



DEPARTMENT OF VETERANS AFFAIRS

Medical Center
4150 Clement Street
San Francisco, CA 94121

AUG 11 2015

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

In Reply Refer To: 662/138

Subject: Section 106 Initiation for the San Francisco Veterans Affairs Medical Center
Building 203 C-Wing (Ground Floor Patient Welcome Center) and Drop-Off Area Project

Dear Ms. Roland-Nawi:

The U.S. Department of Veterans Affairs (VA) is proposing to introduce a new traffic circle southwest of Building 1, permanently close through traffic on Veterans Drive, and construct a new Welcome Center pavilion between Buildings 200 and 203 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 and partially within 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 current stage of project development for the proposed Building 203 C-Wing (Ground Floor Patient Welcome Center) and Drop-Off Area project (the project). As the project site for this sub-phase of the Long Range Development Plan (LRDP) is located adjacent to and within the SFVAMC Historic District, we are following the consultation procedures outlined under PA Review Categories A and B, as previously identified in Attachment B of the PA. Stipulation III of 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)*. Additionally, this letter documents measures taken to avoid or minimize adverse effects on the SFVAMC Historic District. No responses to SHPO or consulting parties' comments are included, because this constitutes the first submission and no comments have yet been solicited.

Prior Consultation

The VA made preparations to begin the Section 106 consultation for the proposed project prior to work being put on hold pending the Section 106 review of the LRDP and the development of the PA. Initial design drawings have previously been provided, and our agencies have had prior discussions regarding this project. The VA is now formally initiating consultation under the PA; however since this project has

been in process for several years, the design stage has already advanced to 85% completion. While it falls outside of the typical protocol for the review process for new projects as outlined in the PA; the VA is submitting the project design at its current stage with this initiation letter in an effort to be transparent and continue to move the current project forward. Further, the VA is requesting that the SHPO accept submittals one and two, as outlined in Review Categories A (Stipulation III.a.i and ii) and B (Stipulation III.b.i and ii), in combination for this project review process.

Proposed Sub-Phase Undertaking

Existing Conditions

The proposed sub-phase undertaking, identified as SFVAMC LRDP Sub-phase 1.6 in the PA (previously the project was identified as Phase 1.4 Patient Welcome Center and Drop-Off Area in the LRDP FOE) includes the construction of a new 7,200 square foot entrance and lobby for the campus between Buildings 200 and 203, the reconfiguration of the driveway and bus drop-off area, a "healing garden" and an entry plaza with a canopy structure. The existing site consists of a section of Veterans Drive that passes between Buildings 200 and 203 and underneath an aerial bridge. The new entry pavilion, "healing garden", and western portion of the plaza would be located outside of the historic district boundaries and between Building 200 and 203 (non-contributing resources located outside the boundaries of the Historic District). The eastern section of the plaza and the new traffic circle are to be located within the historic district and adjacent to Building 1 (a contributing resource to the Historic District.)

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

Site Improvements

The existing site includes a portion of Veterans Drive spanning from near the campus entrance at Clement Street to the west end of Building 203; the northwest section of the lawn at the campus entry; and concrete-paved sidewalks lining Veterans Drive and crossing the lawn. North of Veterans Drive there are several landscaped areas near Building 1 and two raised planters adjacent to Building 200.

All existing asphalt paving, concrete paving and landscaping within the project area would be demolished and removed. Also, the existing stair at the south side of Building 1 would be demolished. The proposed project would establish a turnaround in Veterans Drive at the east end of Building 203. The new turnaround would replace the northwest section of the entry lawn and provide a new passenger loading area and bus stop. West of the proposed turnaround, a new paved entry plaza would replace Veterans Drive and would feature several landscaped planters and a canopy structure.

The plaza design includes new concrete paving set in an angled pattern and alternating sections that are broom finished with bands that are float finished. The proposed paving extends slightly into the new vehicular turnaround as well. Arced and circular bands of aggregate embedded concrete radiate across the plaza from the new turnaround and the new pavilion. A new prefabricated exterior ramp and stair with a stainless steel guardrail with horizontal guardrail bars would provide access to the Building 1 side entrance. New timber benches, concrete seat walls, a valet canopy, a wheelchair storage locker, security bollards, circular tree wells, planters with palm trees and modern stainless steel pole lights are proposed for the entry plaza.

The angled, banded concrete paving would continue along the sidewalk immediately adjacent to the vehicular turnaround. Palm trees are proposed for the planting area around the outside edge of the turn. The new circular traffic island centered within the turnaround is proposed to be a planting area.

Additionally, a new concrete sidewalk at the outer edge of the planting area south of the new traffic circle would connect to the existing pedestrian sidewalks traversing the front lawn.

On the west side of the proposed Welcome Center pavilion, the "healing garden" would replace another section of Veterans Drive and would extend between Buildings 200 and 203. The "healing garden" would be bound by Building 200 to the north, the new Welcome Center pavilion to the east, Building 203 to the south and a proposed custom Cor-Ten steel art fence to the west. The garden includes angled and banded concrete paving and planting areas broken up by five circular meditation spaces with wood platform benches, circular bands of aggregate embedded concrete and rock gardens. The garden also includes new circular concrete podiums, stainless steel light posts, and trees. A new ramp extends up from the southwestern corner providing access to the garden from Veterans Drive, a new concrete sidewalk lines Veterans Drive at the west boundary of the project, and an ornamental metal fence and gate encloses the northern section of the garden west of the Building 200.

