS process.”

RTC B2-3: The Executive Summary correctly characterizes the impact as Minor.

RTC B2-4: The Historic District Design Guidelines (HDDG) are still under preparation. VA has coordinated with SHPO and will continue to coordinate with the Consulting Parties.

RTC B2-5: As the National Environmental Policy Act (NEPA) lead agency, VA has the primary responsibility to identify alternatives for evaluation in an environmental document. Alternatives 1 and 2, although similar, have different development phases that result in different impacts during construction, which are presented in the SDEIS. VA appreciates the comment to consider a further reduced development alternative at the existing campus; however, such an alternative would not meet VA’s purpose and need. Please see SDEIS Section 2.2, “Alternatives Considered But Eliminated From Further Review,” for an explanation of VA’s reasons for not including such an alternative for analysis in the SDEIS.

RTC B2-6: VA acknowledges that Phase 1 new construction would introduce more development in proximity to NPS lands. However, the visibility of this new development and its height and massing, as characterized by visual simulations, would have a minor effect on publicly accessible views across the Campus. In particular, please refer to pp. 3.1-17 through 3.1-28 for the visual effects of the Alternative 1 short-term projects, and to pp. 3.1-39 through 3.1-40 for the visual effects of the Alternative 2 short-term projects. Moreover, the landscape concept included as part of the LRDP would further minimize and avoid visual effects and help preserve park experiences. The landscape concept seeks to:

Promote good relations with Campus neighbors.

- Provide clear and attractive pedestrian connections between the residential neighborhood and surrounding open space, as well as use of publicly accessible open space on the Campus.
- Partner with the Golden Gate National Recreation Area (GGNRA) to improve the ecology and environmental health of the area.

Create a welcoming environment.

- Reinforce site geometries and circulation routes, improving wayfinding and site comprehension.

The visual effects and the related effects on the feeling and setting of the Fort Miley Military Reservation Historic District are reported in the Section 106 documentation. The FOE report that was approved by SHPO concluded that the LRDP would have no adverse effect on the Historic District. SFVAMC has decided to remove the water tower and upgrade the system to store water underground; therefore, the water tower would not be visible or potentially diminish park experiences on the NPS lands. This change in plans for the water tower occurred after release of the SDEIS. The conceptual landscape design in the LRDP, which considers the location and vegetative screening that will provide a buffer along the Campus/GGNRA boundary, will be refined further and finalized as part of the

National Historic Preservation Act (NHPA) Section 106 consultation process in accordance with the fully executed PA dated January 9, 2015. Please refer to RTC B2-8 for an additional description of the LRDP landscape concept plan and its implications for NPS lands and park experiences.

RTC B2-7: The SFVAMC 2014 LRDP building sizes and heights represented VA's best estimates and the available information at the time of that document's release. As further planning and programming occur during SFVAMC's annual updates to the LRDP, the building sizes and heights may be revised. It is typical in environmental analyses to use the largest reasonable development program and assumptions to analyze the greatest, or most conservative, potential effects. With some future buildings now proposed to be shorter or smaller than previously proposed, the visual and other effects identified in the SDEIS for these buildings would be less than described in the Draft Environmental Impact Statement (DEIS).

RTC B2-8: RTC B2-6 indicates that the short-term LRDP projects on the Campus would not adversely affect the area's visual setting or quality. The landscape concept that is part of the LRDP would continue to evolve and further reduce visual effects through identification of various landscape zones, locations for plantings, and guidelines for planting materials and styles. The "Buffer Landscape" zone has been specifically created to introduce landscaping that would serve as a buffer and transition to adjacent lands including the GGNRA. VA will continue to coordinate with GGNRA on the appropriate vegetative screening. The design would be refined further, thus adjusting the visual effect of proposed buildings along the Campus/boundary, and would be finalized as part of the NHPA Section 106 consultation process in accordance with the fully executed PA dated January 9, 2015. With respect to the West Fort Miley side, SFVAMC has decided to remove the water tower and upgrade the system to store water underground. The northwestern corner will, therefore, not be modified, and the visual effects of this portion of the Campus relative to the adjacent GGNRA lands would be reduced further. This change to the water tower plans occurred after release of the SDEIS. Furthermore, VA would submit plans related to visual screening of public views from the Camino Del Mar Trail to CCC for review and concurrence.

RTC B2-9: The urban design and landscape concepts reinforce the proposed pedestrian and circulation plans for the Campus. As described in RTC B2-6, objectives that will serve as a basis for future improvements on the Campus include providing clear and attractive pedestrian connections and partnering with GGNRA to improve the area. VA appreciates the collaboration and discussions with NPS, and plans to continue participation in identifying mutually beneficial improvements. These include opportunities to further enhance pedestrian connections and to create appropriate gateways.

RTC B2-10: The comment requests a revision to pp. 2-9, 2-13, and 2-16 to reflect VA's commitment to fully redirect stormwater that currently drains to the northern slope to the combined sewer system as a component in the construction of Building 40 (Phase 1). Please refer to RTC B2-15, which explains that existing federal and local requirements regarding stormwater management and Management Measure HYD-1 would address drainage sufficiently; there would be no adverse effect, and redirecting northern slope drainage to the combined sewer

system would not be required. In addition, renovation of Building 6 will include the redirection of three of the outflows.

RTC B2-11: As mentioned in the comment, Chapter 2.0 of the SDEIS describes the LRDP alternatives and the related parking supply proposed under each alternative. The information requested by the comment concerning a comparison of the proposed parking supply and the estimated parking demand under each alternative is contained in Section 3.13 of the SDEIS. Please see SDEIS pp. 3.13-64 through 3.13-66 and pp. 3.13-74 through pp. 3.13-76 for a discussion of LRDP-related parking effects in the short-term (2020) and long-term (2027) time frames, including a discussion of proposed parking supply relative to estimated parking demand for the net new development under each alternative.

In response to the comment regarding cumulative parking effects, the SDEIS evaluates these effects in the 2040 time frame qualitatively, because the LRDP horizon extends only to 2027. The LRDP does not specifically propose any projects beyond 2027, and future projects after 2027 would be identified during a subsequent long-term master-planning process for the Campus. Therefore, no specific changes to parking conditions as a result of the LRDP are expected in the cumulative time frame beyond those already identified for the long-term time frame.

Before describing the overall parking supply and demand on Campus and the effects on the surrounding land uses, the following information is offered to better explain parking conditions at and near the Campus, and alternative transportation options available to staff, patients, and visitors when traveling to and from the Campus.

- Parking conditions are not static—parking supply and demand vary from day to day, from day to night, from month to month, etc. The availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel.
- The absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urban development pattern, may induce drivers to seek alternative parking facilities, shift to other available travel modes, or change their overall travel habits.
- Campus users have several options when traveling to and from the Campus by transit. The San Francisco Municipal Railway (Muni) provides high-frequency, high-capacity bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the Transit Effectiveness/Muni Forward Project (TEP) and Geary Corridor Bus Rapid Transit (BRT) Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private shuttle services supported by the SFVAMC and affiliate organizations (SDEIS Table 3.13-5). These include commuter shuttles operated by contract with Bauer's Transportation, which are highly used by current visitors to the Campus, connecting to local and regional transit hubs; interclinic shuttles connecting the Campus with VA clinics in Downtown San Francisco, San Bruno, and greater

Northern California; specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and local shuttles operated jointly by SFVAMC and the University of California, San Francisco (UCSF).

- Options for automobile travel that do not require SFVAMC employees or visitors to physically park a vehicle at or near the Campus (such as taxis, rideshares, and private vehicle pick-up/drop-off) are also available.

The parking deficit reported in the SDEIS may be calculated as the difference between the estimated demand (426 spaces) less the proposed net increase in parking supply at the campus (306 spaces), or 120 spaces. Although this deficit may result in parking spillover into the surrounding neighborhood, it is more likely that these motorists would switch to available alternative modes (such as the transit options discussed above), or make other changes in their travel and parking behavior that would reduce this shortfall in parking demand, given that the total supply of on-street parking in the areas surrounding the Campus is unlikely to change substantially in the future and is currently at or near capacity during peak demand periods.

Furthermore, SFVAMC has additional measures to manage parking demand and minimize these effects. Valet parking, in particular, may be implemented to effectively increase the on-Campus parking supply beyond what was assumed in the LRDP (and therefore reduce the parking deficit); this would increase the space efficiency of parking facilities, which may increase parking capacity to up to 150 percent of existing capacity. For example, the existing valet parking program could be expanded to include the additional parking structures proposed to be constructed under Alternatives 1 and 2. This could increase the on-site parking capacity by as many as 150 additional spaces, which would be sufficient to satisfy the estimated parking deficit of 120 spaces referenced above.

Based on these considerations, the SDEIS concluded that the estimated deficit of 120 spaces would result in minor effects related to parking, with implementation of feasible measures.

With regard to parking spillover effects into the areas surrounding the Campus, it should be noted that some variation in mode split and parking demand may be expected as a result of the availability of parking in and around the Campus. In particular, the absence of an available supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urban development pattern, may induce drivers to seek alternative parking facilities, shift to other available travel modes, or change their overall travel habits (see SDEIS p. 3.13-64).

The on-street parking spaces are located on land or rights-of-way in the City and County of San Francisco, and are considered public facilities; they are therefore not controlled by SFVAMC, which has limited jurisdiction to control or monitor the use of these spaces by Campus users. These off-Campus parking areas are under the purview of other public agencies such as the NPS (e.g., parking near Lands End) or the San Francisco Municipal Transportation Agency (SFMTA) (e.g., on-street parking in the surrounding residential

neighborhood). There are time-limit restrictions on parking (currently limited to a maximum of 4 hours for those spaces adjacent to NPS lands) during the day to discourage long-term use (whether among Campus users or other motorists), and to encourage more turnover. Despite the time-limit restrictions, the on-street parking spaces still attract some level of use among Campus users.

Finally, regarding the effect of parking on NPS lands during construction, SFVAMC has worked with NPS to provide overflow parking in various NPS-owned parking areas near Lands End (including at the parking lot along El Camino del Mar adjacent to the *USS San Francisco* Memorial; along the west side of El Camino del Mar north of Point Lobos Avenue; and in the Merrie Way surface lot serving Lands End Lookout and the Sutro Baths) during Campus construction activities. In August 2010, SFVAMC coordinated with NPS to use 120 parking spaces across these parking areas for a period of 18 months. These spaces were signed specifically for use by SFVAMC staff and patients. Because of the distance and elevation difference between these NPS-owned parking areas and the Campus, SFVAMC provided a shuttle service to connect these areas with the Campus, operating every 15 minutes during the peak periods (8 a.m. to 9:30 a.m. and 4 p.m. to 6 p.m.), and every 30 minutes during the midday period (9:30 a.m. to 4 p.m.). Based on shuttle ridership, SFVAMC estimates that occupancy of these spaces peaked at approximately 95 percent (i.e., effectively fully occupied). To control parking in areas not designated for SFVAMC use, NPS posted 4-hour parking limit signs approximately 1 year into the agreement.

SFVAMC signed a separate, subsequent 2-year agreement with NPS in June 2013 to use 150 parking spaces across NPS parking areas near the *USS San Francisco* Memorial and at Merrie Way, with SFVAMC paying for use of these spaces. Similar to the 2010 arrangement, SFVAMC operated shuttles every 15 minutes during the morning and late afternoon, and 30 minutes during the midday. Both SFVAMC police and NPS monitored and patrolled these parking areas, and SFVAMC estimates that occupancy of these spaces peaked at approximately 75 percent on Mondays and Fridays, and approximately 90 percent on Tuesdays, Wednesdays, and Thursdays, based on shuttle use and staff monitoring. Use during off-peak months (November and December) was lower because of staff vacations during the holiday season.

This agreement was in effect in early 2011 as part of the North Slope Stabilization Project and during construction of Building 212 (parking structure for patients and visitors), which necessitated the closure of the former Parking Lot A, portions of Veterans Drive, and associated parking areas between Building 6 and Building 7.

Visual observations indicate that these VA-designated spaces are generally well-used; however, parking in these areas is provided only through agreements negotiated with NPS as needed to accommodate past and ongoing construction at the Campus, and is not necessarily available to SFVAMC on a long-term or permanent basis. Furthermore, SFVAMC has no intention to make use of NPS lands as a permanent solution for Campus

parking needs. With the completion of Buildings 211 and 212 (which are both parking structures), the need for overflow parking on NPS-owned lands will be greatly diminished.

The evaluation of LRDP construction impacts from the DEIS has been augmented in the SDEIS with estimates of parking demand and (on-Campus) supply by phase, which were prepared as part of the construction traffic and parking management plan for the LRDP. Based on these estimates, on-site parking capacity at the Campus would likely be mostly sufficient, on a daily basis, to accommodate the temporary increase in parking demand generated by construction-related activities. Any deficits in the projected parking demand due to the temporary effects during the construction period may be alleviated by the expansion of the valet parking operations to beyond the existing parking lots.

SFVAMC understands the sensitivity of parking concerns among residents of the surrounding neighborhood and NPS, and is committed to regularly reviewing parking conditions at and surrounding the Campus. This regular review process is not necessarily part of the LRDP, but instead part of SFVAMC's facility management duties at the Campus. In recognition of the potential for construction-related activities to affect parking conditions, the SDEIS includes Mitigation Measure TRANS-2, which requires SFVAMC to conduct supplemental surveys of parking occupancy, and to implement programs to prevent parking spillover during construction. This includes SFVAMC coordination with construction contractors, as construction plans for specific LRDP projects are developed, to determine whether construction-related activities would result in parking deficits, and whether temporary mitigation measures or strategies would need to be implemented.

For the current parking deficit on the Campus that has been identified, SFVAMC would act in good faith to implement measures to minimize the spillover parking demand into the surrounding neighborhood (i.e., outside of the Campus on City and County of San Francisco rights-of-way, including NPS-owned parking areas), and consistent with current conditions. As described earlier, these measures may include expanding the Campus's valet program; and requiring general contractors to establish carpool/vanpool programs during the construction period for their workers, encourage transit use, optimize staging-area needs, and coordinate vendor arrival schedules.

RTC B2-12: NEPA analysis is required to make a good faith effort to inform and disclose potential effects, including those related to views and visual quality. In response to public comments received on the DEIS, VA prepared visual simulations for the same 12 publicly accessible vantage points included in the DEIS, and depicted them in the SDEIS. Potential visual impacts related to proposed extensions of Buildings 209 and 211 are depicted in SDEIS Figures 3.1-11a and 3.1-18a. The changes to the visual setting were evident, as seen in the visual simulations, but were determined to be minor.

Visual analysis seeks to take into account the sensitivity and scenic qualities of the viewshed; the number and sensitivity of viewers; the temporal nature of the view (e.g., long-term versus fleeting); and the degree of change to these qualities with the LRDP. As a result, public views, such as those from roads, vista points, and open-space areas where a larger number of viewers can be affected, are typically evaluated rather than private views

or public views from a particular building. VA appreciates the suggestion to classify the visual effect from new Campus construction as moderate along the Campus/Park boundary. However, the categories of effect used here and in all other sections of the SDEIS provide a sufficient range to define the intensity and context of the visual effects. Regardless of the classification as moderate or minor, the point made throughout this comment is that the changes are direct and sufficient to diminish the significance of the Fort Miley Historic District.

In response to the summary above of the NPS comment, the discussion in the SDEIS acknowledges that atmospheric and visual changes would be introduced into the Fort Miley Military Reservation Historic District setting by the LRDP. An undertaking would have an adverse effect on a historic property if a project impairs the characteristics (character-defining features) that qualify it for inclusion in the National Register of Historic Places. However, these proposed LRDP changes would not prevent the Historic District from retaining its integrity of location, design, materials, workmanship, association, character, and setting; thus, overall, the LRDP would not affect the character-defining features of the Historic District. The aspects of integrity convey the historical significance of the property, and are necessary for the viewer to understand the property's historically significant role. When considering a historic district, the integrity of the whole is considered paramount to the individual integrity of any one component (unless there are individually eligible buildings, structures, or objects present). Although VA agrees with NPS that a change to setting would occur, and that views of the new construction would be only be partially obscured by existing trees and vegetation, VA has determined the effect to be minor, because the Historic District would retain those aspects of integrity mentioned above that allow it to convey its historical significance. SHPO concurred with the finding of no adverse effect in the FOE.

The following responses address specific text changes or clarifications raised in the comment on cultural resources.

The third paragraph on SDEIS p. 3.1-19 has now been updated in the Final EIS in response to the comment that this paragraph mistakenly refers to long-term projects.

However, implementing Alternative 1 ~~short~~^{long}-term projects would result in only a minor impact related to views and visual character. These locations are not focal or prime destinations for hikers, and the changes would be noticeable only when looking up toward the building rather than along the trail or out toward San Francisco Bay. Instead, these are generally areas that people pass through on their way to more scenic GGNRA locations with more expansive views of San Francisco Bay, including views of the Golden Gate Bridge and Marin Headlands. The proposed new buildings would also be built with materials, colors, and massing that would be designed to fit within the context of the existing buildings on the SFVAMC Fort Miley Campus, thereby minimizing their visual effect. With implementation of Alternative 1 ~~short~~^{long}-term projects, trees would be planted 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. Furthermore, the proposed Patient Welcome Center drop-off area roundabout, though visible from the adjacent residential streets, would be in the same location as the current on-Campus bus drop-off area.

VA understands the sensitivity regarding the location and visual effects of the water tower. Subsequent to the release of the SDEIS, VA decided to remove the water tower and store water underground. As a result of this change to VA plans, the changes requested by this comment to include the water tower in several figures of the SDEIS are no longer necessary. The visual simulations have been revised to reflect these changes; see Figure 3.1-13 (View 9a), Figure 3.1-14 (View 11a and 12a), Figure 3.1-20 (View 9b), and Figure 3.1-21 (View 11b and 12b).

RTC B2-13: (Page 3.4-5) Text on p. 3.4-5 in SDEIS Section 3.4-5 under “Cultural Resources Identified in the Project Area” has now been changed in the Final EIS:

Fort Miley Military Reservation Historic District

(Page 3.4-13) The rationale for preparing a supplemental environmental document is governed under NEPA. The explanation of why an SDEIS is being prepared, pursuant to NEPA, is provided in both the Executive Summary and Chapter 1.0; therefore, it is unnecessary to provide this same explanation in the Regulatory Framework description of the “National Historic Preservation Act of 1966.”

(Page 3.4-17) Please refer to RTC B2-12, above, for an explanation of the visual changes expected as a result of the LRDP and particularly for the effects on the Fort Miley Historic District. RTC B2-12 provides SFVAMC’s rationale for describing the visual effects as minor.

(Page 3.4-18) Impacts are considered indirect, because no changes would take place directly on character-defining features within the boundary of the Fort Miley Military Reservation Historic District, but rather would result in changes outside the Fort Miley Military Reservation Historic District boundary. Therefore, the LRDP would affect the Fort Miley Military Reservation Historic District indirectly. Furthermore, Feeling and Setting are two aspects of integrity that support the significance of the District. Aspects of Integrity are generally not considered the basis by which impacts are considered direct or indirect. Therefore, the information and impact conclusions within Table 3.4-1, Impacts of Alternative 1 short-term projects on the SFVAMC and Fort Miley Historic District, is correct, and no changes to it are necessary.

(Page 3.4-20) SFVAMC posted an update related to the date of the final HDDG on the SFVAMC Consulting Parties website on April 3, 2015, and notified Consulting Parties of this posting. The HDDG is still under preparation, and will be posted to the SFVAMC website. VA has coordinated with SHPO regarding the status of the HDDG and will continue to coordinate with Consulting Parties.

(Page 3.4-21) SDEIS text on p. 3.4-21 has now been changed in the Final EIS in response to the comment that identified an incorrect reference to a mitigation measure number:

Implementing Mitigation Measure CR-~~32~~ would help reduce the severity of impacts of Alternative 1 short-term projects on the SFVAMC Historic District; however, the impact would remain adverse, because proposed construction would still result in demolition of contributors and densification of the SFVAMC Historic District.

(Page 3.4-23) Text on SDEIS p. 3.4-23 under Alternative 2 Short-term Projects has now been changed in the Final EIS in response to the comment that Mitigation Measure CR-3 was omitted:

These impacts would generally range in significance from beneficial to adverse with mitigation (Mitigation Measures CR-1, ~~and CR-2,~~ and CR-3).

(Page 3.4-23) Text on SDEIS p. 3.4-23 under Alternative 3 Short-Term Projects has now been changed in the Final EIS in response to the comment that Mitigation Measure CR-3 was omitted:

These impacts would generally range in significance from minor to adverse with mitigation (Mitigation Measures CR-1, ~~and CR-2,~~ and CR-3).

(Page 3.4-25) Text on SDEIS p. 3.4-25 has now been changed in the Final EIS in response to the comment requesting clarification about which historic district would be affected:

This would be a direct adverse impact on the SFVAMC Historic District.

RTC B2-14: As shown in Figure 1-3 on p. 1-8 of the DEIS, the SFVAMC Fort Miley Campus encompasses 29 acres, including part of the northern slope area. Major and minor landslides, as well as surface slumping, have historically occurred on the slope below the northern portion of the SFVAMC Fort Miley Campus as a result of high rainfall, seismic movement, and land erosion. As a result, VA recently completed a land stabilization plan in that area, referred to as the North Slope Seismic/Geologic Stabilization Project, to structurally stabilize the northern slope of the Campus. Please refer to RTC B2-15 for a description of the stabilization project and how it serves to minimize landslide and erosion hazards for the downslope lands of SFVAMC and NPS.

