

**CALIFORNIA COASTAL COMMISSION**

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# F12b

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Staff:	J. Manna-SF
Staff Report:	11/28/2012
Hearing Date:	12/14/2012

## STAFF REPORT: REGULAR CALENDAR

<b>Consistency Determination No.:</b>	<b>CD-046-12</b>
<b>Federal Agency:</b>	<b>Department of Veterans Affairs</b>
<b>Location:</b>	San Francisco Veterans Affairs Medical Center Fort Miley Campus, 4150 Clement Street, City and County of San Francisco.
<b>Project Description:</b>	San Francisco Veterans Affairs Medical Center Fort Miley Campus Long Range Development Plan, Phase 1.
<b>Staff Recommendation:</b>	Concurrence

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## SUMMARY OF STAFF RECOMMENDATION

The US Department of Veterans Affairs (VA) has submitted a consistency determination for the San Francisco VA Medical Center (SFVAMC) Fort Miley Campus (Campus) Long Range Development Plan (LRDP<sup>1</sup>). The LRDP is a comprehensive plan created to guide the development of the 29-acre SFVAMC Campus located at 4150 Clement Street in the City of San Francisco. The LRDP outlines the construction of new buildings, demolition of old buildings, and retrofitting of existing buildings that would occur through the year 2023. The LRDP would

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<sup>1</sup> Note: Not to be confused with the same term and acronym used in Commission review of State University LRDPs under to Section 30605 of the Coastal Act.

support the SFVAMC's mission to be a major primary and tertiary healthcare center which provides cost-effective and high-quality care to eligible veterans in the SF bay area and north coast of California.

As submitted, the LRDP consistency determination outlines a near-term phase (Phase 1) and a long-term phase (Phase 2), with two alternatives for Phase 2. Since the two alternatives for Phase 2 result in varying degrees of impact, and because the VA has not selected which alternative it intends to implement for Phase 2, the Commission has determined that a phased review of this consistency determination is appropriate. Therefore, the Commission's review of the VA's consistency determination will only be for Phase 1 activities within the LRDP. The standard or review for this project is consistency to the maximum extent practicable with the Chapter 3 policies of the Coastal Act.

The SFVAMC Campus is surrounded by Golden Gate National Recreation Area (GGNRA) lands to the north, west, and east, and by the outer Richmond District residential neighborhood to the south. Implementation of Phase 1 development activities has been projected to increase parking demand during peak PM periods by 128 parking spaces. Since most of the parking in the surrounding area is free, unmetered, parallel parking, parking impacts by additional employees and users of the medical facility may affect access to the coastal zone and nearby GGNRA lands. However, Phase 1 development includes construction of a new parking structure that would provide a net of 263 new parking spaces on Campus, which would accommodate the parking demand increase generated by Phase 1 development. Therefore, Phase 1 of the LRDP is consistent with Coastal Act public access and recreation policies (Section 30210, 30211, and 30212.5).

All of the planned development for Phase 1 would take place within the existing SFVAMC Campus development footprint, consistent with the height, materials, colors, and massing of the existing development. Some of the new structures would be visible from outside Campus through vegetation along trails within GGNRA lands. While this new development would alter the scenery of the area, portions of the trails affected are not primary destinations for hikers. The VA would mitigate for permanent and temporary visual impacts by planting native trees along the Campus borders and implementing best management practices during construction to screen construction equipment. There are no creeks, wetlands, open water bodies, federally listed species, or environmentally sensitive habitat areas within or adjacent to the SFVAMC Campus. Implementation of the LRDP would limit impervious surfaces primarily to existing already impervious sites, resulting in minimal impacts to the site's runoff conditions. The VA would include low impact development techniques, comply with the San Francisco Public Works Code, and implement a storm water pollution prevention plan to reduce any potential impacts to water quality. Therefore, the project is consistent with the visual and water quality policies of the Coastal Act (Section 30251 and 30231).

Staff therefore recommends the Commission concur with the consistency determination for Phase 1 of the LRDP.

