



Letterman Residential Project Environmental Assessment

DRAFT MARCH 2026

**PRESIDIO
TRUST**

CONTENTS

Environmental Assessment

	<u>Page</u>
Section 1. Introduction	1-1
1.1 Existing Conditions	1-1
1.1.1 Letterman District	1-1
1.1.2 Housing in the Park	1-5
1.2 Guidelines and Strategies for Planning Decisions	1-5
1.2.1 Presidio Trust Management Plan	1-6
1.2.2 West Letterman/Thornburgh Final Design Guidelines	1-7
1.2.3 Forever Park	1-7
1.3 Project Purpose and Need	1-7
1.4 Purpose and Contents of the Environmental Assessment	1-8
Section 2. Proposed Project and Alternatives	2-1
2.1 Proposed Project	2-1
2.1.1 Residential Buildings	2-1
2.1.2 Vehicular Access and Parking	2-10
2.1.3 Pedestrian Circulation and Landscaping	2-10
2.1.4 Utilities	2-11
2.1.5 Site Work	2-11
2.1.6 Project Schedule	2-11
2.1.7 No Action Alternative	2-12
2.1.8 Mixed-Use Alternative	2-12
2.1.9 Alternatives Eliminated from Further Consideration	2-12
Section 3. Affected Environment and Environmental Consequences	3-1
3.1 Resource Issues Retained for Further Analysis	3-1
3.1.1 Historic Resources	3-1
3.1.2 Traffic and Circulation	3-13
3.2 Resource Issues Considered but Dismissed from Further Analysis	3-23
3.2.1 Archaeology	3-23
3.2.2 Natural Resources	3-24
3.2.3 The Community	3-30
3.2.4 Public Safety	3-32
3.2.5 Utilities	3-35
Section 4. Agency Consultation and Public Involvement	4-1
4.1 NHPA Review Process	4-1
4.2 Agency Review	4-1
4.2.1 Advisory Council on Historic Preservation	4-1
4.2.2 National Park Service	4-2
4.2.3 California State Historic Preservation Officer	4-2
4.3 Other Agency Review	4-3
4.3.1 Department of Toxic Substances Control DTSC	4-3
4.4 Public Participation	4-4

Section 5. List of Preparers and Consultants..... 5-1
Section 6. References..... 6-1

Figures

Figure 1 Regional Context and Project Vicinity..... 1-2
 Figure 2 1926 Aerial 1-3
 Figure 3 Aerial of Project Site..... 1-4
 Figure 4 Floor Plan – Ground Level 2-2
 Figure 5 Floor Plan – Level 2 2-3
 Figure 6 Floor Plan – Level 3 2-4
 Figure 7 Site Elevation – Girard Road..... 2-5
 Figure 8 Lincoln Boulevard View Northwest – before and after..... 2-6
 Figure 9 Girard Road View Northeast – before and after 2-7
 Figure 10 Landscape and Site Circulation 2-8
 Figure 11 Historic Images of South and West of Letterman Hospital 3-2
 Figure 12 Historic Images of North and Courtyard of Letterman Hospital..... 3-5
 Figure 13 Maximum Allowable Heights for New Construction..... 3-11

Tables

Table 1 Existing Dwelling Units..... 1-5
 Table 2 Proposed Buildings 2-9
 Table 3 Dwelling Units – Type, Number, and Percentage..... 2-9
 Table 4 Existing Total Intersection Volume Comparison 3-14
 Table 5 Person Trips by Mode 3-15
 Table 6 Vehicle Trips by Mode..... 3-16
 Table 7 Trip Generation Summary..... 3-17
 Table 8 Project Weekday PM Peak Hour Vehicle Trip Distribution 3-17
 Table 9 Project Weekday PM Peak Hour Trip Assignment 3-18
 Table 10 Trips added by the Project and Alternatives Compared to Current Intersection
 Volumes (Weekday PM Peak Hour)..... 3-19
 Table 11 Parking Supply and Weekday Afternoon Parking Demand..... 3-22
 Table 12 Consistency with Potentially Applicable Control Measures in 2017 Clean Air Plan..... 3-28

Appendices

- A. Draft Finding of No Significant Impact
- B. Resource Protection Measures
- C. California State Historic Preservation Officer letter (December 2025)
- D. Department of Toxic Substance Control letter (December 2025)
- E. Scoping Comments and Responses

SECTION 1

Introduction

The Presidio Trust (Trust) is considering the construction of six architecturally compatible residential buildings with 196 dwelling units to re-establish the historic character and density of the West Letterman area within the Presidio of San Francisco (Presidio or park) as envisioned in the Presidio Trust Management Plan (PTMP) (Trust 2002a).¹ The proposed project is intended to meet many of the PTMP goals by increasing revenue for park operations, adding housing in a transit-accessible part of the park, and focusing new construction in an already developed area.

