

DEPARTMENT OF VETERANS AFFAIRS Medical Center 4150 Clement Street San Francisco, CA 94121

MAY 0 7 2015

In Reply Refer To: 662/138

Carol Roland-Nawi, Ph.D State Historic Preservation Officer Office of Historic Preservation Department of Parks & Recreation 1725 23rd Street, Suite 100 Sacramento, CA 95816

Subject: Section 106 Initiation for the San Francisco Veterans Affairs Medical Center Building 207 Office of Information Technology (OIT) Expansion Project

Dear Ms. Roland-Nawi:

The U.S. Department of Veterans Affairs (VA) is proposing the expansion of Building 207 in order to provide additional Information Technology support space for the San Francisco Veterans Affairs Medical Center (SFVAMC) at Fort Miley in San Francisco, California. The SFVAMC is located on a 29-acre site in northwest San Francisco (see Exhibits 1 and 2) and is a major tertiary care facility that serves as a VA regional referral center for specialized medical and surgical programs. The 12-acre SFVAMC National Register Historic District (see Exhibit 3) lies within the boundaries of the SFVAMC Fort Miley Campus, and the proposed undertaking is located adjacent to the Historic District (see Exhibit 4).

Per the requirements of the National Historic Preservation Act (NHPA) and the *Programmatic Agreement Among the U.S. Department of Veterans Affairs, Veterans Health Administration, San Francisco Veterans Affairs Medical Center; the Advisory Council on Historic Preservation; and the California State Historic Preservation Officer Regarding the Long Range Development Plan for the San Francisco Veterans Affairs Medical Center (the PA) dated November 25, 2014 and executed January 9, 2015, the VA is contacting you to initiate consultation in the early stages of project development prior to completing the Schematic Design of the proposed Building 207 OIT Expansion project. As the project site for this sub-phase of the Long Range Development Plan (LRDP) is located adjacent to the SFVAMC Historic District, we are following the consultation procedures outlined under PA Review Category B, as previously identified in Attachment B of the PA. Additionally, we are considering constructing a bridge connection to Building 2 as part of the undertaking, because Building 2 is within the Historic District, we will also be following the procedures outlined under Review Category A. The PA allows for review categories to be combined when more than one review category applies.*

This letter constitutes the review initiation for the proposed undertaking per the directives of Review Categories A and B and includes a written description of the proposed sub-phase and any way in which it differs from what is described in the LRDP Finding of Effect (FOE) and how the design applies the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOISTHP).

Proposed Sub-Phase Undertaking

Existing Conditions

The proposed sub-phase undertaking, identified as SFVAMC LRDP Sub-phase 1.10 in the PA (previously the project was identified as Phase 2.2 in the LRDP FOE) includes the construction of an addition to Building 207, which is located outside of and is not a contributing resource to the Historic District. The existing building is sited on a triangular-shaped area bound by three buildings. Building 207 is located eighteen feet from Building 1 (a contributing resource to the Historic District); nine feet from Building 2 (a contributing resource to the Historic District); and eleven feet from Building 200 (a non-contributing resource located outside the boundaries of the Historic District).

Building 207 was constructed in the early 1990s and is an essentially triangular-shaped, single-story building with a flat roof. The approximately 3,600 square foot building is partially visible only from the south side through an opening between Buildings 200 and 1. The remainder of the existing building is obstructed from view by the surrounding structures.

Included in this submission are photographs of the existing site and exterior building conditions.

Building Improvements

The proposed project would serve to expand and consolidate the OIT with the design of new second and third floors over the existing building. Additionally, the design would include a new two-level bridge connecting Building 207 to Building 2 at both the first and second floors. Each proposed floor would cover an area of no more than 4,000 square feet, and the proposed design would generally adhere to the existing building footprint. The new building height, including the proposed addition, would be dependent on the design approach and may be up to approximately fifty feet to the top of the mechanical screen, and the building exterior would be finished with a painted plaster or stucco.

