



DEPARTMENT OF VETERANS AFFAIRS
Medical Center
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Carol Roland-Nawi, PhD
State Historic Preservation Officer
Office of Historic Preservation
Department of Parks & Recreation
1725 23rd Street, Suite 100
Sacramento, CA 85816

Subject: Continued Section 106 Consultation for the Department of Veterans Affairs San Francisco Medical Center: Construction of Building 40 (Research Center) and Demolition of 4 Buildings (Building 40 project, LRDP Phase 1.9) (VA_2013_0110_001)

Dear Ms. Roland-Nawi,

The purpose of this letter is to continue project-specific consultation for the San Francisco Veterans Affairs Medical Center (SFVAMC) Building 40 project, Phase 1.9 (previously Phase 2.4) within our Long Range Development Plan (LRDP). Following the stipulations of the draft programmatic agreement (PA) for the LRDP, we initiated consultation for the Building 40 project, under Review Category A, by my letter dated December 17, 2013.

An update to the LRDP was published in January 2014, and the title of the phase of work currently under review was changed to "Phase 1.9," which includes the demolition of buildings, 18, 14, and 21, demolition of trailer 23, relocation of the water tower (Structure 206) and construction of Building 40.

As the Building 40 project is in the Design Development phase, we are proceeding to Stipulation III. a. ii., as described in the 2nd *Administrative Draft Programmatic Agreement* dated February 27, 2014 (**Appendix A**).

This step of the Review Procedures for Individual LRDP Projects (PA III. a.ii.) states:

- ii. Before completing Design Development, SFVAMC will document the measures taken to avoid or minimize adverse effects on the SFVAMC Historic District.
 1. Documentation will include, but not be limited to:
 - a. Written description of how the project applies the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.
 - b. Written statement of whether the net result of the project will be a contribution to the adverse effect on the Historic District.

- c. Drawings including site plans, elevations, sections, and renderings illustrating the existing conditions and proposed project.
2. SFVAMC will make the above documentation available to all Consulting Parties for a 30-day review and comment period.

Project-Level Description of Building 40

Building 40 is located on the northwestern edge of the campus/SFVAMC Historic District and is accessed from the loop road that follows the perimeter of the campus, as well as other internal roadways. The selected site is located immediately to the west of Building 6, an historic resource. This location offers the best opportunity for connectivity to the future Veterinary Medical Unit (VMU), identified as Building 41 in the LRDP Phase 1.2. This connectivity in the form of an underground tunnel is crucial in creating an interior, environmentally controlled functional relationship between the new Building 40 research building and the VMU. Connectivity to the remainder of the medical center allows researchers who also serve clinical roles to move seamlessly between the research and clinical spaces.

The design proposal for Building 40 is for a four-story (16'-0" floor-to-floor heights) building with a basement (23'-0" floor to floor height) and an enclosed mechanical penthouse. The building's mass is topped by stepped back roof lines, parapets and mechanical enclosures. The overall height of the building is 64 feet to the lower roof (411 feet above sea level) and 91 feet to the top of the upper parapet (438 feet above sea level). The proposed height of the building was established by balancing several objectives including 1) creating more efficient floors, which calls for larger floor plates and a shorter building; 2) occupying minimal site area on the already constricted campus, which leads to smaller floor plates and a taller building; and 3) an architectural objective of keeping the new building compatible with the heights of the historic buildings in the district and lower than the primary historic hospital building (440 feet above sea level).

The above grade portion of the building will house research laboratories and associated office space with a compact light-filled atrium that encourages gathering, interaction and collaboration among the researchers. The atrium creates a single arrival space that may be accessed from either the north or the south, allowing the project to integrate itself into the natural movement paths across the campus.

The north side of Building 40 has a symmetrical composition with a centrally-located recessed entrance that evokes the symmetry of the historic buildings throughout the district, and which references the dual mass and proportions of Building 18.