RTC B2-15: As described on SDEIS p. 3.8-17, the short-term projects would add approximately 0.69 acre of impervious surface, a 4 percent increase in impervious area compared to the existing condition. SDEIS p. 3.8-21 states that long-term LRDP projects would add no new acres of impervious surface, because this phase would only involve the replacement of an existing building. Although no to minor changes in impervious surface would result from the LRDP, stormwater design for the LRDP require that the site's predevelopment stormwater discharge rates and volumes be maintained post-construction, by using design techniques that infiltrate, filter, store, evaporate, and detain runoff to comply with

Section 438 of the Energy Independence and Security Act. In addition, compliance with Article 4.2 of the San Francisco Public Works Code, which requires submittal of a stormwater control plan that meets San Francisco Public Utilities Commission (SFPUC) guidelines, would be required for the LRDP. As described in the SDEIS, the area of the Campus located in the separate sewer areas, including the northern slopes of the Campus, would be required to capture and treat the rainfall from a design storm of 0.75 inch.

Management Measure HYD-1, presented on p. 3.8-18 of the SDEIS, requires SFVAMC to submit final drainage plans to SFPUC for all phases of construction, demonstrating that off-site up-gradient runoff would be conveyed through the project site, and that LRDP-related on-site runoff would be appropriately contained to reduce flooding impacts. The conveyance amounts associated with the LRDP have not yet been determined. The system capacity of the separate storm drain system that drains areas to the north of the SFVAMC Fort Miley Campus would be determined as part of a hydrologic and hydraulic analysis of stormwater flows during projects design. Drainage and storm sewer systems would be designed in accordance with VA's Site Utility Design Manual, which requires that a hydrologic assessment be conducted for the 2-, 5-, 10-, 50- and 100-year storm events, and that the system be sized for a minimum 10-year, 1-hour storm event.

As described in the final environmental document for the North Slope Seismic/Geologic Stabilization Project on November 9, 2010, the potential impacts of discharging stormwater onto the northern slope were evaluated in geotechnical investigations performed for that project. The recommendations were incorporated into the design of the outfalls to reduce the potential for slope failure on both VA and NPS properties. A long-term monitoring and maintenance plan has been put into effect to maintain the drainage system in good repair so that it is effective in controlling localized erosion. The monitoring and maintenance plan is intended to identify any local erosion at an early stage so that repairs can be initiated before it becomes a significant problem.

As described in the SDEIS on p. 3.8-19, with implementation of Management Measure HYD-1, the LRDP would not increase the risk of flooding either on the SFVAMC Fort Miley Campus or down-gradient on NPS properties. In addition, future stormwater and water storage plans that avoid contributing to geologic instability would be submitted by VA to CCC for review and concurrence (CCC, 2015). Therefore, VA considers the proposed means of stormwater disposal to be sufficient and effective.

As requested by the comment, additional discussion has been added to the "Affected Environment" and "Environmental Consequences" to describe stormwater in the northern slope area.

Text has now been added in Final EIS Section 3.8.1, "Affected Environment," under "Local Hydrologic Features," "Existing SFVAMC Fort Miley Campus":

The impacts of discharging stormwater onto the northern slope were included in geotechnical investigations performed for the North Slope Seismic/Geologic Stabilization Project, and the recommendations were incorporated into the design of the

outfalls to reduce the potential for slope failure on both the VA and NPS properties (VA, 2010a). The geotechnical investigation that was completed in March 2010 identified the discharge of surface water onto the northern slope as a major destabilizing factor contributing to on-going slope failure, which could result in the potential for on- and off-site erosion, an increased risk of localized landsliding downslope from the proposed retaining walls, and the potential for undermining the proposed retaining walls because of continued landslide movement. Storm drain improvements as part of this project included replacement of the existing catch basins, manholes, and storm drain piping to the northern slope, which were old and damaged. The new pipelines were placed above ground to allow monitoring for potential damage or movement of the pipe over time and to facilitate maintenance. The pipelines discharge to energy dissipaters that reduce the erosional forces of the water. The energy dissipaters consist of rock riprap embedded in concrete and underlain by overlapping sheets of a puncture-resistant vapor barrier. The project also reduced the slope gradient, which reduced slide potential and eliminated areas where water previously ponded. Two retaining walls were installed as part of the project; native shrubs and trees were planted below the retaining walls after construction. A long-term monitoring and maintenance plan has been put into effect to maintain the drainage system in good repair so that it is effective in controlling localized erosion (VA, 2010).

Text has now been added in Final EIS Section 3.8.3, “Environmental Consequences,” under “Alternative 1: SFVAMC Fort Miley Campus Buildout Alternative,” “Short-Term Projects,” “Alternative 2: SFVAMC Fort Miley Campus Buildout Alternative,” and “Alternative 3: SFVAMC Fort Miley Campus Plus Mission Bay Campus Alternative,” in each case under “Short-Term Projects,” “Operation,” in the subsections “Downstream Flooding or Increase in the Frequency or Severity of Combined Sewer Overflow Events as a Result of Altered Drainage Patterns or an Increase in Impervious Surfaces” and “Water Quality Degradation Caused by Changes in the Intensity of Land Use and Increases in Impervious Surfaces;

Furthermore, VA would run any future stormwater and water storage plans that avoid contributing to geologic instability by CCC for review and concurrence (CCC, 2015).

The comment requests that stormwater flow volumes be quantified. The conveyance amounts associated with the LRDP have not yet been determined and cannot be determined, because VA does not have grading and drainage plans at this stage of planning. The system capacity of the separate storm drain system that drains to areas to the north of the SFVAMC Fort Miley Campus would be determined as part of a hydrologic and hydraulic analysis of stormwater flows during future LRDP design.

The retaining wall that was installed as part of the North Slope Seismic/Geologic Stabilization Project is not part of the Proposed Action. However, from a cumulative aesthetics perspective, it should be noted that the retaining wall is textured to mimic and blend in with natural rocks and landscape while also providing slope stability. In addition, VA will coordinate with NPS to ensure planting of native plants when re-planting.

RTC B2-16: The description of traffic, circulation, and parking conditions in SDEIS Section 3.13, “Transportation, Traffic, and Parking,” reflects features of the transportation network that existed at the time of the LRDP preparation and are consistent with the LRDP. These conditions provide the existing baseline against which the transportation effects of the LRDP are assessed. Accordingly, text and tables that are suggested for revision by the comment have not been updated to account for recent changes.

As indicated in the comment, changes to those conditions have occurred since the 2012 baseline was defined. Regarding the partial removal of Lot J and the addition of Building 211, these changes result in a net increase in parking supply at the Campus, and would not result in additional adverse impacts not already disclosed in the SDEIS.

Text has now been added to Final EIS Section 3.13.1, “Affected Environment,” under “Loading,” “Existing Fort Miley Campus” to address the comment requesting inclusion of more discussion of the East Fort Miley access road:

Although not related to VA facilities at the SFVAMC Fort Miley Campus, the National Park Service (NPS) Trails Crew facility at East Fort Miley also generates freight loading demand and heavy-vehicle access needs related to materials and equipment deliveries that access the Campus via the 42nd Avenue/Clement Street intersection. Truck movements into and out of the access road serving East Fort Miley occasionally result in minor, temporary obstructions to traffic circulation in this part of the Campus, which usually dissipate after trucks have completed their maneuvers.

The comment requests a change to the square footage shown for LRDP Project 1.8 (Building 24 – Mental Health Clinic Expansion) in three tables in Section 3.13. The information in these tables, however, is consistent with that in the LRDP, as described in Table 2-1 of the SDEIS. In general, as progress is made on the specific design of each building or facility, minor changes to square footage are expected and generally considered negligible in terms of affecting the conclusions of the SDEIS regarding environmental impacts. In addition, a reduction in the proposed square footage, as identified by the comment, would reduce the net travel demand generated by the building. As a result, the magnitude of the effects associated with this building would be less than that described in the SDEIS.

As discussed in the SDEIS, the LRDP would implement some changes to the SFVAMC Fort Miley Campus’s roadway network to better segregate employee and Veteran/visitor traffic across the Campus’s two main access points on 42nd Avenue and 43rd Avenue. These changes would result in, at most, minor modifications to the total traffic volumes passing through the Veterans Drive/Fort Miley Circle intersection. The changes would not preclude NPS access into and out of East Fort Miley, which currently can and will continue to be achieved by turning right upon entry onto the Campus. The traffic to and from the NPS land is infrequent throughout the day, and consists primarily of NPS staff members. In addition, the LRDP does not propose to physically alter the design of the Fort Miley Circle/Veterans Drive intersection in a way that would preclude GGNRA access into and out of East Fort Miley.

As described in the March 30, 2011, NPS and SFVAMC Memorandum of Understanding (MOU) 8142-410-0504 (Modification #1), SFVAMC, in agreement with the NPS, determined that an alternative location for this access road from Clement Street into the southeastern corner of East Fort Miley would be prohibitively expensive, be intrusive on the natural environment, and require extensive multi-jurisdictional coordination including the City of San Francisco (San Francisco Recreation and Parks Department). SFVAMC and NPS agreed that it would be preferable to all parties to improve the existing access road location, with minor location adjustments and accessibility improvements, within the SFVAMC Fort Miley Campus. The access road was designed to accommodate the turning radius for vehicles up to 20 feet in length. Both SFVAMC and NPS agreed through the MOU that “larger vehicles will have to attempt wider turns and will have to back up and turn into the driveway as needed.” The Maintenance Division of the NPS reviewed the design, and agreed that they would be able to adequately maneuver vehicles.

Given the rare frequency of this type of activity, the ability of the GGNRA to pursue the use of smaller delivery vehicles or equipment, the fact that the LRDP does not specifically propose any design modifications to this intersection or the access road, and the determination that the overall changes to circulation and traffic volumes in this portion of the Campus as a result of the LRDP would be relatively minor, the SDEIS does not identify any significant adverse effects to GGNRA access as a result of the LRDP. Consequently, no mitigation measures would be warranted.

RTC B2-17: The typographical error has been corrected.

SDEIS text on p. 3.14-5 has now been updated in Final EIS Section 3.8, “Affected Environment,” “Wastewater and Stormwater”:

This system is described further in Section 3.48, “Hydrology and Water Quality.”

The comment regarding northern slope drainage is addressed earlier in RTC B2-15. Please refer to that response for information pertaining to potential geotechnical, flooding, and drainage effects.

The comment requests a revision to pp. 2-9, 2-13, and 2-16 to reflect VA’s commitment that stormwater that currently drains to the northern slope will be fully redirected to the combined sewer system as a component in the construction of Building 40 (Phase 1). Future stormwater and water storage plans that avoid contributing to geologic instability would be submitted by VA to CCC for review and concurrence (CCC, 2015).

RTC B2-18: Thank you for providing the updated completion dates for NPS projects included in the cumulative projects list.

SDEIS text in Chapter 4.0, Table 4-1 has now been updated in the Final EIS:

3	National Park Service	Golden Gate National Recreation Area Dog Management Plan	Completed in 2012 <u>and beyond</u>
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		(within NPS GGNRA lands)	
4	National Park Service	Golden Gate National Recreation Area General Management Plan (within NPS GGNRA lands)	2012-2015 and beyond
7	SFRPD	Lincoln Park Steps Improvement	In planning and design phase Completed in <u>2015</u>

RTC B2-19: As described earlier in RTC B2-12, VA appreciates the suggestion to classify the visual effect from new Campus construction as moderate. However, the categories of effect used here and in all other sections of the SDEIS provide a sufficient range to define the intensity and context of the visual effects.

RTC B2-20: As described earlier in RTC B2-16, NPS and SFVAMC reached an agreement in 2011 regarding access to East Fort Miley, and designed the access road to accommodate trucks up to 20 feet long. SFVAMC is amenable to working with the GGNRA to explore further concerns about maneuverability into and out of the existing access roadway serving the GGNRA maintenance facility at East Fort Miley.

B3) Responses to U.S. Environmental Protection Agency Comments on SDEIS

RTC B3-1: Thank you for your comments on the SDEIS. The DEIS in 2012 stated that demolition activities would generate a maximum of 56,000 cubic feet of construction waste. SDEIS p. 2-5 states that demolition would generate a maximum of 945,085 cubic feet of construction waste. The new number is an error, and text in the SDEIS has been corrected to reflect the correct demolition waste volume. For purposes of consistency with the information used to support the air quality, noise, and transportation analysis, the volume has been converted to cubic yards. The correct demolition waste volume would be approximately 127,500 cubic yards for Alternative 1 (Preferred Alternative). The impact analysis for air quality, noise, and transportation was based on the 127,500 cubic yards, and therefore was based on the correct amount. The construction waste volume is based on a CalEEMod assumption that demolition debris volume is 25 percent of the building's total volume. CalEEMod is the accepted model for modeling construction-related air quality and greenhouse gas emissions in California.

The construction demolition volume took into account buildings proposed for demolition and seismic retrofit. The building volume is determined by taking the gross square feet (gsf) of the footprint of the building and multiplying by its height to come to a volume in cubic feet. The building's volume is multiplied by a factor of 0.037 to convert it to cubic

yards, and multiplied again by 0.25 (25 percent) to determine the amount of demolition debris. Based on these calculations, the following table shows the cubic yards of construction demolition material for each building proposed for seismic retrofit or demolition.

Table RTC-1		
Demolition Material Volume Alternative 1		
Building	Action	Cubic Yards
Buildings 5 and 7	Seismic Retrofit	17,005
Buildings 9 and 10	Seismic Retrofit	5,897
Building 20	Demolition	1,065
Building 18	Demolition	6,021
Building 14	Demolition	3,272
Building 21	Demolition	683
Building 1	Seismic Retrofit	27,879
Building 6	Seismic Retrofit	31,037
Building 8	Seismic Retrofit	10,487
Building 12	Demolition	24,148
	TOTAL	127,494 127,500 (rounded up)

The approximately 127,500 cubic yards of demolition material was correctly used in the air quality, noise, and transportation impact analyses in the SDEIS, but the estimated construction waste volume had not been reported in the SDEIS. Daily haul truck trips were estimated by calculating the volume of demolition debris associated with each phase. The total numbers of haul truck trips were calculated by dividing the total demolition debris by the assumed truck capacity (20 cubic yards each truck). Daily demolition haul truck trips were calculated by dividing the total trips by the number of work days. The estimated number of daily haul trips was then used to arrive at a total estimate of daily construction-related traffic, including vendor/delivery trucks and construction worker trips. The estimated noise levels along the anticipated truck routes leading to the project site were based on the estimated peak daily trips as generated by LRDP-related construction traffic (trucks and worker vehicles). As described above, the estimated quantity of demolition material was correctly used in the SDEIS analysis to derive the daily haul trucks and the corresponding noise predictions.

Text in SDEIS Section 2.3.1, p. 2-5 has now been revised in the Final EIS to reflect the correct demolition volume and metric:

All construction staging would occur on the SFVAMC Fort Miley Campus, in previously disturbed areas. Demolition would generate a maximum of 127,500~~945,085~~ cubic yards ~~feet~~ of construction waste, at least 50 percent of which would be reused or recycled and diverted from landfills in accordance with the VA SSPP.

Footnote 2 in SDEIS Section 2.3.1, p. 2-5 has now been revised in the Final EIS to reflect the correct demolition volume and metric:

The volume of demolition waste generated was calculated based on the volume of square footage of all buildings proposed for demolition and seismic retrofit (in cubic feet), converted to cubic yards, and multiplied by a factor of 0.25 to obtain the demolition debris volume(4,000 square feet total) multiplied by the estimated height of each building (all buildings proposed for demolition are single story). The height of each building story was assumed to be 14 feet.

Text in SDEIS Section 2.3.1, p. 2-11 has now been revised in the Final EIS to reflect no demolition in the Alternative 1 long-term (Phase 2):

Implementing the Alternative 1 long-term (Phase 2) project would involve one development project over approximately 2 years, with completion anticipated by March 2026. See Table 2-2 for a detailed schedule and phasing for construction of the Alternative 1 long-term (Phase 2) project. All construction staging would occur within the SFVAMC Fort Miley Campus, in previously disturbed areas. ~~Demolition would generate a maximum of 2,210,600 cubic feet of construction waste,⁴ at least 50 percent of which would be reused or recycled and diverted from landfills in accordance with the VA SSPP.~~

Footnote 4 in SDEIS Section 2.3.1, p. 2-11 has now been deleted in the Final EIS:

~~The volume of demolition waste generated was calculated based on the square footage of all buildings proposed for demolition (57,600 square feet total) multiplied by the estimated height of each building (all buildings proposed for demolition are single story except Building 12, which is two stories). The height of each building story was assumed to be 14 feet.~~

Text in SDEIS Section 2.3.2, p. 2-15 has now been revised in the Final EIS to reflect the correct demolition volume and metric:

All construction staging would occur on the SFVAMC Fort Miley Campus, in previously disturbed areas. Demolition would generate a maximum of 58,091,945,085 cubic yardsfeet of construction waste, at least 50 percent of which would be reused or recycled and diverted from landfills in accordance with the VA SSPP.

Footnote 6 in SDEIS Section 2.3.2, p. 2-15 has now been revised in the Final EIS to reflect the correct demolition volume and metric:

The volume of demolition waste generated was calculated based on the volume of square footage of all buildings proposed for demolition and seismic retrofit (in cubic feet), converted to cubic yards, and multiplied by a factor of 0.25 to obtain the demolition debris volume(4,000 square feet total) multiplied by the estimated

~~height of each building (all buildings proposed for demolition are single story). The height of each building story was assumed to be 14 feet.~~

Text in SDEIS Section 2.3.2, p. 2-21 has now been revised in the Final EIS to reflect the correct demolition volume and metric:

All construction staging would occur on the SFVAMC Fort Miley Campus, in previously disturbed areas. Demolition would generate a maximum of 69,403~~389,866~~ cubic yards~~feet~~ of construction waste, at least 50 percent of which would be reused or recycled and diverted from landfills in accordance with the VA SSPP.

Footnote 8 in SDEIS Section 2.3.2, p. 2-21 has now been revised in the Final EIS to reflect the correct demolition volume and metric:

~~The volume of demolition waste generated was calculated based on the volume of square footage of all buildings proposed for demolition and seismic retrofit (in cubic feet), converted to cubic yards, and multiplied by a factor of 0.25 to obtain the demolition debris volume(4,000 square feet total) multiplied by the estimated height of each building (all buildings proposed for demolition are single story). The height of each building story was assumed to be 14 feet.~~

Text in SDEIS Section 3.12, p. 3.12-9 has now been revised in the Final EIS to reflect the correct demolition volume and metric:

Constructing Alternative 1 short-term projects would result in a short-term increase in the generation of construction waste. Construction activities would require disposal of solid waste generated from tree removal and demolition of existing facilities, as well as removal of excess unsatisfactory soil from excavation activities, trash, and scrap materials. Most construction waste is expected to be generated by the demolition of existing buildings, which would generate approximately 127,500~~945,085~~ cubic yards~~feet~~ of construction waste.²

The VA SSPP has a diversion target for nonhazardous solid waste of 50 percent by 2015. Should this target be achieved, approximately 63,750~~472,540~~ cubic yards~~feet~~ of construction waste would be transported to landfills over the 7-year construction period for Alternative 1 short-term projects. City and County of San Francisco Ordinance No. 27-06, the Construction and Demolition Debris Recovery Ordinance, requires that all mixed construction and demolition debris be transported by a registered transporter and be taken to a registered facility that can process and divert a minimum of 65 percent from landfills. However, SFVAMC is not required to comply with Ordinance No. 27-06 when implementing an EIS Alternative (Williams, pers. comm., 2012).

Footnote 5 in SDEIS Section 3.12, p. 3.12-9 has now been revised in the Final EIS to reflect the correct demolition volume and metric:

The volume of demolition waste generated was calculated based on the volume of square footage of all buildings proposed for demolition and seismic retrofit (in cubic feet), converted to cubic yards, and multiplied by a factor of 0.25 to obtain the demolition debris volume(4,000 square feet total) multiplied by the estimated height of each building (all buildings proposed for demolition are single story). The height of each building story was assumed to be 14 feet.

B4) Responses to Planning Association for the Richmond, Friends of Lands End, Coalition to Save Ocean Beach, Friends of Sutro Park, and People for a Golden Gate National Recreation Area Comments on SDEIS

RTC B4-1: SFVAMC thanks the five local groups for their background comments, and hopes to continue to work with the groups to improve Veterans health. As a point of clarification, Alternative 3 would implement 170,000 gsf at Mission Bay instead of Fort Miley and, as such, would result in 170,000, not 110,000, less net new gsf at Fort Miley.

RTC B4-2: VA respects the thoughtful explanation for the alternative preferences of the five local groups. SFVAMC's preferred alternative is Alternative 1; however, that does not preclude VA from implementing one of the other proposed alternatives if it decides to do so as part of its Record of Decision (ROD). SFVAMC construction would not expand beyond its existing land boundaries within the community, and SFVAMC has owned its property since the 1930s, before the development of the Outer Richmond neighborhood. SFVAMC looks forward to coexisting with the community in the future.

As noted above, the square footage numbers in the comment are incorrect with regard to Alternative 3; Alternative 3 would implement 170,000 gsf at Mission Bay instead of Fort Miley, which would result in 170,000, not 110,000, less net new gsf at Fort Miley. Importantly, the LRDP EIS is both a project-level NEPA assessment for the short-term projects and a programmatic-level NEPA assessment for the long-term projects, which include the long-term project at Mission Bay. The EIS explains that VA would conduct project-level NEPA analysis for long-term projects once specific sites are selected. Project-level impacts can only be assessed once a specific site is selected, and a specific site cannot be selected until VA has undergone its real property process to select and purchase land. All NEPA project-level and cumulative-level impacts on the SFVAMC Fort Miley Campus are addressed and, where relevant, mitigated in the EIS.

