



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

DEC 29 2015

In Reply Refer To: 662/138

Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation  
Department of Parks & Recreation  
1725 23<sup>rd</sup> Street, Suite 100  
Sacramento, CA 95816

Subject: Section 106 Consultation for the Department of Veterans Affairs San Francisco Medical Center: Seismic Retrofit of Buildings 1, 6, and 8

Dear Ms. Polanco,

The San Francisco Veterans Affairs Medical Center (SFVAMC) wishes to continue National Historic Preservation Act Section 106 consultation regarding its plans to correct seismic deficiencies in Buildings 1, 6, and 8 (Sub-phase 1.16), in support of our Long Range Development Plan (LRDP). This letter provides a written description of the proposed Sub-phase.<sup>1</sup>

Prior Consultation

SFVAMC initiated consultation with your office on December 13, 2013, for Project 662-402, Phase 2.4 of its LRDP. The SFVAMC accepted your January 25, 2013, suggestion to divide the LRDP Phase 2.4 into two undertakings: seismic retrofit (now Sub-phase 1.16) and new construction (now Sub-phase 1.9). We continued consultation on the construction of Building 40 and demolition of five buildings (Sub-phase 1.9) by my letter dated December 17, 2013. We also initiated consultation for the removal and installation of the water tower by my letter dated March 20, 2014 and May 5, 2015, a Sub-Phase component *not* formally included in Phase 2.4, though it was incorporated into Sub-phase 1.9 of the LRDP in January of 2014 (**Appendix A**).

Proposed Project Description

The purpose of the proposed sub-phase is to seismically retrofit Buildings 1, 6, and 8, strengthen the connection of the buildings to their foundations, and update the mechanical, engineering and plumbing (MEP) systems of each building.

Currently, Buildings 1, 6, and 8 are not adequately connected to their foundations. The perimeter footings of the buildings will be encased and interconnected with an eight-inch slab-on-grade foundation to create a continuous foundation. The wall to footing connection of the foundations will be strengthened by steel plate bolted connections and a six-inch thick, three foot high shotcrete wall will be placed around the perimeter of the buildings. Micro-piles ten inches in diameter will be located in the new footings. The shotcrete reinforcement on the exterior of the buildings will terminate at exterior openings of the building.

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<sup>1</sup> This Section 106 Consultation process is consistent with SFVAMC Programmatic Agreement stipulations.

On Building 1, the existing stair tower at the south end of the building will be removed and a new exit stair will be created on the interior of the building. On Buildings 6 and 8, noncompliant exterior exit stairs will be removed. A new exit stair will be constructed on the interior of Building 6. On Building 8, two new enclosed exterior stairs will be constructed on the east façade of the building.

On the interior of Buildings 1, 6, and 8, interior finishes and partitions will be removed, which will allow asbestos containing materials and lead-based paint to be removed. Removal of the interior fabric will also facilitate the construction of new shear walls that will be introduced within the shell of the buildings. New partitions, hardware and finishes will be introduced to accommodate the final program.

New mechanical, electrical, telephone, data, life safety, vertical transportation systems and public toilet facilities will be introduced into each building. New services risers will be concentrated into service 'cores' within the interior of the buildings. These cores will allow services to rise through the building in an uninterrupted route, will maximize natural light and views for occupied spaces for users, and will maximize the functionality and flexibility of each floor plate.

The new building systems for Buildings 1, 6, and 8 will terminate in a mechanical penthouse on the roof on each building. Plaster wall systems with aluminum rain screens will enclose all mechanical systems. On Building 1, the mechanical equipment will flank the central pavilion of the building. Building 6 already contains rooftop mechanical equipment; the existing equipment would be screened and a new elevator overrun would be incorporated onto the roof. The height of the mechanical penthouses and the elevator overrun will not exceed the height of the entry pavilion tower. On Building 8, the mechanical penthouse will be set back from the primary (west) façade of the building.

The SFVAMC is currently evaluating emergency power capacity and loads to determine if the existing system can support Buildings 1, 6, and 8 upon renovation. If it cannot, generators will be included in the mechanical penthouse for Buildings 1 and 8. For Building 6, the VA determined that cooling tower requirements could be carried by the Building 40 proposed for the SFVAMC, eliminating the necessity of a separate cooling tower for Building 6.

Construction staging will include the construction use of 50,000 BGSF modular buildings, which would be temporarily located at four locations within the SFVAMC campus. One-story modular units will be located in the turn-about at the north end of Veterans Drive on the paved area before Buildings 10 and 11; on the paved area north of Buildings 4 and 2; and on the paved area north of Wing A of Building 203. One two-story modular unit will also be constructed east of Building 1, in Parking Lot B. All of the modular units will be located on paved areas and will be set back from the perimeter of the SFVAMC campus. A portion of Building 209 (the parking garage) will also temporarily house maintenance shops currently located in Building 6. The modular units and garage will be used for approximately six months.

#### The LRDP and Finding Of Effect

This Seismic Retrofit undertaking was reviewed at the programmatic level in an LRDP Environmental Impact Statement (EIS) and Finding of Effect (FOE). On July, 22, 2013, SHPO concurred with the SFVAMC's determination that implementation of the LRDP would adversely affect historic properties pursuant to 36 CFR Part 800.5(d)(2). As Buildings 1, 6, and 8 are within the boundaries the SFVAMC Historic District and are considered to be contributors to the Historic District, it was determined that their rehabilitation would contribute to the Adverse Effect on Historic Properties of the LRDP undertaking unless designed in accordance with the Secretary of the Interiors Standards for the Treatment of Historic Properties.