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**EXHIBITS**

- Exhibit 1 – Project Area Map
- Exhibit 2 – Phase 1 Development
- Exhibit 3 – Phase 2-Alternative 1 Development
- Exhibit 4 – Phase 2-Alternative 2 Development
- Exhibit 5 – SFVAMC Campus Location
- Exhibit 6 – On-site Parking
- Exhibit 7 – Phase 1 Building Massing
- Exhibit 8 – Negative Determination Letter (ND-012-11)

## **I. FEDERAL AGENCY’S CONSISTENCY DETERMINATION**

The Department of Veterans Affairs has determined the project consistent to the maximum extent practicable with the California Coastal Management Program (CCMP).

## **II. MOTION AND RESOLUTION**

### **Motion:**

*I move that the Commission **concur** with consistency determination CD-046-12 that the project described therein is fully consistent, and thus is consistent to the maximum extent practicable, with the enforceable policies of the California Coastal Management Program.*

Staff recommends a **YES** vote on the motion. Passage of this motion will result in an agreement with the determination and adoption of the following resolution and findings. An affirmative vote of a majority of the Commissioners present is required to pass the motion.

### **Resolution:**

*The Commission hereby **concurs** with consistency determination CD-046-12 by the Department of Veterans Affairs on the grounds that the project is fully consistent, and thus consistent to the maximum extent practicable, with the enforceable policies of the CCMP.*

## **III. FINDINGS AND DECLARATIONS**

### **A. PROJECT LOCATION AND DESCRIPTION**

US Department of Veterans Affairs (VA) has submitted a consistency determination for the San Francisco VA Medical Center (SFVAMC) Fort Miley Campus (Campus) Long Range Development Plan (LRDP). The LRDP is a comprehensive plan created to guide the development of the 29-acre SFVAMC Campus located at 4150 Clement Street in the northwest portion of San Francisco (see **Exhibit 1** for the project location). The LRDP outlines the construction of new buildings, demolition of old buildings, and retrofitting of existing buildings that would occur through the year 2023. The LRDP would support the SFVAMC’s mission to be a major primary and tertiary healthcare center which provides cost-effective and high-quality care to eligible veterans in the SF bay area and north coast of California. The proposed development and modifications included within the LRDP would help the SFVAMC meet necessary seismic safety requirements and the needs of veterans in the area over the next 20 years.

The existing SFVAMC Campus occupies approximately 1 million square-feet and includes an inpatient hospital building, an outpatient clinical building, research buildings, two hotel<sup>2</sup> buildings, a community living center, administrative/office buildings, storage, 10 surface parking lots, two parking structures, and a helipad. The SFVAMC has identified in its LRDP a deficiency of 589,000 square-feet of building space. All new development would be designed to meet Leadership in Energy and Environmental Design (LEED) Silver Certification, the VA's sustainability goals as outlined in their VA Strategic Sustainability Performance Plan, and VA seismic design requirements in compliance with Executive Order 12941.

The LRDP is laid out in two phases, a near-term phase (Phase 1) and a long-term phase (Phase 2) as outlined below:

- **Phase 1 (near-term):** New development of one research facility, an emergency operations center, and patient welcome center and drop-off area, expansion of a parking garage and mental health clinic, retrofitting of 7 buildings, and demolition of 2 buildings. Phase 1 work would result in a net of 204,300 new gross-square-feet of building space on the Campus (see **Exhibit 2** for details on Phase 1 development).
- **Phase 2 (long-term):**
  - **Alternative 1-** Expansion of an operating room, Information Technology (IT) support space, and mental health research building, development of one research building and an ambulatory care center, demolition and removal of 5 buildings, seismic retrofitting of 3 buildings, and creation of a central green park area. Phase 2 would result in a net of 189,700 new gross-square-feet of building space on the Campus (see **Exhibit 3** for details on Alternative 1 Phase 2 development).
  - **Alternative 2 Phase 2 (long-term):** Expansion of an operating room, IT support space, and mental health research building, development of one research building, demolition and removal of 5 buildings, seismic retrofitting of 3 buildings, and creation of a central green park area. Phase 2 would result in a net of 69,700 new gross-square-feet of building space on the Campus. Under this alternative the ambulatory care center would be located on 3.56 acres in Mission Bay (see **Exhibit 4** for details on Alternative 2 Phase 2 development).