RTC B4-3: The comment requests clarification on the data and assumptions for several topics covered in the SDEIS.

The SDEIS reports that employment has fallen in the San Francisco Bay Area. As described on p. 3.11-3 of the SDEIS, the San Francisco Bay Area has experienced a decrease in the number of jobs in 2010 compared to the year 2000, which supports the statement in the SDEIS. The data presented for years 2000 and 2010 are based on the

U.S. Census, and provide a historical context for employment in the Bay Area. The data for years 2020 and 2030 were based on the most comprehensive sources of projections at the time this document was written, and provide a future context for employment in the Bay Area.

The California Department of Finance released updated projections for 2020 and 2030 after the release of the SDEIS in May 2015. The population and housing projections for the City and County of San Francisco have been updated accordingly; however, population, housing, and employment projections for the larger San Francisco Bay Area are provided by the Association of Bay Area Governments (ABAG). The most recent ABAG projections were published in 2009.

SDEIS Section 3.11, Table 3.11-1, and the paragraph following on page 3.11-1 and 3.11-2, has now been revised in the Final EIS to reflect this status:

Table 3.11-1: Population of the San Francisco Bay Area and of the City and County of San Francisco

	2000	2010	2020	2030	Annual Average Growth	
					Previous (2000–2010)	Projected (2010–2030)
San Francisco Bay Area	6,783,762	7,341,700	8,018,000	8,719,300	55,794	68,880
City and County of San Francisco	776,733	815,358 805,235	852,788 850,000	877,847 874,100	3,863 3,851	2,587 2,631

Sources: U.S. Census Bureau, ~~2000 and 2010~~; ~~DOF, 2013a~~; ~~DOF, 2011~~; ABAG, 2009

Approximately ~~815,358~~805,235 persons resided in San Francisco in 2010, an increase of ~~38,625~~28,502 persons since 2000 (Table 3.11-1). San Francisco is estimated to experience an increase in total population of ~~51,742~~27,612 (8.3 percent) between 2010 and 2030 (Table 3.11-1).

Text in SDEIS Section 3.11, Table 3.11-2 and paragraph preceding it on page 3.11-2 has now been revised in the Final EIS to reflect this status:

The greater San Francisco Bay Area had approximately 2,667,340 housing units in 2010, an increase of 201,320 units since 2000 (Table 3.11-2). The Bay Area is estimated to experience an increase in total housing units of 504,600 (19 percent) between 2010 and 2030 (Table 3.11-2). San Francisco had approximately 358,380 housing units in 2010, an increase of ~~41,853~~30,415 units since 2000 (Table 3.11-2). San Francisco is estimated to ~~lose 7,812~~ experience an increase in total housing of 42,320 units (~~12.2~~11.8 percent) between 2010 and 2030 (Table 3.11-2).

Table 3.11-2: Housing Units in the San Francisco Bay Area and in the City and County of San Francisco

	2000	2010	2020	2030	Annual Average Growth	
					Previous (2000–2010)	Projected (2010–2030)
San Francisco Bay Area	2,466,020	2,667,340	2,911,000	3,171,940	20,132	25,230
City and County of San Francisco	346,527	358,380 76,942	372,750 61,785	400,700 69,130	3,042 1,185	2,116 261

Sources: U.S. Census Bureau, ~~2000 and 2011~~2010; ~~DOF, 2013b; DOF, 2014~~; ABAG, 2009

The traffic and parking study area were defined based on accepted transportation planning and analysis practices and guidelines of the City and County of San Francisco. Please refer to RTC B4-35 and RTC B4-37 for full explanations of the traffic and parking study areas, respectively.

Regarding the use of air quality monitoring data from a location that is not near the SFVAMC Fort Miley Campus, the 10 Arkansas Street station is the closest monitoring station to the project site, and is intended to be representative of the City's attainment of the state and federal ambient air quality standards. Localized air quality conditions in the Outer Richmond are likely to be better than monitoring data from the 10 Arkansas Street station because of the prevailing winds and the surrounding land uses. These conditions, however, do not negate the common practice of using information from the 10 Arkansas Street station to generally characterize air quality throughout the City.

The Lincoln Park Steps Project was completed in May 2015, after the SDEIS was released.

Text in SDEIS Chapter 4.0, Table 4-1, p. 4-4 has now been revised in the Final EIS to reflect this status:

7	SFRPD Lincoln Park Steps Improvement	Potential accessibility improvements to the steps and preparation of steps, bench, and retaining walls to receive ceramic tiles	In planning and design phase <u>Completed in 2015</u>
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RTC B4-4: The comment expresses that the SDEIS understates the cumulative impact, and that most impact determinations are assessed as Minor or Minor with Mitigation, with two exceptions: Vibration and Historic Properties. An extensive list of projects were reviewed as part of the cumulative analysis to ensure that cumulative effects from past, present, and future projects were addressed. The impacts are disclosed in Section 4.4.5 of the SDEIS. Table 4.3 includes only topics (resource areas) for which the LRDP has the potential for an adverse cumulative impact and gives brief descriptions of those potential impacts. The sections following the table analyze the potential for impacts in more detail, and make a final determination regarding the significance of any cumulative impacts. These impacts were not understated. The potential for a significant cumulative impact for Traffic, Transit,

and Parking would be during construction. The proposed action phasing and mitigation and management measures will help ensure that a significant cumulative impact is not reached.

The cost/benefit ratio of cumulative impacts related to the potential new SFVAMC Mission Bay Campus that is considered under Alternative 3 cannot be fully determined at this time. However, due to the active level of development from past, present, and future projects in that area of San Francisco, there is also a potential for a significant cumulative impact.

The proposed action will not result in a degradation of adjacent resources at the SFVAMC Fort Miley Campus. For example, Consistency Determination CD-0003-15, adopted by CCC on June 12, 2015, found the LRDP consistent with public access, recreation, and visual policies.

RTC B4-5: There is no mention of “retained for further, or more detailed analysis” in the Air Quality section. The only case of “refined” or “further” analysis is regarding the health risk assessment (HRA), where the section identifies the need for more refined and further analysis to determine and disclose the impacts of toxic air contaminants. This analysis was completed for the SDEIS; therefore, the analysis and SDEIS is complete. Nevertheless, because this is an SDEIS for a LRDP, it is true that, in the future, individual components of the LRDP will need to undergo environmental review at a project level.

No information has been presented to support the contention that the Proposed Action would result in economic damages to property owners in the area. The SFVAMC Fort Miley Campus has been in operation since 1934, and VA is not aware of having a direct influence on property values. Real estate fluctuates with economic conditions, which are influenced by many factors. Property in the Richmond neighborhood of San Francisco, like most areas of San Francisco, has maintained its value.

The bullet referring to “Alternative” in the comment is vague, making it difficult to respond. However, each Alternative considered cumulative impacts for construction and operational phases.

The expected number of patients that will be at SFVAMC in 2020 and 2030 is difficult to predict. The improvements to the facilities under the Proposed Action will allow for adequate space to meet the current predicted needs; however, there are many factors that influence how many patients use a VA facility. The LRDP is a living document meant to respond to changing conditions, and the EIS was analyzed with a conservative approach to address the buildout conditions of the Campus.

RTC B4-6: The entire development program and building square footage in the LRDP is directly tied to activities that support the mission of SFVAMC. As described in Chapter 2.0, Alternatives, the LRDP was developed to meet a number of objectives, including VA’s ability to continue to provide combined clinical, research, and educational services for Veterans; and improved functional relationships between facilities and programs. The LRDP development program also meets other specific objectives, including meeting patient privacy standards and resolving Americans with Disabilities Act deficiencies; addressing

space deficiency at the campus; ensuring a parking supply that meets current and future demands; and improving internal and external Campus circulation, utilities, and infrastructure. The SFVAMC LRDP development program would allow VA to achieve 94 percent of its determined need through 2030 at a single campus. The following table shows the gsf of buildings at the project site that fall within the categories requested by the comment.

Building	GSF	Percentage of Buildout
Inpatient and Outpatient Facilities <ul style="list-style-type: none"> • Building 211 Emergency Operations Center • Buildings 22, 9, 10 (Hoptel) • Building 203 C-Wing Extension (Patient Welcome Center) • Building 200 Expansion (Operating Room) • Building 24 Mental Health Clinic • Building 203 Extension (Psychiatric Intensive Care Unit) • Building 208 Extension (Community Living Center and National Cardiac Device Surveillance Center) • Building 213 (Clinical Addition) • Buildings 1, 6, 8 (Clinical, Geriatrics, Mental Health) • Building 7 (Canteen, Auditorium, Chapel) • Building 5 (Prosthetics, Research, Clinical, Administration) 	2,000 gsf 18,200 gsf 7,100 gsf 5,300 gsf 15,600 gsf 1,200 gsf 10,000 gsf 170,000 gsf 38,515 gsf 22,803 gsf 4,590 gsf	
Subtotal	295,308 gsf	38%
Research and Laboratories <ul style="list-style-type: none"> • Building 41 (Research) • Building 40 (Research) • Building 207 Expansion (IT Support Space) • Building 43 (Research) • Building 23 (Mental Health Research Expansion) • Buildings 1, 6, 8 (Research) 	14,200 gsf 91,300 gsf 7,000 gsf 7,500 gsf 15,000 gsf 38,516 gsf	
Subtotal	192,216 gsf	25%
Administration <ul style="list-style-type: none"> • Building 211 Storage • Building 43 (Administration) • Buildings 1, 6, 8 (Administration) • Trailer 36 (Modular) 	3,000 gsf 7,500 gsf 38,516 gsf 2,200 gsf	
Subtotal	51,216 gsf	7%
Parking <ul style="list-style-type: none"> • Building 211 Parking • Buildings 209 and 211 Parking Garage Extensions 	150,000 gsf 82,252 gsf	
Subtotal	232,252 gsf	30%
TOTAL	770,992	100%

RTC B4-7: Since release of the SDEIS, SFVAMC has decided to remove the proposed water tower and store water underground. This change to VA's plan would avoid the visual effects

identified by the comment. Text and figures have been modified in the Final EIS to reflect this revision to the plans.

RTC B4-8: The design of proposed buildings along the Campus/GGNRA boundary would be finalized as part of the NHPA Section 106 consultation process in accordance with the fully executed PA dated January 9, 2015. Because the designs are still in development, more detailed visual simulations would not provide additional information at this time. The design process that is currently underway pursuant to the Section 106 consultation will result in development along the Campus/GGNRA boundary that will be protective and consistent with the integrity and design sensitivities of the neighboring NPS lands.

No changes can be seen between existing conditions in Figure 3.1-6b and the proposed project conditions in Figure 3.1-20b because no view change would occur from this vantage point.

VA would not trim or remove trees on GGNRA's property, because maintenance and preservation of trees and other vegetation is handled by GGNRA. The LRDP does, however, show a landscape concept that includes a "Buffer Zone," the purpose of which is to provide a buffer and transition between VA and its neighbors. The landscape plan identifies the location for future plantings, as well as the type of planting materials to achieve the objective of each zone.

RTC B4-9: Potential visual impacts related to proposed extensions of Buildings 209 and 211 are depicted in SDEIS Figures 3.1-11a and 3.1-18a. Based in part on these simulations, the buildings' visual effects on publicly accessible viewpoints were determined to be minor. It is noted that the design of the side of these buildings along the property boundary is under refinement, and will be reviewed in accordance with the PA. The outcome of this process may adjust the design in a manner that will be protective and consistent with the integrity and design sensitivities of the neighboring NPS lands.

RTC B4-10: Data monitored at the 10 Arkansas Street station and other stations in the San Francisco Bay Area Air Basin are used by the U.S. Environmental Protection Agency to designate the attainment status of the region for ambient air quality standards. The region's attainment designations are used to determine the applicable *de minimis* thresholds used to evaluate a project's construction and operational emissions. The 10 Arkansas Street station is the closest monitoring station to the project site, is generally representative of air quality conditions in the City, and is typically used in environmental documents to describe ambient air quality conditions. As noted by the comment, localized air quality conditions in the Outer Richmond are likely to be better than monitoring data from the 10 Arkansas Street station because of the prevailing winds and the surrounding land uses. These conditions, however, do not negate the common practice of using this information to generally characterize air quality throughout the City. It should be noted that these ambient air quality data are not used to directly evaluate the LRDP.

RTC B4-11: The comment identifies several concerns with the assumptions used to evaluate construction-related air quality effects, and requests that additional mitigation measures be included in the Final EIS.

Regarding the methodological assumption for estimating the health risks from construction activities, HRA and criteria air pollutant emissions modeling was conducted using default assumptions in CalEEMod based on the amount of development proposed in the LRDP. This analysis was not based on two pieces of equipment during a single demolition or construction phase. Rather, the default CalEEMod assumptions used to derive health risks are conservative to avoid underestimating emissions, and are consistent with methodology prescribed by the Bay Area Air Quality Management District (BAAQMD) when project-specific information is unknown. In addition, the HRA considered the worst-case years of construction, and conservatively assumed that the associated emission levels would continue throughout the entire construction period. Furthermore, the calculations used to determine health risks are purposely overestimated by levels of magnitude to err on the side of safety (i.e., determine higher potential impacts). The conservative assumptions used for the HRA analysis would indicate that actual emission levels would be less than those reported.

As presented in the SDEIS, all health risk impacts associated with construction activities would be less than the health risk thresholds established by BAAQMD with implementation of mitigation measures. Although, as stated in the comment, health risks are close to BAAQMD thresholds, health risks calculated as part of HRAs are highly conservative, as described above. Not every project that contributes air quality emissions to a region would be considered significant. BAAQMD developed health risk thresholds of significance to determine whether these short-term and temporary increases in air quality emissions would be significant. Pursuant to the California Office of Environmental Health Hazard Assessment's conservative health risk calculations, and BAAQMD's established thresholds of significance, the LRDP's construction activities would not result in significant health risk impacts on nearby sensitive receptors.

With respect to mitigation measures, Tier 4 construction equipment represents the lowest emitting construction equipment commercially available at the time of this analysis. As described in the analysis, implementation of the mitigation measures (Mitigation Measures AIR-1 and AIR-2 from the SDEIS) would reduce health risk impacts associated with construction activities to below the thresholds used by the BAAQMD to determine significant adverse effects. Therefore, if impacts are reduced to a less-than-significant level, no other mitigation measures are required. The comment raises concern about the contractor's ability to properly implement prescribed mitigation measures. A mitigation monitoring and reporting program will be developed and implemented that will be used to verify the use of the air quality mitigation measures adopted by VA.

RTC B4-12: There are no comments on the SDEIS community services section; therefore, no response is provided.

RTC B4-13: The impact of proposed construction on the SFVAMC Historic District and the Fort Miley Reservation Historic District was considered in the NHPA Section 106 technical documentation. This documentation includes a report that identifies potential effects to historic resources, based on criteria that are defined by federal regulations. Critical to this assessment is whether the effect would compromise the integrity of the historic resource and cause it to lose its ability to convey its significance. Pursuant to the Section 106 process, this effects document, identified as a FOE, must be reviewed by the SHPO, who will consider the analysis and determine whether the effects criteria have been appropriately applied. The FOE indicates that construction of Building 40 would alter the scale, massing, site plan, and rhythm of the western end of the SFVAMC Historic District. Based on the nature and extent of these changes, the FOE concludes that the LRDP would have an adverse effect on the SFVAMC Historic District. As required by the Section 106 process, this finding was reviewed and concurred with by the SHPO. SFVAMC has shared the submissions to SHPO with the community. A PA was prepared that defines the process to address adverse impacts on the SFVAMC Historic District through feasible mitigation measures. Consequently, specific measures to reduce adverse historic resource effects will be finalized as part of the NHPA Section 106 consultation process, in accordance with the fully executed PA dated January 9, 2015. All buildings designed on Campus take into consideration the proximity to the Historic District in efforts to contextually blend in with existing massing and architecture; buildings outside of the historic district will be reviewed in accordance with the PA. The HDDG is currently being developed and will be posted on the SFVAMC website; comments from Consulting Parties will be considered before design plans are finalized. Coordination with SHPO has taken place, keeping them informed on the status.

RTC B4-14: There are no comments on the SDEIS floodplains, wetlands, and coastal management section; therefore, no response is provided.

RTC B4-15: The comment requested clarification on what mitigation actions are proposed to address stability concerns over the southern slope of the SFVAMC. Previously mapped landslides appear to be well outside the southern slope area (ENGEO, 2008). In addition, a site visit did not reveal any potential impact from landslides mapped on the campus. Furthermore, no excessive erosion nor any springs or seepages were observed on the southern slope (Treadwell & Rollo, 2010). By contrast, major and minor landslides, as well as surface slumping, have historically occurred on the slope below the northern portion of the SFVAMC Fort Miley Campus as a result of high rainfall, seismic movement, and land erosion. As a result of the above investigations and review of conditions for the southern slope, no slope stability effects are anticipated, and therefore geology/soils mitigation measures are not proposed for the southern slope. However, SFVAMC has committed to coordinating with GGNRA in developing stormwater and water storage plans that avoid contributing to geologic instability; this is included in Consistency Determination CD-0003-15 adopted by CCC on June 12, 2015, which found the LRDP consistent with water quality and hazard policies of the Coastal Act (Sections 30231 and 30253a and b).

RTC B4-16: There are no comments on the SDEIS greenhouse gas emissions/climate change section; therefore, no response is provided.

RTC B4-17: There are no comments on the SDEIS hydrology/water quality section; therefore, no response is provided.

RTC B4-18: As stated in the comment, the SDEIS reports the total acreage of the SFVAMC campus as 29 acres. VA acknowledges that areas such as those identified by the comment (i.e., slide area) are not usable areas for future development.

RTC B4-19: VA recognizes the value of accessibility to parklands, and the role that the SFVAMC can have in fostering improved connections to neighboring GGNRA areas. In response to these opportunities, the landscape concept in the LRDP provides high-level design guidance for the landscaping, wayfinding, and connections that the SFVAMC Fort Miley Campus can offer. The goals and objectives from the LRDP that are applicable to this comment include:

Promote good relations with Campus neighbors.

- Provide clear and attractive pedestrian connections between the residential neighborhood and surrounding open space, as well as use of publicly accessible open space on the Campus.
- Partner with GGNRA to improve the ecology and environmental health of the area.

Create a welcoming environment.

- Reinforce site geometries and circulation routes, improving wayfinding and site comprehension.

The LRDP provides the framework for circulation, open space, design, and new development. As future development progresses, SFVAMC would adhere to the goals and objectives listed above, providing and improving upon pedestrian connections to the adjacent parks, and improving signage. Details of the pedestrian interface for Building 23 in particular will be identified and determined during the final design.

Although SFVAMC cannot commit to providing funding to another federal agency for improvements or renovations on their property, SFVAMC is committed to continuing to partner with the GGNRA to find opportunities for improvements that are mutually beneficial.

RTC B4-20: The comment states that the Proposed Action would industrialize the site and have a substantial cumulative impact on land use. The existing SFVAMC Fort Miley Campus is already developed. The Proposed Action does not include residential development that would directly increase the population density of the area. Section 3.9 of the SDEIS concludes that the Proposed Action would not substantially alter the existing land use at the existing SFVAMC Fort Miley Campus, because the LRDP proposes a continuation of land uses already existing at the Campus. The Proposed Action is also a medical/institutional facility designed to support local and regional patients.

The immediate vicinity of the Campus is defined by the Outer Richmond residential neighborhood, the GGNRA/NPS recreational and historic resources, other recreational resources, and limited commercial uses along Geary Boulevard and Clement Street. The cumulative changes in this area are primarily those related to the SFVAMC campus; other changes to land uses in the Outer Richmond are not expected to substantially alter the existing land use pattern or intensify the existing uses. As a result, the cumulative effects are largely a reflection of changes on the Campus and little elsewhere. The changes to land use, then, are primarily those described in the LRDP-related analysis and summarized in the preceding paragraph. The combined effect of planned land use changes at the SFVAMC Campus and in the Outer Richmond would not be cumulatively adverse.

Regarding the comment that the proposed LRDP would industrialize the site, “industrial” uses typically include light or heavy manufacturing, power plants, ship yards, automobile wrecking, food and beverage processing, hazardous waste facilities, junkyards, and livestock processing. Industrial uses can also be found in industrial parks, business parks, and campus-like settings. The uses proposed by the LRDP call for an increased development program that includes net new construction on-site, but the LRDP also proposes design concepts to foster use of open space, pedestrian connections, and improved wayfinding (please refer to RTC B4-19). Therefore, VA would not consider development proposed under the LRDP to be industrial in nature; rather, the LRDP proposes new medical-related development and design guidelines to meet VA’s Purpose and Need, while minimizing and avoiding impacts to the surrounding neighborhood.

RTC B4-21: Trailer 36 is a modular unit and, if needed, could be used for office space for administrative staff on a temporary basis.

The noise analysis in the SDEIS evaluates noise impacts at residences along Clement Street and Sea Rock Drive immediately south of the SFVAMC Fort Miley Campus project site (to represent the worst-case analysis) and residences at a further distance, at Point Lobos Avenue and 43rd Avenue. The baseline ambient noise levels in the vicinity of the project site were measured in March 2011. The comment references the San Francisco Noise Ordinance (SFNO), which states that “*in no case shall the ambient be considered or determined to be less than: (1) thirty-five dBA for interior residential noise, and (2) Forty-five dBA in all other locations,*” and suggests that the baseline ambient should be 45 A-weighted decibels (dBA), in lieu of the measured ambient of 60 dBA used for the LRDP noise analysis.