The potential contributions to the adverse effect made by the seismic retrofit of Buildings 1, 6, and 8, and efforts made to conform to the Secretary's Standards and minimize any effects will be further explored in a continuing consultation letter to SHPO.

Summary

We look forward to consulting with you about the proposed seismic retrofit of Buildings 1, 6, and 8 on the SFVAMC campus. Please acknowledge this initiation of review and provide any initial comments or guidance you deem appropriate at this time. We will post both this letter and your response on the LRDP Section 106 website and notify Consulting Parties. If you have questions or comments, please contact Robin Flanagan, Planning Officer at [Robin.Flanagan@va.gov](mailto:Robin.Flanagan@va.gov) or (415) 750-2049.

Sincerely,



Bonnie S. Graham, MBA  
Medical Center Director

Enclosures:

- A. Prior Consultation regarding Sub-Phase 1.16
- B. Site Plan identifying location of proposed Sub-Phase

CC:

National Park Service  
Advisory Council on Historic Preservation



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

December 17, 2013

Carol Roland-Nawi, PhD  
State Historic Preservation Officer  
Office of Historic Preservation  
Department of Parks & Recreation  
1725 23<sup>rd</sup> Street, Suite 100  
Sacramento, CA 85816

Subject: Section 106 Consultation for the Department of Veterans Affairs San Francisco Medical Center: Construction of Building 40 (Research Center) and Demolition of 5 Buildings (VA\_2013\_0110\_001)

Dear Ms. Roland-Nawi,

The San Francisco Veterans Affairs Medical Center (SFVAMC) is continuing National Historic Preservation Act Section 106 consultation regarding its plans to demolish 5 buildings to construct Building 40, a new research center. SFVAMC initiated consultation with your office on December 14, 2012, for Project 662-402, Phase 2.4 of its Long Range Development Plan (LRDP). The SFVAMC accepts your January 25, 2013, suggestion to divide the LRDP Phase 2.4 into two undertakings: seismic retrofit and new construction. This Section 106 consultation package applies to the proposed construction of Building 40 and demolition of five (5) buildings. The proposed undertaking would demolish Buildings 12, 14, 18, 21, and T-23 in order to construct Building 40, a new four-story with basement research center. For clarity, this project will be called the Building 40 Undertaking throughout this document.

The purpose of this letter is to continue consultation for the Building 40 Undertaking and follow the 1<sup>st</sup> *Administrative Draft Programmatic Agreement Stipulations for the SFVAMC (PA)* dated December 13, 2013 for project-level review now that the SFVAMC has developed a detailed description of the undertaking. This letter builds upon information SHPO concurred with on January 25, 2013 (**Appendix A**):

- The location of the SFVAMC;
- The boundary of the Area of Potential Effect (APE); and,
- The historic properties located within the APE.

Encl. 1

## The LRDP and Programmatic Agreement

This Building 40 undertaking was reviewed at the programmatic level in an LRDP Environmental Impact Statement (EIS) and Finding of Effect (FOE). On July, 22, 2013, SHPO concurred with the SFVAMC's determination that implementation of the LRDP would adversely affect historic properties pursuant to 36 CFR Part 800.5(d)(2) (**Appendix B**). The FOE concluded that the proposed project would result in demolition of a historic property, Building 18, which contributes to the SFVAMC Historic District. Buildings 12, 14, 21, and T-23 are non-contributing to the historic district (**Appendix C**).<sup>1</sup>

The LRDP Section 106 process was coordinated with preparation of an EIS in support of the National Environmental Policy Act (NEPA). Public comments received through the EIS and FOE processes did not specifically address the project-level impacts or effects of the Building 40 undertaking proposed in Phase 2.4 of the LRDP; however, the NPS expressed concerns regarding the development of new construction and increased traffic and parking congestion during construction (**Appendix D**). Continued consultation for the Building 40 undertaking presents an opportunity to discuss the proposed undertaking in greater detail and the construction staging activities that are proposed to occur in support of the undertaking.

Consultation for the EIS, and FOE continues; SFVAMC has drafted a Programmatic Agreement in consultation with the Advisory Council on Historic Preservation (ACHP), SHPO and other consulting parties. The Building 40 Undertaking will occur within the SFVAMC Historic District; therefore, under the PA it will be reviewed according to the parameters outlined in Category A (**Appendix E**). The first step in Review Category A of the PA calls for a written description of the proposed project including any ways in which the project differs from what was described in the LRDP FOE. As described in the LRDP FOE, the Building 40 Undertaking:

...would construct a 5-story building and would involve the demolition of Buildings 12, 14, 18, 21, and T-23. With the exception of Building 18, these are all noncontributory to the SFVAMC Historic District. The planned construction would take place on the west side of the existing SFVAMC Fort Miley Campus, both within and immediately outside of the SFVAMC Historic District boundaries.<sup>2</sup>

Since the SFVAMC issued the LRDP FOE, the height of Building 40 has been reduced from five (5) to four (4) stories.

### Project-Level Description of the Proposed Undertaking

Currently, the site of the proposed undertaking is occupied by three buildings, 14, 18, and 21, as well as several utility buildings and utility lines. The proposed undertaking would

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<sup>1</sup> AECOM. 2011. *National Historic Preservation Act Baseline Documentation: San Francisco Veterans Affairs Medical Center*. Prepared for SFVAMC Engineering Services, December 15, 2011.

<sup>2</sup> AECOM. 2013. *Finding of Effect for Long Range Development Plan: San Francisco Veterans Affairs Medical Center*. Prepared for SFVAMC June 2013. p. 58.

demolish Buildings 12, 14, 18, 21, and T-23 to construct Building 40, a new four-story with basement research center.

An electrical utility trench crosses the site and will need to be relocated.

