

**SCOPING OUTLINE, SAN FRANCISCO VA MEDICAL CENTER  
PROJECT #662-05-3-6440-0062, RESEARCH MODULAR BUILDING  
LOT 4/ BUILDING 16 REPLACEMENT**

**INTRODUCTORY**

The Richmond community and organizations appreciate the opportunity to participate in a scoping session with the San Francisco Veterans' Administration Medical Center ("SFVAMC") concerning its proposed 14,500 square foot "temporary" research modular building 16 at the southwest corner of their campus. The basis for this project is to remove the research from the acute care building 203, which will be undergoing seismic retrofit, and place the research in the new building 16. We appreciate the good offices of Congresswoman Nancy Pelosi's staff in bringing about a public meeting on this very important community and environmental issue.

We note that the location of this proposed research building was one of the locations identified by the SMITHGROUP, architects and planners, who were under contract with SFVAMC since early 2003 for the purpose of preparing a Facility Master Plan its campus. The Plan was completed and issued on April 13, 2005, but has not been reviewed by the public (although provided to the Planning Association for the Richmond). We understand that the findings and recommendations of the SMITHGROUP, include analysis of SFVAMC needs, the requirement for additional space for clinical and research, the accommodation of traffic and parking, and the reorganization of medical services space. Based upon the SMITHGROUP'S space and functional analysis, the SFVAMC will have a space deficit of 324,073 square feet by 2007, which does not include off-site clinics.

The community is therefore concerned that this proposed 14,500 gross square foot laboratory building, which replaces a 3,600 gross square foot "temporary computer" building, is in reality a piecemeal addition to the permanent built space on the campus (as well as the many other "temporary" modular buildings of ancient lineage). The SFVAMC administration has admitted on numerous occasions that it has been experiencing great difficulty in existing within the 29 1/2 acres of its campus. The fact that currently 21 percent of the space is being utilized for research (which will

increase to 33 percent in 2007), results in less space for the treatment of veterans, which is the principal mission of the SFVAMC.

During the past 35 years, neighborhood residents Richmond District organizations, including the Planning Association for the Richmond and national park advocates, have taken the position that the SFVAMC must limit its activities to the treatment of veterans and that it should move the bulk of the research off campus. The cumulative effect of the increase in research and the construction of more buildings is to increase the environmental impact on the surrounding community and adjoining national park lands.

The purpose of this scoping process is to determine the adequacy of the Environmental Assessment, which was prepared before any community involvement, to commence an analysis to determine the severity of the environmental impact caused by this project, and the *cumulative effect* of continuing to construct additional buildings on an already dangerously dense and over populated campus.

## **I. ALTERNATIVES CONSIDERED:**

Is the “Alternatives Considered” section of SFVAMC’s Environmental Assessment (“AE”) dated August 7, 2005 (prepared without any community notice or input) adequate or complete? The relevant portion of the AE section on alternatives is as follows:

To specifically address the Research space options associated [with] the Building 203 project [seismic retrofit], Research and Planning staff has explored numerous relocation possibilities even though...the Research programs have clinical components that are closely tied to the research and housing these off site is not a viable alternative. These option[s] included Mt. Zion, CPMC, San Francisco General’s Gladstone Institute, obtaining a new site in Sausalito, the leased homeless outreach site at 3<sup>rd</sup> & Mission, the new CBOC [Community Based Outpatient Clinic] in San Bruno, and new off site leases. None of these were considered viable due to one or more of cost, timing, adjacency issues, available space, clinic and research access requirements.

Although these did not work out to resolve Building 203 Research needs, SFVAMC continues to review these as viable option[s] to revolve other space and functional concerns on campus. (AE at 3)

What was the reason that each location was deemed not viable?

In view of the restraints which are set forth in the quoted paragraph (“cost, timing, adjacency issues, available space, clinic and research access requirements”), was this a serious attempt by SFVAMC to find an alternative location for research, or done to satisfy the National Environmental Policy Act (“NEPA”) requirements?

Is it correct that SFVAMC limited its investigation to only UCSF, SFGH, California Pacific Medical Center, and the South San Francisco/Brisbane VAMC community outpatient clinic? If not, SFVAMC should provide details of why each site was not a viable alternative.

Was SFVAMC offered a lease for a research facility at the Gladstone Institute at SFGH, but considered it too expensive?