The additional floor space would accommodate new computer equipment rooms, computer support rooms, telecommunications rooms, and general support areas including: a reception area, staff and administrative areas, a staff lounge, toilet facilities and storage areas. Due to the multi-story project approach, floor area would also be required for internal circulation components and emergency exiting.

The project is to be designed to current VA design and construction standards, the International Building Code (IBC), ADA Standards for Accessible Design, and to the VA Sustainable Design Manual. The project construction would be phased in order to maintain daily operations at the OIT facility. The scope of work would include: general construction, alterations, grading, drainage, concrete, structural steel framing, metal wall framing, doors and windows, flooring, ceiling, roofing, fire protection, plumbing, mechanical and electrical work, utility systems, interior finishes and furnishings, and necessary removal of existing improvements and various building components.

Site Improvements

The existing site consists of asphalt paving surrounding Building 207 on all sides, and an accessible concrete ramp and stair serving a secondary entrance to Building 200. No landscape planting material or irrigation system exists. It is anticipated that the paving, accessible ramp and stair will be removed and replaced as part of the undertaking, along with improved exterior area lighting. New landscaping is currently under consideration, but not yet confirmed.

Finally, given that the project will result in a building approximate three times the size of the existing building, it is anticipated that all utility services provided to the existing building will require appropriate increases in capacities.

LRDP FOE Consistency

The proposed sub-phase undertaking was previously identified in the LRDP FOE as Phase 2.2, IT Support Space Expansion (Building 207). The FOE project description stated that, "this phase would construct an addition on Building 207, located outside of the Historic District. The planned construction would occur outside and to the south of the SFVAMC Historic District boundaries" (AECOM, Draft FOE for the LRDP SFVAMC, August 2012, p.56). Later in the same document the effect analysis summarized that the, "vertical expansion of buildings currently located south of Building 2 would cause a minimal change to the integrity of setting and feeling in comparison with the massive Building 200 in the original landscaped entry to Building 2" (AECOM, p.59). Finally, Attachment B of the PA, which refers to the project as Sub-phase 1.10, provides an additional Finding of Effect Analysis stating, "Sub-phase 1.10 would involve constructing as addition on Building 207, located outside of the HD. The planned construction would occur outside and to the south of the SFVAMC HD boundaries" (PA, p.27).

The proposed undertaking appears to coincide generally with the previous descriptions as outlined in the FOE and the PA, with two exceptions. The addition of a bridge connection to Building 2 is a new element being explored in the undertaking. Also, the expansion of Building 207 as proposed in the LRDP indicated that the final building would be two stories; however the current proposal would add two stories above the existing ground floor.

Application of the SOISTHP

- 1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
 - Comment: The property's use will continue to support the campus' function as a VA medical facility.
- 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
 - Comment: The proposed undertaking would not require the removal of historic materials or the alteration of features and spaces that characterize the Historic District. The project site is located outside of the Historic District, and it appears that only the building parapet would be visible from within the Historic District due to the screening provided by existing buildings. The proposed connection to Building 2 would be located at the site of previously enclosed window openings, so as to avoid the removal of any additional historic materials or features.
- 3. Each property shall 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 architectural elements from other buildings, shall not be undertaken.
 - Comment: The proposed design would not create a false sense of historical development. The exterior of the addition would essentially match the existing conditions of Building 207, which is a simple, utilitarian building with no ornament or any particular architectural style. The exterior wall finish and color would be compatible to the rest of the campus buildings, and the new addition would be clearly modern.
- Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
 - Comment: No changes relative to Building 207 have acquired historic significance.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

Comment: As a non-contributing structure, Building 207 maintains no distinctive features, finishes or construction techniques that contribute to the character of the Historic District. The location selected for the potential connection of a bridge would be where no historic windows or decorative spandrels remain.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

Comment: No work would be done to any historic features as part of this undertaking. The proposed connection to Building 2 would be at existing window locations that were previously infilled.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