The proposed new Building 40 is a rectangular-plan, four-story over basement (16' floor-to-floor height) building capped by an atrium and an enclosed mechanical penthouse. Cooling towers will be located outside on the roof. The exterior of the building will be largely clad with a structural, glazed curtain wall. Mechanical penthouse will be covered by hybrid cement plaster with an EIFS finish coat.

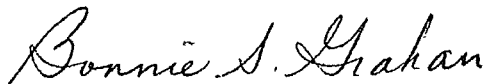
Continued Consultation

The proposed Building 40 Undertaking contributes to the adverse effect on the SFVAMC Historic District, as it will result in the demolition of Building 18, a contributing resource to the SFVAMC Historic District. The LRDP PA has drafted mitigation measures to address the demolition of contributors within the Historic District, however we welcome your thoughts on whether this will trigger the need to revise the boundaries of the SFVAMC Historic District to reflect the loss of this contributor. The construction of Building 40 will occur within the SFVAMC Historic District and will therefore affect historic properties. The SFVAMC has not yet determined if the design will be an adverse effect; we will make that determination and document those findings in accordance with the draft PA's section II.b.ii.

The SFVAMC proposes to meet with SHPO to review the Building 40 Undertaking and continue consultation with consulting parties regarding the proposed undertaking – particularly the assessment of whether the design will be an adverse effect.

If you have questions or comments about this project, please contact Allan Federman, Facility Planner at [Allan.Federman@va.gov](mailto:Allan.Federman@va.gov) or (415) 850-7281.

Sincerely,



Bonnie S. Graham  
Medical Center Director

Enclosures:

Appendices A, B, C, D, E

Cc: ACHP and other consulting parties

## APPENDIX A

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR., Governor

### OFFICE OF HISTORIC PRESERVATION DEPARTMENT OF PARKS AND RECREATION

1725 23<sup>rd</sup> Street, Suite 100  
SACRAMENTO, CA 95816-7100  
(916) 445-7000 Fax: (916) 445-7053  
calshpo@parks.ca.gov  
www.ohp.parks.ca.gov



January 25, 2013

Reply in Reference To: VA\_2013\_0110\_001

Jeffrey A. Joseph  
Acting Associate Director  
Department of Veterans Affairs Medical Center  
4150 Clement Street  
San Francisco, CA 94121

Re: Section 106 Consultation for Seismic Retrofit of Buildings 1, 6, 8 and 12, Demolition of 16 buildings and Construction of Building 40, San Francisco Department of Veterans Affairs Medical Center (662/138)

Dear Acting Director Joseph:

Thank you for initiating consultation regarding the Veterans Affairs (VA) efforts to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800.

The VA has identified the undertaking as the construction of a new five-story medical research facility identified as building 40 and the seismic retrofit of Buildings 1, 6, 8 and 12 at the San Francisco Department of Veterans Affairs Medical Center (SFVAMC). Additionally, the demolition of 16 buildings will be required to provide space for the new research facility. Buildings 1, 6 and 8 are contributing elements to the SFVAMC historic district, a listed National Register property. The VA is currently in consultation with my office regarding a Long Range Development Plan, a document intended to inform future undertakings and construction activities at the SFVAMC campus.

The VA is now initiating consultation with my office for the above-referenced seismic retrofit and Building 40 undertakings and is also seeking my concurrence on their definition of the proposed undertaking and proposed approach to the Section 106 process. After reviewing the information provided, I have the following comments:

- 1) I concur the VA has properly defined and established the undertaking pursuant to 36 CFR Part 800.3. However, given the extent and nature of the undertakings I would like to suggest the VA address the seismic retrofit undertaking separately from the construction of Building 40 and associated demolition. If this is not an acceptable modification to the VA's Section 106 approach, please notify the OHP staff contact listed below upon receipt of this letter.
- 2) I agree with the VA's approach to the Section 106 process for this undertaking as described in your submittal.

- 3) I have no objection to the VA's definition and delineation of Area of Potential Effects (APE) as related to currently proposed project activities. Please note it may be necessary to amend the APE should changes in project parameters occur.
  
- 4) To facilitate consistent and efficient project development at SFVAMC that conforms to the Secretary of the Interior's Standards, the VA should refrain from finalizing planning for these proposed undertakings until the Long Range Development Plan has been completed.
  
- 5) It is my understanding that all comments received by the interested parties identified in your 14 December 2012 letter will be provided for my review.

Thank you for seeking my comments. I look forward to working with the VA toward the effective management of their historic resources and appreciate the VA involving my office early in the planning process. If you have any questions or concerns, please contact Ed Carroll of my staff at (916) 445-7006 or at email at [Ed.Carroll@parks.ca.gov](mailto:Ed.Carroll@parks.ca.gov).

Sincerely,

*Susan H Stratton for*

Carol Roland-Nawi, PhD  
State Historic Preservation Officer



CC:

**Brian Lusher**  
Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 803  
Washington, DC 20004

**Kathleen Schamel**  
Federal Preservation Officer  
Historic Preservation Office (00CFM)  
Office of Construction & Facilities Management  
Department of Veterans Affairs  
811 Vermont Avenue, NW  
Washington, DC 20420

APPENDIX B.

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR., Governor

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

1725 23<sup>rd</sup> Street, Suite 100  
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calshpo@parks.ca.gov  
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July 22, 2013

Reply in Reference To: VA120323A

C. Diana Nicoll, M.D., PhD, M.P.A.  
Acting Medical Center Director  
Department of Veterans Affairs Medical Center  
4150 Clement Street  
San Francisco, CA 94121

Re: Section 106 Consultation for San Francisco Department of Veterans Affairs Medical Center  
Draft Long Range Development Plan

Dear Ms. Nicoll:

Thank you for continuing consultation regarding the Veterans Affairs (VA) efforts to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800.