How does the cost of constructing and maintaining the “temporary” facility at proposed building 16 compare with the cost of build out and lease at Gladstone Institute at SFGH? Did Gladstone have existing laboratories available? Was the expense of leasing at Gladstone the only reason it was not acceptable?

Were any other hospitals or similar facilities contacted in either San Francisco or Northern San Mateo, other than those listed?

Were any commercial brokers retained to search for appropriate space?

Was there any consultation with the Presidio Trust to determine whether there was an available building for a temporary laboratory facility?

When was each of any contacts for alternative space for laboratory facilities made and by whom?

## **II. ENVIRONMENTAL CONSEQUENCE OF THE PROPOSED ACTION**

### **1. Describe the Proposed Project Building 16**

A. Materials and method of construction of the exterior and foundation of 14,500 square feet modular building.

B. Is there consideration for the construction of a frame building; if so, what will be the basis for such action?

C. What is the estimated cost of construction of proposed building 16, including infrastructure, foundation, vertical, and interior build out? What is the estimate of annual expense for operation of all building systems and utilities?

D. The Concept Design Documents depict a “potential 2nd floor addition” for an additional 1,800 square feet. What are the plans for using this additional space? The present proposed maximum occupancy is represented as “80.” What will the estimated occupancy be with the additional space? Does the design of the proposed building accommodate any additional space in addition to the 1800 square feet ?

E. The SFVAMC has designated the proposed research building 16 as a “temporary” building (“T 16”). What is the estimated period that the building will remain at its proposed location? Based upon the Facility Master Plan, April 2005, there will be a space deficit of 248,000 square feet by 2007, and 324,000 feet by 2012. (See p. 3.1). The EA prepared by Diana Carranza, SFVAMC Chief Engineer, and staff, states that the “shortage of space” is higher, i.e., 350,000 square feet currently, and 450,000 square feet by 2012. Based upon this deficit of space, what is the basis of the statement in the EA that the building is considered “temporary?” (EA, p.3.) What is the SFVAMC’s definition of “temporary.”

## **2. Describe the Laboratory Research that will be Conducted, Including Animal Research**

A. The wet/dry laboratories depicted on the architectural plans (p.5) indicates that there will be twelve Biosafety Level 2 labs, which are associated with human disease hazard. Although animal experimentation will be performed, which of the labs will be involved in such animal research? What are the applicable vertebrate animal biosafety levels for such animal research in accordance with NIH “Summary of Recommended Biosafety Levels for Activities in Which Experimentally or Naturally Infected Vertebrate Animals are Used.”

B. The community has been informed that the research will involve the areas of dermatology and the prostate. Based upon the any language or limitations set forth in the grants, what is the estimated length of each research project? Is there any Biosafety Level limitation above BSL-2 for future research projects which may be carried out in building 16?

## **3. Describe and Quantify the Production of Noise from Building 16 which will Impact the Adjacent Residences and Parkland**

A. Noise from laboratory vacuum systems intakes and exhausts.

B. Noise from Laboratory air compression system intakes; noise produced from “roof mounted HVAC components.” This and other mechanical equipment are to be installed on rooftop “to maximize office space.” (SFVAMC Engineering Service, Design Build Request, p.28). Describe the equipment that will be mounted on the roof. What is the difference in exterior noise production between equipment on the interior of the building and the exterior (roof)?

C. Two master system alarms, in separate locations, will produce separate warnings, for each laboratory gas and vacuum system. How often do these alarms sound based upon average use?

D. To what extent will noise from building 16 impact visitors to West Fort Miley, as well as residents of Seal Rock Drive and nearby streets.

E. What are the measurements of Noise produced by maximum exhaust discharge from exhaust above building 16.

F. What are the measurements of noise produced by installation of voice announcement system from main campus which is independent from the fire alarm system? The system will receive and broadcast all announcements throughout building. This presumably will also be heard by adjacent residences.

#### **4. Production of Toxic Fumes from Exhaust from Roof of Building #16**

A. Will laboratory exhaust discharge affect the adjacent residential buildings, due south of building 16, with any risk of exposure to pathogens or other toxic material? Will the risk increase during winds from the North? Does the SFVAMC have a monitoring system research to identify the type and concentration of pathogens and toxins exhausted from its laboratories?