Building Improvements

The proposed 7,200 square-foot, single story Welcome Center pavilion is to be located beneath the section of Building 203 which bridges Veterans Drive and connects to Building 200. Presently, support columns land in a median bisecting Veterans Drive. South of the underpass at the east side, an exterior canopy provides protection to an entry to Building 203, and north of the underpass, also at the east side, a single-story enclosed vestibule offers access to Building 200. The new pavilion would create a connection to the ground floors of Buildings 200 and 203 and would extend out into the new plaza to the east. The proposed building footprint extends east from the bridge almost 60' and occupies a space of approximately 4,000 square feet. The pavilion will provide access to both Buildings 200 and 203 and serve as the main pedestrian entry for the campus. The proposed west elevation primarily consists of a glazed storefront wall located within the existing framework of the adjacent buildings. The east elevation features a predominant laminated wood clad canopy extending out to the east, large expanses of glass separated by laminated wood clad columns, and a glazed clerestory. At the southeast a new EIFS clad wall separates the pavilion from a narrow walkway at Building 203 matching an existing buttress to the north at the east entry to Building 200.

The project is to be designed to current VA design and construction standards, the International Building Code (IBC), ADA Standards for Accessible Design, ABA Accessibility Standards and to the VA Sustainable Design Manual. The scope of work would include: general construction, alterations, grading, drainage, landscaping, 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.

LRDP FOE Consistency

The proposed sub-phase undertaking was previously identified in the LRDP FOE as Phase 1.4, Patient Welcome Center and Drop-Off Area. The FOE project description states

Phase 1.4 would introduce a traffic circle southwest of the south elevation of Building 1, and permanently close through traffic on Veterans Drive. A one-story pavilion would also be constructed on the ground level between Building 200 and 203, extending out towards Building 1. A traffic circle and drop-off area that would be introduced in the front would require taking out part of the roadway and replacing it with a garden.

The planned construction would take place inside the SFVAMC Historic District boundaries and would introduce new visual elements to the Historic District. The location of the planned

construction within the Historic District has already been altered in recent years through the construction of Buildings 200 and 203, and the parking lot near Building 1 (AECOM, Draft FOE for the LRDP SFVAMC, August 2012, 48).

The FOE determined the effect analysis of the project to be as follows:

The feeling and setting of Building 1 would be changed by the introduction of the patient drop-off and closure of Veterans Drive to through traffic. However, this is likely to result in an improvement to the historical integrity of setting and feeling by reintroducing a formal landscape element evocative of those that were lost with the 1965 building campaign (AECOM, 59)

Finally, Attachment B of the PA, which refers to the project as Sub-phase 1.6 Building 203 C-Wing Extension (Ground Floor Patient Welcome Center) and Drop-Off Area with Canopy Structure, provides an additional Finding of Effect Analysis stating,

Sub-phase 1.6 would introduce a traffic circle southwest of the south elevation of Building 1 and permanently close through traffic on Veterans Drive. A one-story pavilion would also be constructed on the ground level between Buildings 200 and 203, extending out toward Building 1. A traffic circle and drop-off area would be introduced to the east, in the front, and would require modifying the roadway to incorporate a garden.

The planned construction would take place inside the SFVAMC HD boundaries and would introduce new visual elements to the HD. The location of the proposed construction within the district has already been altered in recent years through the construction of Building 200 and 203, and the parking lot near Building 1 (PA, 25).

Further, the PA states that the project has the potential to contribute to the adverse effect on historic properties unless design in accordance with the *SOISTHP*.

The proposed undertaking appears to coincide generally with the previous descriptions as outlined in the FOE and the PA. While the PA does not describe the proposed canopy structure at the plaza in detail, it does include the canopy as an element within the overall project. Also, both the FOE and PA mention the replacement of a section of roadway with a garden, but both indicate that the garden would be on the east side. In the proposed project the "healing garden" is located west of the proposed pavilion.

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: It appears that the proposed undertaking would require the removal of minimal historic material and would not significantly alter features and spaces that characterize a property. The majority of the work is to occur outside of the Historic District in a location that has already been significantly altered by the construction of Buildings 200 and 203 and the parking lot at Building 1.

A review of historic photos illustrates that the section of Veterans Drive and the lawn that are included within the project scope have been re-configured several times as the road was re-designed first to accommodate Building 200 and then Building 203. Finally, the project includes the removal and replacement of the exterior stair at the south side of Building 1. Historic photographs indicate that the side entry tower and exterior stair are not original to the building; therefore, the removal of the exterior stair would not constitute the removal of historic fabric.

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. All proposed work would be clearly modern and would not include any conjectural features or architectural elements from other buildings.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Comment: It does not appear that any changes relative to the project location or adjacent contributing structures have acquired any historic significance.

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

Comment: It does not appear that any distinctive finishes, or construction techniques or examples of craftsmanship that characterize a property would be destroyed. Sections of lawn, a potentially significant landscape feature within the historic district will be removed.

The project would remove the northern section of the entry lawn between Clement Street and Veterans Drive, as well as the lawn in the traffic island between Veterans Drive and the parking lot adjacent to Building 1 and all planting areas at the south end of Building 1. All existing trees in the previously mentioned locations would be removed also. The southern section of the landscaped area between Clement Street and Veterans Drive would not be altered as part of the proposed project. The project would remove a section of Veterans Drive from near Clement Street to Fort Miley Circle.