The VA has prepared a Long Range Development Plan (LRDP) for the San Francisco Medical Center campus (SFVAMC) to support and address future campus construction, improvement, preservation and planning. It has been determined by the VA that the proposed actions described in the LRDP will adversely affect the San Francisco Veterans Affairs Medical Center Historic District. While submitted documentation clearly illustrates the proposed changes to the SFVAMC will adversely affect historic properties, it appears that certain undertakings within the LRDP may also have the potential to affect the Fort Miley Military Reservation Historic District, an adjacent property under the stewardship of the National Park Service (NPS). Potential impacts to the Fort Miley Reservation are addressed via the National Park Service's comments from October 2012 and are included in the June 2013 LRDP.

After reviewing the documentation provided, I concur with the VA's determination that implementation of the LRDP will adversely affect historic properties pursuant to 36 CFR Part 800.5(d)(2). It is my understanding that the VA will continue to consult with the NPS to address the undertaking's potential effects to the Fort Miley Military Reservation Historic District.

If you have any questions or concerns, please contact Ed Carroll of my staff at (916) 445-7006 or at email at [Ed.Carroll@parks.ca.gov](mailto:Ed.Carroll@parks.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Carol Roland Nawi, Ph.D.".

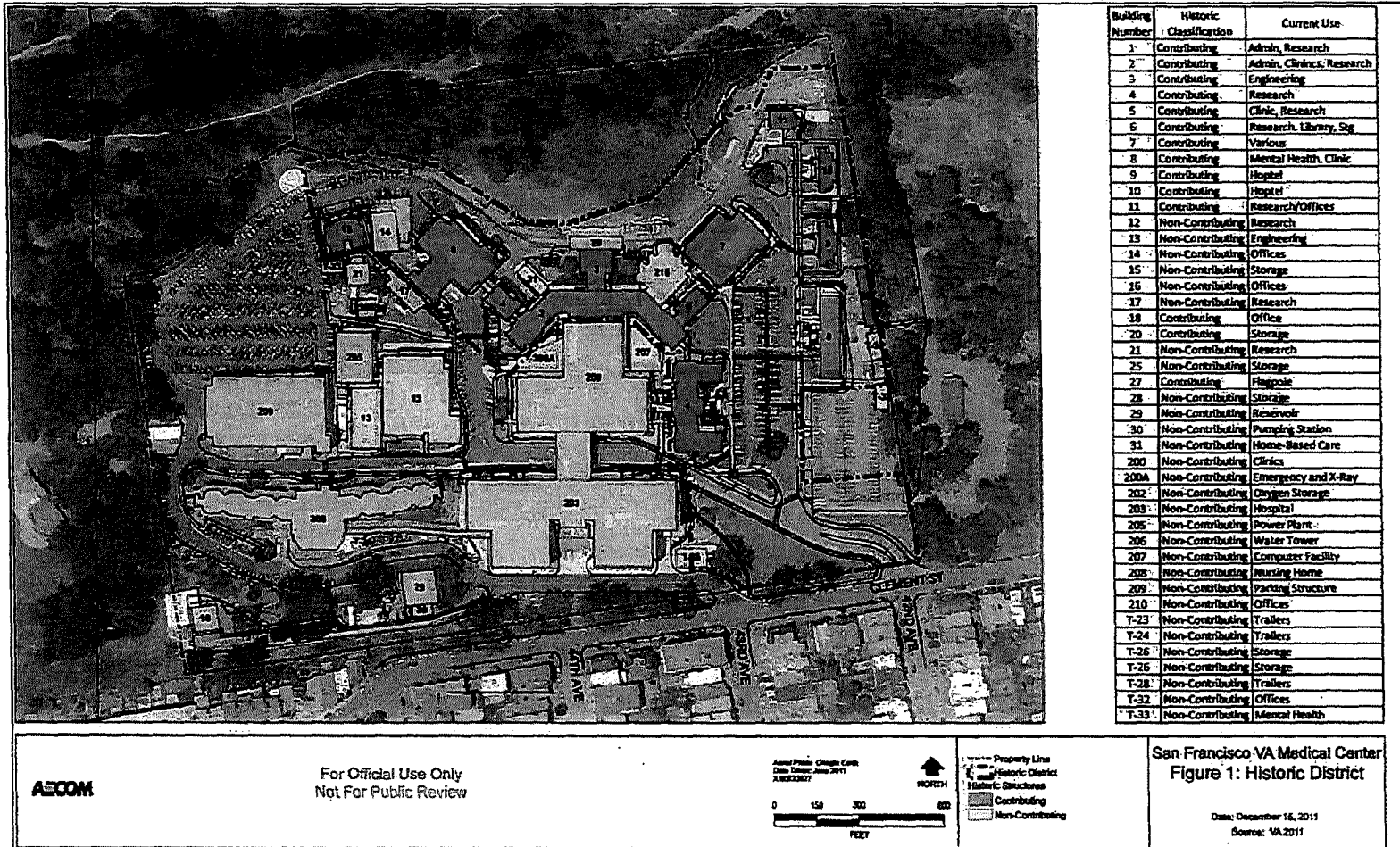
Carol Roland Nawi, PhD  
State Historic Preservation Officer

CC:

**Brian Lusher**  
Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 803  
Washington, DC 20004

**Kathleen Schamel**  
Federal Preservation Officer  
Historic Preservation Office (00CFM)  
Office of Construction & Facilities Management  
Department of Veterans Affairs  
811 Vermont Avenue, NW  
Washington, DC 20420

APPENDIX C.