The SFVAMC Campus is surrounded by Golden Gate National Recreation Area (GGNRA) lands to the north, west, and east, and by the outer Richmond District residential neighborhood to the south (**Exhibit 5**). The west side of the SFVAMC Campus is located within the coastal zone boundary; however, because the Campus is on federal land the entire site is considered "excluded" from the coastal zone. Development included in the LRDP could nevertheless have potential impacts on resources within the coastal zone. Also, activities proposed at the Mission Bay location in Alternative 2 of Phase 2 are within the San Francisco Bay Conservation and Development Commission's (BCDC's) area of jurisdiction and are not subject to review by the Coastal Commission. In the event that Alternative 2 is chosen for Phase 2 and development is

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<sup>2</sup> Overnight, shared accommodations for eligible Veterans receiving health care services.

proposed within BCDC's jurisdictional area, a consistency determination would need to be submitted to BCDC prior to construction.

## **B. PROCEDURES**

As submitted, the SFVAMC Campus LRDP consistency determination outlines a near-term phase (Phase 1) and a long-term phase (Phase 2), with two alternatives for Phase 2. Both of the Phase 2 alternatives have the potential to affect public access to the coastal zone as the development may not provide adequate parking resources to support the projected increase in parking demand. Since the two alternatives result in varying degrees of impact, and because the VA has not selected which alternative it intends to implement for Phase 2, the Commission has determined that a phased review of this consistency determination is appropriate. The Coastal Zone Management Act (CZMA) allows (and encourages) "phased federal consistency reviews" in cases where federal decisions to implement an activity are also made in phases. Section 930.36 (d) of the CZMA implementing regulations provides:

*(d) Phased consistency determinations. ... In cases where federal decisions related to a proposed development project or other activity will be made in phases based upon developing information that was not available at the time of the original consistency determination, with each subsequent phase subject to Federal agency discretion to implement alternative decisions based upon such information (e.g., planning, siting, and design decisions), a consistency determination will be required for each major decision. [15 CFR Section 930.36(d)]*

The benefits of this type of phased review are that: (1) it provides the federal agency, in advance of specific project or plan implementation, notice of what issues are likely to arise under the CCMP; and (2) it provides the Commission with an overall planning context within which to review specific plans or projects subsequently proposed.

As such, the Commission is only reviewing the LRDP's Phase 1 activities through this consistency determination. The Commission expects that the VA will continue to coordinate the implementation of its LRDP with the Commission to enable further Commission review of a supplemental consistency determination for Phase 2 activities.

## **C. PUBLIC ACCESS AND RECREATION**

Coastal Act Sections 30210, 30211, and 30213 protect public access and recreation, including parking for recreational access. These policies state:

***Section 30210:** In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

***Section 30211:** Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but*

*not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

**Section 30212.5:** *Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.*

The SFVAMC Campus is surrounded by Golden Gate National Recreation Area (GGNRA) parklands on three sides including Land's End, Fort Miley, and Lincoln Park (see **Exhibit 5**). There are access roads to Fort Miley through the SFVAMC Campus that may be temporarily closed during construction periods included in Phase 1 of the LRDP. While these roads are occasionally used to access the GGNRA, they are not the primary entry points into Fort Miley. The VA intends to maintain these roads as open access ways to the maximum extent feasible. However, if closures are needed, notice would be posted 2 weeks in advance of the closures. As these are not the primary entry or access ways to the park, and notice of closures would be posted, the temporary closure would not significantly impact public access to GGNRA lands.