A substantial portion of the original campus design included large areas of lawn, and the primary landscape feature was historically the horseshoe-shaped driveway for patient drop off in front of Building 2. Most of the lawn areas and the drop off driveway have been lost to various parking lots and construction projects, namely the construction of Buildings 200 and 203 and the parking lot next to Building 1. The remaining lawns on campus are the section fronting Clement Street and the strips buffering Buildings 2, 3, 5, 7, 8, 9, 10, 11, and 18.

A survey of historic aerial photos ranging from 1935 to present illustrates that the section of lawn fronting Clement Street and south of Building 1 have been significantly re-configured over time with the construction of new buildings and the re-alignment of the roadways. The sections of lawn to be removed are remnants from various periods of development, while portions of the southern segment along Clement Street appear to be in the same location as in 1935. The proposed loss of lawn does not appear to constitute the significant loss of a distinctive feature, as the area has previously been significantly altered and the more significant section of lawn along Clement Street will be maintained. Overall the project appears to comply with Standard 5.

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 deteriorated historic features as part of this undertaking.

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 are 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 proposed project includes a significant amount of 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 destroy very little historic material that characterizes the property (limited to portions of the lawn), and it would be primarily located outside of the Historic District. The majority of the historic entry lawn would remain unaltered, and the new traffic circle would be located at the northwest end, which has already been significantly altered. All work would be clearly modern and easily differentiated from the historic. The development of a new traffic circle for the SFVAMC is reminiscent in concept of the historic horseshoe drives that once existed in front of Buildings 1 and 2.

A canopy structure would extend from the plaza to the drop-off area on the south side. This structure will insert a modern element into the Historic District and care should be taken to ensure its design is compatible to the District, while also being clearly differentiated from the historic fabric.

The new pavilion would be recessed significantly from the boundary of the Historic District and located between two non-contributing structures. The visible extension of the pavilion to the east would also be clearly modern and fit within the context of the modern adjacent buildings.

It does not appear that the proposed new prefabricated exterior ramp and stair at the south side of Building 1 would destroy any historic material. The ramp would be located at the side, secondary elevation of the building and would replace an existing non-original stair and various non-original planters. Careful attention will be placed on the design of the railing, stair and ramp to ensure they are compatible with the Historic District and Building 1.

The proposed design of the eastern plaza and the "healing garden" include several features that would be quite modern and present areas where a discussion about compatibility with the Historic District could occur. The "healing garden" would be located almost completely out of visual range of the Historic District, and it does not appear that the "healing garden" design would have any impact on the integrity or significance of the Historic District. The eastern exterior plaza would be visible from a significantly intact portion of the Historic District and would become a primary entry feature for the campus. Some elements of the eastern exterior plaza design that appear modern and do not have a precedent on the campus include: palm trees, stainless steel modern light poles, wood timber benches, banded and angled paving patterns, the extension of paving pattern into the roadway and aggregate embedded paving set in circular patterns.

Overall, the introduction of the vehicular turnaround and patient drop off area would return a sense of formal landscaping to the property that was lost with the construction of Buildings 200 and 203 and the parking lot in front of Building 1. The general massing, size and scale of the landscape plan and the new Welcome Center pavilion appear to be appropriate to the campus and would not overwhelm the nearby contributing historic buildings. All elements of the proposed work are clearly modern, and may be somewhat too modern to appear compatible with the features of the Historic District. The proposed project appears to be essentially compliant with Standard 9, however some of the more modern elements of the design of the eastern plaza may not be the most compatible selections.

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 pavilion, landscaping, plaza, ramp, canopy structure and traffic circle were to be removed in the future, the essential form and integrity of the Historic District and its contributing structures would remain unimpaired.

Findings

Not all items outlined in PA Stipulation III Review Categories A and B have been able to be addressed in the current submission. The Historic District Design Guidelines, as prescribed in the PA, have not yet been completed; therefore the Design Guidelines were not applied (Stipulation III.a.ii.1.a. and Stipulation III.b.ii.1.a.) Additionally, because submissions one and two are combined within one document no comments have been solicited or received from the SHPO, or any Consulting Parties to date; therefore no comments have been addressed by the SFVAMC (Stipulation III.a.ii and Stipulation III.b.ii.)

Measures that were taken to comply with the *SOISTHP* and minimize the adverse effects on the SFVAMC Historic District include:

- Reinstating a formal circular drive and patient entry drop off;
- Locating the "healing garden" out of view from most of the SFVAMC Historic District;
- Locating the Welcome Center pavilion between two non-contributing buildings and outside of the SFVAMC Historic District;
- Maintaining significant amounts of existing lawn areas;
- Employing concrete paving for the primary plaza surface material, similar to the existing sidewalks found through the campus; and
- Connecting the new pedestrian paths to existing sidewalks.

The proposed project design does appear to generally comply with *SO/STHP*, and a minimization of adverse effects appears to have been achieved. Some design elements may be considered for review and discussion in terms of compatibility due to their modern nature, such as the use of palm trees, angled and circular paving patterns, and modern light poles.