The comment interpreting the minimum ambient noise requirements of the SFNO warrants a further explanation. For clarification, the referenced section from the SFNO (Section 2901[a]) establishes the minimum (presumed) ambient for the purpose of determining the minimum background noise level in the absence of any new noise sources. It is not the required ambient noise level. That is, if the measured ambient noise is below 45 dBA (at the exterior of a residence), then the presumed ambient would be 45 dBA (to be used for determination of violation of the noise ordinance). On the other hand, the actual measured ambient noise level (if greater than 45 dBA) should be used as the baseline

ambient, which is the case for the SDEIS. Based on this clarification, the baseline ambient noise levels used in the SDEIS noise analysis are correct and in accordance with the SFNO. Therefore, the noise impact as presented in the SDEIS was appropriately analyzed. As described in the SDEIS (p. 3.10-19), the temporary adverse noise impact (approximately 3 months) associated with the installation of Trailer 36 would be reduced to a minor impact with implementation of Mitigation Measure NOI-1.

RTC B4-22: The baseline ambient noise levels near the Campus were measured, as described in RTC B4-21, immediately above. The SDEIS does not assume that these ambient conditions are acceptable; they serve as a baseline against which to measure changes that would result from implementation of the LRDP.

As described in the SDEIS (p. 3.10-25), any new on-site stationary equipment (e.g., mechanical heating, ventilation, and air conditioning equipment) that would be installed on new buildings on the Campus must comply with SFNO Section 2909 “Noise Limits.” That is, the noise generated by the new stationary equipment shall not exceed the ambient noise levels at the project property line by 5 decibels (dB) or exceed the fixed residential interior noise limits (45 dB between 10 p.m. and 7 a.m. and 55 dB between 7 a.m. and 10 p.m.). These are performance standards that must be met by all new stationary equipment (also, please refer to RTC B4-21, above, for a clarification on the definition of ambient noise levels). During the final design of new buildings proposed by the LRDP, new on-site stationary equipment will be designed to comply with this standard through installation of standard noise control features, such as noise barriers, acoustical louvers, and silencers. Because future construction must adhere to these standards in the SFNO, noise impacts associated with the new on-site stationary sources would be minor.

Text in SDEIS Section 3.10, p. 3.10-25 has now been revised in the Final EIS to reflect the on-site stationary sources at the nearest off-site residences (project southern property line):

Based on the noise monitoring conducted at existing HVAC equipment on the project site, noise attributable to exterior equipment would not exceed 55 dB at a distance of 100 feet, which is the shortest distance between the proposed locations of Alternative 1 short term projects and off site residences. The design of the new stationary equipment (e.g., mechanical HVAC equipment) would include standard noise control features, such as barriers, acoustical louvers, and silencers, in compliance with the San Francisco Noise Ordinance. Therefore, the proposed project stationary equipment would not exceed the existing ambient noise level at the project property line by more than 5 dB.

RTC B4-23: As described in the SDEIS (p. 3.10-4) and according to the Federal Transit Administration (FTA) (Table 3.10-3 of the SDEIS), a vibration level of 75 vibration decibels (VdB) is the approximate dividing line between a barely perceptible and a distinctly perceptible level, and a vibration level of 85 VdB would be acceptable only if there are infrequent daily vibration events. The SDEIS analysis used an 80 VdB threshold for construction impacts, which is based on the FTA impact criterion for residences and buildings where people normally sleep, and on the temporary occurrence of construction activities.

The estimated vibration level of 78 VdB at the residence on Seal Rock Drive is based on assumptions for the intense vibration generated by construction activities (i.e., large bulldozer excavating), and represents the most conservative analysis. These assumptions include use of a large bulldozer for the installation of Trailer 36. The groundborne vibration level at the nearest residence on Seal Rock Drive would likely be less than 75 VdB, because the construction equipment used for the installation of Trailer 36 would likely not generate groundborne vibration level as otherwise produced by the operation of large bulldozer (i.e., no excavation).

The Legion of Honor/Fine Arts Museum of San Francisco was identified as a sensitive receptor in the vicinity of the SFVAMC Fort Miley Campus (p. 3.10-7 of the SDEIS). Vibration impact was not analyzed for this location because of its distance from the LRDP construction area, approximately 600 feet northeast of the project site. At this distance, significant groundborne vibration impacts from the LRDP construction activities would not be expected to occur. This expectation is based on the following: the vibration levels from construction equipment (assuming the highest groundborne vibration generating piece of equipment, a vibratory roller) at the Legion of Honor/Fine Arts Museum of San Francisco would be approximately 53 VdB (0.002 peak particle velocity [PPV]). The LRDP construction-related vibration would be well below the approximate threshold of human perception of 65 VdB (per FTA, see Table 3.10-3 of the SDEIS) and the potential building damage threshold of 0.12 PPV (the most stringent threshold applicable to buildings extremely susceptible to vibration damage, according to FTA; see Table 3.10-7 of the SDEIS). Therefore, no vibration impacts from LRDP construction would be expected to impact the Legion of Honor/Fine Arts Museum of San Francisco.

RTC B4-24: The comment requests clarification on the assumptions for employment, where the SDEIS reports that employment has fallen in the San Francisco Bay Area. Please refer to RTC B4-3, which explains this statement and also updates demographic information presented in the SDEIS.

RTC B4-25: The comment states that the SDEIS does not address adverse economic impacts of the cumulative minor impacts on nearby property owners. As evaluated in SDEIS Section 3.11, “Socioeconomics and Environmental Justice,” the impacts of short-term construction and long-term operations would not cause an adverse impact with respect to population, housing, and employment growth; displacement of populations and/or local businesses; environmental justice; and environmental health and safety risks to children. Rather, the LRDP would increase employment, which could be an economic benefit to local businesses in the area. Because all socioeconomic issues have been determined to have no impact or, if adverse, can be mitigated, it is not anticipated that the cumulative effect of these impacts would affect property owners. Furthermore, neither construction nor operation of the cumulative projects would result in hardships for the local economy.

RTC B4-26: The comment states that the “*impact of Alternative 1 or Alternative 2 on activities engaged in by residents (enjoyment of their back yard, hours of sleep/quiet) is not mitigated.*” Noise impacts associated with LRDP construction and operation were evaluated (Section 3.10,

“Noise and Vibration,” of the SDEIS), and impacts associated with construction would be reduced to minor impacts at the nearest off-site residential uses with the recommended noise mitigation measures. With respect to operational noise, the analysis has determined that the LRDP would not result in adverse impacts from on-site stationary sources (e.g., building mechanical equipment) and off-site mobile sources (e.g., vehicle traffic).

Short-term impacts on visitors of GGNRA would be minor. The peak period for visitors to GGNRA lands is on the weekend, when construction would not occur at SFVAMC. The CCC reviewed the Proposed Action, including consideration of the adjacent GGNRA land. Consistency Determination CD-0003-15, adopted by CCC on June 12, 2015, found the LRDP consistent with public access, recreation, and visual policies (CCC, 2015).

RTC B4-27: The radiological procedures and isotopes used at SFVAMC have little risk to the public due to their level, location, and shielding.

RTC B4-28: VA meets its obligations under the Emergency Planning and Community Right-to-Know Act (EPCRA) through updates to its Hazardous Materials Business Plan to the City and County of San Francisco, Department of Public Health, Environmental Health Branch; and via the state’s California Environmental Reporting System database. Chemicals covered by EPCRA are those that are specifically identified in the Code of Federal Regulations (40 CFR, Part 355, Appendix A and Appendix B).

RTC B4-29: Permitted emissions are listed in the SFVAMC Bay Area Quality Management District Permit, Site A0459, as follows.

Table RTC-2 Permitted Emissions				
BAAQMD Permit A0459	Pollutants (average pounds/day)			
Source	PM	ROG	CO	NO_x
Incinerator	1	2	13	0.1
Boilers	1	2	13	54

Notes:

BAAQMD = Bay Area Air Quality Management District

CO = carbon monoxide

NO_x = oxides of nitrogen

PM = particulate matter

ROG = reactive organic gases

SFVAMC has an animal carcass incinerator in use. Emissions in terms of particulates are not measured from the animal carcass incinerator. Based on this past year’s use, SFVAMC estimates its 12-month consumption to be 1,049 therms (assuming that the maximum natural gas fuel usage rate is 19 therms/hour). Incinerator-related emissions are assumed to be the same and constant across all three action Alternatives.

RTC B4-30: SFVAMC has an emergency operation plan, which determines how VA responds to various emergencies. However, this document is not publically available, because it contains

security-sensitive information. Also, there are no Biohazard Safety Level (BSL)-3 activities on the SFVAMC Fort Miley Campus, and none are planned as part of the LRDP.

RTC B4-31: There would be no increased hazardous materials exposure risk related to implementation of the Alternatives evaluated in the SDEIS.

RTC B4-32: The time periods selected for the parking study are intended to capture all potential peak periods for parking demand (as observed through the *occupancy* of parking spaces), and are consistent with parking studies in the City and County of San Francisco, as recommended in the San Francisco Planning Department's *Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)*. These time periods were selected because they capture the expected peak periods of demand for parking (when turnover for parking spaces is not expected to be high) for all types of land uses, including residential (early evening), office (late morning), and retail/restaurant (early afternoon or early evening).

The time periods suggested by the comment of 6:40 a.m. to 9:00 a.m. and 4:00 p.m. to 6:30 p.m. correlate well with the 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m. windows considered as the "(weekday) a.m. peak period" and "(weekday) p.m. peak period," respectively.

Collecting parking occupancy data during periods of high turnover is generally not recommended. The high frequency of parking movements results in potential variability in the observed occupancies over the course of the survey period, which can be quite substantial and may result in the underestimation of parking demand and occupancy/utilization. For an accessory parking facility exclusively serving an office building, for example, parking occupancy would be expected to gradually rise over the course of the a.m. peak period from 7:00 a.m. to 9:00 a.m. as employees arrive at work, eventually peaking in the first peak period for parking demand (i.e., occupancy) at 9:00 a.m. to 11:00 a.m. Subsequently, occupancy would drop as employees leave for lunch or other errands before peaking again (usually at a lower level than the late morning period) when they return to the office after lunch, in time for the second peak period for parking demand at 1:00 p.m. to 3:00 p.m. Likewise, occupancy for on-street parking, which is primarily used by local residents who commute to work by car, would gradually increase over the course of the p.m. peak period from 4:00 p.m. to 6:00 p.m. when residents arrive home, eventually peaking in early evening peak period for parking demand at 7:00 p.m. to 9:00 p.m. Consequently, parking studies are typically conducted in the hours before, after, or between periods of frequent movements, when the frequency of parking movements has subsided and occupancy is comparatively stable and consistent, with minimal variability over the course of the survey period. The time periods suggested by the comment would not capture periods of actual peak parking demand (as measured by occupancy of parking spaces) so much as periods of high turnover.

It should be noted that residential and employment-based land uses generally complement each other in terms of parking demand peaking. In particular, many SFVAMC personnel begin leaving Campus by 4:00 to 5:00 p.m., with occupancy of Campus employee parking facilities beginning to reduce to 50 percent during these times. Thus, the effect of Campus

parking demand on the surrounding residential neighborhoods during the course of a typical day has already substantially subsided by the latter half of the weekday p.m. peak period, when many local residents in the area would be expected to be returning home from work or school.

RTC B4-33: Existing bicycle conditions off-Campus, including the sharrows along Clement Street and Seal Rock Drive (Routes 10/95) identified in the comment, are characterized in SDEIS pp. 3.13-19 through 3.13-21. The potential effects of the LRDP on bicycle conditions off-Campus, including the effect of additional vehicular traffic generated by the Campus on or crossing roadways with designated bikeways, are described in the SDEIS (see SDEIS pp. 3.13-63 and 3.13-73). Given the magnitude of the expected increase in vehicular traffic, the SDEIS concludes that the LRDP is unlikely to substantially increase the potential for conflicts between bicyclists and motorists, and that the LRDP's overall operational impacts on bicycle conditions would be minor. Any potential effects to bicycle conditions along Clement Street and Seal Rock Drive as a result of construction-related activities are also expected to be minor after implementation of Mitigation Measure TRANS-1 to restrict construction-related truck traffic to identified haul routes (see SDEIS p. 3.13-51); and of Management Measure TRANS-1 to provide protective measures for traffic (including bicyclists), transit, and pedestrians if pedestrian facilities or travel lanes on- or off-Campus require temporary closure (see SDEIS pp. 3.13-52 and 3.13-53).

RTC B4-34: The LRDP does not specifically include any project elements regarding car-sharing or parking spaces dedicated for car-share use, either on- or off-Campus. Although SFMTA is in the process of conducting a 2-year pilot program to designate as many as 900 on-street parking spaces throughout the City as on-street car-share spaces for use by certified car-share organizations, there is no firm or stated commitment yet on the part of SFMTA to make these changes permanent. Therefore, on-street car-share spaces are not a foreseeable change at this time, and are not considered in the EIS. Should SFMTA decide to make the pilot program permanent, however, SFMTA would likely conduct its own environmental review process to analyze potential environmental impacts of the change.

Designation of on-street car-share spaces in the neighborhood surrounding the Campus may reduce overall demand for on-street parking by allowing some households in the area to forego or reduce their automobile ownership. Strategies such as valet parking can also increase the on-site parking capacity at the Campus to address on-street parking supply limitations, even if SFMTA subsequently decides to implement on-street car-share spaces as a permanent program.

RTC B4-35: The intersections evaluated in the traffic operations analysis were selected based on engineering judgment, and reflect locations that are projected to best capture the traffic flow effects of the SFVAMC Fort Miley Campus, as described on SDEIS p. 3.13-5. As a result, the study intersections include the two main Campus roadway access points along Clement Street at 42nd Avenue and 43rd Avenue, as well as their connection to the major east-west roadway (Point Lobos Avenue, which merges with Geary Boulevard east of 40th Avenue).

The 45th Avenue/Clement Street intersection was not selected, because the expected traffic increase given its distance from the main entrances to the Campus, compared to the existing traffic volumes, was not sufficient to trigger closer examination. The weekday p.m. peak-hour counts conducted in 2011, which were illustrated in SDEIS Figure 3.13-4, show a total of 544 vehicles leaving the Campus from the two primary access points at 42nd Avenue/Clement Street and 43rd Avenue/Clement Street. Only 86 of these vehicles (approximately 16 percent) made right turns onto westbound Clement Street, and the vast majority proceeded southbound (54 percent) or made a left turn onto eastbound Clement Street (30 percent). This traffic flow, with relatively little towards the west, informed the decision to not include the 45th Avenue/Clement Street intersection.

As indicated in the SDEIS, none of the LRDP alternatives would result in a significant impact at any of the selected study intersections (including 42nd Avenue/Clement Street and 43rd Avenue/Clement Street), which would continue to operate at acceptable conditions in all horizon years. Given that these intersections are located on the primary access routes to the Campus and carry significantly more traffic than the 45th Avenue/Clement Street intersection, no adverse impacts would be expected at 45th Avenue/Clement Street, which would likely continue to operate at acceptable conditions in the future.

RTC B4-36: Although San Francisco as a whole is experiencing rapid development growth, the Outer Richmond neighborhood is considered mostly built-out, with relatively little opportunity for new developments and redevelopment. Redevelopment opportunities in this neighborhood are observed to be primarily replacement of existing uses or modest increases of existing density, which overall would not result in substantial increases in vehicle trip generation.

From a Citywide perspective, the City and County of San Francisco projects traffic growth based on land use changes, including redevelopment zones and community plan areas covering most of the eastern portion of the city (e.g., the extensive Eastern Neighborhoods rezoning effort, the Market and Octavia Neighborhood Plan, the Rincon Hill Plan, the Transit Center District Plan, and the Transbay and Mission Bay redevelopment programs, and three major redevelopment areas [Candlestick Point/Hunters Point Shipyard, Treasure Island/Yerba Buena Island, and Parkmerced]). Outside of these areas, future growth is also expected to take place in Central SoMa and Mid-Market, and in large-site redevelopments such as Visitacion Valley (Schlage Lock site), Pier 70, Executive Park, public housing sites (Sunnydale–Velasco and Potrero Terrace and Annex), and unused or disused publicly owned sites such as the Balboa Reservoir site. Specifically, the San Francisco Planning Department forecasts that 80 percent of the city's expected growth will be concentrated in neighborhoods occupying just 20 percent of the land, none of which are near the Richmond District. The Planning Department is not currently undertaking any efforts to rezone or increase the density or scale of development in the neighborhoods surrounding the Campus beyond what is already allowed by existing zoning regulations.

The population projections from these and other future developments have already been captured in the SDEIS's future-year transportation analyses through the use of growth factors derived from the San Francisco Chained Activity Modeling Process (SF-CHAMP) and the travel demand forecasting model maintained by the San Francisco County Transportation Authority (SFCTA), as discussed on SDEIS pp. 3.13-44 through 3.13-45. SF-CHAMP incorporates growth from the developments described above (estimated in the form of changes in population and employment for zones covering the entire geographical scope of the city and region, with each zone encompassing one or more city blocks), and uses a sophisticated forecasting and assignment methodology to assign future travel demand to the City's transportation network, including roadways and transit infrastructure and services. The land use projections incorporated into SF-CHAMP are maintained by the San Francisco Planning Department, which generally requires that all transportation-related environmental analyses (including transportation impact studies and environmental impact reports) make use of SF-CHAMP when forecasting future transportation conditions.

In addition to the aforementioned specific land use developments, SF-CHAMP also assumes marginal to moderate levels of growth in remaining parts of the city, including the Outer Richmond. As a result, the SDEIS's population growth rates for the Outer Richmond are appropriate and consistent with forecasts by the San Francisco Planning Department, and the projections from the SFCTA's SF-CHAMP model outputs.

Regarding the comment about the age of the traffic count data, turning movement counts at the study intersections were collected in 2011. Generally, data within a 2-year time frame of the commencement of a study—e.g., publication of a Notice of Intent (NOI) for an environmental impact statement—are considered adequate for use in a transportation-related technical analysis. The time frame may be extended, however, if general traffic levels have remained stable or declined. Given that the Outer Richmond neighborhood surrounding the Campus is a built-out residential district that has not seen substantive development between 2011 and 2015, background traffic levels (controlling for traffic generated by the Campus, including traffic generated by construction-related activities on the Campus) are unlikely to have changed enough to warrant the collection of more recent count data.

In particular, traffic levels (like parking conditions) change from day to day, and a variation of 5 to 10 percent from one day to the next is common and considered within the acceptable margin of error of other components of the traffic analysis (such as the *Highway Capacity Manual* methodology). Given these considerations, most transportation-related environmental analyses are based on a single day of counts. Collection of more than one day of traffic counts is appropriate when conducting detailed traffic/transportation engineering work for design and construction of roadway improvements.

RTC B4-37: The geographical scope of the parking occupancy surveys at the SFVAMC Fort Miley Campus is consistent with the approach recommended by the San Francisco Planning Department, which requires that any parking analysis consider a parking area within a two-block radius of a project site (see p. 23 of the Transportation Impact Study, in SDEIS

Appendix E). Surveys of parking in areas beyond this radius are typically not considered necessary, because parking conditions are highly variable. The absence of a ready supply of parking spaces, combined with available transportation alternatives and an urban development pattern, can be expected to induce shifts in travel behavior towards transit, walking, biking, or other modes (see SDEIS pp. 3.13-64, et al.). Given the expected parking deficit in on-Campus parking (see SDEIS p. 3.13-75, et al.) and the considerations cited above, parking conditions beyond the two-block radius are not expected to be sufficiently unique to warrant further study, and the spillover effects generated by parking demand at the Campus would decrease with distance from the site. Additional study of these more distant areas would not provide additional data that would change the conclusions of the SDEIS.

SFVAMC understands that some Campus users may park in the areas cited in the comment, including Seal Rock Drive to the west of the Campus and El Camino del Mar and other areas near the Legion of Honor. These facilities are public parking on land or rights-of-way not controlled by SFVAMC, which has limited ability to control the use of these spaces by Campus users. SFVAMC does not have any jurisdiction over these off-Campus parking areas, which are under the purview of other public agencies such as the NPS (e.g., parking near Lands End) or the SFMTA (e.g., on-street parking in the surrounding residential neighborhood). Many of the areas on NPS land are already restricted to 4-hour parking during the day to discourage long-term use (whether among Campus users or other motorists) and encourage more turnover, but still attract some level of use among Campus users.

RTC B4-38: The Department of Public Works (DPW) administers San Francisco's street sweeping program and manages the frequency, day(s), and hour(s) of street cleaning. The SFMTA permits use of portions of the public right-of-way for on-street parking. It is the responsibility of the motorist using the on-street parking space to vacate it in compliance with the established curb restrictions, such as for street cleaning.