Phase 1 of the LRDP would result in an increase in parking demand of 128 spaces during the weekday peak period as projected in the *Draft Environmental Impact Statement for the SFVAMC LRDP*. Currently, the SFVAMC Campus contains two parking structures (Building 209 and Building 212) and 10 surface parking lots, providing 1,253 total parking spaces (See **Exhibit 6** for the details of the existing off-street parking supply). Field observations taken by the VA showed that these facilities are well used during the PM peak periods, with occupancies of about 80 percent. On-street parking options in the vicinity of the SFVAMC Campus also exist in the form of unmetered parallel parking. The SFVAMC is located in a dense urban area which provides alternative methods of transportation including transit services, taxis, bicycles, and foot travel.

In past consistency determinations, the Commission has expressed concern over the adequacy of parking for the SFVAMC and coastal recreational impacts caused by the use of off-site parking on adjacent GGNRA lands by employees and users of the medical facility. In the late 1980's, the SFVAMC constructed a 4-level parking structure (Building 209) to provide additional parking. When reviewing a later project for the development of a District Counsel office building the Commission noted that, due to fees charged for parking within Building 209, as opposed to free parking within and surrounding the medical center, the use of the structure remained low and the parking problems in the surrounding area persisted (CD-026-91). The Commission nevertheless concurred with the VA's consistency determination, as legislation prohibited the VA from allowing free use of the parking structure, finding the development consistent "to the maximum extent practicable" with the Coastal Act access and recreation policies.

While the VA has included the construction of a 5-level parking garage (Building 211) on an area currently occupied by a surface parking lot (Parking Lot J) within Phase 1, the Commission has already authorized this parking garage through concurrence with a VA negative determination (ND-012-11). As discussed in the Commission staff's concurrence letter (**Exhibit 8**), the temporary loss of spaces from the surface parking lot during construction would be mitigated by the availability of nearby parking in Building 209, the provision of temporary on-

and off-site parking with the use of shuttle and valet services, and the promotion of rideshare, carpool, mass transit vouchers, and work schedule change programs during project construction. In relation to the remainder of Phase 1 development, the Commission further finds that both temporary and permanent impacts to parking demand resulting from Phase 1 construction would be met by the LRDP planning and mitigation measures, including a net increase of 263 new parking spaces, which would be sufficient to meet the projected increase in parking demand of 128 spaces from Phase 1 development.

Therefore, the Commission finds that Phase 1 of the LRDP is consistent to the maximum extent practicable with Coastal Act policies 30210, 30211, and 30212.5. The SFVAMC should work with the Commission in their long-term planning to ensure that there will be adequate parking and transportation options for employees and users of the medical facility so that Phase 2 development would not affect access to the coastal zone and nearby GGNRA lands.

#### **D. VISUAL RESOURCES**

Coastal Act Policy 30251 states:

*The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

All of the planned development within Phase 1 of the LRDP would take place within the existing SFVAMC Campus development footprint. The Campus is already substantially developed with medical and research buildings, parking structures, and parking lots that are partially visible to the surrounding area. All of the new proposed development would be consistent with the height of the current development on Campus, with no building height exceeding the height of the tallest existing building (Building 2). All new structures would also be built with materials, colors, and massing consistent with the existing SFVAMC development (See **Exhibit 7**).

New buildings located in the central portion of the Campus would be mostly screened from views outside of Campus by existing buildings. New buildings located on the western end of Campus would be screened by existing buildings, dense vegetation and other landforms, and would not be visible from outside of Campus. New buildings located near the eastern and northern portion of the Campus adjacent to GGNRA lands would be visible through existing vegetation and would alter the physical surroundings experienced by visitors in this area. While this development would alter the scenery of the area, especially to those hiking along the El Camino del Mar trail, these areas are not primary destinations for hikers and are areas hikers usually pass through on their way to more scenic GGNRA lands. To help mitigate impacts to surrounding views the VA would plant native trees along the perimeter of the Campus to further screen the new buildings.



The presence of construction equipment would also result in minor temporary visual impacts; however, the VA would implement best management practices (BMPs), such as screening construction staging areas, to limit this impact. Construction activities would be limited to daylight hours, which would minimize any construction lighting impact.