1.1 Existing Conditions

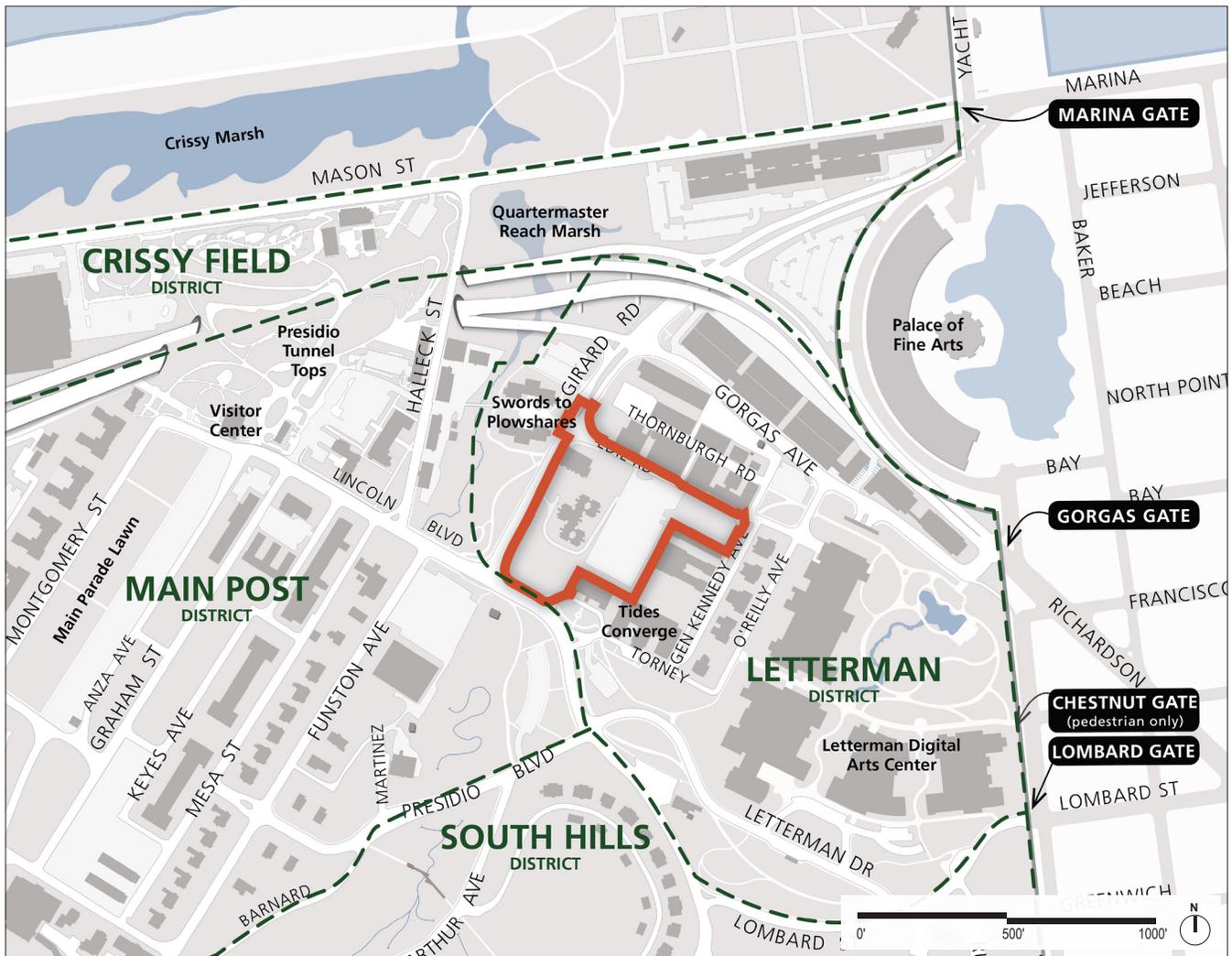
The Presidio is a national park site and a National Historic Landmark District (NHLD) in the northern San Francisco Peninsula (Figure 1). This land was the traditional territory of the Yelamu, a local tribe of the Ramaytush Ohlone peoples of the San Francisco Peninsula. It then served as a military outpost for the Spanish Empire, the Mexican Republic, and the U.S. Army.

1.1.1 Letterman District

The 63.7-acre Letterman District, a residential and working campus and one of seven PTMP planning districts within the Presidio, occupies the park's northeast corner. The 18-acre western portion of the Letterman District, known as the West Letterman/Thornburgh area, centers on the former U.S. Army (later Letterman) General Hospital. Established in 1899, the hospital was once the second-largest military hospital in the country (Figure 1). The project site comprises 4.66 acres within this area (Figure 2).

Although remnants of West Letterman's past remain, including select buildings, street layouts, and open spaces associated with the former Letterman General Hospital, which contribute to the NHLD, the project site has lost much of its historic built fabric. Many of the wards, galleries, administration buildings, and the garden landscaped central courtyard that formed the hospital complex are no longer present. Starting in 1973, the U.S. Army demolished all the historic hospital structures located north and west of the Administration Building (Building 1016), including the central courtyard and surgery gallery north of Building 1016 (Figure 3).

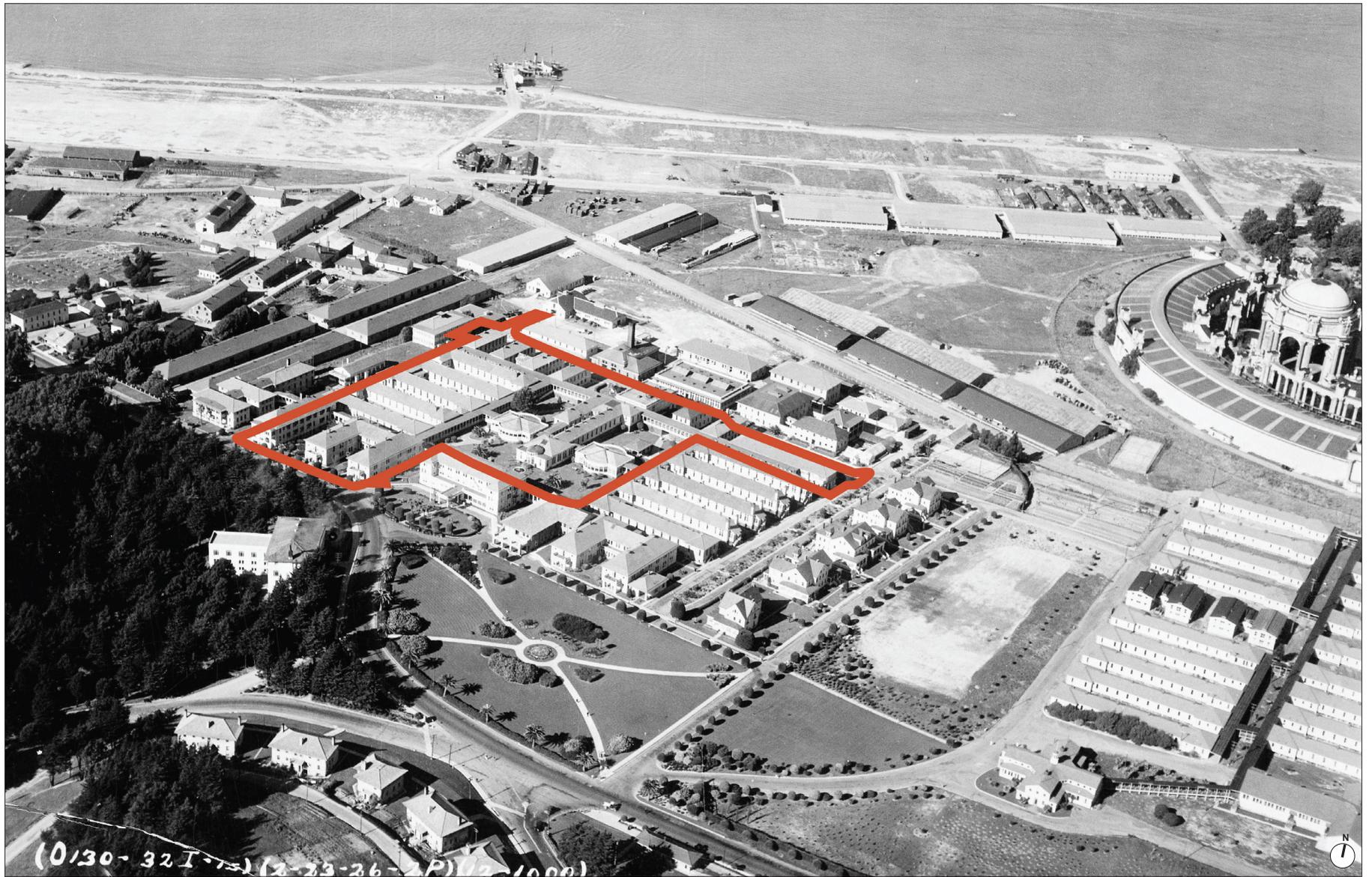
¹ The PTMP is the management plan that informs the Trust's land use and implementation decisions within Area B. The PTMP can be viewed at the Trust's website at <https://presidio.gov/about/presidio-trust/documents/land-use-plans>.