Measures prescribed in the PA to mitigate the adverse effects on historic properties, including the effects of new construction within the SFVAMC Historic District, consist of the following:

- Development of Historic District Design Guidelines
- Development of a Historic Landscape Study
- Establishment of a Public Interpretation Program
- Preparation of a Historic Preservation Treatment and Maintenance Plan

None of the identified documents listed above have been completed, however under Stipulation IV.e., the PA allows for the SFVAMC to continue to consult on individual LRDP sub-phases as the Mitigation Measures are being developed.

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 203 C-Wing (Ground Floor Patient Welcome Center) and Drop-Off Area 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.

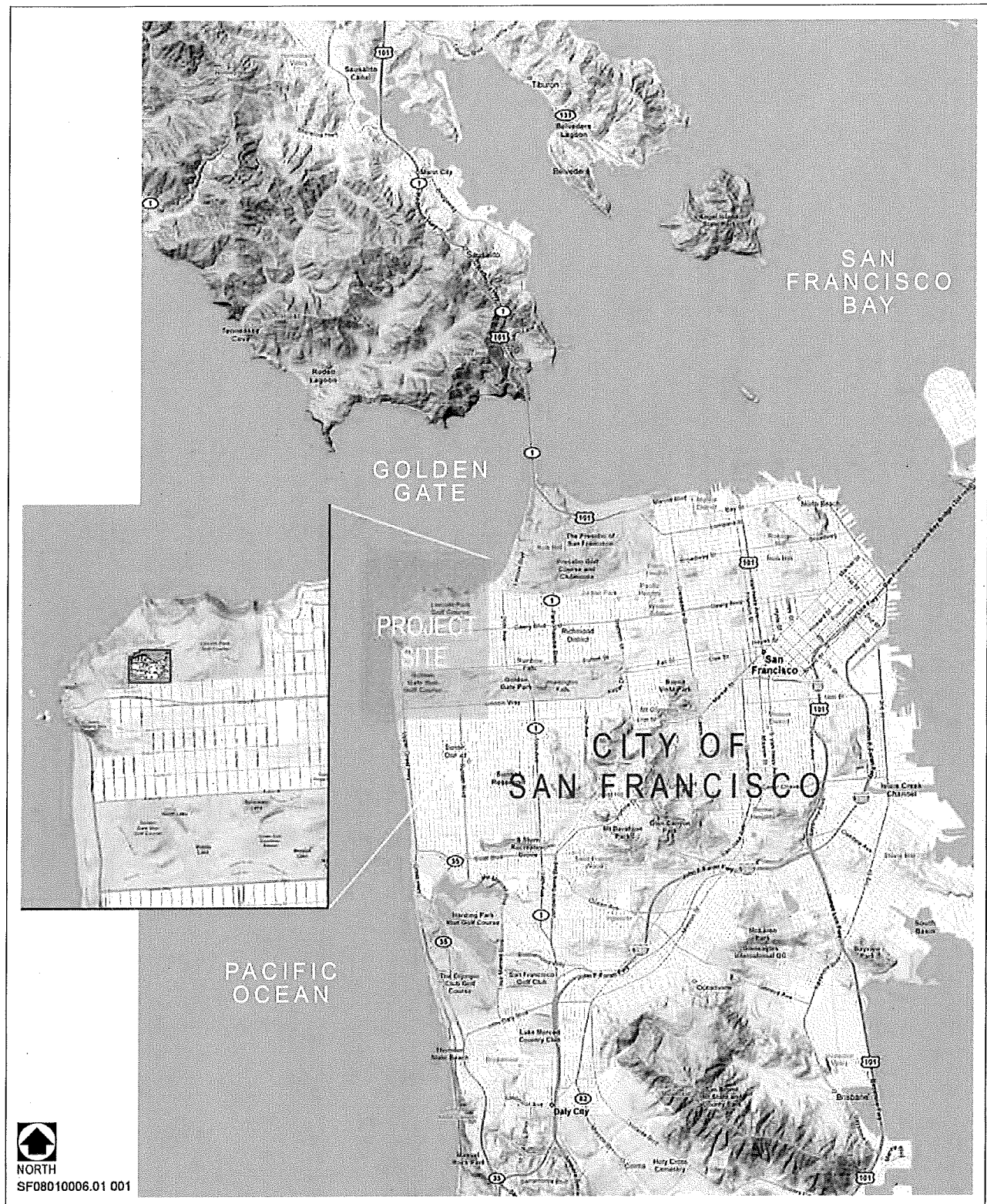
Should you have any questions about this project, please contact Robin Flanagan, Planning Office, at (415) 750-2049.