Comment: There no plans for any chemical or physical treatments to be undertaken on any historic materials as part of this project.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Comment: The Archaeological Data Recovery Plan Template for the SFVAMC is included Attachment C of the PA. The original construction of Building 207, circa 1988, included soil preparation, foundations, relocation of existing utilities and new utilities. The proposed new construction does not include any additional ground disturbing activities. If any discoveries are made during construction, then the PA procedures would be followed.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

Comment: The proposed undertaking would not destroy any historic materials that characterize the property, as it would be primarily located outside of the Historic District and the proposed connection to Building 2 would be at the rear of the building within a previously enclosed window opening that no longer maintains any decorative or character defining features. The proposed building addition would essentially maintain the existing Building 207 footprint, while increasing the height. The surrounding buildings would continue to screen most of Building 207 from view within the Historic District. The addition design will be compatible in massing, size, and scale, by remaining subordinate to the surrounding contributing buildings. The design would include only essential architectural elements executed in a utilitarian manner and employ finishes and colors that would be compatible to the Historic District. It appears that the inclusion of a bridge connection between Building 207 and Building 2 would not impact the historic integrity of the Historic District, because the connection to Building 2 would be at an existing window opening that has been previously modified, and it would not be visible from the Historic District.

10. New additions and adjacent or related new construction shall 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.

Comment: If the proposed addition and bridge were to be removed in the future, the essential form and integrity of the Historic District and its contributing structures would remain unimpaired.

Public Involvement

In accordance with our responsibilities under the PA, the SFVAMC will post the review initiation to its LRDP Section 106 website and notify all other Consulting Parties within 15 days of transmittal to the State Historic Preservation Office (SHPO). Following the receipt of acknowledgement of the review initiation and initial comments from SHPO, the SFVAMC will post the response to the SFVAMC website and notify Consulting Parties.

Summary

With this letter, the VA would like to initiate the review of the SFVAMC Building 207 OIT Expansion Project in accordance with the PA under Review Categories A and B and in compliance with Section 106 of NHPA. We request your comments or guidance specific to this sub-phase.

Should you have any questions about this project, please contact Mr. Savoth Hy, Program Specialist, Engineering, Projects Section at (415) 221- 4810 ext. 5121.

Sincerely,

Bonnie S. Graham, MBA

Medical Center Director

Attachments:

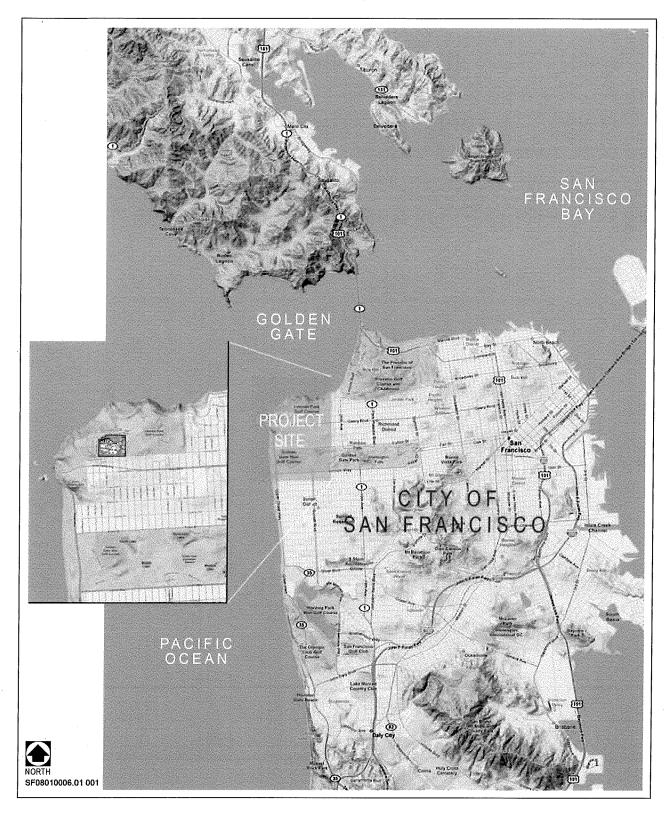
Exhibit 1 (Location of SFVAMC Fort Miley Campus within Urban Context of San