B. What is the potential toxic impact to Seal Rock Drive neighbors from fumes when resistant waste is neutralized by chemical means, and when the acid waste is exhausted through roof vents? (p.25)

#### **5. SFVAMC has Represented that Personnel for Building 16 would be Limited to Eighty Persons, Who Would Work an Eight Hour, 5 Day Shifts.**

A. To what extent do employees, physicians, scientists, medical students, interns, and volunteers, continue research after hours and on weekends?

B. Will the design of modular building allow an additional 2400 square feet. What plans are there for utilization of the additional space?

#### **6. Potential Risks in Operation of Laboratory at Proposed Building**

In the Design-Build Request for Proposal for the construction of building 12 prepared by the SFVAMC Engineering Service which was

issued on June 21, 2005, *five weeks before the EA*, there is an attachment entitled “VA Design Guide---Research Laboratory.” This document was prepared by the Department of Veteran Affairs, and includes certain risks and hazards connected with the operation of “biosciences labs” or “life sciences labs.”

A. Is the proposed building 16 laboratory facility subject to “high risk factors [including] possible contamination from specimens, [and] explosion...”? Does this present a risk of fire?

B. Will the proposed building 16 store flammable liquid products?

## **7. Lighting**

A. What is the proposed design and density of lighting in the exterior areas of proposed building 16, including the narrow roadway which descends from the main perimeter road and any of the paths or stairways depicted on the Request for Proposal? Will this exterior lighting remain activated until sunrise?

B. Will there be any spot lights or other security type lighting in the area of the building?

## **8. Parking and Traffic**

A. What are the plans for parking on the roadway or entrance area of the proposed building 16? How many spaces are proposed? What are the locations of such parked cars?

B. Are there any parking limitations in the area of building 16 after hours or on weekends? How will such limitations on parking be enforced?

C. What is the anticipated traffic on the roadway on the “mud lot” or gully road. Does this include commercial vehicles, vans and other miscellaneous traffic? What consideration, if any, has been given to prohibiting any parking, other than for employees or veterans with disabilities which compromise their ability to walk?

**9. Inadequate Access for Emergency Vehicles**

A. Does the location of proposed building 16, at the end of a cul-de-sac, reached by a very steep narrow single lane road, provide adequate and safe access for emergency vehicles, including fire fighting of the San Francisco Fire Department? Does the available space in front of the building 16 provide sufficient space for the stationing of large Fire Department trucks?

B. Does the width of road and reduced space at end of road provide for an adequate turn around for emergency vehicles? How would any emergency vehicle return to the main road if there are other emergency vehicles along the access road to building 16?

C. Does the grade and width of road, location of hydrant (at top of hill), and proposed parking area in the immediate vicinity of the building 16, create safety problems in the event of an emergency?

**10. Will Building 16 Expose the Seal Rock Drive Residents and GGNRA Parklands to Risk?**

A. Will a fire or explosion in building 16 (See 6.A, supra.) cause a substantial risk of fire with respect to the vegetation at the property lines of the Seal Rock Drive residences and the GGNRA?

B. Are the proposed constraints in the construction phase of building 16 adequate to protect the property of the Seal Rock Drive residents? For example, the Request for Proposal documents provides that the contractor must wall off dust from the VAMC, but does not provide the same protection for the adjacent residents. (See General Requirements, p.9, D.1a,c.)

**11. Has the SFVAMC Made Application for Approvals from Regulatory Agencies for Construction of Building 16 and Made Disclosure of Toxic Materials for Use in a Populated Area?**

A. The Federal Consistency Unit of the California Coastal Commission implements the federal Coastal Zone Management

Act (CZMA) of 1972 as it applies to federal activities, development projects, permits and licenses, and support to state and local governments. The SFVAMC is within the Coastal Zone and is required to apply for a permit from the Coastal Commission.

2. **Compliance with Compliance with Nationally Recognized Codes, 40 USC § 3312.** The SFVAMC is required under federal law to follow San Francisco zoning codes, and other similar laws relating to the construction and placement of buildings “which would apply if it were not a building constructed or altered by a federal agency.” This legal obligation included consultation with the City and County of San Francisco Planning and Building departments, and considering all recommendations made by these and similar agencies.

3. **Federal Compliance With Right-to Know Laws (42 USC 1301-13109); 58 FR. 41981, 41992).** The SFVAMC has the obligation to provide the public with information on any hazardous and toxic materials which would expose members of the community to risk.

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