The Commission therefore concludes that Phase 1 of the LRDP would protect scenic coastal views, minimize landform alteration, be consistent with the visual character of the surrounding area, and be consistent with the visual resources policy of the Coastal Act (Section 30251).

## **E. WATER QUALITY**

Coastal Act Section 30231 states:

*The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

No creeks, wetlands, open water bodies, federally listed species, or environmentally sensitive habitat areas are located within or adjacent to the SFVAMC Campus. Implementation of Phase 1 of the LRDP would increase the impervious surfaces on the Campus by 5% (1.34 acres). The increase in impervious surfaces would result in minimal impacts to the site's runoff conditions as the project would occur primarily on existing impervious sites. The VA would also implement low impact development techniques to infiltrate, evaporate, and detain storm water to maintain the pre-development storm water runoff conditions. Any development within the LRDP would require compliance with the San Francisco Public Works Code which regulates the quantity and quantity of discharges into the sewer system. In addition, storm water and wastewater from the project site would be treated at the Oceanside Water Pollution Control Plant prior to discharging into the Pacific Ocean. Lastly, the VA would develop and implement a storm water pollution prevention plan to reduce any project related pollution of surface water through construction activities.

The Commission therefore finds Phase 1 of the LRDP consistent with the water quality policy of the Coastal Act (Section 30231).

CD-046-12 (Department of Veterans Affairs)

## **APPENDIX A: SUBSTANTIVE FILE DOCUMENTS**

CD-026-91 (Department of Veterans Affairs, 2-story, 9,900 square-foot District Counsel office building at the Fort Miley Medical Center)

Consistency Determination CD-046-12, US Department of Veterans Affairs, San Francisco VA Medical Center Long Range Development Plan, 2012.

*Draft Environmental Impact Statement San Francisco Veterans Affairs Medical Center Long Range Development Plan*, August 17, 2012 (AECOM)

ND-012-11 (Department of Veterans Affairs, 5-level parking structure on an existing parking lot)