Francisco)

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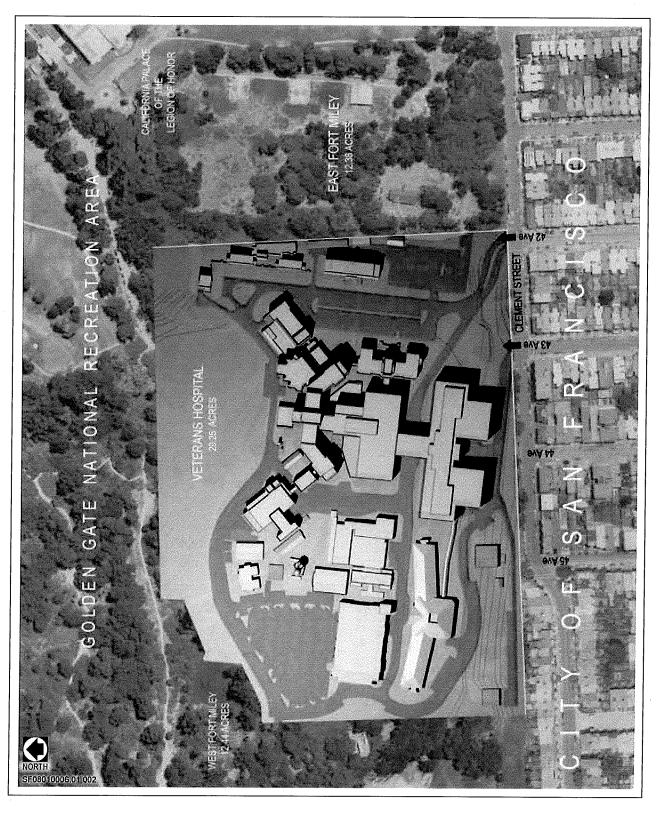
Exhibit 2 (Existing SFVAMC Fort Miley Campus)

Exhibit 3 (SFVAMC Historic District)
Exhibit 4 (Approximate Project Limits)
Existing Conditions Photographs