Sincerely,



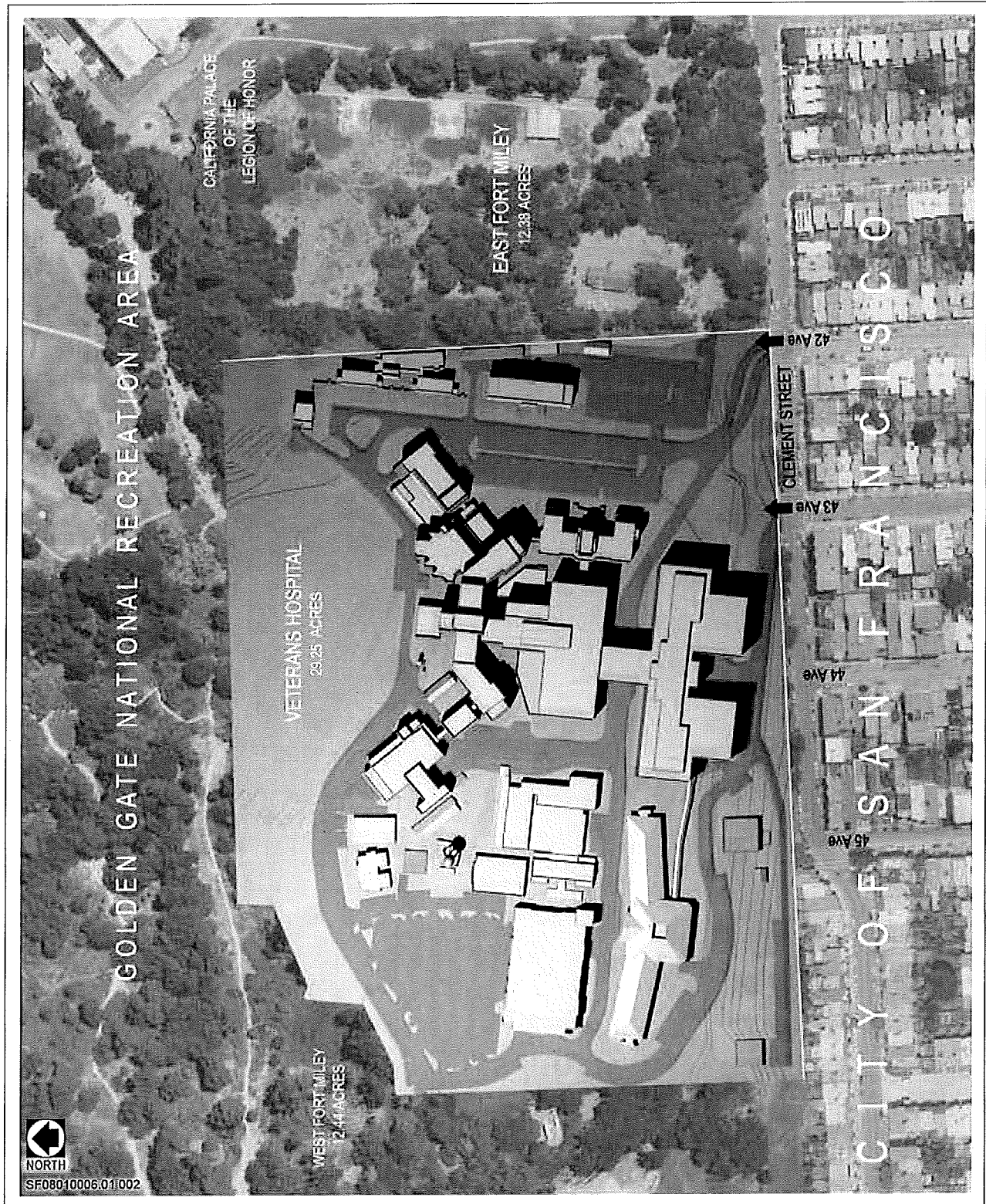
Bonnie S. Graham, MBA
Medical Center Director

Attachments: Exhibit 1 (Location of SFVAMC Fort Miley Campus within Urban Context of San Francisco)
Exhibit 2 (Existing SFVAMC Fort Miley Campus)
Exhibit 3 (SFVAMC Historic District)
Exhibit 4 (Approximate Project Limits)
Exhibit 5 (Photograph and Project Rendering Locations)
Historic and Existing Conditions Photographs and Project Renderings
Selected Construction Documents