Source: AECOM. 2011. National Historic Preservation Act Baseline Documentation. San Francisco, CA.



The figure above illustrates the relationship of the SFVAMC Historic District (shaded in gray) and the SFVAMC property lines (dashed) to the Fort Miley Military Reservation Historic District (outlined in red). Source: Page & Turnbull, 2013.

APPENDIX D



**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.

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](mailto:katharine_arrow@nps.gov) with any questions.

Sincerely,

Frank Dean  
General Superintendent

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

NPS Comments  
SFVAMC LRDP Draft Environmental Impact Statement

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**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.

**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.

**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".

**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

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.

*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 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 effects on park resources and park visitors which are described in other parts of this letter.

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.

#### 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.

*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



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.

*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.

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.

#### 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.

*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.

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 Suro 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.

*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.

*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.

*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.

*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.

### Cumulative Impacts

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

### 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.

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**I. MITIGATION MEASURES**

- a. **Public Interpretation:** VA will design and implement a public interpretation program related to the history of the SFVAMC to offset the LRDP's adverse effects on historic properties, including the LRDP's proposed demolition of Buildings 18 and 20 and proposed new construction within the SFVAMC Historic District.
  - i. This program may include:
    1. oral histories;
    2. museum quality, publically accessible, permanent displays;
    3. traveling exhibits;
    4. publically accessible website; and/or
    5. popular publications.
  - ii. VA will post the public interpretation program to the Website for comment by the Consulting Parties and notify Consulting Parties via e-mail of the posting. If these parties do not comment within 14-days of receipt, VA may assume that these parties concur with the program and schedule. VA will finalize the public interpretation program after considering the comments and implement the program.
  - iii. VA will post the final public interpretation program and resulting materials to the Website.
- b. The interpretive program may be expanded in the future, as net adverse effects are identified through the review of individual projects.

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### II. REVIEW PROCEDURES FOR INDIVIDUAL LRDP PROJECTS

a. In consultation with California OHP, VA has identified the potential for individual LRDP projects to adversely affect historic properties. The degree to which projects may adversely affect historic properties is directly related to whether the project is located within the SFVAMC Historic District, adjacent to the SFVAMC Historic District or the Fort Miley Military Reservation Historic District, or is located outside of and out of visual range of either historic district. The review procedures for individual LRDP projects are categorized based on these project parameters.

#### b. REVIEW CATEGORY A: Projects Located within the SFVAMC Historic District

- i. At or before preparation of 30% design drawings, SFVAMC will send a written request to California OHP to initiate project review under the terms of this agreement, with reference to Review Category A. The request will include a written description of the proposed project, including any ways in which the project differs from what was described in the LRDP Finding of Effect.
  1. SFVAMC shall post the request for initiation of project review to the SFVAMC LRDP Section 106 website and notify the Consulting Parties within 14 days of transmittal to California OHP.
  2. California OHP shall respond in writing to acknowledge the initiation of project review and provide initial comments or guidance specific to that project, as California OHP deems appropriate.
- ii. At or before preparation of 60% design drawings, SFVAMC shall prepare documentation of the effort to avoid or reduce adverse effects on the Historic District, including but not limited to:
  1. Written description of how the project applies the Secretary of the Interior's Treatment Standards.
  2. Written statement of whether the net result of the project will be a contribution to the adverse effect on the Historic District.
  3. Site plans, elevations, sections, and renderings illustrating the existing conditions and proposed project.
- iii. SFVAMC shall distribute the documentation prepared in Stipulation II.b.ii to the Signatory and Concurring Consulting Parties for a 14-day review and comment period.
- iv. Following the 14-day review and comment period, SFVAMC will meet with California OHP Architecture Review Unit staff to discuss the comments and develop additional measures for adhering to the Secretary's Standards, if warranted.
- v. SFVAMC will prepare a letter report summarizing the results of the Review Category A consultation, including measures to avoid and reduce

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adverse effects. This letter will be submitted to California OHP for concurrence on the completion of Section 106 consultation for the project. Once California OHP concurs, the final summary report will be posted to the SFVAMC LRDP Section 106 website, with notification to the Consulting Parties.

### c. **REVIEW CATEGORY B: Projects Located Adjacent to the SFVAMC Historic District**

- i. At or before preparation of 60% design drawings, SFVAMC shall prepare documentation of the effort to avoid or reduce adverse effects on the Historic District, including but not limited to:
  1. Written description of the proposed project, including any ways in which the project differs from what was described in the LRDP Finding of Effect
  2. Written description of how the project affects the integrity of the SFVAMC Historic District, with special attention to the integrity of feeling, association, and setting.
  3. Written statement of whether the net result of the project will be a contribution to the adverse effect on the SFVAMC Historic District.
  4. Site plans, elevations, sections, and renderings illustrating the existing conditions and proposed project.
- ii. SFVAMC shall distribute the documentation prepared in Stipulation VI.c.ii to the Signatory and Concurring Consulting Parties for a 14-day review and comment period. SFVAMC will forward all comments received within the 14-day review period to California OHP.
- iii. California OHP will provide written comments on the 60% design documentation within 30 days. If comments are not received within 30 days, SFVAMC may proceed to Step VI.c.iv.
- iv. At or before preparation of 90% design drawings, SFVAMC shall prepare final documentation of the effort to avoid or reduce adverse effects on the Historic District. The documentation will be posted to the SFVAMC LRDP Section 106 website, and notification will be sent to all Signatory and Consulting Parties. The documentation will include, but not be limited to:
  1. A summary of the comments received from California OHP and Consulting Parties.
  2. Written and graphical descriptions of how the 60% design was modified to further reduce or avoid adverse effects, if warranted in light of the comments received.
  3. A statement of the net effect of the project on the integrity of the SFVAMC Historic District.