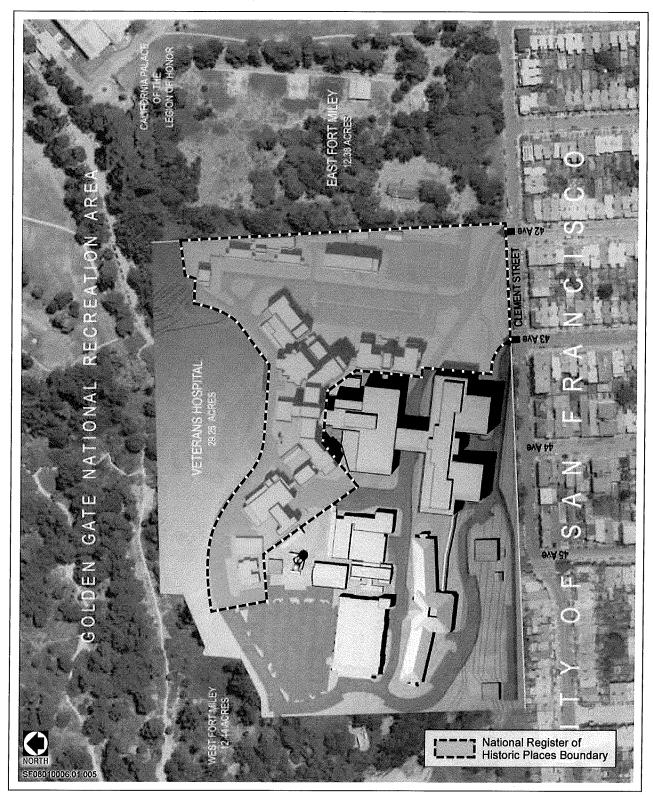


Source: USVA, 2010

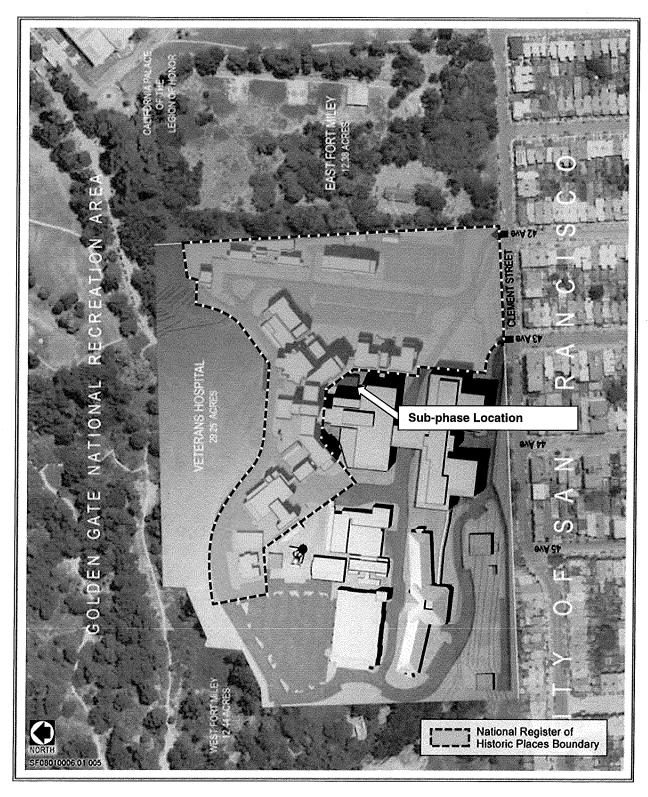
Exhibit 1: Location of SFVAMC Fort Miley Campus within Urban Context of San Francisco



Source: USVA, 2010



Source: SFVAMC Institutional Master Plan



Source: SFVAMC Institutional Master Plan (Altered by Author)



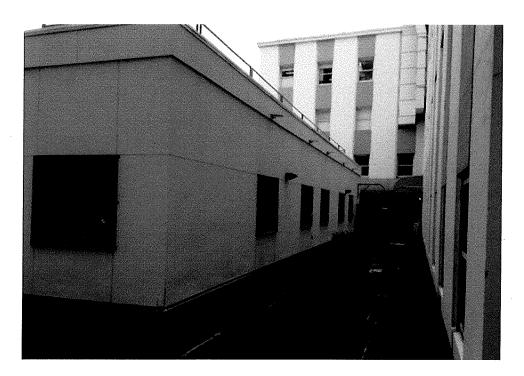
Photograph 1: Northeast elevation of Building 207 looking southeast toward Building 1. (Source: The KPA Group)



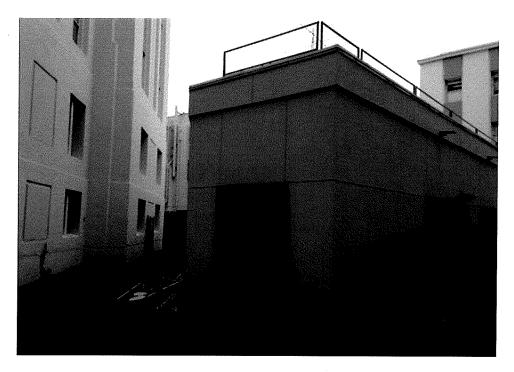
Photograph 2: East elevation of Building 207 looking south toward the bridge between Buildings 1 and 200. (Source: The KPA Group)



Photograph 3: South elevation of Building 207 (right side) and accessibility ramp to Building 200 (left side). (Source: The KPA Group)



Photograph 4: West elevation of Building 207 looking south toward Building 200. (Source: The KPA Group)



Photograph 5: North elevation of Building 207 looking southeast. Note: Building 2 at the left. (Source: The KPA Group)



Photograph 6: View toward Building 207 through bridge between Building 1 and 200.

Note: Subject building is not visible. (Source: The KPA Group)