Mechanical systems located in the enclosed penthouse will include air handling units, chillers, and emergency generators. The decision to enclose these equipment areas centered on providing for ease of maintenance and to protect equipment from the corrosive effects of the marine environment. Cooling towers will be located outside on the roof.

The exterior enclosure of the building draws on a palette of materials and colors that are appropriate to the surrounding historic district and the local marine environment. White plaster, a prevalent building material on site, will clad Building 40's penthouse; white concrete, also a prevalent building material on site, is visible on the building's south façade and at the base of the building below the cantilever of the ground floor; and terra cotta battens on the south façade reference the decorative terra cotta panels that embellish the entrances of the historic buildings.

In addition to maintaining compatibility with the historic district, ease of maintenance and durability in the marine environment were factored into the selection of building materials. Areas of the façade that include vision areas would be clad in a curtain wall system of extruded aluminum mullions and supporting vision and spandrel glass. Solid portions would be clad in a terra cotta rain screen and metal panels. The mechanical penthouse would be clad in cement plaster. Site retaining walls would be exposed, cast-in-place concrete.

Efforts taken to avoid or minimize impacts

The primary impact of the Building 40 project is the proposed demolition of Building 18, which is a contributor to the existing historic district. Understanding that the new building will be constructed within the existing historic district, efforts were taken to avoid or minimize any additional impacts to the historic district through careful siting and orientation of the new building, and through the design of the building's height, massing, materials and overall character.

The impact to the site has been minimized by locating the new building along the periphery and northwestern edge of the historic district. The site of Building 40 is already disconnected from its connection to other historic buildings in the district through contemporary additions, and its location on the site's northern edge will reduce any impact within the heart of the district itself (see **Appendix B**).

The existing contributing buildings in the historic district are of varying heights, but effort was made to keep the height of Building 40 lower than the primary historic hospital building, Building 2. In addition, the massing, scale, materials and colors of Building 40 were chosen to be compatible with the character-defining features of the historic district. The new building references the historic buildings on the site through its height, stepped massing at the roof line, color, terra cotta features, and inclusion of punched windows on the south façade. In addition, the north side of Building 40 was designed to reference the symmetry of the historic buildings in the district and the dual mass and composition of Building 18. As a result, the new building remains subordinate, in both height and character, to the existing historic buildings on the site.

In addition to the exterior character of the building described above, impacts to the site were minimized by putting common mechanical rooms and the programmed VMU underground.

These efforts are described in more detail in the Standard's Analysis below.

Secretary of the Interior's Standards for the Treatment of Historic Properties

The *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Secretary's Standards) include Preservation, Rehabilitation, Restoration, and Reconstruction. For the Building 40 project, *Standards for Rehabilitation* will be used to analyze the proposed design for compatibility with SFVAMC Historic District. This analysis is based upon design documentation including architectural drawings and renderings dated February 14, 2014 provided by Skidmore, Owings & Merrill, which are included as an attachment to this report (**Appendices C and D**).

Rehabilitation Standard 1: *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

Rehabilitation Standard 1 has been applied to Building 40 in the following way: The existing and historical uses of the SFVAMC have been a combination of offices, labs and medical facilities supporting the needs of veterans. Research has historically been part of the mission of the Veterans Health Administration. The proposed project would construct a new research facility that would support the significance of the

SFVAMC Historic District as a medical facility for veterans. Through the site's ongoing use as a medical and research facility for veterans, the property will be used as it was historically.

Rehabilitation Standard 2: *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the property will be avoided.*

Rehabilitation Standard 2 has been applied to Building 40 in the following way: As described in its National Register Nomination, the SFVAMC Historic District is significant for its 1) technologically advanced reinforced concrete structures, 2) Mayan Art Deco architectural detailing, and 3) on-going use as a medical and research facility.

As proposed, the majority of the contributing resources within the historic district will be retained and preserved. Demolition of Building 18, however, will result in the loss of one contributing building in the historic district. Despite the loss of this building, the district will still be able to convey its significance as a historic resource.