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- d. REVIEW CATEGORY C: Projects Located Adjacent to the Fort Miley Military Reservation Historic District**
- i. At or before the preparation of 30% design drawings, SFVAMC will meet with GGNRA to discuss the proposed project and preliminary designs. SFVAMC will provide GGNRA with a written and graphical description of the proposed design. GGNRA will provide written comments within 14 days of the meeting.
  - ii. At or before preparation of 60% design drawings, SFVAMC shall prepare documentation of the effort to avoid or reduce adverse effects on the Fort Miley Military Reservation Historic District. If the project is located within the SFVAMC Historic District, this documentation may be combined into one package with the documentation for Review Category A. This documentation will include, but not be limited to:
    1. Written description of the proposed project, including any ways in which the project differs from what was described in the LRDP Finding of Effect.
    2. Summary of coordination efforts with GGNRA, including full copies of written comments received from GGNRA.
    3. Written description of how the project affects the integrity of the SFVAMC Historic District, with special attention to the integrity of feeling, association, and setting.
    4. Written statement of whether the net result of the project will be a contribution to the adverse effect on the Fort Miley Historic District.
    5. Site plans, elevations, sections, and renderings illustrating the existing conditions and proposed project.
  - iii. SFVAMC shall distribute the documentation prepared in Stipulation VI.c.ii to the Signatory and Concurring Consulting Parties for a 14-day review and comment period. SFVAMC will forward all comments received within the 14-day review period to California OHP.
  - iv. California OHP will provide written comments on the 60% design documentation within 30 days. If comments are not received within 30 days, SFVAMC may proceed to Step VI.c.iv.
  - v. At or before preparation of 90% design drawings, SFVAMC shall prepare final documentation of the effort to avoid or reduce adverse effects on the Historic District. The documentation will be posted to the SFVAMC LRDP Section 106 website, and notification will be sent to all Signatory and Consulting Parties. The documentation will include, but not be limited to:
    1. A summary of the comments received from California OHP and Consulting Parties.
    2. Written and graphical descriptions of how the 60% design was modified to further reduce or avoid adverse effects, if warranted in light of the comments received.

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3. A statement of the net effect of the project on the integrity of the SFVAMC Historic District.

**e. REVIEW CATEGORY D: Projects Located Outside of and Out of Visual Range of Historic Districts**

- i. At or before preparation of 30% design drawings, SFVAMC will send a written request to California OHP concurrence on VA's finding of no adverse effect under the terms of this agreement, with reference to Review Category D. The request will include a written description of the proposed project, including any ways in which the project differs from what was described in the LRDP Finding of Effect.
  1. SFVAMC shall post the request for concurrence to the SFVAMC LRDP Section 106 website and notify the Consulting Parties within 14 days of transmittal to California OHP. SFVAMC will forward all comments received after 14 days to California OHP.
  2. California OHP shall respond in writing within 30 days.

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Attachment 2: SFVAMC LRDP Projects (Revised June 2012)

with Preliminary Section 106 Review Category

Phase	Building	Building Gross Square Feet (GSF)	Finding of Effect Statement	Section 106 Review Category
1.1	Building 41 (Research)	14,200	Phase 1.1 would construct a large two-story building adjacent to the SFVAMC Historic District, to the south and slightly west of Building 6. This would introduce a new visual element in close vicinity to the SFVAMC Historic District, but outside of the Historic District boundaries. This phase also includes the demolition of Building T-17, a noncontributor to the Historic District.	B
1.1	Building T-17	-1,700		
1.2	Emergency Operations Center and Building 211 Parking Garage Expansion (477 spaces; 295 net new)	5,000 gsf (2,000 for EOC, 3,000 for storage space plus 150,000 square feet of new parking garage)	Phase 1.2 would construct a five-story parking structure west of Building 18, a contributor. The Emergency Operations Center would be incorporated into the parking garage building. Construction would take place on the western end of the SFVAMC Fort Miley Campus, outside of and to the rear of the SFVAMC Historic District, which is oriented more to the north and facing the San Francisco Bay. The proposed development would occur outside of the Historic District and would introduce new visual elements to the district.	B
1.3	Building 22 (Hoptel)	8,700	Phase 1.3 would construct a two-story building behind Buildings 9 and 10 (both contributors) as well as seismically retrofit Buildings 5, 7, 9, 10, 11, and 13. With the exception of Building 13, these buildings are contributors to the SFVAMC Historic District. Also with the exception of Building 13—which is outside of Historic District boundaries—all proposed activities would be conducted within the Historic District. (See Images 17–20 for views of Buildings 5, 7, 9, and 10.)	Previous Section 106 Consultation resulted in finding of No Adverse Effect. SHPO concurred 8/27/09.
1.3	Seismic Retrofit Buildings 5, 7, 9, 10, 11, and 13	N/A		
1.4	Patient Welcome Center and Drop Off Area	14,800 (1,350 is drop off area)	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	A



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Phase	Building	Building Gross Square Feet (GSF)	Finding of Effect Statement	Section 106 Review Category
			<p>constructed on the ground level between Buildings 200 and 203, extending out toward 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.</p> <p>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. (See Image 21 for a view of Building 1.)</p>	
1.5	Building 24 (Mental Health Clinic Expansion)	15,600	<p>Phase 1.5 would construct a three-story building behind Building 8 (a contributor). Building 20 (a contributor) would be demolished as part of this phase. All proposed construction would occur within the SFVAMC Historic District boundaries. The planned development would alter the look and feel of the Historic District by removing a contributing resource and introducing modern elements into a part of the Historic District that is mostly intact and features a high level of integrity of setting and design.</p>	<p>A and C (in progress; Section 106 initiated 8/27/10)</p>
1.5	Building 20	-2,300		
2.1	Operating Room Expansion (D-Wing)	5,300	<p>This phase would include an addition of a D-wing on Building 200, which is located outside of the Historic District. The planned construction would occur outside and to the south of the SFVAMC Historic District boundaries. The proposed development would introduce new visual elements adjacent to the district; however, the construction would not substantially alter the existing scale and character of the SFVAMC Fort Miley Campus.</p>	D