Source: Presidio Trust, 2023

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 1
Regional Context and Project Vicinity



Source: The National Archives and Records Administration

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FIGURE 2
1926 Aerial



Source: The Presidio Trust, 2025

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FIGURE 3
Aerial of Project Site

In 1976, the Army built the non-historic Nurses' Dormitories (Building 1028) along with the associated garage and storage building (Building 1027). In recent years, the Trust has used Building 1028 to provide market-rate housing, known as the Letterman Apartments, while Building 1027 has been used by the U.S. Park Police (USPP) as a storage facility.

As part of a separate project (25-027), the USPP is relocating to another location within the Presidio, a move intended to address space deficiencies at the existing facility and to consolidate storage.

In addition, under a separate project (25-033), the Trust will demolish non-historic Buildings 1027 and 1028. Both are aging and functionally obsolete buildings that pose long-term financial, operational, and safety challenges. Building 1028 has significantly high maintenance costs that exceed rental income potential. Both also contain building materials that require abatement, including asbestos, and exhibit significant accessibility deficiencies.

1.1.2 Housing in the Park

Housing has always been an essential component of the Presidio's landscape. A diversity of housing types was developed in the park to accommodate a range of U.S. Army personnel. The existing mix of housing units in the park is listed in Table 1, *Existing Dwelling Units*.

**TABLE 1
EXISTING DWELLING UNITS**

Unit Type	Number	Percent
SRO/Dorm ¹	127	9
Studio	0	0
1 Bedroom	127	9
2 Bedroom	277	20
3 Bedroom	489	35
4 Bedroom	327	24
5+ Bedrooms	34	2
Total²	1,381	100

Notes:

1. This does not include the former 63 SRO/Dorm units in Building 1028 which have been decommissioned; Building 1028 has been approved for demolition.
2. Percentages may not add up to 100 due to rounding.

Source: Trust 2026

1.2 Guidelines and Strategies for Planning Decisions

The Trust has developed multiple guidance and strategy documents for planning decisions for West Letterman, including the project site. Such documents include the PTMP, the West Letterman/Thornburgh Final Design Guidelines document, and the Forever Park strategy. Each is discussed in detail below.

1.2.1 Presidio Trust Management Plan

In 1996, in recognition of the Presidio's singular character and of the challenges and expense associated with its preservation, Congress established the Presidio Trust to oversee the Presidio as a distinct component of the Golden Gate National Recreation Area (GGNRA) (U.S. Code Title 16, Section 460bb note). The Presidio Trust Act delineated the Trust's jurisdiction within the Presidio (Area B), distinguished from that of the National Park Service (NPS) (Area A), and required the Trust to be financially self-sufficient by 2013. The law also gave the Trust the authority to lease property to generate the revenue necessary for park operations and capital improvements. This shift in governance was accompanied by an evolution of land use laws and policies, starting with the PTMP, which guides the rehabilitation of the former military post into a national park.

The PTMP anticipated new construction, building rehabilitation, and circulation and landscape improvements within West Letterman to achieve the Trust's goals. Under the PTMP, up to 160,000 square feet of infill construction is permitted, provided that at least 30,000 square feet of non-historic buildings are removed. The PTMP also outlines the following goals for future development for West Letterman:

- Re-establish the historic courtyard and connect it with other open spaces and formal landscapes.
- Use new construction to articulate the character and density of the historic district.
- Consider removal of non-historic dormitories (Building 1028) and replacement with more compatible housing west of the historic hospital complex.
- Maintain and enhance the pedestrian scale and mixed-use campus setting.
- Create a new entrance from Doyle Drive into the park as part of the Doyle Drive reconstruction.
- Protect and restore Tennessee Hollow.
- Retain the historic Lombard Gate as the primary, formal entrance to the park.

The last three bullets listed above have already been implemented. The replacement of Doyle Drive with the Presidio Parkway was completed in 2015. Approximately 66 acres of Tennessee Hollow have been restored to date. Lombard Gate continues to serve as a formal entrance to the park, enhanced with new plaques, lighting, and a kiosk. In addition, the demolition of Buildings 1028 and 1027 was approved in 2025 as a separate project.