The sweeping schedule for Clement Street in the immediate vicinity of the Campus between 39th Avenue and 45th Avenue restricts parking along the northern side on the second and fourth Thursdays of each month between 12:00 p.m. and 2:00 p.m., and along the southern side on the second and fourth Tuesdays of each month between 10:00 a.m. and 12:00 p.m. Sweeping activities along the intermediate side streets (39th Avenue through 45th Avenue) between Clement Street and Point Lobos Avenue take place during the second and fourth Wednesdays or Fridays each month (depending on street side), between 12:00 p.m. and 2:00 p.m. or between 1:00 p.m. and 3:00 p.m. Thus, within this area, there are 8 days each month during which DPW conducts street sweeping, for which only a fraction (approximately a quarter) of the street sides in the area are affected on any one day, for a total duration of 2 hours during the midday period. Given these considerations, street sweeping is generally an infrequent event, outside the typical range of parking conditions expected on a given day. Transportation-related environmental review conducted in the City and County of San Francisco does not consider effects associated with street sweeping

restrictions; such effects would be considered an occasional condition, and not representative of a typical baseline condition against which to evaluate project impacts.

RTC B4-39: SFVAMC understands neighborhood concerns related to parking, and has already implemented a variety of measures to help reduce some of the effects of parking spillover, including valet parking and the Campus's commuter shuttle program. As stated in the comment, on-street parking in the vicinity of the Campus is managed by the City of San Francisco through SFMTA, which implements a variety of programs and measures, including the Residential Parking Permit (RPP) program.

With regard to the potential impacts of the LRDP relative to the proposed RPP program for the surrounding neighborhood, any environmental analysis, including one related to transportation, must be conducted based on the information available at the time of the commencement of the study. The original NOI of the environmental impact statement for the LRDP was published in April 2011. At that time, no specific information was available regarding an RPP program for the neighborhood surrounding the Campus.

If an RPP program is implemented in the surrounding neighborhood, SFVAMC has strategies to address Campus parking capacity. Valet parking can increase the on-site parking capacity and, as mentioned previously, less available on-street parking in the neighborhood may induce motorists traveling to the Campus to use other modes of transportation.

RTC B4-40: Traffic safety concerns related to existing shuttle operations on City streets should be raised separately with the SFVAMC and the SFMTA. Other than minor changes to on-Campus circulation and stop locations, the LRDP does not include any specific elements related to the shuttle service at the Campus, including the commuter coaches referenced in the comment.

SFVAMC does not operate any shuttle services along Seal Rock Drive, and does not expect to do so any time in the near future, under the LRDP or otherwise. The restrictions referenced in the comment regarding vehicles with more than eight passengers on Seal Rock Drive are intended to discourage use of this route by tour buses and vans. The recent installation of signage by SFMTA would not affect the conclusions of the study, which found only minor operational traffic impacts under the LRDP. In particular, the Campus does not attract or accommodate tour buses or other tourist-oriented heavy-vehicle traffic, and is not expected to do so any time in the near future, under the LRDP or otherwise. Although the LRDP will likely result in slight increases in traffic volumes along Seal Rock Drive, the magnitude of this increase is not expected to be substantive enough to warrant additional study, or to result in significant adverse impacts.

RTC B4-41: There are no comments on the SDEIS utilities section; therefore, no response is provided.

RTC B4-42: There are no comments on the SDEIS wildlife and habitat section; therefore, no response is warranted.

B5) Responses to Planning Association for the Richmond (PAR) Comments on SDEIS

RTC B5-1: Thank you for your comments. This comment supports Alternative 4 as the NEPA “preferred alternative,” and opposes the Proposed Action.

For clarification purposes, the DEIS calculates an estimated parking demand for 730 spaces for the net new development at the Campus proposed under the LRDP (please see DEIS p. 3.13-38). Starting with this number, the parking deficit is calculated by subtracting the proposed net increase in parking supply at the Campus (263 spaces) from the estimated demand (730 spaces). The resulting on-site parking deficit projected for the net new development at the Campus is 467 spaces.

Alternative 4, the No Action Alternative, would have less traffic and parking impacts than Alternatives 1, 2, and 3 (the action alternatives), because no development or improvements would be proposed at the SFVAMC Fort Miley Campus. However, Alternative 4 would not meet the LRDP goals including, but not limited to, the need to meet the identified space deficiency.

RTC B5-2: Alternative 3 is not a better alternative compared to Alternatives 1 and 2 from VA’s perspective, because it would not maintain VA’s mission to more effectively integrate clinical care, education, and research, at one location. It would take a long time to make a transition to a new location while maintaining operation of the existing SFVAMC Fort Miley Campus. In addition, real estate prices in San Francisco would make Alternative 3 challenging.

The SFVAMC has been in operation since 1934, and its location has not been a problem for employees to commute to and from work. VA provides incentives to commuters, including transit subsidies, shuttles, and very low parking rates.

Although the comment is correct that there is no regional public transit in the vicinity of the Campus, SFVAMC is served by high-capacity local public transit operated by Muni along the Geary Boulevard corridor (see SDEIS pp. 3.13-10 through 3.13-13). These services connect with key local and regional transit hubs, including the Market Street Subway (BART and Muni Metro) and the (Temporary) Transbay Terminal, and are within walking distance of regional ferry services at the Ferry Building. The SFMTA has already committed to major enhancements to transit service along the Geary Boulevard corridor under the TEP and BRT Project, which would further increase capacity and efficiency of public transportation to the Campus (see SDEIS pp. 3.13-46 through 3.13-47).

Complementary to local public transit options to the Campus, several private transit (shuttle) services are available to connect the Campus with the rest of San Francisco, the Bay Area, and the greater Northern California region (see SDEIS Table 3.13-5). These services include interclinic shuttles operated by SFVAMC; regional shuttles operated by the Disabled American Veterans Volunteer Transportation Network; joint shuttle services operated by SFVAMC and UCSF to connect the Campus and UCSF’s Parnassus Campus; and an extensive commuter shuttle system operated by Bauer’s Transportation on behalf of SFVAMC, which connects to regional transit hubs including the Ferry Building, the Transbay Terminal, the Caltrain San Francisco (Fourth & King) terminal, Civic Center

Station, and the Golden Gate Bridge Toll Plaza. In particular, the commuter shuttle services offer a quick and frequent alternative to local public transit along the Geary Boulevard corridor, and serve more than 1,285 staff members and patients every day, with more than 16 daily roundtrips (see SDEIS p. 3.13-16).

The deficit of 632 parking spaces cited by the comment is based on an assumed 700-space deficit at the Campus. Please see RTC B5-1 for a discussion regarding the parking deficit.

RTC B5-3: Responses to specific lettered items in the comment letter are provided separately below.

Item (a): The time periods selected for the parking study are intended to capture all potential peak periods for parking demand (as observed through the *occupancy* of parking spaces), and are consistent with parking studies in the City of San Francisco, as recommended in the *SF Guidelines*. These time periods are selected because they capture the expected peak periods for all types of land uses, including residential (early evening), office (late morning), and retail/restaurant (early afternoon or early evening).

The time periods suggested by the comment of 6:40 a.m. to 9:00 a.m. and 4:00 p.m. to 6:30 p.m. correlate well with the 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m. windows considered as the “(weekday) a.m. peak period” and “(weekday) p.m. peak period,” respectively. Collecting parking occupancy data during periods of high turnover is generally not recommended. The high frequency of parking movements results in potential variability in the observed occupancies over the course of the survey period that can be quite substantial. For an accessory parking facility exclusively serving an office building, for example, parking occupancy would be expected to gradually rise over the course of the a.m. peak period from 7:00 a.m. to 9:00 a.m. when employees arrive at work, eventually peaking in the first peak period for parking demand (i.e., occupancy) at 9:00 a.m. to 11:00 a.m. Subsequently, occupancy typically would drop as employees leave for lunch or other errands before peaking again (usually at a lower level than the late morning period) when they return to the office after lunch, in time for the second peak period for parking demand at 1:00 p.m. to 3:00 p.m. Likewise, occupancy for on-street parking, which is primarily used by local residents who commute to work by car, would gradually increase over the course of the p.m. peak period from 4:00 p.m. to 6:00 p.m. when residents arrive home, eventually peaking in early evening peak period for parking demand at 7:00 p.m. to 9:00 p.m. Consequently, parking studies are typically conducted in the hours before, after, or between periods of frequent movements, when the frequency of parking movements has subsided and occupancy is comparatively stable and consistent, with minimal variability over the course of the survey period. The time periods suggested by the comment would not capture periods of peak parking demand (as measured by occupancy of parking spaces) so much as periods of high turnover.

It should be noted that residential and employment-based land uses generally complement each other in terms of parking demand peaking. In particular, many SFVAMC personnel begin leaving Campus by 4:00 to 5:00 p.m., with occupancy of Campus employee parking facilities beginning to reduce to 50 percent during these times. Thus, the effect of Campus parking demand on the surrounding residential neighborhoods during the course of a

typical day has already substantially subsided by the latter half of the weekday p.m. peak period, when many local residents in the area would be expected to be returning home from work or school.

Items (b) and (c): Although San Francisco as a whole is experiencing rapid development growth, most of this growth is occurring or projected in redevelopment zones and community plan areas covering most of the eastern portion of the city—including the extensive Eastern Neighborhoods rezoning effort, the Market and Octavia Neighborhood Plan, the Rincon Hill Plan, the Transit Center District Plan, and the Transbay and Mission Bay redevelopment programs—and in three major redevelopment areas (Candlestick Point/Hunters Point Shipyard, Treasure Island/Yerba Buena Island, and Parkmerced). Outside of these areas, future growth is also expected to take place in Central SoMa and Mid-Market, and in large-site redevelopments such as Visitacion Valley (Schlage Lock site), Pier 70, Executive Park, public housing sites (Sunnydale–Velasco and Potrero Terrace and Annex), and unused or disused publicly owned sites such as the Balboa Reservoir site. Specifically, the San Francisco Planning Department forecasts that 80 percent of the city’s expected growth will be concentrated in neighborhoods occupying just 20 percent of the land, none of which are near the Richmond District. The Planning Department is not currently undertaking any efforts to rezone or increase the density or scale of development in the neighborhoods surrounding the Campus beyond what is already allowed by existing zoning regulations.

The population projections from these and other future developments have already been captured in the SDEIS’s future-year transportation analyses through the use of growth factors derived from SF-CHAMP and the travel demand forecasting model maintained by the SFCTA, as discussed on SDEIS pp. 3.13-44 through 3.13-45. SF-CHAMP incorporates growth from the developments described above (estimated in the form of changes in population and employment for zones covering the entire geographical scope of the city and region, with each zone encompassing one or more city blocks), and uses a sophisticated forecasting and assignment methodology to assign future travel demand to the City’s transportation network, including roadways and transit infrastructure and services. The land use projections incorporated into SF-CHAMP are maintained by the San Francisco Planning Department, which generally requires that all transportation-related environmental analyses (including transportation impact studies and environmental impact reports) make use of SF-CHAMP when forecasting future transportation conditions.

In addition to the aforementioned specific land use developments, SF-CHAMP also assumes marginal to moderate levels of growth in remaining parts of the city, including the Outer Richmond. As a result, the SDEIS’s population growth rates are appropriate and consistent with forecasts by the San Francisco Planning Department.

Turning movement counts at the study intersections were collected in 2011. Generally, data within a 2-year time frame of the commencement of a study—e.g., publication of a NOI for an environmental impact statement—are considered adequate for use in a transportation-related technical analysis. The time frame may be extended, however, if general traffic

levels have remained stable or declined. Given that the neighborhood surrounding the Campus is a built-out residential district that has not seen any substantive development in the time between 2011 and 2015, background traffic levels (controlling for traffic generated by the Campus, including traffic generated by construction-related activities on the Campus) are unlikely to have changed enough to warrant the collection of more recent count data.

In particular, traffic levels (like parking conditions) change from day to day, and a variation of 5 to 10 percent from one day to the next is common and considered within the acceptable margin of error of other components of the traffic analysis (such as the *Highway Capacity Manual* methodology). Given these considerations, most transportation-related environmental analyses are based on a single day of counts. Collection of more than one day of traffic counts is typically more appropriate when conducting detailed traffic/transportation engineering work for design and construction of roadway improvements.

Given the resulting future-year level of service (LOS) at the study intersections (LOS C or better under Alternative 1, even in 2040, as reported in SDEIS Table 4-5), collecting a new set of more recent count data, even should it show slightly higher traffic levels than the 2011 count data, is not expected to affect the conclusions of the SDEIS regarding traffic and transportation impacts.

Item (d): The assumption of 25 feet of curb per parking space is a relatively conservative rule-of-thumb to estimate supply of on-street (parallel) parking, and is reflective of the typical length of personal automobiles, plus a margin to account for the necessary clearance at the front and rear of each parked vehicle to maneuver into and out of parking spaces provided in series. Vehicle lengths generally range from small (i.e., “compact”), measuring 15 feet or less; to large, measuring 16.25 feet or more.

For the example described in the comment regarding two 25-foot-wide lots side-by-side, each with an 8-foot-wide curb cut located in the middle of the lot, there would be 17 feet of curb between each lot to accommodate on-street parking, which would exceed the length of a large vehicle. Because these spaces are not provided continuously, the need for clearance at the front and rear of the space is substantially reduced. Field observations conducted during parking surveys in the neighborhood surrounding the Campus confirmed that access into and out of driveways is generally maintained despite the existing curb conditions and demand for on-street parking. Although vehicles parked in on-street spaces were generally observed to occupy the entire curb length permitted for off-street parking, they did not intrude into the roadway space adjacent to curb cuts provided for local access.

Based on these considerations, there would typically be one space between adjacent lots, a result that correlates quite well with parking behavior observed during high-occupancy periods, which indicated one car parked between adjacent lots. There may be some locations that do not provide enough curb space, but this condition is typically balanced by other locations such as large corner lots that offer extended segments of unobstructed curb space. Therefore, an assumption of 25 feet of curb per on-street parking space is appropriate.

Item (e): DPW administers San Francisco's street sweeping program and manages the frequency, day(s), and hour(s) of street cleaning. SFMTA permits use of portions of the public right-of-way for on-street parking. It is the responsibility of the motorist using the on-street parking space to vacate it in compliance with the established curb restrictions, such as for street cleaning.

The sweeping schedule for Clement Street in the immediate vicinity of the Campus between 39th Avenue and 45th Avenue restricts parking along the northern side on the second and fourth Thursdays of each month between 12:00 p.m. and 2:00 p.m., and along the southern side on the second and fourth Tuesdays of each month between 10:00 a.m. and 12:00 p.m. Sweeping activities along the intermediate side streets (39th Avenue through 45th Avenue) between Clement Street and Point Lobos Avenue take place during the second and fourth Wednesdays or Fridays each month (depending on street side), between 12:00 p.m. and 2:00 p.m. or between 1:00 p.m. and 3:00 p.m. Thus, within this area, there are 8 days each month during which DPW conducts street sweeping, for which only a fraction (approximately a quarter) of the street sides in the area are affected on any one day, for a total duration of 2 hours during the midday period. Given these considerations, street sweeping is generally an infrequent event, outside the typical range of parking conditions expected on a given day. Transportation-related environmental review conducted in the City and County of San Francisco does not consider effects associated with street sweeping restrictions; such effects would be considered an occasional condition, and not representative of a typical baseline condition against which to evaluate project impacts.

Item (f): SFVAMC understands neighborhood concerns related to parking, and has already implemented a variety of measures to help reduce some of the effects of parking spillover, including valet parking and the Campus's commuter shuttle program.

With regard to the potential impacts of the LRDP relative to the proposed RPP program for the surrounding neighborhood, any environmental analysis, including one related to transportation, must be conducted based on the information available at the time of the commencement of the study. In this case, the original NOI of the environmental impact statement for the LRDP was published in April 2011. At the time of the commencement of the SDEIS's transportation analysis, no specific information was available regarding an RPP program for the neighborhood surrounding the Campus. In addition, although a petition may have been submitted to SFMTA, filing of a petition is not, in and of itself, an indication that the SFMTA Board of Directors will approve the requested RPP program.

If an RPP program is implemented in the surrounding neighborhood, SFVAMC has strategies at its disposal to address Campus parking capacity. The availability of strategies such as valet parking can readily increase the on-site parking capacity to address any potential secondary effects related to parking.

RTC B5-4: The comment refers to "factors" enumerated in the preceding comment. See the responses to the various items above.

The three methodologies cited on SDEIS p. 3.13-35 are actually data sources that were used to estimate the travel demand generated by LRDP alternatives. The methodology for estimating parking demand generated by LRDP alternatives can be found on SDEIS pp. 3.13-37 through 3.13-38. Please see RTC B5-1 for a discussion of the methodology used to arrive at the parking demand estimates.

Historical parking demand and supply data can be considered a potential source of data for estimating parking demand; however, it should not be used by itself. Parking conditions are not static—parking supply and demand vary from day to day, from day to night, from month to month, etc. The availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel. In particular, use of historical demand and supply data does not necessarily account for conditions and factors that have changed since the time the historical data were collected, including background traffic congestion levels, the presence and quality of transit service, the availability or cost of parking, the average price of gasoline, and the general economic state of the Bay Area. These and many other factors all affect the travel behavior choices of Campus users. As a result, historical data on parking demand generated by the Campus may significantly underestimate or overestimate the parking demand generated by the Campus today and in the future-year scenarios analyzed in the SDEIS with the LRDP.

The estimated parking demand for Building 40 is presented in SDEIS Table 3.13-14.

RTC B5-5: The comment references the person-trip generation rates in Table 3.13-7, and also the methodology for estimating travel demand and parking demand. The SDEIS adopts an approach that blends Institute of Transportation Engineers (ITE) trip generation and parking demand rates with mode share and trip distribution data from the *SF Guidelines*.

ITE maintains a database of empirical data on travel and parking demand for sites across the United States, categorized by land use. The trip generation and parking demand rates published by the ITE are considered industry-accepted sources for estimating travel and parking demand for land use development and associated environmental review. Similarly, the *SF Guidelines* are the accepted source for empirical data on trip-making characteristics localized to the unique conditions of San Francisco—a dense, urban environment where alternative modes of travel such as transit, biking, and walking are viable options. The San Francisco Planning Department generally requires use of the *SF Guidelines* when evaluating land use development in San Francisco. Information from these two data sources is frequently blended when developing travel and parking demand estimates for land use development in San Francisco, particularly when there are unique or specialized considerations that make reliance on only one or the other data source difficult.

An approach that relies solely on trip generation and parking demand rates provided by ITE, for example, does not account for the unique, localized trip-making characteristics found in San Francisco. In particular, the ITE demand rates are based on suburban locations where the automobile mode share is effectively 100 percent, due to segregated land use patterns and roadway designs that encourage and facilitate the use of personal automobiles, but discourage alternative modes such as transit, biking, and walking. In contrast,

automobile mode shares in northwestern San Francisco are closer to 50 percent, with the remaining 50 percent spread across these alternative modes. The average occupancy of personal automobiles is also typically higher in San Francisco due to a higher trend toward carpooling and ridesharing, so that each vehicle on the road (and, consequently, each parked vehicle) ends up carrying more people per trip, on average, than the same vehicle in a suburban location. Likewise, incorporating the ITE trip generation and parking demand rates balances the empirical *SF Guidelines* mode share data to help account for the unique, localized conditions found specifically at the Campus, a relatively isolated location surrounded by a lower-density land use pattern. Thus, the travel demand methodology accounts for the “unique isolation” of the Campus in a relevant manner.

Other than minor changes to on-Campus circulation and stop locations, the LRDP does not include any specific elements related to the shuttle service at the Campus, including the commuter coaches referenced in the comment.

All intersections in the immediate vicinity of the Campus (at Clement Street, Point Lobos Avenue, and Geary Boulevard) are controlled by all-way stop signs, so that both north-south and east-west traffic flows are subject to stop control. Decisions to install traffic signals are based on engineering judgment and a comprehensive analysis of collision history, peak hour and daily traffic volume variation, and other factors. Proposals to install signalized controls at intersections based on existing concerns can be raised separately with SFMTA independent of the NEPA process.

SFVAMC does not operate any commercial shuttle services along Seal Rock Drive, and does not expect to do so any time in the near future, under the LRDP or otherwise. The restrictions referenced in the comment regarding vehicles with more than eight passengers on Seal Rock Drive are intended to discourage use of this route by tour buses and vans. The recent installation of signage by SFMTA would not affect the conclusions of the study, which found only minor operational traffic impacts under the LRDP. In particular, the Campus does not attract or accommodate tour buses or other tourist-oriented heavy-vehicle traffic, and is not expected to do so any time in the near future, under the LRDP or otherwise. Although the LRDP will likely result in slight increases in traffic volumes along Seal Rock Drive, the magnitude of this increase is not expected to be substantive enough to warrant additional study, or to result in significant adverse impacts.

In regard to the comment referencing the trip distribution patterns presented in SDEIS Table 3.13-8, the data presented in SDEIS Table 3.13-8 are based on empirical trip distribution data published in the *SF Guidelines* for trips with at least one trip end in Superdistrict 2 (as described on SDEIS pp. 3.13-36 through 3.13-37), and are incorporated into the travel demand estimates developed for the LRDP alternatives (and presented in SDEIS Tables 3.13-10 through 3.13-13). The data do not represent demographic data of SFVAMC employees. Because there are a limited number of routes directly serving the project site typically used by Campus users, it is unlikely that there would be a sufficient difference in trip distribution between the *SF Guidelines* data and any demographic data on SFVAMC employees’ residences to change the conclusions of the SDEIS.

Regarding the regional transit accessibility of SFVAMC, Campus users have several options when traveling to and from the Campus by transit. Muni provides high-frequency, high-capacity bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the TEP and BRT Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private shuttle services supported by the SFVAMC and affiliate organizations (SDEIS Table 3.13-5), including the following:

- Commuter shuttles operated by contract with Bauer's Transportation, connecting to local and regional transit hubs;
- Interclinic shuttles connecting the SFVAMC Fort Miley Campus with VA clinics in Downtown San Francisco, San Bruno, and greater Northern California;
- Specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and
- Local shuttles operated jointly by SFVAMC and UCSF.