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Phase	Building	Building Gross Square Feet (GSF)	Finding of Effect Statement	Section 106 Review Category
2.2	IT Support Space Expansion	7,000	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.	D
2.3	Building 23 (Mental Health Research Expansion)	15,000	Phase 2.3 would construct a three-story building behind Building 8 (a contributor). The planned development would alter the look and feel of the SFVAMC Historic District by introducing modern elements into a part of the Historic District that is mostly intact and features a high level of integrity of setting and design.	A
2.4	Building 40 (Research)	100,000	Phase 2.4 would construct a 5-story building and would involve the demolition of Buildings 12, 14, 18, 21, and T-23. With the exception of Building 18, these are all non-contributors to the SFVAMC Historic District. The planned construction would take place on the west side of the existing SFVAMC Fort Miley Campus, both within and immediately outside of the SFVAMC Historic District boundaries.	A
	Building 14 (Removal)	-9,700		
	Building 18	-6,400		
	Building 21	-1,700		
	Building T-23	-900		
	Building 12	-38,900		
2.4	Seismic Retrofit Buildings 1, 6, 8	N/A	Phase 2.4 would also include the seismic retrofit of Buildings 1, 6, and 8, which are contributors to the Historic District.	A
2.5	Ambulatory Care Center (ACC)	120,000	This phase would include the construction of a five-story building, with a basement, in the northwestern part of the SFVAMC Fort Miley Campus. This would introduce a new visual element in close vicinity to the SFVAMC Historic District, but outside of the Historic District boundaries.	B, C
	Swing Space (Temporary)	24,000	Phase 2 would entail bringing temporary, modular units into the northwest parking lot of the SFVAMC Fort Miley Campus, outside of and to the rear of the SFVAMC Historic District. No permanent changes would be made to the Historic District or to its setting.	D