Source: USVA, 2010

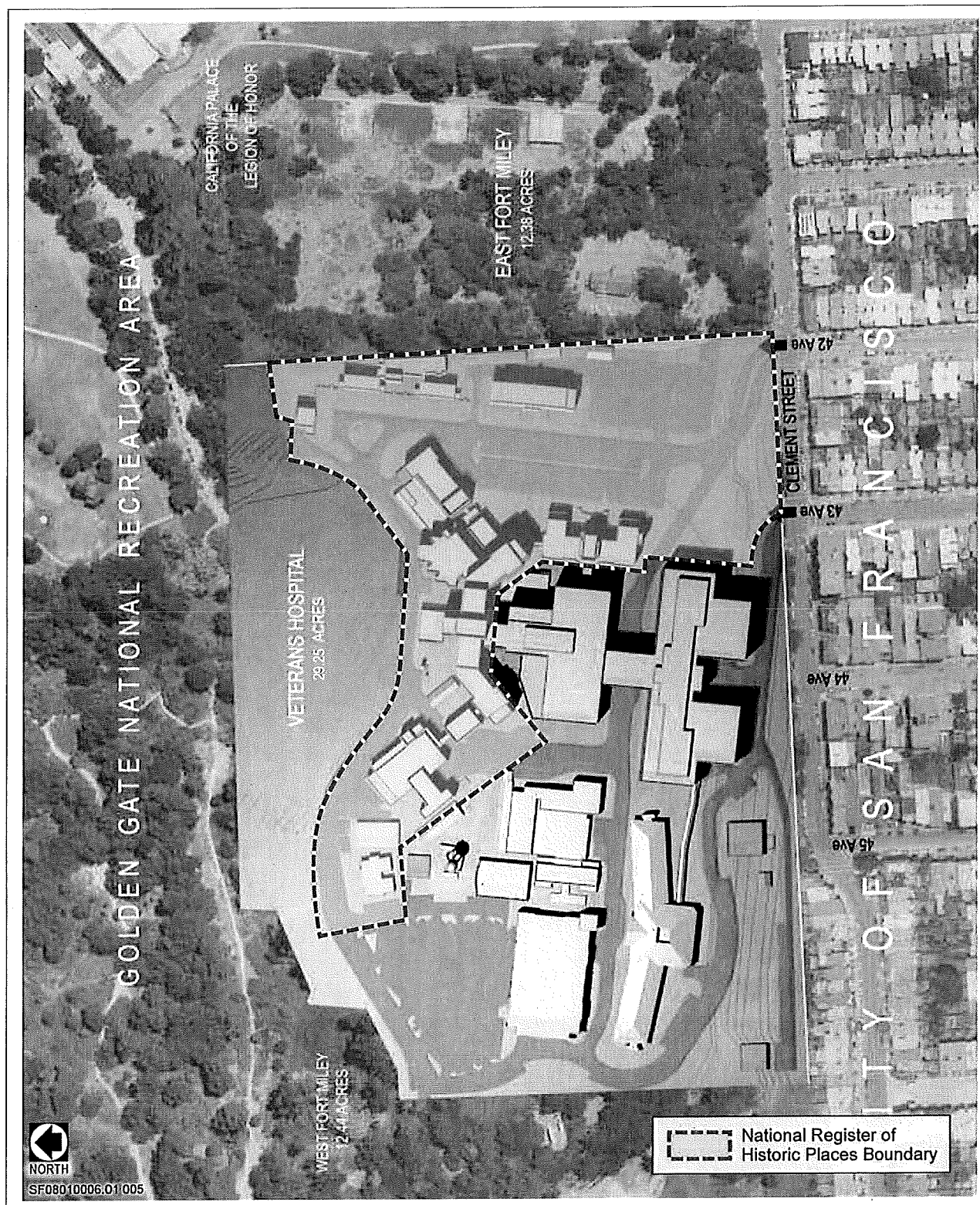
Exhibit 1: Location of SFVAMC Fort Miley Campus within Urban Context of San Francisco



Source: USVA, 2010

Exhibit 2:

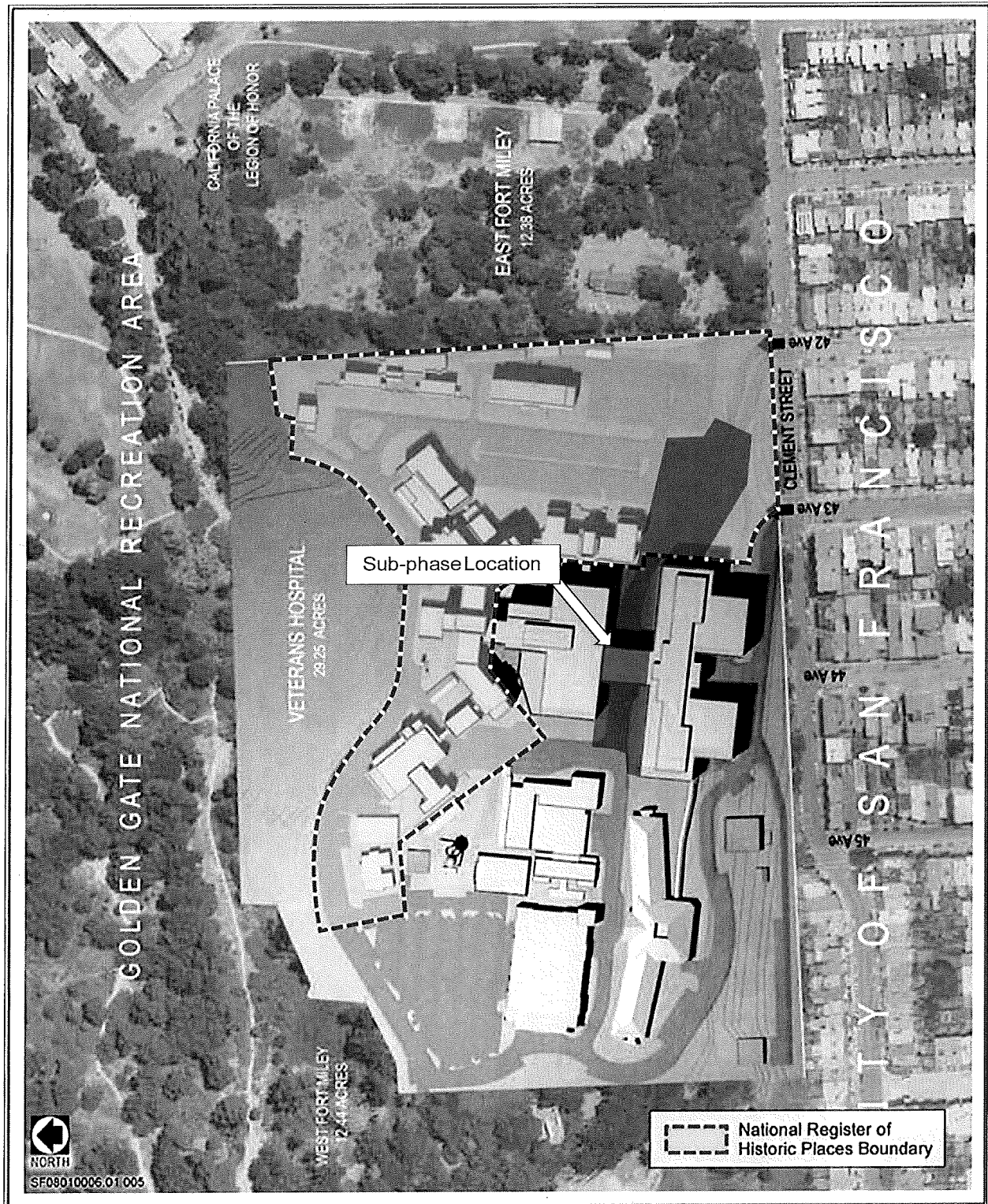
Existing SFVAMC Fort Miley Campus



Source: SFVAMC Institutional Master Plan

Exhibit 3:

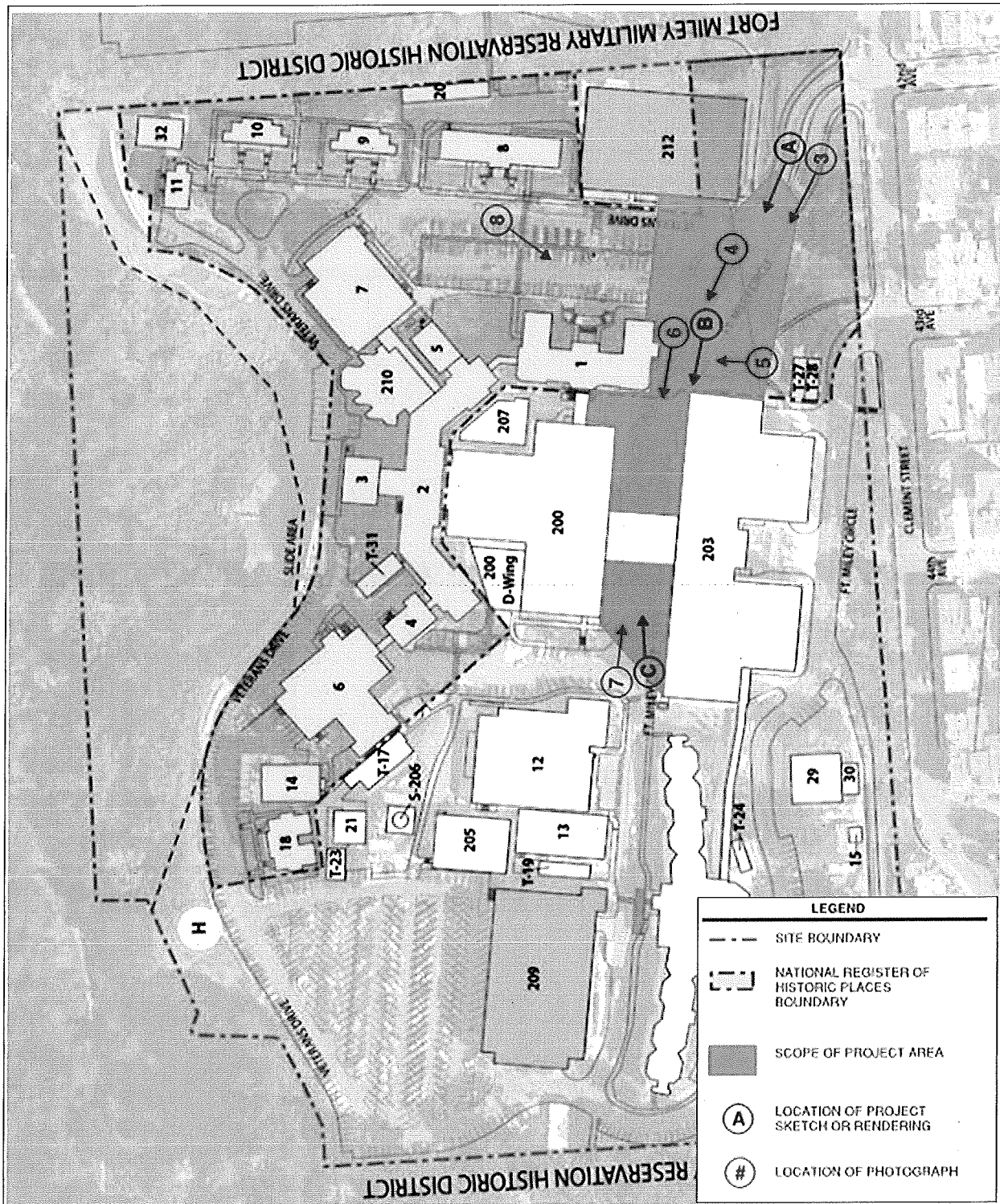
SFVAMC Historic District



Source: SFVAMC Institutional Master Plan (Altered by Author)

Exhibit 4:

Sub-phase Location



Source: Taylor Design

Exhibit 5:

Photograph and Project Rendering Locations



Photograph 1: Aerial view of the Fort Miley campus looking north c. 1935.
Source: San Francisco Public Library.



Photograph 2: Aerial view of the Fort Miley campus looking northeast after the construction of Building 200, the vertical tower at the south side of Building 1, and roadway and lawn alterations.
Source: San Francisco Public Library.