The comment's references to the estimated travel demand and parking demand generated by Building 40 may be based on a misunderstanding of the values presented in Table 3.13-10 and Table 3.13-14. A "person-trip" for the purposes of estimating travel demand represents one person making a one-way trip, and is not equivalent to the number of employees or personnel expected to use or visit this facility for any given duration. In general, it is assumed that each person will make at least two-person trips associated with a given land use in any one day (one person-trip to the given land use and one person-trip leaving the given land use). For an office use, for example, each employee would be expected to make one person-trip to the office in the morning and one person-trip leaving the office in the afternoon or early evening. Therefore, the 963 person-trips from SDEIS Table 3.13-10 represent approximately 482 persons making "trips" to Building 40. However, many building users would be expected to make more than two person-trips in the course of the day, particularly if they leave the Campus for lunch, run personal errands, or conduct work-related duties off-Campus such as field visits or off-site meetings. As a result, the number of persons making "trips" is further reduced.

In addition, the value of 963 person-trips from SDEIS Table 3.13-10 represents the person-trip total over the course of the entire day. In particular, it is estimated that Building 40 would generate 963 person-trips daily, only 127 of which would take place during the weekday p.m. peak hour (SDEIS Table 3.13-10). As described above, however, person-trips represent one-way trips; therefore, the 127 weekday p.m. peak hour person-trips from SDEIS Table 3.13-10 would include a combination of both inbound (to Building 40) and outbound (leaving Building 40) trips, and the total in any one direction would be less than 127.

Furthermore, the comment correlates the building users (calculated from the person-trip values in SDEIS Table 3.13-10) with the parking demand presented in SDEIS Table 3.13-14. One of the primary factors characterizing parking behavior is turnover. A facility accommodating 100 visitors (200 visitor person-trips) who drive to the facility over

the course of a day does not typically require 100 parking spaces, because visitors will be spread out over the course of the day. The peak demand for parking spaces at a single point in time (i.e., the peak parking demand period) would be substantially less than 100. Parking spaces for employee use would generally be expected to exhibit less turnover.

RTC B5-6: Please see RTC B5-5 for a discussion of the relationship between trip generation (i.e., person-trips) and parking demand.

The correct value for the parking deficit for the net new development at the Campus at buildout of the LRDP, not accounting for current and existing spillover effects, is approximately 120 spaces (see SDEIS p. 3.13-75).

The remainder of the comment requests more credible assumptions and projections to be developed and vetted as part of the EIS. The analysis methodologies and assumptions are based on standard approaches prescribed by the San Francisco Planning Department as part of transportation-related environmental analysis. Please see RTC B5-3 and RTC B5-5 for justification of the analysis methodologies adopted in the SDEIS's transportation analysis.

RTC B5-7: The SDEIS complies with NEPA requirements by identifying and proposing mitigation for adverse impacts related to transportation and other topics.

SFVAMC recognizes local concerns regarding construction activities. The following steps, management actions, and mitigations from the SDEIS aim to reduce the traffic and parking effects:

- Notify contractors about the need to be responsible members of the community to ensure good standing with neighbors. SFVAMC recognizes that some issues remain, and VA is continuing to work diligently with contractors to encourage and enforce compliance among the construction workforce.
- Use only identified haul truck routes, monitor truck arrivals, and implement queue abatement programs.
- Implement LRDP construction traffic and parking management plan for the LRDP. Based on estimates of parking supply and demand by phase, on-site parking capacity at the Campus would likely be sufficient to accommodate the temporary increase in parking demand generated by construction-related activities.
- Implement Mitigation Measure TRANS-2, requiring SFVAMC to conduct supplemental surveys of parking occupancy and implement programs to prevent parking spillover during construction.
- Work with construction contractors as each element of the LRDP enters the construction phase to determine whether construction-related activities would result in parking demand exceeding the available supply, and whether temporary measures would be needed to mitigate these parking constraints.
- If a major parking deficit on the Campus is identified, ensure that the spillover parking demand into the surrounding neighborhood (i.e., outside of the Campus, including NPS-owned parking areas) would not increase beyond current conditions. Potential strategies to achieve this goal may include expanding the Campus's valet program and requiring

general contractors to establish carpool/vanpool programs; encouraging transit use; optimizing staging-area needs; and coordinating vendor arrival schedules.

- Implement protective measures to ensure the safety of bicyclists and pedestrians and minimize disruptions.

The following management measures have also been included in the SDEIS to improve conditions:

- Management Measure TRANS-1, “Implement Protective Measures for Traffic, Transit, and Pedestrians if Pedestrian Facilities or Travel Lanes Require Closure during Construction”
- Management Measure TRANS-2, “Implement Protective Measures for Traffic, Transit, and Pedestrians during the Presence of Temporary Modular Structures on Campus”
- Management Measure TRANS-3, “Implement Protective Measures for Traffic, Transit, and Pedestrians during Overlapping Construction Projects Located Close to Each Other on Campus”

These management practices and mitigation measures would reduce the adverse effects on local circulation and parking that would be experienced by neighbors surrounding the Campus.

B6) Responses to Hiroshi Takahashi Comments on SDEIS

RTC B6-1: Thank you for your comments on the SDEIS. SFVAMC understands the neighborhood sensitivities and concerns with existing parking conditions around the Campus. SFVAMC encourages all staff to park on site, and informs staff about the risks of parking off-Campus. SFVAMC is committed to working with the NPS Park Ranger, the Police Department, and the City to enforce parking restrictions and regulations, such as parking in the wrong zone or exceeding the allowed duration, as well as obstructing curb cuts, crosswalks, and curb ramps.

Future growth in the neighborhood and at the Campus has the potential to make the fixed supply of on-street parking even more competitive than it is today. In recognition of these conditions, the LRDP contains policies and programs that seek to improve parking demand and supply. It should be noted that the LRDP already proposes to provide additional parking at the Campus at a ratio (based on habitable building inventory) that exceeds the current ratio (SDEIS pp. 3.13-65 and 3.13-76). Parking garage extensions, valet programs that increase the capacity of the garages, and SFVAMC shuttles that provide convenient connections to regional transit services are all part of VA’s program to address parking in the area.

Despite these efforts, a deficit in the on-Campus parking supply proposed under the LRDP relative to the estimated parking demand from the net new development could still result in parking spillover into the surrounding neighborhood. Additional strategies could be implemented should such conditions occur. In particular, valet parking could effectively

increase the on-Campus parking supply beyond what is assumed in the LRDP. This could increase the on-Campus parking capacity by as many as 150 additional spaces.

The expanded valet program would help increase Campus parking supply. On the demand side, it can be expected that motorists traveling to the Campus may elect to shift from driving to other modes of accessing VA. In particular, the limited supply of parking spaces, which are at or near capacity during peak demand periods, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot), may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits (see SDEIS p. 3.13-64). The combined effect of increased Campus capacity and mode shifts by motorists traveling to the Campus would reduce the deficit identified in the SDEIS, and the spillover parking effects in the neighborhood.

B7) Responses to Preston Wong Comments on SDEIS

RTC B7-1: Thank you for your comments on the SDEIS. Construction-related parking effects, including the additional parking demand generated by construction-related activities (including construction workers, haul trucks, and vendor/delivery trucks) and the estimated on-Campus parking supply at key milestones in the LRDP, are discussed on SDEIS pp. 3.13-54 through 3.13-57.

Specifically, the estimated maximum parking demand generated by construction-related activities on any single day during the peak month of construction traffic is expected to be substantially less than 100 spaces (SDEIS pp. 3.13-55). The recent completion of Building 211 increased the on-Campus parking supply by approximately 200 spaces; as part of the LRDP, SFVAMC would continue to provide valet parking at key on-Campus parking facilities, which would provide an additional 180 spaces of parking capacity in addition to the capacity provided by Building 211. The extensions of Building 209 and Building 211 would further augment the on-Campus parking supply by an additional 250 spaces.

The comment is correct that the number of spaces *specifically* provided for construction workers, delivery trucks, and mobile equipment was not disclosed in the SDEIS. Omission of this value does not represent a flaw in the SDEIS or its transportation-related environmental analysis—rather, it is simply a reflection of the fact that this value is highly variable and cannot be quantitatively determined at this time to the level of accuracy requested by the comment. In particular, the ultimate number of spaces designated for these uses will depend on the detailed construction plans developed for each LRDP project, which would be prepared by the given contractor working in concert with the SFVAMC at the time that each LRDP project moves forward. Although the LRDP provides an approximate timeline for implementing specific Campus improvements, there is still some level of uncertainty and variability regarding whether the proposed improvements will be completed in the chronological order and within the time frame assumed by the LRDP. This uncertainty and variability is not unique to the LRDP, but is inherent in the implementation of most long-range planning processes, which can be subject to issues

related to financing and funding and changes in policies and priorities that affect how these planning efforts are ultimately implemented.

In addition, most project components described in the LRDP have not undergone detailed design, which would inform the constructability analysis (and the corresponding choice of construction method and resulting construction-related space needs at the Campus). As a result, it is difficult to forecast exactly how much the available on-Campus parking supply for regular (i.e., not related to construction activities) Campus users may need to be temporarily reduced, relocated, or reallocated during construction.

Instead, the SDEIS focuses on the types of data and estimates available at this time (construction traffic estimates and the proposed supply of parking provided by each parking-related LRDP component) to provide a semi-quantitative assessment of construction-related parking effects that meets the requirements of environmental impact analysis under NEPA. Semi-quantitative or qualitative assessments of construction-related impacts are not unique to the SDEIS, and are frequently used for environmental documents evaluating any number of small and large projects, in recognition of the uncertainties and variable nature in attempting to determine aspects (such as parking supply) to a level of detail necessary to conduct a comprehensive quantitative assessment.

In recognition of the potential of construction-related activities to change parking conditions beyond the scope of typical parking utilization levels (under regular operation of SFVAMC facilities), the SDEIS includes Mitigation Measure TRANS-2, which requires SFVAMC to conduct supplemental surveys of parking occupancy, and to implement programs to prevent parking spillover during construction.

Regarding implementation of an RPP program for the neighborhood, SFVAMC understands neighborhood concerns related to parking, and has already implemented a variety of measures to help reduce some of the effects of parking spillover, including valet parking and the Campus's commuter shuttle program.

It should be noted that on-street parking in the vicinity of the Campus is managed by the City of San Francisco through SFMTA, which implements a variety of programs and measures in this duty, including the RPP program, metered parking, time limits, and curb restrictions. In general, however, on-street parking is a public asset intended for public use, and must be managed to meet the variety of users expected, including (but not limited to) both local residents and employees, patients, and visitors of the Campus and GGNRA.

With regard to the potential impacts of the LRDP relative to the proposed RPP program for the surrounding neighborhood, any environmental analysis, including one related to transportation, must be conducted based on the information available at the time of the commencement of the study. In this case, the original NOI of the environmental impact statement for the LRDP was published in April 2011. At the time of the commencement of the SDEIS's transportation analysis, no specific information was available regarding an RPP program for the neighborhood surrounding the Campus. In addition, although a

petition may have been submitted to SFMTA, filing of a petition is not, in and of itself, an indication that the SFMTA Board of Directors will approve the requested RPP program.

If an RPP program is implemented in the surrounding neighborhood, SFVAMC has strategies at its disposal to address Campus parking capacity. The availability of strategies such as valet parking can readily increase the on-site parking capacity to address any potential secondary effects related to parking.

RTC B7-2: The purpose of the SDEIS public meeting held on March 14, 2015 (as well as the purpose of all NEPA public meetings) was to take verbal public comments on the SDEIS. There was no formal agenda for the public meeting, and no formal time periods for certain topical discussions.

RTC B7-3: The SDEIS document and public meeting is related to the LRDP for the entire SFVAMC Fort Miley Campus, and not a single proposed research project and related seismic retrofits. As described in SDEIS Table 2-1, the construction duration for Building 40 and the seismic retrofit of Buildings 1, 6, and 8 would be approximately 5 years if they were constructed sequentially. However, the timing of construction and its specific duration and overlap potential is ultimately dependent on the availability of funding. As required by NEPA, answers to questions are provided below in this RTCs document as part of the Final EIS.

RTC B7-4: The estimated amount of additional on-Campus parking proposed under the LRDP and the expected use of on-Campus parking facilities by Campus user type is provided in Table 3 of the Transportation Impact Study for the LRDP (see SDEIS Appendix E). The LRDP proposes to increase the on-Campus parking supply for Campus affiliates by more than 361 spaces.

It should be noted, however, that parking conditions are not static—parking supply and demand vary from day to day, from day to night, from month to month, etc. The availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel.

The absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urbanized development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits.

In this particular case, Campus users have several options when traveling to and from the Campus by transit. Muni provides high-frequency, high-capacity bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the TEP and BRT Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private shuttle services supported by the SFVAMC and affiliate organizations (SDEIS Table 3.13-5), including the following:

- Commuter shuttles operated by contract with Bauer's Transportation, connecting to local and regional transit hubs;

- Interclinic shuttles connecting the Campus with VA clinics in Downtown San Francisco, San Bruno, and greater Northern California;
- Specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and
- Local shuttles operated jointly by SFVAMC and UCSF.

Options for automobile travel that do not require SFVAMC employees or visitors to physically park a vehicle at or near the Campus (such as taxis, rideshares, and private vehicle pick-up/drop-off) are also available.

Although a deficit in the on-Campus parking supply proposed under the LRDP relative to the estimated parking demand from the net new development could result in parking spillover into the surrounding neighborhood, it is more likely that these motorists would switch to alternative modes (such as the transit options discussed above), or make other changes in their travel and parking behavior that would reduce this shortfall in parking demand, given that the total supply of on-street parking in the areas surrounding the Campus is unlikely to change substantially in the future, and is currently at or near capacity during peak demand periods.

Furthermore, even if the secondary effects of a parking deficit—such as delays or disruptions to traffic, transit, bicycle, or pedestrian circulation—were to cause concern, SFVAMC has additional measures at its disposal to manage parking demand and minimize these secondary effects. Valet parking, in particular, could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP (and therefore reduce the parking deficit) by increasing the space efficiency of parking facilities. For example, the existing valet parking program could be expanded to include the additional parking structures proposed to be constructed under Alternatives 1 and 2. This could increase the on-site parking capacity by as many as 150 additional spaces, thereby exceeding the estimated deficit in on-Campus parking of 120 spaces under the LRDP (the estimated demand of 426 spaces generated by the net new development, less the proposed net increase in parking supply at the Campus of 306 spaces).

The dates of data collection efforts for intersection turning movement counts and parking occupancy surveys are disclosed in the SDEIS and its supporting documentation. Intersection turning movement counts were conducted in February 2011 (SDEIS p. 3.13-5), while parking occupancy surveys were conducted in September 2013 (pp. 40–41 of the Transportation Impact Study, SDEIS Appendix E).

RTC B7-5: Detailed estimates of the number of construction workers at the site were not developed as part of the SDEIS. However, the SDEIS included the estimated number of daily construction worker trips by month provided in Tables 3 through 6 of the Construction Traffic and Parking Management Plan in SDEIS Appendix E. It should be noted, however, that these values represent one-way person-trips, and do not completely correlate with personnel. Specifically, each worker at the site would be expected to make at least two trips a day, but could potentially make more trips a day if they travel off-site for breaks, lunch, or work-related tasks. Therefore, the maximum number of construction workers on an

average day for a given month can be taken as half of the values reported in Tables 3 through 6. For the peak construction months, this assumption would result in a maximum of approximately 77 workers for Alternative 1 (peaking in December 2015) and approximately 64 workers for Alternative 2 (peaking in January 2016).

Construction-related parking effects, including the additional parking demand generated by construction-related activities (including construction workers, haul trucks, and vendor/delivery trucks) and the estimated on-Campus parking supply at key milestones in the LRDP, are discussed on SDEIS pp. 3.13-54 through 3.13-57.

Specifically, the estimated maximum parking demand generated by construction-related activities on any single day during the peak month of construction traffic is expected to be substantially less than 100 spaces (SDEIS pp. 3.13-55). The recent completion of Building 211 increased the on-Campus parking supply by approximately 200 spaces; as part of the LRDP, SFVAMC would continue to provide valet parking at key on-Campus parking facilities, which would provide an additional 180 spaces of parking capacity in addition to the capacity provided by Building 211. The extensions of Building 209 and Building 211 would further augment the on-Campus parking supply by an additional 250 spaces.

The number of spaces *specifically* provided for construction workers, delivery trucks, and mobile equipment was not estimated in the SDEIS. Omission of this value does not represent a flaw in the SDEIS or its transportation-related environmental analysis—rather, it is simply a reflection of the fact that this value is highly variable and cannot be quantitatively determined at this time to the level of accuracy requested by the comment. In particular, the ultimate number of spaces designated for these uses will depend on the detailed construction plans developed for each LRDP project, which would be prepared by the given contractor working in concert with the SFVAMC at the time that each LRDP project moves forward. Although the LRDP provides an approximate timeline for implementing specific Campus improvements, there is still some level of uncertainty and variability regarding whether the proposed improvements will be completed in the chronological order and within the time frame assumed by the LRDP. This uncertainty and variability is not unique to the LRDP, but is inherent in the implementation of most long-range planning processes, which can be subject to issues related to financing and funding and changes in policies and priorities that affect how these planning efforts are ultimately implemented.

In addition, most project components described in the LRDP have not undergone detailed design, which could determine the constructability (and the corresponding choice of construction method and resulting construction-related space needs at the Campus) that make it difficult to forecast exactly how much the available on-Campus parking supply for regular (i.e., not related to construction activities) Campus users may need to be temporarily reduced, relocated, or reallocated.

Instead, the SDEIS focuses on the types of data and estimates available at this time (construction traffic estimates and the proposed supply of parking provided by each

parking-related LRDP component) to provide a semi-quantitative assessment of construction-related parking effects that still adequately meets the requirements of environmental impact analysis under NEPA. Semi-quantitative or qualitative assessments of construction-related impacts are not unique to the SDEIS, and are frequently used for environmental documents evaluating any number of small and large projects, in recognition of the uncertainties and variable nature in attempting to determine aspects (such as parking supply) to a level of detail necessary to conduct a comprehensive quantitative assessment.

In recognition of the potential for construction-related activities to affect parking conditions, the SDEIS includes Mitigation Measure TRANS-2, which requires SFVAMC to conduct supplemental surveys of parking occupancy, and to implement programs to prevent parking spillover during construction. This includes SFVAMC coordination with construction contractors as construction plans for specific LRDP projects are developed to determine whether construction-related activities would result in parking deficits, and whether temporary mitigation measures or strategies would need to be implemented.

As disclosed on SDEIS p. 3.13-52, construction activities are anticipated to take place primarily Mondays through Fridays between 7:30 a.m. and 6:00 p.m., with any Saturday work assumed to occur between 8:00 a.m. and 4:00 p.m. on an as-needed basis. Work would be conducted in compliance with the SFNO (Article 29 of the City and County of San Francisco Police Code) and the conditions required by the Department of Building Inspection permit.

RTC B7-6: Please see RTC B7-1 for a discussion of the proposed RPP program for the neighborhood surrounding the Campus.

B8) Responses to C. K. Wai Comments on SDEIS

RTC B8-1: Thank you for your comments on the SDEIS.

The characterization of “major” space and parking deficiencies at the Campus (see SDEIS p. ES-1) is primarily intended to establish the current conditions for the LRDP and the associated facility and infrastructure improvements at the Campus. This statement provides the background necessary to understand the purpose and need of the LRDP, including the various elements of the LRDP that would increase the amount of parking provided at the Campus (see SDEIS Chapter 2.0). In contrast, the characterization of “minor” on p. ES-34 is an impact rating given for the impacts associated with the implementation of the proposed action and alternative actions.

The geographical scope of the parking occupancy surveys at the Campus is consistent with the approach suggested by the San Francisco Planning Department, which requires that any parking analysis consider a parking area within a two-block radius of a project site (see p. 23 of the Transportation Impact Study, in SDEIS Appendix E). Surveys of parking in areas beyond this radius are typically not considered necessary, given that parking conditions are highly variable and the effects of a particular project diminish beyond this distance.

VA evaluated the need for additional parking. However, due to the limitations on space, the availability of alternative transportation modes (transit, taxis, bicycles, and travel by foot) that are common in urban settings, and the conclusion that the impacts on parking are minor, VA determined that implementation of the proposed action was preferable to the construction of more parking spaces.