Source: Data provided by the SFVAMC Engineering Department in 2010

**Figure 1-1: Location of SFVAMC Fort Miley Campus within the Urban Context of San Francisco**





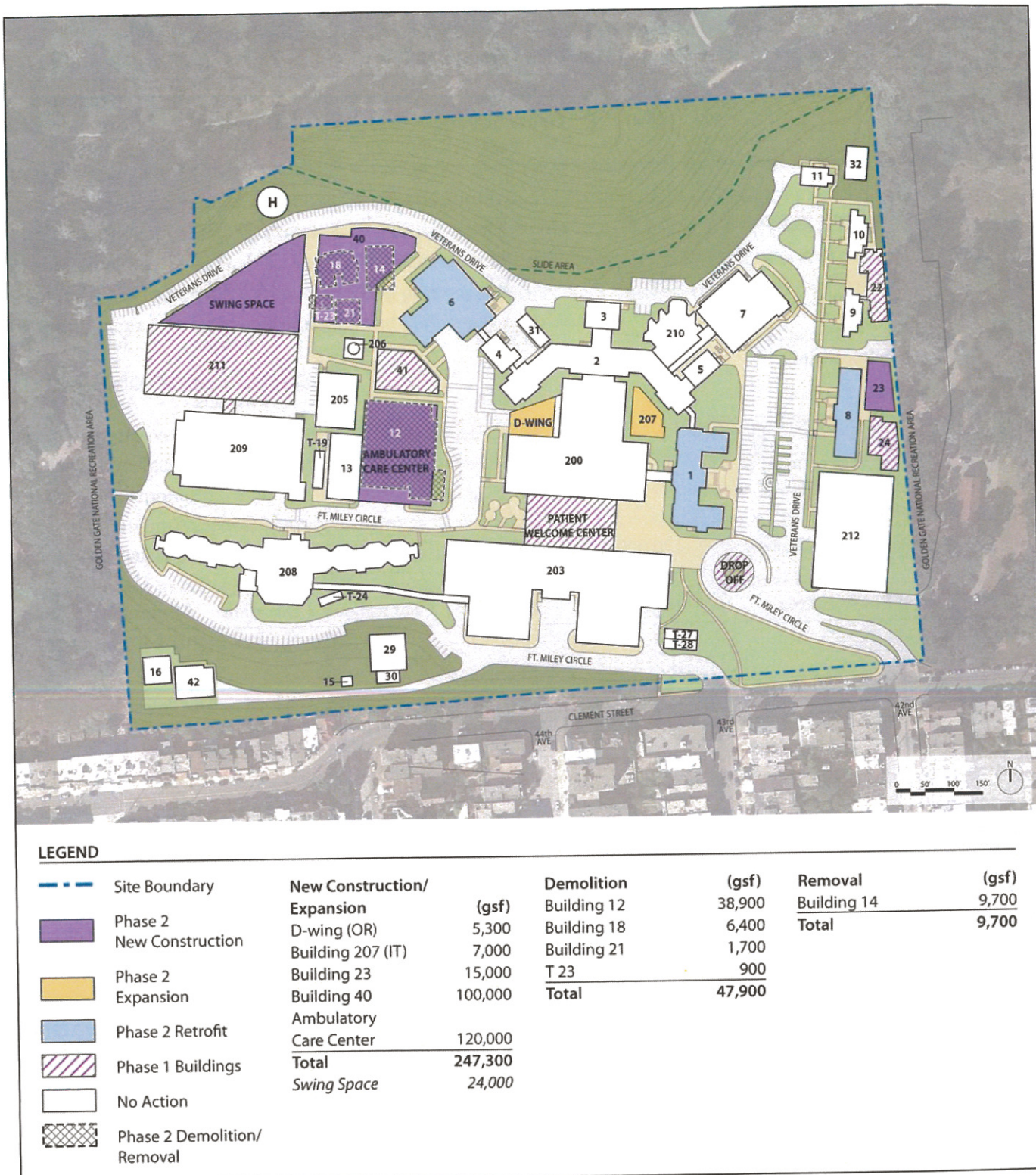
Source: VA, 2012

Note: The five Phase 1 sub-phase components identified in Table 2-1 are indicated on this figure.

**Figure 2-1:**

**Alternatives 1 and 2 (Phase 1) Footprint and Concept Plan through Mid-2015—SFVAMC Fort Miley Campus**





Source: VA, 2012

Note: The five Phase 2 subphase components identified in Table 2-2 are indicated in this figure.