Photograph 3: View looking west up Veteran Drive toward Buildings 1, 200, and 203.
(Source: Taylor Design)



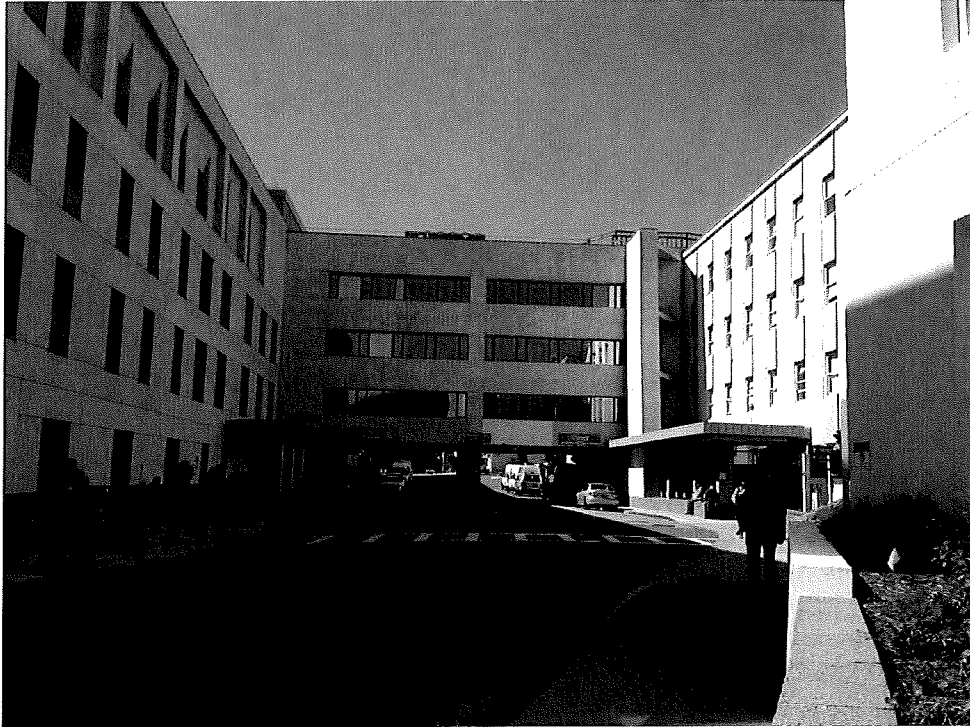
Project Rendering A: View looking west, up the proposed Veteran Drive. (Source: Taylor Design)



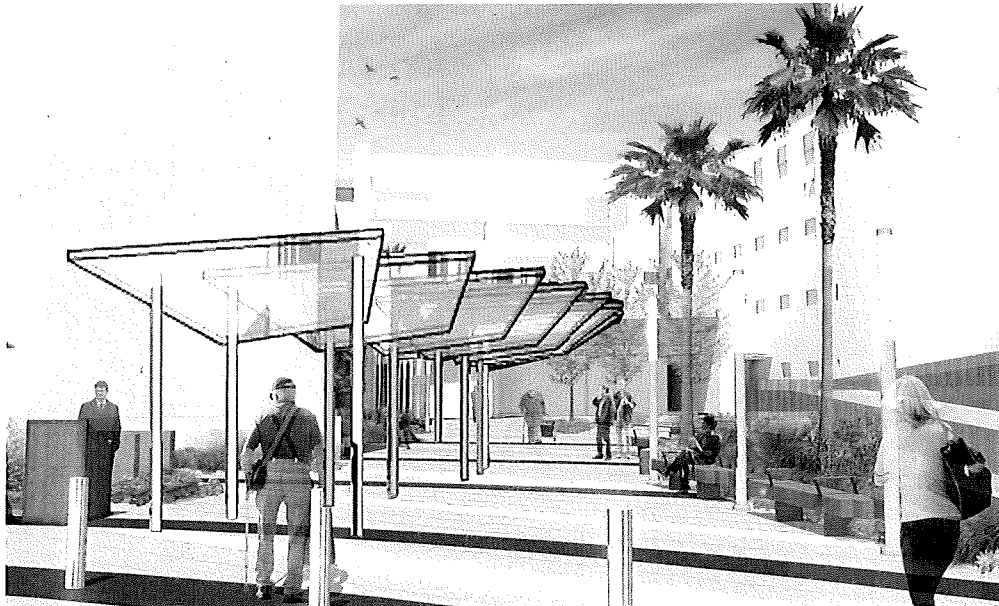
Photograph 4: Location of the proposed drop-off area looking northwest with Building 1 (right side) and Building 203 (left side). (Source: Taylor Design)



Photograph 5: South elevation of Building 1 showing the door and exterior stairs at the tower.



Photograph 6: View of the existing Building 203 connection between Buildings 200 and 203. The proposed pavilion would be located at the base of the connector. Note the corner of Building 1 at the right side.
(Source: Taylor Design)



Project Rendering B: View of the proposed pavilion and canopy structure. (Source: Taylor Design)



Photograph 7: West elevation of the Building 203 connector between Buildings 200 and 203 and the proposed site of the healing garden. (Source: Taylor Design)



Project Rendering C: Proposed healing garden between Buildings 200 and 203.
(Source: Carducci & Associates)



Photograph 8: View looking southwest across Parking Lot B toward Building 1 and the project site.