The PTMP identifies residential use as the most reliable long-term source of revenue available to the Trust and supports adjusting the housing composition by removing non-historic dwelling units and introducing smaller dwelling units. The PTMP also envisions clustering housing near major activity areas to promote community vitality, help reduce traffic and emissions, and support park operations, such as transit and community policing.

1.2.2 West Letterman/Thornburgh Final Design Guidelines

In addition to the PTMP, the West Letterman/Thornburgh Final Design Guidelines (Guidelines) also address the proposed project (Trust 2024).² The Guidelines describe the history of West Letterman, including its architecture and cultural landscape, and provide site-specific guidance on the treatment of open space, the architectural character of new construction, views, access and circulation, and other physical characteristics within the subdistrict. This document includes specific guidelines for infill construction, including standards that “respect the historic spatial relationships, open spaces, and orientation of the existing historic building.” The document also includes guidelines for landscape characteristics, stating that “the decorative, gardenesque landscape of the southern part of Letterman should be preserved or rehabilitated. If new planting is introduced, it should be compatible with existing or historic plant palettes.” The Trust wrote the Guidelines to help ensure future projects would conform to the Secretary of the Interior’s Standards for Rehabilitation. Project consistency with the Guidelines is intended to facilitate project decisions and activities, while reinforcing agency goals and avoiding harm to historic resources.

1.2.3 Forever Park

The Forever Park strategy³ outlines the Trust’s next chapter, focused on sustaining the Presidio for decades to come. To this end, the Trust works to help ensure the Presidio remains a national park site that is free, welcoming, and thriving for future generations. The park is maintained and improved primarily through revenue generated from leasing, hospitality, and permitting efforts. The Trust’s financially sustainable business model provides for the long-term care of the park.

1.3 Project Purpose and Need

The project’s purpose and need is defined by the following objectives:

- Use new construction to re-establish and articulate the historic character and density of the district.
- Beautify the Girard Road gateway to the Presidio and improve the sense of arrival into the park and reinforce the identity of the Letterman District.
- Achieve PTMP housing goals for planned replacement for the West Letterman area to the extent practicable given site-specific assessments of building configuration and financial feasibility.
- Provide housing types that diversify the composition of housing within the park.
- Achieve LEED (Leadership in Energy and Environmental Design) Homes Gold.

² The 2024 Design Guidelines update the 2007 Letterman District Design Guidelines as well as the 2000 Planning and Design Guidelines for New Development and Uses on 23 Acres Within the Letterman Complex. This updated document provides guidelines for remaining projects by incorporating today’s conditions within the Letterman Planning District. The guidelines can be viewed at the Trust’s website at <https://presidio.gov/about/presidio-trust/documents/project-documents>.

³ The Forever Park strategy can be viewed at the Trust’s website at <https://presidio.gov/about/forever-park-strategy>

- Be compatible with the NHLD through conformance as closely as practicable to PTMP guidance and the Guidelines.
- Meet Trust financial goals by furthering its financial stability, increasing revenue for park operations, and increasing its ability to sustain a Forever Park.
- Minimize environmental impacts to threshold levels analyzed and mitigated in the PTMP Environmental Impact Statement (EIS) (Trust 2002b).

1.4 Purpose and Contents of the Environmental Assessment

This environmental assessment (EA) identifies the environmental effects of the proposed redevelopment of a 4.66-acre site with up to 160,000 square feet of new use in the Letterman District.

The EA is divided into the following four sections:

1. A brief discussion that substantiates the need for the project.
2. A description of the proposed project and alternatives, including those dismissed from further consideration.
3. A discussion of the environmental impact of the proposed project and alternatives.
4. A synopsis of agencies consulted, issues raised during consultation, and a summary of the public involvement process.

The EA serves as the factual support for the conclusions in the draft finding of no significant impact (FONSI) (Appendix A). The final EA/FONSI will be made available for public review before the Trust makes its final determination whether to prepare an EIS or to proceed with the project.

Concurrently with the EA analysis, the Trust also provided for the review of the project under the consultation process required by Section 106 of the National Historic Preservation Act following formal guidance from the Council on Environmental Quality and the Advisory Council on Historic Preservation, and in accordance with the Trust's Programmatic Agreement. This process identifies the historic resources that may be affected by an undertaking, assesses the effects on historic resources through a finding of effect, and then looks for ways to "avoid, minimize, or mitigate" the effects identified in the finding of effect.

SECTION 2

Proposed Project and Alternatives

This chapter provides a detailed description of the alternatives considered and a brief description of alternatives dismissed. The Trust explores and objectively evaluates the following alternatives in this EA:

- Proposed Project
- No Action Alternative
- Mixed-Use Alternative

2.1 Proposed Project

Under this alternative, six new residential buildings will be constructed north and west on the block of the former Letterman General Hospital (Figures 4 through 10). Implementation of the proposed project will result in a total of 196 market-rate rental dwelling units in 159,752 square feet of new construction on the site.

2.1.1 Residential Buildings

The Trust will construct 196 new dwelling units in six buildings (Buildings A–F). The buildings will consist of three two-story stand-alone walk-up buildings with 17 to 31 units per building, and three three-story buildings connected via bridges at levels two and three, with 42 to 46 units per building, as detailed in Table 2, *Proposed Buildings*. The dwelling units will be market-rate rental units, with a mix of unit types as detailed in Table 3, *Dwelling Units – Type, Number, and Percentage*. Two-story buildings will have a maximum height of 30 feet, and three-story buildings will have a maximum height of 45 feet.

The 159,752 square feet of new construction is approximately 31,842 square feet less than that considered for the Letterman District in the PTMP. The 196 dwelling units will result in 44 dwelling units more than what was considered for the Letterman District in the PTMP, but 71 dwelling units less than what was considered parkwide.

Building E will include approximately 9,866 square feet of common areas and amenities for the overall development, such as entry lobby/common area, an elevator, coworking lounge, fitness/gym, and mail area on the ground floor and an additional common area and roof deck on the third floor. In addition, each building will include a bike and a trash room.