- RTC B8-2:** SDEIS Tables 2-1 through 2-5 show both gsf and net square feet of the proposed 2014 LRDP. Tables 2-1 through 2-4 show both gsf and net square feet of the previously proposed 2012 LRDP. The October 2010 buildout numbers in the institutional master plan (IMP) reflected the previously proposed 2010 IMP. A NEPA environmental document was not prepared for the 2010 IMP, because VA proceeded to the smaller development amount with the 2013 LRDP, so there is not a direct NEPA figure comparison from the IMP to the 2012 LRDP or the 2014 LRDP. However, for informational and direct comparison purposes, the 2010 IMP proposed 924,200 gsf at the SFVAMC Fort Miley Campus (see IMP p. 3.7 figure), and the 2014 LRDP proposes 554,452 gsf at the Campus (see Figures 2-2 and 2-4).
- RTC B8-3:** Some of the public is in support of and some of the public is in opposition to the expansion and construction of additional buildings and parking structures. It is true that most of the environmental impacts within the SDEIS were determined to be “Minor.” There will be minimal grading, and there are no quantitative thresholds under NEPA related to grading. However, the analysis is based on professional opinion, and is supported by several other NEPA documents prepared for other federal agencies throughout the nation.
- RTC B8-4:** The ambient noise levels in the vicinity of the project site were recorded for a 15-minute duration in accordance with the requirements of the SFNO (Section 2901[a]), which states in part that the ambient measurement shall be minimum 10-minute period. In addition, a 15-minute measurement period is a reasonable duration for sampling of ambient noise levels where street traffic is the dominant noise source in the area. The ambient noise measurements were conducted during midday to represent a generally lower background sound environment (i.e., lower traffic volume as compared to peak traffic hours), to represent a conservative analysis. The approach to the ambient noise monitoring represents the maximum potential noise impact (defined by the noise exceedance above the ambient). As described in the SDEIS, the ambient noise levels were measured at four locations around the Campus, including on-site and off-site locations. These measurement locations include the SFVAMC Fort Miley Campus southern property line, which represent the residences along Clement Street and Seal Rock Drive, as well as residences located further south. In addition to the baseline ambient measurements, the existing background sound levels (due to traffic) were calculated along the roadway segments in the vicinity of the Campus, based on the existing traffic volumes (as provided in Table 3.10-13 of the SDEIS). Therefore, the existing environmental noise conditions in the vicinity of the project site are described in the SDEIS based on the actual ambient noise measurements and predictions based on the existing traffic volumes.

RTC B8-5: SFVAMC has an emergency operation plan, which determines how VA responds to various emergencies. However, this document is not publically available, because it contains security-sensitive information. All pathogenic agents used on the SFVAMC Fort Miley Campus have BSL-1 and -2 approvals, and are tracked. Also, there are no BSL-3 activities on the Campus, and none are planned as part of the LRDP.

RTC B8-6: Permanent population or housing would not be induced by implementation of the LRDP. People's choices about the place of residence involve a variety of factors, including those mentioned in the comment. The effects of future activities at the Campus under the LRDP are described in the SDEIS, and prospective residents may review the LRDP and SDEIS in making their selection for a place of residence.

B9) Responses to Raymond Holland Comments on SDEIS

RTC B9-1: Thank you for your comments on the SDEIS. In accordance with NEPA requirements, responses to comments received on the SDEIS are included below as part of the Final EIS, along with responses to all other public comments received on the SDEIS.

RTC B9-2: The consideration of a location with 20 to 30 contiguous acres was a screening criterion for relocation of the entire SFVAMC elsewhere in San Francisco. Relocation would not almost double the size of the Campus. Because there is not another location with 20 to 30 contiguous acres of land in San Francisco, the relocation of the entire SFVAMC was deemed infeasible and eliminated from further consideration.

RTC B9-3: Alternative 3 identified in the SDEIS is still a feasible alternative; as explained on SDEIS Executive Summary p. 5 and Chapter 2.0 pp. 2-2 through 2-4, this is why it was carried forward for analysis in the SDEIS.

RTC B9-4: The SFVAMC 2014 LRDP contains information on building sizes and heights that were VA's best estimates at the time of that document's release. As with most long-range planning efforts, the building sizes and heights would be expected to change, and may be updated during SFVAMC's annual updates to the LRDP. Building 211 was completed in July 2014. Despite the anticipated revisions to the amount of development on Campus, the estimates in the SDEIS are generally high estimates of building sizes and heights, intended to represent the greatest impact from the development.

RTC B9-5: NEPA and NHPA Section 106 have different requirements and are overseen by different agencies. Therefore, the EIS/ROD and FOE/PA documents are physically separate, although they are interrelated. Because the FOE/PA was completed first, the EIS/ROD may cite the FOE/PA for purposes of characterizing potential effects and mitigation to cultural resources.

RTC B9-6: The SDEIS, and the NEPA environmental process as a whole, is not intended to serve as mechanisms for addressing existing concerns or issues. Existing problems should be raised separately outside of the NEPA process with the appropriate government authorities. Rather, NEPA focuses on environmental impacts of a proposed action (in this case, the

LRDP) as determined by the significance of adverse changes with respect to future conditions without a proposed action.

SFVAMC evaluated the possibility of additional parking. However, due to the space limitations, the availability of alternative transportation modes (transit, taxis, bicycles, and travel by foot) that are common in dense urban settings, and the conclusion that the impacts related to parking are minor, VA determined that implementation of the Proposed Action was preferable to the construction of more parking spaces.

RTC B9-7: With regard to the methodology for estimating travel and parking demand generated by the LRDP alternatives, the SDEIS adopts an approach that blends ITE trip generation and parking demand rates with mode share and trip distribution data from the *SF Guidelines*.

The ITE maintains a database of empirical data on travel and parking demand for sites across the United States, categorized by land use. The trip generation and parking demand rates published by the ITE are considered industry-accepted sources for estimating travel and parking demand for land use development and associated environmental review. Similarly, the *SF Guidelines* are the accepted source for empirical data on trip-making characteristics localized to the unique conditions of San Francisco—a dense, urban environment where alternative modes of travel such as transit, biking, and walking are viable options. The San Francisco Planning Department generally requires use of the *SF Guidelines* when evaluating land use development in San Francisco. Information from these two data sources is frequently blended when developing travel and parking demand estimates for land use development in San Francisco, particularly when there are unique or specialized considerations that make reliance on only one or the other data source difficult.

An approach that relies solely on trip generation and parking demand rates provided by the ITE, for example, does not account for the unique, localized trip-making characteristics found in San Francisco. In particular, the ITE demand rates are based on suburban locations where the automobile mode share is effectively 100 percent, due to segregated land use patterns and roadway designs that encourage and facilitate the use of personal automobiles, but discourage alternative modes such as transit, biking, and walking. In contrast, automobile mode shares in northwestern San Francisco are closer to 50 percent, with the remaining 50 percent spread across these alternative modes. The average occupancy of personal automobiles is also typically higher in San Francisco due to a higher trend toward carpooling and ridesharing, so that each vehicle on the road (and, consequently, each parked vehicle) ends up carrying more people per trip, on average, than the same vehicle in a suburban location. Likewise, incorporating the ITE trip generation and parking demand rates balances the empirical *SF Guidelines* mode share data to help account for the unique, localized conditions found specifically at the Campus, a relatively isolated location surrounded by a lower-density land use pattern. Thus, the travel demand methodology accounts for the “unique isolation” of the Campus in a relevant manner.

With respect to the parking demand estimates in the DEIS, however, the analysis approach adopted was extremely conservative; it did not consider the mode share effects discussed above, nor other factors that would generally reduce the expected parking demand. In

particular, the SDEIS updates the methodology for calculating parking demand to arrive at a more realistic estimate, taking into account the following factors:

- The “campus” nature of the site, which provides co-located research, clinical, and educational facilities at a single campus, and reduces on-site automobile circulation. The ITE demand rates consider each land use or facility in isolation, with every facility user driving to, from, and between the facilities, and each facility providing its own parking and generating its own parking demand. In a campus environment, however, parking is typically shared among buildings, and employees and visitors can walk between the various campus buildings, so anyone driving to the campus only needs one parking space total, not one parking space at each campus building.
- Improvements in transit service along Geary Boulevard as a result of the TEP and the BRT Project, which would reduce travel times and increase incentives for using transit compared to driving. The BRT project alone will reduce travel times by 25 percent, improve reliability by 20 percent, and increase ridership by 10 to 20 percent for bus service along Geary Boulevard, which could feasibly increase the transit mode share at the Campus by at least 5 percent (a shift from personal automobiles to transit).

In response to the comment’s suggestion to use empirical data specific to the Campus historical parking demand and supply data, this can be considered a potential source of data for estimating parking demand; however, use of historical demand and supply data does not necessarily account for conditions and factors that have changed since the time the historical data were collected, including (but not limited to) issues such as background traffic congestion levels, the presence and quality of transit service, the availability or cost of parking, the average price of gasoline, and the general economic state of the Bay Area. These and many other factors all affect the travel behavior choices of Campus users. As a result, there is no guarantee that historical data on parking demand generated by the Campus accurately represent the parking demand generated by the Campus today, much less the parking demand it may generate in the future-year scenarios analyzed in the SDEIS with the LRDP.

The availability of parking changes over time as people change their modes and patterns of travel, and therefore would not constitute a significant impact (see SDEIS pp. 3.13-64 and 3.13-71). Similarly, minor variations in estimated parking demand beyond what was assumed in the SDEIS would also not be expected to increase operational parking impacts to levels of significance beyond the minor impacts already identified in the SDEIS.

The comment also references a “deficit” of 700 spaces from the DEIS. The DEIS calculates an estimated parking demand for 730 spaces for the net new development at the Campus proposed under the LRDP (please see DEIS p. 3.13-38). Starting with this number, the parking deficit may be calculated by subtracting the proposed net increase in parking supply at the Campus (263 spaces) from the estimated demand (730 spaces). The resulting on-site parking deficit for the net new development at the Campus is 467 spaces. Revisions to this deficit have been incorporated in the SDEIS to reflect the availability of other means of accessing the Campus, the interrelationship of Campus activities, and proposed

improvements to transit services along the Geary Boulevard corridor. As a result, the refined estimate of the parking deficit for the net new development at buildout of the LRDP, not accounting for current and existing spillover effects, would be approximately 120 spaces (please see SDEIS p. 3.13-75).

RTC B9-8: The data presented in SDEIS Table 3.13-8 are based on empirical trip distribution data published in the *SF Guidelines* for trips with at least one trip end in Superdistrict 2 (as described on SDEIS pp. 3.13-36 through 3.13-37), and are incorporated into the travel demand estimates developed for the LRDP alternatives (and presented in SDEIS Tables 3.13-10 through 3.13-13). The data do not represent demographic data of SFVAMC employees, which could be subject to extreme variability that would make it potentially unsuitable for use in the analysis. Given that there are only a limited number of roadway routes directly serving the project site typically used by Campus users, it is unlikely that there would be a sufficient difference in trip distribution between the *SF Guidelines* data and any empirical data specific to the Campus population to change the conclusions of the SDEIS.

In response to the comment's questions concerning "work" trips and "nonwork" trips, the *SF Guidelines* characterizes trips by trip purpose. "Work" trips are defined as trips to and from work, while "nonwork" trips represent all other types of trips.

Regarding the comment's request for "'trip distribution data' for each employer's employees," the SFVAMC and the transportation consultant preparing the EIS do not have access to trip distribution data for Campus staff by affiliation. As described above, however, there are only a limited number of roadway routes directly serving the project site typically used by Campus users, and it is unlikely that there would be a sufficient difference in trip distribution between the *SF Guidelines* data and any empirical data specific to the Campus population to change the conclusions of the SDEIS.

RTC B9-9: The comment carries over calculations concerning parking demand and supply from preceding comments. Please see RTC B9-7 for clarification of these calculations. The correct value for the parking deficit for the net new development at the Campus at buildout of the LRDP, not accounting for current and existing spillover effects, is approximately 120 spaces (see SDEIS p. 3.13-75).

In response to the comment's questions concerning the validity of the parking demand estimates, the San Francisco Planning Code guidance presented in SDEIS Table 3.13-19 would suggest that 91 spaces be provided should VA attempt to apply Planning Code requirements to Building 40. It should be noted, however, that this guidance assumes older parking requirements still in effect for the most restrictive zoning districts in the city. The Planning Department has substantially rationalized the Planning Code requirements for off-street parking in areas of the city currently accommodating (or expected to accommodate) growth in the future, so that land uses in many zoning districts are no longer required to provide any parking at all and are, in fact, subject to provisions that limit the total amount of off-street parking that is permitted. The Planning Commission also frequently grants exceptions for providing less than the number of parking spaces prescribed by the Planning

Code, recognizing the multimodal nature of travel in San Francisco and its “Transit First” policy.

Although neither Building 40 nor the LRDP as a whole are subject to the provisions of the San Francisco Planning Code, the example cited above indicates that the parking demand estimate and the Planning Code guidance for Building 40 are more similar than dissimilar.

Regarding the estimated travel demand and parking demand generated by Building 40 presented in Table 3.13-10 and Table 3.13-14, it is important to recognize that a “person-trip” as defined for the purposes of estimating travel demand represents one person making a one-way trip, and is not equivalent to the number of employees or personnel expected to use or visit this facility for any given duration. In general, it is assumed that each person will make at least two-person trips associated with a given land use in any one day (one person-trip to the given land use and one person-trip leaving the given land use). For an office use, for example, each employee (or other building user, such as visitor or building maintenance staff) would be expected to make one person-trip to the office in the morning and one person-trip leaving the office in the afternoon or early evening. Therefore, the 963 person-trips from SDEIS Table 3.13-10 reflect approximately 482 persons making “trips” to Building 40. However, many building users would be expected to make more than two person-trips in the course of the day, particularly if they decide to leave the Campus for lunch, to run personal errands, or to conduct work-related duties off-Campus such as field visits or off-site meetings. Thus, the actual number of persons making “trips” is further reduced.

In addition, the value of 963 person-trips cited from Table 3.13-10 represents the person-trip total over the course of the entire day, and does not represent trips taking place solely during specific hours or time periods of the day. In particular, it is estimated that Building 40 would generate 963 person-trips daily, only 127 of which would take place during the weekday p.m. peak hour (SDEIS Table 3.13-10). As described above, however, person-trips represent one-way trips; therefore, the 127 weekday p.m. peak hour person-trips from SDEIS Table 3.13-10 would include a combination of both inbound (to Building 40) and outbound (leaving Building 40) trips, and the total in any one direction would be less than 127.

In conclusion, an equivalent comparison to the one referenced in the comment would involve the vehicle-trip values in SDEIS Table 3.13-12 and the parking demand values in Table 3.13-14 (although in the comment, the specific reference is to Building 40). The person-trip values presented in SDEIS Table 3.13-12 indicate 108 inbound vehicle-trips and 150 outbound vehicle-trips during the weekday p.m. peak hour. At the most, this level of vehicle-trip activity would be fully equivalent to approximately 150 spaces of parking demand. As cited in SDEIS Table 3.13-14, however, the peak parking demand is 426 spaces, well above 150 spaces because it reflects the accumulation, over the course of several hours, of parking demand by driving employees, as well as the separate parking demands generated by visitor use (e.g., Building 213).

It should be noted that SFVAMC already devotes significant due diligence to encourage sustainable commute options among Campus employees, including participation in commuter benefits programs and provision of an extensive commuter shuttle service operated through Bauer's Transportation (SDEIS Table 3.13-5). SFVAMC's efforts in this regard are similar to those of other large health care-focused institutional users with campuses in San Francisco but outside of the Downtown area, including UCSF, Kaiser Permanente, and California Pacific Medical Center.

B10) Responses to Kay Bradner Comments on SDEIS

RTC B10-1: Thank you for your comments on the SDEIS. VA understands the neighborhood sensitivities and concerns with existing parking conditions around the Campus. VA encourages all staff to park on site, making it an affordable option by only charging \$12.50 per month to park on Campus. VA informs their personnel about the risks of parking off-Campus, and is committed to working with the NPS Park Ranger, the Police Department, and the City to enforce parking restrictions and regulations, such as parking in the wrong zone or exceeding the allowed duration, as well as obstruction of curb cuts, crosswalks, and curb ramps.

Future growth—in the neighborhood, which is beyond VA's control; and at the Campus as a result of the LRDP—has the potential to make the fixed supply of on-street parking even more competitive than it is today. In recognition of these conditions, the LRDP contains policies and programs that seek to improve parking demand and supply. It should be noted that the LRDP already proposes to provide additional parking at the Campus at a ratio (based on habitable building inventory) that exceeds the current ratio (SDEIS pp. 3.13-65 and 3.13-76). Parking garage extensions, valet programs that increase the capacity of the garages, and SFVAMC shuttles that provide convenient connections to regional transit services are all part of VA's program to address parking in the area. Despite these efforts, a deficit in the on-Campus parking supply proposed under the LRDP relative to the estimated parking demand from the net new development could still result in parking spillover into the surrounding neighborhood. Additional strategies could be implemented should such conditions occur. In particular, valet parking could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP. This could increase the on-site parking capacity by as many as 150 additional spaces.

The expanded valet program would help increase Campus parking supply. On the demand side, it can be expected that motorists traveling to the Campus may elect to shift from driving to other modes of accessing VA. In particular, the limited supply of parking spaces, which are at or near capacity during peak demand periods, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot), may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits (see SDEIS p. 3.13-64). The combined effect of increased Campus capacity and mode shifts by motorists traveling to the Campus would reduce the deficit identified in the SDEIS, and the spillover parking effects in the neighborhood.

B11) Responses to Denise Louie Comments on SDEIS

RTC B11-1: Thank you for your comments on the SDEIS. The SFVAMC Fort Miley Campus has been developed as a medical institution for years. Although there are no threatened or endangered species on Campus, facility planners are aware of and sensitive to the biodiversity and natural areas surrounding the Campus. SFVAMC will continue to coordinate and collaborate with NPS to improve the sustainability, open space, and recreational values of the GGNRA lands.

The VA appreciates the information about the Pacific flyway, and future development at the Campus will comply with the federal Migratory Bird Treaty Act, which protects many avian species.

RTC B11-2: As described on p. 3-2 of the 2014 LRDP and on p. 2-5 of the SDEIS, all new development would be designed to achieve Leadership in Energy and Environmental Design (i.e., LEED) Silver certification, and would implement the *Department of Veteran Affairs Strategic Sustainability Performance Plan*. This plan identifies VA's sustainability goals, and defines policy and strategy for achieving these goals, which include water conservation. In addition, SFVAMC disposes of any hazardous materials per VA's Environmental Compliance Directive (VA Directive 0062), which requires VA to meet or exceed the requirements of all applicable executive orders and federal, State, and local environmental laws and regulations (VA, 2012). Therefore, no chemicals would seep into the groundwater or sewer systems. The only herbicide used by SFVAMC in its landscaping operations is Round-Up. Furthermore, SFVAMC incorporates native plant species in its landscaping in many areas of the Campus.

RTC B11-3: VA endeavors to ensure the Campus does not impact the habitat on and adjacent to SFVAMC. The Campus is mostly developed, but VA implements and maintains its facilities in compliance with regulatory requirements. Please refer to RTCs B11-1 and B11-2 regarding VA's willingness and efforts to participate in programs that benefit wildlife and habitat.

B12) Responses to Ron Miguel Comments on SDEIS

RTC B12-1: Thank you for your comments on the SDEIS and background leading to the present EIS.

RTC B12-2: VA operations at SFVAMC follow the national mission for VA to provide clinical, research, and education services on one Campus to benefit Veterans. VA has not talked about growth related to hospital beds, because VA does not see any growth occurring. VA sees growth in its clinical services. Building 40, for example, is proposed to be built to decompress and move research from current locations in different buildings to one area, to allow clinical services to be re-aligned to better support Veterans.

UCSF and the Northern California Institute of Research and Education (NCIRE) have no oversight or control over SFVAMC. Although many of SFVAMC's physicians hold dual appointments, UCSF has no administrative oversight or budgetary control over VA.

RTC B12-3: The SDEIS was prepared by an unbiased and impartial environmental consultant who applied accepted significance criteria and methodologies to perform the impact assessments related to the proposed LRDP.

In addition, as mandated by VA's "Style and Usage Guide, the word "Veteran" is capitalized. VA believes that it is a title of honor and respect. Although some may not consider this proper English, because it is not shown this way in the dictionary, VA believes that those who have defended our freedom and independence deserve the honor and respect of capitalizing the title "Veteran." Such deference is often accorded to the lead agency of an environmental document. In many instances, "city," for example, is capitalized for a municipal lead agency, even though writing guides and proper grammar may not warrant its capitalization.

RTC B12-4: As indicated by the comment, these concerns have been raised by other comments, and have been addressed accordingly in responses to those comments.

RTC B12-5: The purpose of the LRDP document is to provide a programmatic overview to the future, long-range development of the Campus; therefore, SFVAMC's planning and construction related to the LRDP is not piecemeal, but a comprehensive vision of the next 15-year period from 2012 through 2027.

RTC B12-6: Comment noted.

B13) Responses to Andrew Scoular Comments on SDEIS

RTC B13-1: Comment noted.

RTC B13-2: The SFVAMC Campus has been a part of the Outer Richmond District since it opened its operation in 1934. SFVAMC personnel and visitors contribute to the businesses in the vicinity by shopping and eating at the various stores that support the economy in the area. Implementation of the LRDP implementation will not change these spending habits.

RTC B13-3: The comment opposes the Proposed Action, with the exception of potential long-term development under Alternative 3. SFVAMC LRDP implementation at the VA Palo Alto location is not possible to meet the identified alternatives selection criteria (see SDEIS Section 2.2).

RTC B13-4: The comment discusses existing parking spillover into the surrounding neighborhood. Parking spillover into the surrounding neighborhoods is an existing condition, and is addressed separately as part of existing parking conditions (see SDEIS pp. 3.13-23 through 3.13-28). The SDEIS, and the NEPA environmental process as a whole, are not intended to serve as mechanisms for addressing existing concerns or issues, which should be raised separately outside of the NEPA process with the appropriate government authorities. Rather, NEPA focuses on environmental impacts of a proposed action (in this case, the LRDP), as determined by the significance of adverse changes with respect to future conditions without the proposed action.

RTC B13-5: The LRDP development would not diminish the aesthetics of the overall area. Consistency Determination CD-0003-15, adopted by CCC on June 12, 2015, found the LRDP consistent with public access, recreation, and visual policies.

RTC B13-6: Comment noted. However, donation of the property to the City of San Francisco is not an alternative being considered.