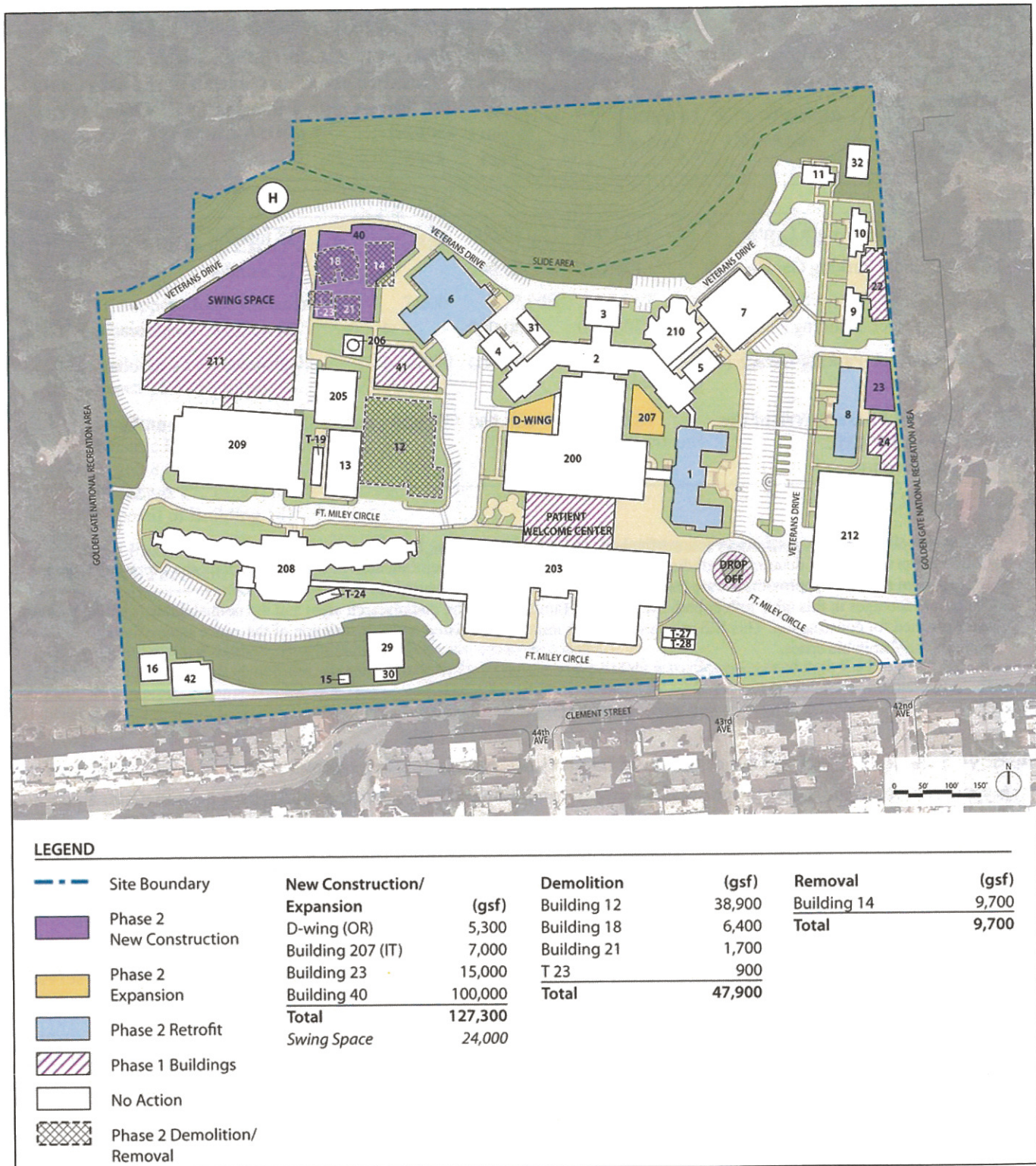
Figure 2-2:

Alternative 1 Long-Term (Phase 2) Footprint and Concept Plan through 2023—SFVAMC Fort Miley Campus

Exhibit 3

CD-046-12





Source: VA, 2012

Note: The four Phase 2 subphase components identified in Table 2-1 are indicated in this figure.

Figure 2-4:

**Alternative 2 (Phase 2) Footprint and Concept  
Plan through 2023—SFVAMC Fort Miley Campus**



Figure 1-2: Neighborhood Context



### Existing Parking Inventory

The SFVAMC Fort Miley Campus currently includes 10 surface parking lot areas and two parking structures that provide a total of approximately 1,250 parking spaces as shown in **Table 2-2** below and in **Figure 2-3, Existing Parking Inventory**.

**Table 2-2: Existing Parking Inventory**

Parking Area	Type of Parking	User	Total Number of Spaces
212	Structure	Patient	160
B	Surface	Patient	102
C	Surface	Employee	13
D	Surface	GSA/Employee	142
E	Surface	Patient	23
F	Surface	Employee	2
G	Surface	Employee	87
H	Surface	Patient/Visitor	17
209	Structure	Patient/ Employee	422
J	Surface	Employee	270
K	Surface	Employee	7
L	Surface	Employee	8
<b>TOTAL</b>			<b>1,253</b>





Figure 3-3: Phase 1 Building Massing

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April 28, 2011

Christopher Brazell  
Project Engineer  
San Francisco Veterans Affairs Medical Center  
4150 Clement Street  
San Francisco, CA 94121

Subject: Negative Determination ND-012-11 (Parking and Emergency Response Structure at Veterans Affairs Medical Center, San Francisco)

Dear Mr. Brazell:

The Coastal Commission staff has reviewed the above-referenced negative determination. The Department of Veterans Affairs proposes to construct a new parking garage at the San Francisco Veterans Affairs Medical Center (SFVAMC). The five-level, 46-foot-high structure would be located in the northwestern corner of the medical complex, on Parking Lot J and adjacent to an existing five-story parking garage immediately south of Lot J. The proposed structure would provide a net gain of 295 parking spaces for use by employees and visitors at the SFVAMC (477 new spaces in the garage minus the 182 spaces displaced in Lot J). The project also includes 7,800 square-feet of office space on the ground floor for an Emergency Operations Center to support response efforts in the event of a major emergency in San Francisco. The Department of Veterans Affairs states that existing on-site parking is severely inadequate to meet current demand. As a result, visitors and employees unable to secure parking in the complex overflow into residential neighborhoods to the south and in lots serving trailheads and other recreational areas in the adjacent Golden Gate National Recreation Area (GGNRA). Construction of the proposed garage is expected to begin in December 2011, last approximately ten months, and occur only on weekdays between the hours of 8:00 am and 5:00 pm.

The structure would be similar in height and design to adjacent buildings, exterior surfaces would be colored to blend in with surrounding buildings, and landscaping is proposed to screen and soften views of the structure. Storm water runoff would be directed to the southwest corner of the structure and into the existing combined storm water/sewer collection system. No sensitive habitat would be disturbed by construction of the garage on the existing paved parking lot. Trees located on GGNRA lands to the west of the project site may support nesting birds that could be disturbed by construction noise. As a result, if construction noise were to begin during nesting season, trees within the project area would be surveyed for nesting birds and appropriate buffers would be established for any birds present. The temporary loss of between 200 and 250 existing parking spaces in Lot J during construction of the proposed garage on this lot would be mitigated by the completion of a new garage (with 75 new parking spaces) on Lot A prior to the

start of construction of the Lot J structure; the provision of temporary on- and off-site parking with the use of shuttle and valet services; and the promotion of rideshare, carpool, mass transit voucher, and work schedule change programs during project construction.

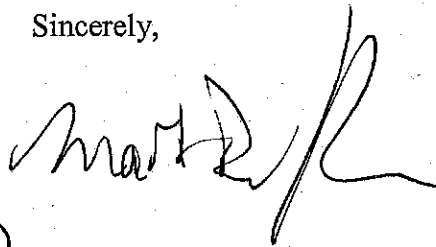
In March 2007 the Commission's Executive Director concurred with negative determination ND-095-06 from the Department of Veterans Affairs for a seismic retrofit of Building 203 and construction of a new building on the west side of the SFVAMC complex that would require the elimination of varying numbers of existing parking spaces, depending on the project alternative selected. The March 2007 concurrence letter cited the existing and historic deficiency of on-site parking at the SFVAMC complex, found that the 2007 project would not adversely affect parking areas that support public access to the GGNRA, but also concluded that:

*... future facility expansion at the VAMC should include provisions for expanded parking facilities, including consideration of expansion of the B-209 parking structure ...  
Implementation of Project Alternative 3 is less preferable as it would ... complicate any effort to expand the B-209 parking structure northward onto Lot J.*

The Department of Veterans Affairs subsequently constructed the seismic retrofit project and did not place the aforementioned replacement building on the southeast corner of Lot J, but rather at a location adjacent to Building 16 in the extreme southwest corner of the complex. As a result, the proposed five-story garage can be constructed on Lot J and provide 295 additional parking spaces to address the existing parking deficiency at the SFVAMC.

In conclusion, the Coastal Commission staff **agrees** that the proposed parking structure at the San Francisco Veterans Affairs Medical Center will not adversely affect coastal resources. We therefore **concur** with your negative determination made pursuant to 15 CFR 930.35 of the NOAA implementing regulations. Please contact Larry Simon at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,



(for)

PETER M. DOUGLAS  
Executive Director

cc: CCC – North Central Coast District  
California Department of Water Resources  
Governor's Washington, D.C., Office