Source: David Baker Architects, 2025

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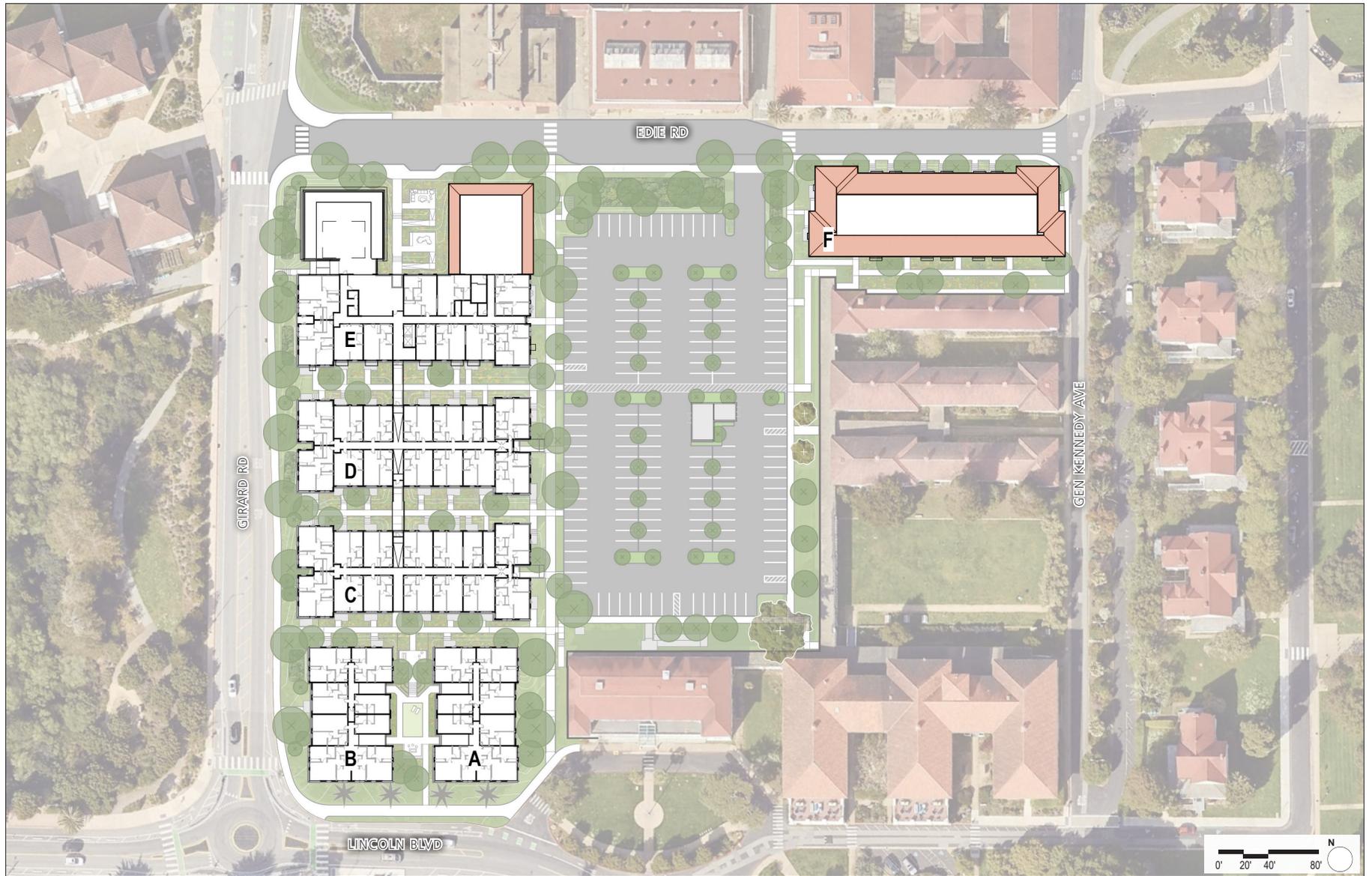
FIGURE 4
Floor Plan — Ground Level



Source: David Baker Architects, 2025

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FIGURE 5
Floor Plan — Level 2



Source: David Baker Architects, 2025

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 6
Floor Plan — Level 3



Source: David Baker Architects, 2025

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FIGURE 7
Site Elevation — Girard Road



Source: David Baker Architects, 2025



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FIGURE 8
Lincoln Boulevard View Northwest — before and after