The historic district's ongoing operations as a VA medical facility will not change. Construction of Building 40 will bolster the campus's ability to serve as a research site through upgraded facilities. Therefore, the construction of Building 40 will retain and preserve the historic character of the site.

Overall, the proposed design of Building 40 reflects the character of the district by conforming to the general height and massing precedent set by other contributing buildings in the SFVAMC Historic District. Contributing buildings within the district currently span one floor in height to seven floors in height. Building 40 would rise to 4 floors plus a mechanical roof shed, falling well within the spectrum of heights already established on the campus. Additionally, the building would be rectangular and built on a north-south axis, with the primary facades (containing entrances) facing north and south. Therefore, it would relate spatially to the SFVAMC Historic District in much the same way that Building 18 is currently sited.

The design of Building 40 would not have an impact on the SFVAMC Historic District's character-defining features and would reflect the character of the district by matching the prevailing height and siting of contributing buildings. Although the removal of Building 18 would have an impact on the district, the district itself would still be able to convey its significance. The new construction as proposed will not impact the historic character of the SFVAMC Historic District to an extent that the District's ability to express its historic significance would be impaired.

Rehabilitation Standard 3: *Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.*

Rehabilitation Standard 3 has been applied to Building 40 in the following way: The proposed project would not create a false sense of history, nor will it add conjectural historical features to Building 40. The proposed project would use a materials palette that is respectful of the local environment while enabling modern research and medical facility needs. It will reference materials found in the historic district (cement plaster, concrete, aluminum, terra cotta detailing), but the new construction would be built using contemporary materials and detailing, and will be recognized as a physical record of its time, place, and use. The changes will not create a false sense of historical development within the SFVAMC Historic District.

Rehabilitation Standard 4: *Changes to a property that have acquired significance in their own right will be retained and preserved.*

Rehabilitation Standard 4 has been applied to Building 40 in the following way: The SFVAMC Historic District has a period of significance from 1934 to 1941. The proposed project would not remove or alter character-defining features on any contributing buildings other than Building 18, and therefore would not affect contributing buildings within the district that contain changes that may have acquired significance in their own right.

The proposed project would also include the demolition of a non-contributing building within the Historic District, Building 14. The building was constructed in 1999-2000 and is not significant in its own right. Building 21 and Trailer 23 are outside the historic district and are not significant in their own right.

Rehabilitation Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

Rehabilitation Standard 5 has been applied to Building 40 in the following way: The proposed project will not affect distinctive materials or construction techniques that characterize historic resources within the SFVAMC Historic District. However, the proposed project will have a minimal adverse effect on the Mayan Art Deco finishes that characterize historic resources within the SFVAMC Historic District through the loss of Building 18. This impact is addressed in the FOE for the LRDP dated June 6, 2013.

Apart from the demolition of Building 18, the proposed project will not affect any nearby contributing resources to the historic district such that their materials, features, finishes, and construction techniques would be impacted.

As designed, the proposed project will not impact the historic character of the SFVAMC Historic District to an extent that the District's ability to express its historic significance would be impaired.

Rehabilitation Standard 6: *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

Rehabilitation Standard 6 has been applied to Building 40 in the following way: The proposed project does not involve the replacement of deteriorated or missing historic features either at the project site or within the SFVAMC Historic District.

Rehabilitation Standard 7: *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

Rehabilitation Standard 7 has been applied to Building 40 in the following way: The proposed project does not entail the cleaning or repair of historic materials.

Rehabilitation Standard 8: *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measure will be undertaken.*

Rehabilitation Standard 8 has been applied to Building 40 in the following way: The proposed project includes excavation work to construct the basement of Building 40. The FOE for the LRDP, dated June 6, 2013, determined that no archaeological resources are known within the Campus.

Rehabilitation Standard 9: *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale, proportion, and massing to protect the integrity of the property and environment.*

Rehabilitation Standard 9 has been applied to Building 40 in the following way: The proposed project would include new construction (Building 40) which will be distinctive from the old, but compatible with the historic materials, features, size, scale, proportion, and massing of the contributing buildings within the Historic District.