**MODULAR UNIT LOCATIONS  
(50,000 SF OPTION)**

**MODULAR UNITS**

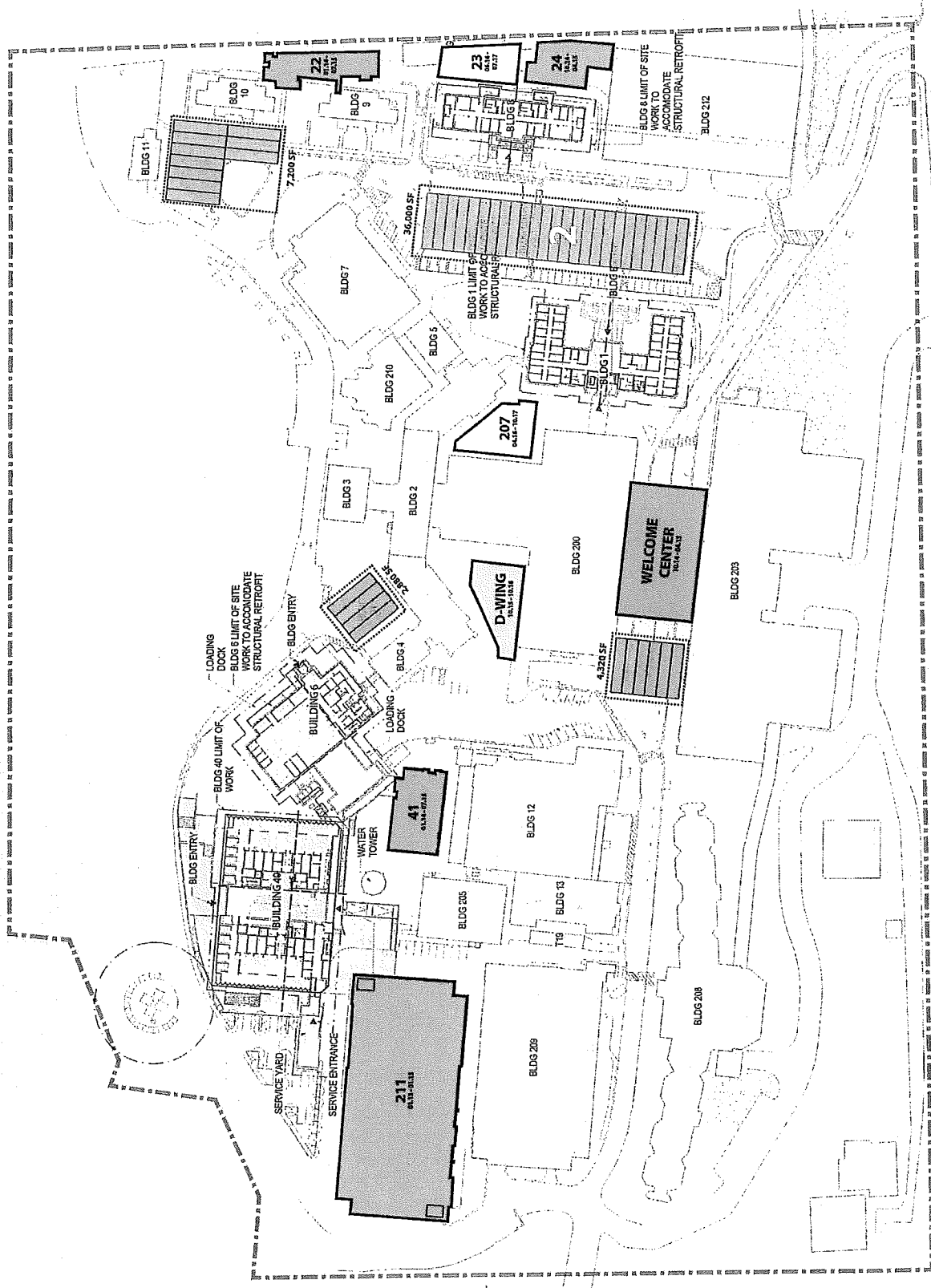
12' x 60' = 720 SF

POTENTIAL MULTI-STORY  
LOCATIONS

**CONSTRUCTION FINISH DATE**




- 2015
- 2016
- 2017

**50,400 SF**






## MODULAR UNIT LOCATIONS

### MODULAR UNITS

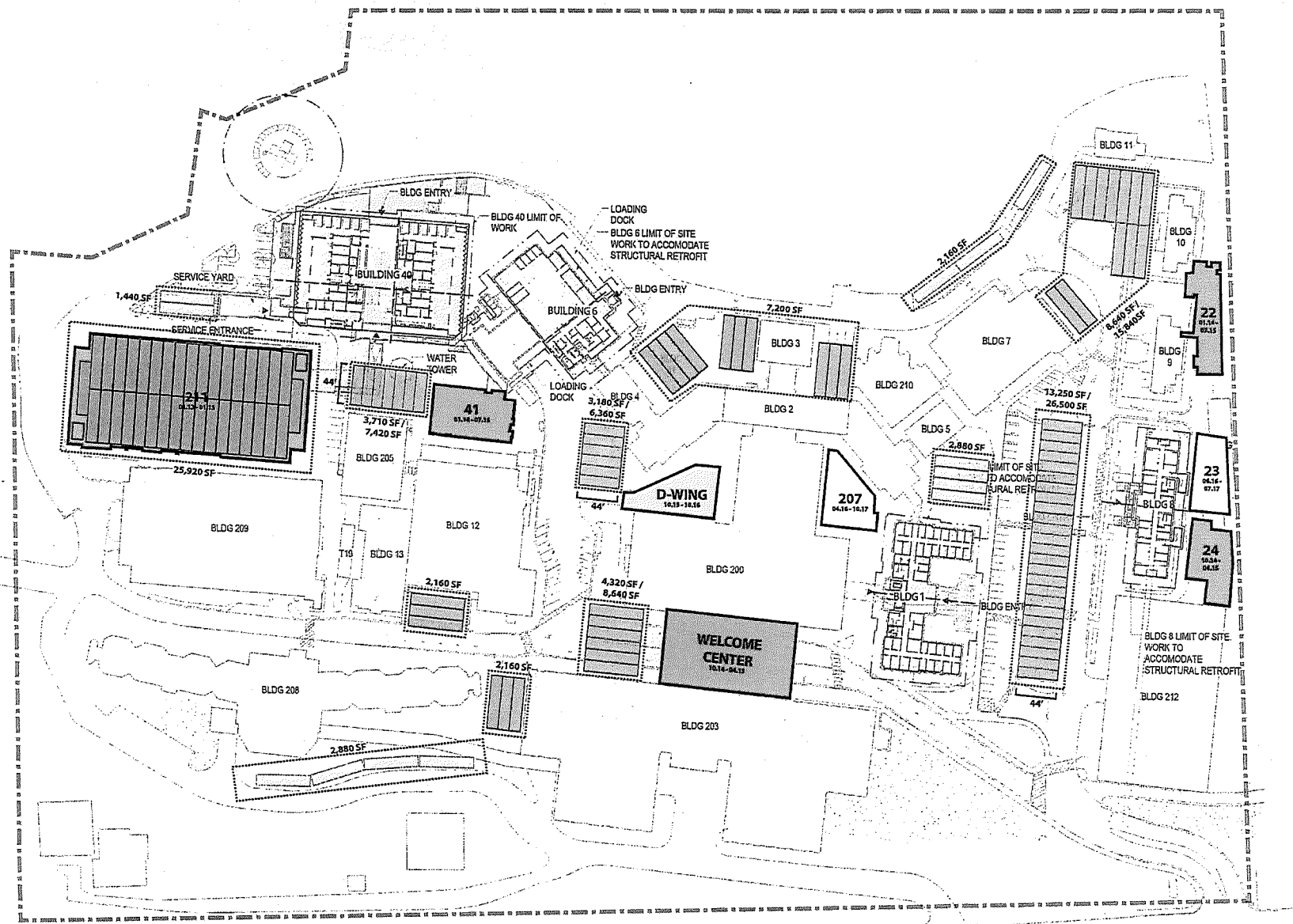
-  12' x 60' = 720 SF
-  12' x 44' = 530 SF
-  POTENTIAL MULTI-STORY LOCATIONS

### CONSTRUCTION FINISH DATE




-  2015
-  2016
-  2017

79,900 SF  
W/ SINGLE LEVEL OF UNITS

111,560 SF  
W/ TWO STORY UNITS AT SELECTED LOCATIONS



**MODULAR UNIT LOCATIONS  
(MAXIMUM SF OPTION)**

- MODULAR UNITS**
-  12'x 60' = 720 SF
  -  12'x 44' = 530 SF
  -  POTENTIAL MULTI-STORY LOCATIONS

- CONSTRUCTION FINISH DATE**
-  2015
  -  2016
  -  2017

**74,040 SF**