RTC B13-7: Comment noted.

B14) Responses to Naurie Morimoto (1) Comments on SDEIS

RTC B14-1: Thank you for your comments on the SDEIS. VA understands the neighborhood sensitivities and concerns with existing parking conditions around the Campus. VA encourages all staff to park on site, making it an affordable option by only charging \$12.50 per month to park on Campus. VA informs their personnel about the risks of parking off-Campus, and is committed to working with the NPS Park Ranger, the Police Department, and the City to enforce parking restrictions and regulations, such as parking in the wrong zone or exceeding the allowed duration, as well as obstruction of curb cuts, crosswalks, and curb ramps.

Future growth in the neighborhood and at the Campus has the potential to make the fixed supply of on-street parking even more competitive than it is today. In recognition of these conditions, the LRDP contains policies and programs that seek to improve parking demand and supply. It should be noted that the LRDP already proposes to provide additional parking at the Campus at a ratio (based on habitable building inventory) that exceeds the current ratio (SDEIS pp. 3.13-65 and 3.13-76). Parking garage extensions, valet programs that increase the capacity of the garages, and SFVAMC shuttles that provide convenient connections to regional transit services are all part of VA's program to address parking in the area.

Despite these efforts, a deficit in the on-Campus parking supply proposed under the LRDP relative to the estimated parking demand from the net new development could still result in parking spillover into the surrounding neighborhood. Additional strategies could be implemented should such conditions occur. In particular, valet parking could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP. This could increase the on-site parking capacity by as many as 150 additional spaces.

The expanded valet program would help increase Campus parking supply. On the demand side, it can be expected that motorists traveling to the Campus may elect to shift from driving to other modes of accessing VA. In particular, the limited supply of parking spaces, which are at or near capacity during peak demand periods, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot), may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits (see SDEIS p. 3.13-64). The combined effect of increased Campus capacity and mode shifts by motorists traveling to the Campus would

reduce the deficit identified in the SDEIS, and the spillover parking effects in the neighborhood.

B15) Responses to Naurie Morimoto (2) Comments on SDEIS

RTC B15-1: Thank you for your comments on the SDEIS. Given the expected distribution of additional traffic generated by the LRDP, the magnitude of the expected increase in traffic volumes at the intersection of 45th Avenue and Clement Street and other locations in the Campus vicinity is not expected to represent a substantial increase in impacts related to traffic safety. Given that the LRDP is not physically affecting the design of this intersection or specifically and actively encouraging motorist behaviors at this intersection that impact traffic safety, the LRDP would not result in a significant adverse impact on traffic safety at this intersection.

B16) Responses to Pamela Carrera Comments on SDEIS

RTC B16-1: Thank you for your comments on the SDEIS. Traffic safety concerns related to existing SFVAMC-related traffic on City streets should be raised separately with the SFVAMC and the SFMTA. SFVAMC has no jurisdiction related to the enforcement of traffic violations on streets owned and maintained by the City. Petitions for increased enforcement of traffic and parking violations or implementation of measures such as traffic calming should be raised separately with the Police Department and SFMTA, outside of the NEPA environmental review process.

In addition, parking spillover into the surrounding neighborhoods is an existing condition, and is addressed separately as part of existing parking conditions (see SDEIS pp. 3.13-23 through 3.13-28). The SDEIS, and the NEPA environmental process as a whole, are not intended to serve as mechanisms for addressing existing concerns or issues, which should be raised separately outside of the NEPA process with the appropriate government authorities. Rather, NEPA focuses on environmental impacts of a proposed action (in this case, the LRDP), as determined by the significance of adverse changes with respect to future conditions without the proposed action.

RTC B16-2: The comment indicates concern about construction noise from trucks and equipment as well as existing sounds. The updated noise analysis in the SDEIS (Section 3.10, “Noise and Vibration”) evaluates potential noise impacts from the LRDP for both construction and operation. Noise impacts were identified and mitigation measures have been recommended to reduce the potential noise impacts from both construction and operation to less than adverse at the off-site residential uses.

RTC B16-3: SFVAMC has an emergency operation plan, which determines how VA responds to various emergencies. All pathogenic agents used on the SFVAMC Fort Miley Campus are tracked and treated appropriately based on their biosafety level.

RTC B16-4: The comment requests that the SFVAMC move some of the research to Mission Bay. SFVAMC does have a research presence in Mission Bay, as described by the SFVAMC's former Associate Director.

RTC B16-5: Property values in the Outer Richmond neighborhood of San Francisco are among the highest in the City. As evaluated in SDEIS Section 3.11, "Socioeconomics and Environmental Justice," the impacts of short-term construction and long-term operations would not cause an adverse impact with respect to population, housing, and employment growth; displacement of populations and/or businesses; environmental justice; and environmental health and safety risks to children. As determined in the analysis, the LRDP would increase employment, which is a benefit to the area. For minor construction impacts on environmental health and safety risks to children, Mitigation Measures NOI-1 and NOI-2 would ensure that noise levels do not exceed applicable thresholds. For minor operational impacts on environmental health and safety risks to children, compliance with federal, State, and local codes and implementation of Mitigation Measure AIR-1 and AIR-2 would ensure that health risk thresholds are not exceeded. Therefore, mitigation has been included in the SDEIS to minimize potential minor impacts. Because all socioeconomic issues have been determined to have no impact or be mitigated (as described above), it is not anticipated that the cumulative effect of these impacts would affect property owners. Furthermore, property values in San Francisco have not historically decreased as a result of additional and/or increased development within its vicinity.

B17) Responses to Weber Kneitel Comments on SDEIS

RTC B17-1: Thank you for your comments on the SDEIS. VA recognizes the neighborhood concerns about traffic, noise, and parking and other challenges of living near a major institution. However, options to contract the Campus would not meet VA's purpose and need. The LRDP and the EIS mitigation and management measures can nevertheless strive to improve upon these conditions.

Verbal Comments Received at Public Meeting on SDEIS

VA appreciates the time and input provided by participants who came to the Public Meeting on the SDEIS. Responses to comments made during the Public Meeting are provided below.

Responses to Rush Sturges Comments Received at SDEIS Public Meeting

RTC PM2-1: The comment supports the SFVAMC LRDP. The Davis Bacon Act mandates that all federal government construction contracts and the contracts for federally assisted construction over \$2,000 must contain the appropriate Davis-Bacon Wage determination. SFVAMC is committed to conformity with the Davis-Bacon Act.

Responses to Ron Miguel Comments Received at SDEIS Public Meeting

RTC PM2-2: Comment will be submitted in writing. No further response is required.

Responses to David Burns Comments Received at SDEIS Public Meeting

RTC PM2-3: The comment indicates that he measured ambient noise levels of 56 to 60 dB in his backyard. This ambient noise level provided by the comment is within the ambient noise levels collected for the LRDP (see Table 3.10-4 of the SDEIS). For example, the measured ambient noise level at Site 1 (residence near the project site) varied from 56.3 dBA (L_{90} , the minimum level) to 74.5 dBA (L_{max} , maximum level), and the measured ambient at Site 2 (project southern property line) varied from 51.1 dBA (L_{90}) to 82.4 dBA (L_{max}).

The ambient noise levels in the vicinity of the project site were recorded for a 15-minute duration in accordance with the requirements of the SFNO (Section 2901[a]), which states in part that the ambient measurement shall be for a minimum 10-minute period. The background ambient noise levels of 56 to 60 dBA are considered “Satisfactory” (which is the lowest noise category) on the land use compatibility chart, as provided by the San Francisco Planning Department (see Table 3.10-9 of the SDEIS).

Responses to Amy Meyer Comments Received at SDEIS Public Meeting

RTC PM2-4: The comment supports the seismic retrofits and internal-to-the- SFVAMC Fort Miley Campus improvements under the Proposed Action. The Campus is 29 acres; however, as noted by the comment, there are portions of the site, such as the small northern slope area of the Campus, that are not suitable for construction. As a result, the actual developable area to accommodate the projected development under the LRDP is less than 29 acres.

RTC PM2-5: The photo shown in SDEIS Figure 3.1-14 represents a typical day with regard to views and weather conditions. In addition, the corresponding visual simulation shown in Figure 3.1-21 demonstrates how a portion of this publicly accessible view would potentially be affected. SFVAMC has decided to remove the water tower and upgrade the system to store water underground; therefore, the water tower would not be visible. The Final EIS figures in Chapter 2.0, “Alternatives” and Section 3.1, “Aesthetics” have been updated to remove the water tower. Therefore, this would not constitute a significant adverse aesthetics impact on the view from the San Francisco Presidio.

RTC PM2-6: The visual simulations shown in Figures 3.1-13b and 3.1-20 provide a publicly accessible view of the SFVAMC Fort Miley Campus as experienced by pedestrians along a GGNRA trail east of Building 212. As depicted, there would be no change in the view from the existing view of a berm, Building 212, and foliage. Therefore, Building 24 would not be visible from publicly accessible views within GGNRA lands, including East Fort Miley. This would represent no visual impact. SFVAMC is coordinating with GGNRA regarding access or linkages between the two properties for the path/trail to be used for hikers and pedestrians for access to VA, NPS, and Legion of Honor.

RTC PM2-7: SFVAMC cannot commit to providing funding to another federal agency for improvements or renovations on their property. SFVAMC is committed to continuing to partner with the GGNRA to find opportunities for improvements that are mutually beneficial.

RTC PM2-8: Please refer to RTC PM2-6 regarding potential visual impacts along the western side of the Campus. Buildings 22, 23, and 24 would not be visible from publicly accessible views within GGNRA lands, including East Fort Miley (see SDEIS Figure 3.1-20). This would represent no visual impact.

RTC PM2-9: See the Final PA for the process that will be followed by consulting parties to share information and solicit input on proposed LRDP buildings design.

RTC PM2-10: See the Final PA for the process that will be followed by consulting parties to share information and solicit input on proposed LRDP buildings design. Only consulting parties that sign the PA would be involved in this process.

Responses to Raymond Holland Comments Received at SDEIS Public Meeting

RTC PM2-11: VA appreciates your comments on the SDEIS. In accordance with NEPA requirements, responses to comments received on the SDEIS are included as part of the Final EIS, along with responses to all other public comments received on the SDEIS. Alternative 3 identified in the SDEIS is a feasible alternative, and is explained on SDEIS Executive Summary p. 5 and Chapter 2.0, pp. 2-2 through 2-4. This alternative has been carried forward for analysis in the SDEIS.

RTC PM2-12: The VA use that could be built at Mission Bay is identified in Table 2-5. The potential use would be an ambulatory care center and associated parking, if Alternative 3 is selected by VA.

RTC PM2-13: Parking conditions including supply and demand vary from day to day, from day to night, and from month to month. As a result, the availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel.

The absence of a ready supply of parking spaces, combined with available alternatives to automobile travel (e.g., transit service, taxis, bicycles, or travel by foot) and an urban development pattern, may induce drivers to seek alternative parking facilities, shift to other travel modes if available, or change their overall travel habits.

In this particular case, Campus users have several options when traveling to and from the Campus by transit. Muni provides high-frequency, high-capacity bus service along the Geary Boulevard corridor, and near-term enhancements will be implemented under the TEP and BRT Project (see SDEIS pp. 3.13-46 through 3.13-47). These public transit options are supplemented by private shuttle services supported by the SFVAMC and affiliate organizations (SDEIS Table 3.13-5), including the following:

- Commuter shuttles operated by contract with Bauer's Transportation, connecting to local and regional transit hubs;
- Interclinic shuttles connecting the Campus with VA clinics in Downtown San Francisco, San Bruno, and greater Northern California;

- Specialized shuttle services for SFVAMC patients operated by the Disabled American Veterans Volunteer Transportation Network; and
- Local shuttles operated jointly by SFVAMC and UCSF.

Options for automobile travel that do not require SFVAMC employees or visitors to physically park a vehicle at or near the Campus (such as taxis, rideshares, and private vehicle pick-up/drop-off) are also available.

Although a deficit in the on-Campus parking supply proposed under the LRDP relative to the estimated parking demand from the net new development could result in parking spillover into the surrounding neighborhood, it is more likely that these motorists would switch to alternative modes (such as the transit options discussed above), or make other changes in their travel and parking behavior that would reduce this shortfall in parking demand, given that the total supply of on-street parking in the areas surrounding the Campus is unlikely to change substantially in the future, and is currently at or near capacity during peak demand periods.

Furthermore, valet parking could effectively increase the on-Campus parking supply beyond what was assumed in the LRDP (and therefore reduce the parking deficit) by increasing the space efficiency of parking facilities. For example, the existing valet parking program could be expanded to include the additional parking structures proposed to be constructed under Alternatives 1 and 2. This could increase the on-site parking capacity by as many as 150 additional spaces, thereby exceeding the estimated deficit in on-Campus parking of 120 spaces under the LRDP (the estimated demand of 426 spaces generated by the net new development, less the proposed net increase in parking supply at the Campus of 306 spaces).

Based on these considerations, the SDEIS concluded that the estimated deficit of 120 spaces would result in minor parking effects.

With regard to the methodology for estimating travel and parking demand generated by the LRDP alternatives, the SDEIS adopts an approach that blends ITE trip generation and parking demand rates with mode share and trip distribution data from the *SF Guidelines*.

The ITE maintains a database of empirical data on travel and parking demand for sites across the United States, categorized by land use. The trip generation and parking demand rates published by the ITE are considered industry-accepted sources for estimating travel and parking demand for land use development and associated environmental review. Similarly, the *SF Guidelines* are the accepted source for empirical data on trip-making characteristics localized to the unique conditions of San Francisco—a dense, urban environment where alternative modes of travel such as transit, biking, and walking are viable options. The San Francisco Planning Department generally requires use of the *SF Guidelines* when evaluating land use development in San Francisco. Information from these two data sources is frequently blended when developing travel and parking demand estimates for land use development in San Francisco, particularly

when there are unique or specialized considerations that make reliance on only one or the other data source difficult.

An approach that relies solely on trip generation and parking demand rates provided by the ITE, for example, does not account for the unique, localized trip-making characteristics found in San Francisco. In particular, the ITE demand rates are based on suburban locations where the automobile mode share is effectively 100 percent, due to segregated land use patterns and roadway designs that encourage and facilitate the use of personal automobiles, but discourage alternative modes such as transit, biking, and walking. In contrast, automobile mode shares in northwestern San Francisco are closer to 50 percent, with the remaining 50 percent spread across these alternative modes. The average occupancy of personal automobiles is also typically higher in San Francisco due to a higher trend towards carpooling and ridesharing, so that each vehicle on the road (and, consequently, each parked vehicle) ends up carrying more people per trip, on average, than the same vehicle in a suburban location. Likewise, incorporating the ITE trip generation and parking demand rates balances the empirical *SF Guidelines* mode share data to help account for the unique, localized conditions found specifically at the Campus, a relatively isolated location surrounded by a lower-density land use pattern. Thus, the travel demand methodology accounts for the “unique isolation” of the Campus in a relevant manner.

Historical parking demand and supply data can be considered a potential source of data for estimating parking demand; however, parking conditions are not static, and as noted above, the availability of parking spaces is not a permanent condition, but one that changes over time as people change their modes and patterns of travel. In particular, use of historical demand and supply data does not necessarily account for conditions and factors that have changed since the time the historical data were collected, including (but not limited to) issues such as background traffic congestion levels, the presence and quality of transit service, the availability or cost of parking, the average price of gasoline, and the general economic state of the Bay Area. These and many other factors all affect the travel behavior choices of Campus users (and all tripmakers anywhere). As a result, there is no guarantee that historical data on parking demand generated by the Campus accurately represent the parking demand generated by the Campus today, much less the parking demand it may generate in the future-year scenarios analyzed in the SDEIS with the LRDP.

To the extent that parking is dynamic and that availability of parking, in and of itself, therefore would not constitute a significant impact (see SDEIS pp. 3.13-64 and 3.13-71), minor variations in estimated parking demand beyond what was assumed in the SDEIS would also not be expected to increase the operational parking impacts to levels of significance beyond the minor impacts already identified in the SDEIS.

RTC PM2-14: Building 211 construction is complete and currently open for parking use.

In response to the comment’s questions concerning the parking demand estimates for Building 40, the San Francisco Planning Code guidance presented in SDEIS

Table 3.13-19 would suggest that 91 spaces be provided should VA attempt to apply Planning Code requirements to Building 40. It should be noted, however, that this guidance assumes older parking requirements still in effect for the most restrictive zoning districts in the city. The Planning Department has substantially rationalized the Planning Code requirements for off-street parking in areas of the city currently accommodating (or expected to accommodate) growth in the future, so that land uses in many zoning districts are no longer required to provide any parking at all and are, in fact, subject to provisions that limit the total amount of off-street parking that is permitted. The Planning Commission also frequently grants exceptions for providing less than the number of parking spaces prescribed by the Planning Code, recognizing the multimodal nature of travel in San Francisco and its “Transit First” policy.

Although neither Building 40 nor the LRDP as a whole are subject to the provisions of the San Francisco Planning Code, the example cited above indicates that the parking demand estimate and the Planning Code guidance for Building 40 are more similar than dissimilar.

In addition, the comment’s references to the estimated travel demand and parking demand generated by Building 40 may be based on a misunderstanding of the relationship between travel demand (as estimated in person-trips) and parking demand. A “person-trip” as defined for the purposes of estimating travel demand represents one person making a one-way trip, and is not equivalent to the number of employees or personnel expected to use or visit this facility for any given duration. In general, it is assumed that each person will make at least two-person trips associated with a given land use in any one day (one person-trip to the given land use and one person-trip leaving the given land use). For an office use, for example, each employee (or other building user, such as visitor or building maintenance staff) would be expected to make one person-trip to the office in the morning and one person-trip leaving the office in the afternoon or early evening. Therefore, the 963 person-trips from SDEIS Table 3.13-10 reflect approximately 482 persons making “trips” to Building 40. However, many building users would be expected to make more than two person-trips in the course of the day, particularly if they decide to leave the Campus for lunch, to run personal errands, or to conduct work-related duties off-Campus such as field visits or off-site meetings. Thus, the actual number of persons making “trips” is further reduced.

In addition, the value of 963 person-trips cited from Table 3.13-10 represents the person-trip total over the course of the entire day, and does not represent trips taking place solely during specific hours or time periods of the day. In particular, it is estimated that Building 40 would generate 963 person-trips daily, only 127 of which would take place during the weekday p.m. peak hour (SDEIS Table 3.13-10). As described above, however, person-trips represent one-way trips; therefore, the 127 weekday p.m. peak hour person-trips from SDEIS Table 3.13-10 would include a combination of both inbound (to Building 40) and outbound (leaving Building 40) trips, and the total in any one direction would be less than 127.

Furthermore, the comment correlates estimates of building users (calculated from the person-trip values in SDEIS Table 3.13-10) with the estimated parking demand presented in SDEIS Table 3.13-14, but does not consider the nuances of parking behavior. In particular, one of the primary factors characterizing parking behavior is turnover. For example, a facility accommodating 100 visitors (200 visitor person-trips) who drive to the facility over the course of a day does not typically require 100 parking spaces, because visitors will be spread out over the course of the day. The actual peak demand for parking spaces at a single point in time (i.e., the peak parking demand period) is substantially less than 100. Parking spaces for employee use would generally be expected to exhibit less turnover, if we apply this same example, but assumed that 100 employees would drive to the facility over the course of the day. In this case, the peak parking demand would be greater than for the visitor example, and likely closer to 100 spaces. There can still be some level of turnover in the employee example, however, particularly if the facility accommodates schedule shifts or has a high share of employees who regularly travel off-site over the course of the day.

In conclusion, an equivalent comparison to the one referenced in the comment would involve the vehicle-trip values in SDEIS Table 3.13-12 and the parking demand values in Table 3.13-14 (although in the comment, the specific reference is to Building 40). If we look at the person-trip values presented in SDEIS Table 3.13-12, however, one arrives at 108 inbound vehicle-trips and 150 outbound vehicle-trips during the weekday p.m. peak hour. At the most, this level of vehicle-trip activity would be, more or less, fully equivalent to approximately 150 spaces of parking demand. As cited in SDEIS Table 3.13-14, however, the peak parking demand is 426 spaces, well above 150 spaces, because it reflects the accumulation, over the course of several hours, of parking demand by driving employees, as well as the separate parking demands generated by visitor use (e.g., Building 213).

Responses to Jason Jungreis Comments Received at SDEIS Public Meeting

RTC PM2-15: To build a VA facility, VA would need to purchase land, thus it would become “federal land.”

RTC PM2-16: NCIRE is a non-profit institution that provides administrative support to manage the research funding for many of SFVAMC’s researchers. NCIRE does not conduct research. All researchers at the SFVAMC are employed by VA, and the majority also provide clinical care to Veterans.

Responses to Kay Weinkam Comments Received at SDEIS Public Meeting

RTC PM2-17: SFVAMC has 124 inpatient beds and 120 skilled nursing home beds. There are no plans to increase inpatient beds.

RTC PM2-18: This comment opposes the Proposed Action. However, NEPA has no requirements related to how a federal lead agency shall define its purpose and need. In addition, VA

operations include intertwined clinical, research, and education services that benefit Veterans.

RTC PM2-19: VA continues to monitor noise on campus. There have been equipment and other mechanical issues that resulted in increased noise related to these buildings, and VA has addressed these issues when they became aware of them.

Responses to Kathy Lassen-Hahne Comments Received at SDEIS Public Meeting

RTC PM2-20: VA is aiming to have a decision with regard to the EIS sometime in the summer of 2015.

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