The proposed project would include materials and features that will not distract from those that characterize the district, yet it will be constructed with contemporary materials that are sensitive to both the historic district and the marine environment. Additionally, the spatial massing of the proposed project differs from that of the existing building it will replace, and therefore has the potential to affect the spatial relationships that characterize the district. However, the design of the proposed project has been completed in a way that maintains the spatial relationships between the project and the district. The entrances will be centered on the north and south facades, aligning with the existing circulation paths currently in use in the SFVAMC Historic District. The height of the proposed building is taller than the adjacent historic resource (Building 6, three stories-over-basement) but not as tall as the tallest building in the SFVAMC Historic District (Building 2, six stories in height with a tower that rises to seven stories). The height of the proposed new building is four stories-over-basement, with mechanical sheds on the roof, rising to 64' from the ground floor to the lower roof, and 91' from the ground floor to the top of the upper parapet.

Rehabilitation Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

Rehabilitation Standard 10 has been applied to Building 40 in the following way: The proposed project includes the demolition of an existing historic building and construction of a new building within the SFVAMC Historic District. As detailed in the evaluation of Standards 1 through 9, the project is designed in a manner that minimizes its impact on the historic district's ability to retain and express its historic character and historic significance. Because of this minimized impact, whether the new project, after it is constructed, is retained or removed in the future, neither condition would impair the essential form and integrity of the SFVAMC Historic District.

Building 40 Project and its Relationship to Subordinate Projects

The following describe subordinate projects that are dependent upon completion of Building 40 and are also part of Phase 1.9 of the LRDP.

Currently, the site is occupied by four buildings, 14, 18, 21 and T-23, as well as several utility buildings and utility lines. These structures will be demolished to accommodate construction of Building 40. Building 18 is located within the SFVAMC Historic District boundary and is a contributing building. The adverse effect of the demolition of Building 18 is addressed in the LRDP FOE and in the LRDP programmatic agreement mitigation.

Buildings 14, 21, T-23 are non-historic buildings in and near the historic district, and their demolition will therefore have no adverse effect on the historic district.

To the south of the Building 40 site are an existing water tower (Structure 206) and two below grade fuel tanks. Although these were not addressed in my December 17, 2013 letter for the Building 40 project, they are part of Phase 1.9 in the updated LRDP. The water tower will be relocated so that it is closer to the perimeter of the campus. The fuel lines that serve the tanks and their associated fueling station will also require relocation because they currently run through the location of Building 40. Additionally, an electrical utility trench crosses the site and will need to be relocated. As relocation of the water tower is a separate sub-project identified in the updated LRDP Phase 1.9 (but was not included in the former LRDP Phase 2.4), and falls under Review Category B and C of the draft PA, we will initiate project-specific review separately under the terms of the PA.

In reference to the demolition of Building 12 in my December 17, 2013 letter, we have removed Building 12 from the current Building 40 project review as it is no longer part of Phase 1.9 in the updated LRDP. We will initiate project-specific review for Building 12 as a separate package for Phase 1.17.

Summary

The design of Building 40 and the demolition of buildings 14, 21 and T-23 will not contribute to the adverse effect of the LRDP. However, Phase 1.9 of the LRDP will result in a NET adverse effect due to the demolition of Building 18.

We look forward to hearing from you regarding the design of Building 40. If you have questions or comments about this project, please contact Allan Federman, Project Engineer at Allan.Federman@va.gov or (415) 850-7281.

Sincerely,



Bonnie S. Graham
Director

Enclosures

Appendices A, B, C, D:

- A. 2nd Administrative Draft Programmatic Agreement
- B. SFVAMC Historic District – Site Plans Showing Existing Conditions and Proposed Project
- C. Building 40 Design Development Drawings - Site Plan, Elevations, and Sections

D. Site Photos of Existing Conditions and Renderings of the Proposed Project

Cc: ACHP and other consulting parties