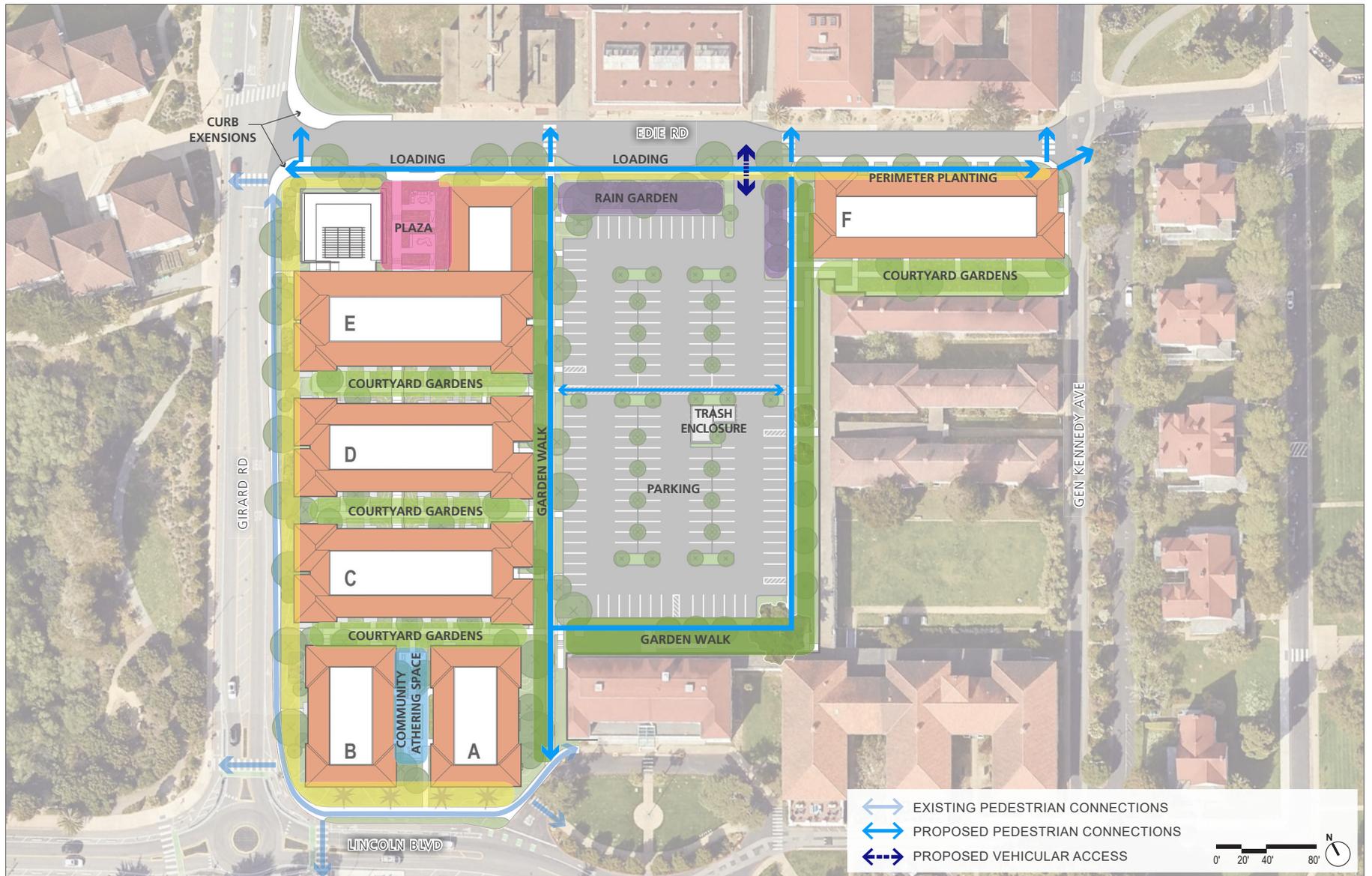
Source: David Baker Architects, 2025



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FIGURE 9

Girard Road View Northeast — before and after



Source: The Presidio Trust, 2025

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 10
Landscape and Site Circulation

**TABLE 2
PROPOSED BUILDINGS**

Building No.	Square Feet¹	Stories	Dwelling Units
Building A	13,247	2	17
Building B	14,460	2	18
Building C	32,762	3	42
Building D	32,858	3	42
Building E ²	45,825	3	46
Building F	20,599	2	31
Total³	159,752		196

Notes:

1. Square footages are calculated using the Presidio Building Envelope Gross Area methodology.
2. Building E includes 9,866 square feet of common areas and amenities for the overall development.
3. Numbers may not add to total due to rounding.

Source: David Baker Architects 2025

**TABLE 3
DWELLING UNITS – TYPE, NUMBER, AND PERCENTAGE**

Unit Type	Existing Parkwide		Proposed Project		Parkwide with Project	
	Number	Percent	Number	Percent	Number	Percent
SRO/Dorm ¹	127	9	0	0	127	8
Studio	0	0	34	17	34	2
1 Bedroom	127	9	93	47	220	14
2 Bedroom	277	20	69	35	346	22
3 Bedroom	489	35	0	0	489	31
4 Bedroom	327	24	0	0	327	21
5+ Bedroom	34	2	0	0	34	2
Total²	1,381	100	196	100	1,577	100

Notes:

1. As part of a separate project, 63 SRO/Dorms in Building 1028 have been approved for demolition.
2. Percentages may not add up to 100 due to rounding.

Source: Data compiled by the Trust in 2026.

The buildings will be rectangular and oriented parallel or perpendicular to surrounding roadways and buildings to reinforce the site's historic context. Their design will be simple and functional, reflecting the tradition of military architecture characteristic of Letterman and throughout the Presidio.

The material palate will include Presidio white-painted, fiber-cement siding, thin brick and storefront elements at the lobby building, and painted concrete at the foundations. Roof materials will include red shingle and/or tile, with built-up roofs at mechanical wells. The buildings will include a combination of hipped and gable roof forms, overhanging eaves, and divided windows.

The project will include modifying the existing stairs that extend west from Building 1016 near proposed Building A and the stairs that extend north from Building 1007 near proposed Building F. In both locations, part or all of the non-historic exit stairs will be removed and rebuilt so that stairs connect to new or rebuilt walkways. This may include removing the current attachment of the non-historic stairs to the existing historic buildings and attaching a new stair in generally the same location. All residential buildings and project site circulation routes will meet Federal Architectural Barrier Act standards. Sidewalks, crosswalks, curb ramps and other elements within the public right-of-way will comply with the Public Right-of-Way Accessibility Guidelines, under the Architectural Barriers Act and Americans with Disabilities Act.

New construction will be designed to achieve a minimum LEED Homes Gold rating. Some LEED measures include waste diversion during construction, all-electric buildings that meet Title 24/LEED energy-efficiency requirements, locally sourced materials, tenant education programs, concrete embodied carbon analysis, installation of ENERGY STAR appliances, compliance with minimum indoor air quality requirements, and the exclusion of invasive plants.

All buildings are proposed as Type V wood-framed construction with slab-on-grade systems and approximately 30-inch-deep perimeter grade-beam foundations. Common amenity spaces will incorporate a combination of concrete, steel, and wood-framed construction.

2.1.2 Vehicular Access and Parking

The roadways that surround the project site—Lincoln Boulevard, Girard Road, Edie Road, and General Kennedy Avenue—will continue to provide access to the site. The south side of Edie Road will be modified to include curbside loading and parallel parking areas with bump-outs in between to calm traffic and provide planting areas. The intersection of Girard and Edie roads will be improved with new bulb-outs,⁴ crosswalks, curbs, and sidewalks. The intersection of General Kennedy Avenue and Edie Road will be improved with crosswalks, curbs, and sidewalks. The other roadways will not be changed.

The existing parking lot in the center of the site will provide primary parking for the project. The parking lot will be redesigned to include a single point of entry on Edie Road, and the number of parking spaces will be reduced from 205 to 172. Eighteen electric vehicle (EV) parking spaces and 69 EV-ready parking spaces will be included. All parking spaces are non-exclusive and available for use by tenants and the general public for a fee. Improvements to the parking lot will include resurfacing and restriping, as well as vegetated stormwater capture areas and trees. A trash enclosure will be sited near the center of the lot.

2.1.3 Pedestrian Circulation and Landscaping

Existing sidewalks surround the project site. However, the sidewalk along Edie Road does not extend adjacent to the existing parking lots. Sidewalks will be extended across the site and

⁴ *Bulb-outs*, also known as curb extensions, enhance pedestrian safety by narrowing the roadway and enhancing visibility.

enhanced as part of the proposed project. Pedestrian pathways will be provided between buildings and adjacent to the parking lot (Figure 10).

The project will include new landscape vegetation along roadway frontages as well as within the areas between and surrounding the residential buildings. The landscape will be drought tolerant, will include native plants, and will be designed with consideration for both existing and historic plant palettes. The landscape design will be subject to the Vegetation Management Plan (Trust 2001), the Guidelines (Trust 2024), the Landscape Plant Selection List, and the Presidio Trust Design Review process.

The project will include street furniture and lighting that will be subject to the Presidio Site Furnishing Guidelines (Trust 2020), the Outdoor Lighting Policy (Trust 2020) and the Presidio Trust Design Review process.

2.1.4 Utilities

Existing utilities (e.g., water, wastewater, stormwater, electrical) surround and cut across the project site. To accommodate the proposed project, the utilities will be modified as follows:

- *Water:* Construction of water laterals for domestic, irrigation, and fire water to service each building from the adjacent water distribution system.
- *Sewer:* Construction of sewer laterals from each building to the adjacent sewer distribution system.
- *Storm Drainage:* Construction of bioretention areas and storm drainage pipes that will extend across the site and connect to the adjacent system.
- *Electrical:* Construction of new connections to the adjacent system, transformers, and vehicle chargers.

2.1.5 Site Work

The project site slopes downward to the north, with the Edie Road side sitting approximately 20 feet lower in elevation than the Lincoln Boulevard side (see Figure 7). The buildings are stepped down the site, reducing the need for cut-and-fill while providing accessible routes. Approximately 9,380 cubic yards of soil will be cut from the site to address the elevation change and accommodate subsurface utility lines and building foundations. Of this amount, approximately 4,500 cubic yards will be reused on-site for fill, while an estimated 4,880 cubic yards will be exported off-site for re-use or disposal.

2.1.6 Project Schedule

As discussed previously, Buildings 1027 and 1028 will be demolished under a separate project (25-033). Once project 25-033 is completed, the proposed project will be constructed in a single phase. Site preparation is expected to begin in summer 2027, followed by full construction in fall 2027. Project completion is anticipated between winter 2028 and 2029.

2.1.7 No Action Alternative

The No Action Alternative would include 159,752 square feet of new construction in six buildings—the same square footage, building configurations, and heights as the proposed project. However, this alternative would only include 152 dwelling units, consistent with the maximum number of dwelling units considered in the PTMP EIS for the Letterman District. This alternative would have larger dwelling units, but 44 fewer dwelling units than the proposed project.

2.1.8 Mixed-Use Alternative

The Mixed-Use Alternative would include 159,752 square feet of new construction in six buildings—the same square footage, building configurations, and heights as the proposed project. However, this alternative would only include 152 dwelling units, consistent with the maximum number of dwelling units considered in the PTMP EIS for the Letterman District. This alternative would have 44 fewer dwelling units than the proposed project; however, the dwelling units would be the same size as those in the proposed project. The balance of the square footage, approximately 30,000 square feet, would be for commercial use.

Similar to the proposed project, a mixed-use project would be consistent with the PTMP’s vision for the Letterman District, which describes it as, “[T]he Letterman District is the most urban of the planning districts and has a long history of intensive land use and development. It will continue to be a compact, mixed-use office and residential area with support services, visitor amenities, and transit access.”

2.1.9 Alternatives Eliminated from Further Consideration

The Trust has considered, but is not pursuing, the following alternatives:

All-Commercial Use Project. At the present time, commercial vacancy rates are high across the San Francisco Bay Area (Bay Area), and a commercial project would not meet the Trust’s financial goals. In addition, there are other areas of the park, with existing structures, including Fort Scott, where commercial uses are prioritized.

Underground Parking. Underground parking would increase the project cost by approximately \$13.76 million (assuming \$80,000⁵ times 172 parking spaces). This does not account for additional soil remediation work that may be required, and it does not account for groundwater mitigation and management for an underground structure. This additional project cost would not be offset by any historic or visual benefits and would render the project financially infeasible.

The proposed project will not foreclose the possibility of constructing underground parking in the future, and the project will include improvements to the existing parking lot that will enhance the landscape character of the area. The improvements include incorporation of vegetation, bioswales, pathways, centralized trash management, and perimeter planting upgrades.

⁵ This rate was determined by using the Parking Database at <https://database.greentrip.org/>.

SECTION 3

Affected Environment and Environmental Consequences

The National Environmental Policy Act (NEPA) requires that documents address the environmental impacts of a proposed federal action and any adverse environmental effects that cannot be avoided should the project be implemented. This chapter describes the existing environment and the environmental impacts associated with the Proposed Action, No Action, and Mixed-Use alternatives.

A notice of intent (NOI) to prepare an EA, Invitation to Participate and Comment was circulated from November 3 to December 8, 2025. The NOI was circulated to agencies and the public (see Section 4), with the objective of “meaningfully informing the consideration of environmental effects and the resulting decision on how to proceed, as well as eliminating from further study non-substantive issues.” The NOI noted that the EA will address key topics such as historic resources and transportation and circulation, presented in Sections 3.1.1 and 3.1.2. The NOI also noted that all other environmental issues will likely be summarized in a section titled “Resource Issues Considered but Dismissed from Further Analysis,” provided in Section 3.2.

3.1 Resource Issues Retained for Further Analysis

Historic resources and traffic and circulation are analyzed below, including descriptions of the affected environment and the associated environmental consequences. The analysis incorporates and references the PTMP EIS, along with any applicable project conditions of approval.

3.1.1 Historic Resources

Affected Environment

History and Summary of Changes Over Time

The U.S. Army constructed a general hospital on the present-day project site starting in 1898 to provide long-term and specialized care to soldiers returning from deployment for the Spanish-American and Philippine-American Wars. Over time it also provided care to military families and veterans across the Bay Area, as well as functioning as a training hub for doctors, nurses, and medical technicians. Named in 1911 for Major Jonathan Letterman, medical director of the Army of the Potomac during the Civil War, the complex has seen continued construction and changes through to the present day. Serving as a medical care facility for almost 100 years, its history is intertwined with the military history of the U.S. See Figure 11, *Historic Images of South and West of Letterman Hospital*.



Buildings 1017, 1016, 1014, 1013 looking northeast from Lincoln Blvd. ca. 1910

Source: *OpenSFHistory / wnp26.583.jpg*



Looking north on Girard Road from Lincoln Blvd ca. 1920, former Building 1019 to the right 1910

Source: *National Library of Medicine*

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 11

Historic Images of South and West of Letterman Hospital

Within the Army's system of general hospitals, Letterman gained renown for the state of its medical arts and was, for a time, among the largest hospitals in the country. Letterman boasts early innovations in orthopedic and physical therapy, created the first Army psychiatric wards, and was one of the first Army hospitals to employ nurses from the Army Nurse Corps (and thereby became one of the first places where women served in the armed forces). In 1906, the hospital provided relief to the City of San Francisco during the earthquake and subsequent fires. Earthquake victims were welcomed into the Army's hospital as the city's hospitals went up in flames, expanding with temporary facilities to handle the displaced and sick. It reached its peak of activity during World War II, when it received 73,000 patients in 1945 alone. The buildings along Edie Road, Thornburgh Road, and Gorgas Avenue (north of and outside the project site) have ties to this distinctive history, as well as to the more mundane side of hospital life such as growing food, doing the laundry, storing hospital supplies, and the generation of heat.

In the late 1960s, after construction of the Letterman Army Medical Center (LAMC) General Hospital to the east of the historic hospital core, the Army developed a plan to demolish the old hospital in its entirety. After tearing down about a quarter of the historic complex and constructing a new concrete nurses' dormitory and an associated building (Buildings 1027 and 1028, both built in 1976), the Army changed course and paused its demolition plans. Although they kept the remaining historic buildings, they became the "back of house" area for the hospital while the core activities shifted to the LAMC structure. In the twilight of its tenure at the Presidio, the Army removed the early 20th century Nurse's Dormitory (Buildings 1020, 1022, 1024, 1026) on the west side of Girard Road, further eroding the hospital complex.

In 1993, the NPS determined that the former Letterman General Hospital complex and its remaining late nineteenth and early twentieth century buildings were contributors to the updated Presidio of San Francisco National Historic Landmark District inventory. However, when the NPS took over the Presidio from the Army in 1994, the historic Letterman Hospital was in a state of serious disrepair. Long vacant and without heat, the core buildings of the hospital, including the administration building (Building 1016) and the remaining wards were highly dilapidated. The NPS removed an additional building from the early 20th century hospital complex, a lab (Building 1006), due to its deteriorated condition.

The NPS, while still evolving its General Management Plan for the Presidio, began the process of rehabilitating Letterman through its Historic Leasing Program. In partnership with a developer (Equity Community Builders) and a tenant (the Tides Foundation), the three parties completed an award-winning rehabilitation of the remaining historic hospital buildings using Federal Historic Preservation Tax Credits. The Tides Foundation formed the Thoreau Center for Sustainability (now known as Tides Converge) to occupy the buildings, which remains the master tenant to the present.

When the Presidio Trust took over operations of Area B of the Presidio from the NPS in 1998, its first big project was also at Letterman. Concluding that the 1964 LAMC General Hospital and the 1971 Letterman Army Institute of Research (LAIR) facilities were out of date for medical use and seismically unsound, the 23-acre site on which they stood (east of and outside the current project site) was offered as a ground lease. Lucasfilm Limited was selected to develop the site

for a Digital Arts campus, demolishing the two concrete facilities and building four new office buildings and associated landscaping.

The next major event impacting the project site was Caltrans and Federal Highways Administration (FHWA)'s replacement of the seismically and functionally obsolete Doyle Drive with the Presidio Parkway. This long-planned, multi-agency effort reconfigured the western edge of the project site by widening and extending Girard Avenue, creating a new freeway access point at Girard Avenue and Gorgas Avenue, and expanding the Edie Road/Girard Avenue intersection. Caltrans/FHWA completed the freeway portions of the project by 2015 and installed new landscaping along Girard, at the west edge of the project site, by 2021.

In 2019 the Trust completed the rehabilitation of the NHLD-contributing Gorgas Avenue Warehouses (Buildings 1160-1163, 1167, 1169, 1170) at the northern edge of the Letterman district, leaving the nine buildings north of the project site (known as the Thornburgh sub-district), as the last remaining unrehabilitated, unoccupied historic buildings in the former Letterman Hospital complex.

In 2025, the Trust finalized plans for the removal of the two non-historic, vacant buildings on the site of the Letterman Residential project (Buildings 1027 and 1028). Both buildings were aged and functionally obsolete assets that posed long-term financial, operational, and safety challenges. Post-demolition, the site will be graded and stabilized to avoid erosion and allow for interim public access.⁶

Historic Architecture and Cultural Landscape

Construction of the initial Letterman General Hospital complex concluded in 1902. The Army designed the original hospital as a 300-bed pavilion style facility with buildings, including wards, administrative buildings, kitchen and mess halls arranged symmetrically around a centrally planted quadrangle. By 1904, additional construction included an operating pavilion in the center of the quadrangle, the powerhouse, a laundry facility, two officers' residences, and additional barracks wards on and around the project site.

Letterman was part of a grand tradition in hospital design whereby the physical design of the facility reflected current thinking in medical treatment and functions. The pavilion plan allowed for separate hospital wards for separate disease types. The wards, operating rooms, and other hospital functions were linked by one-story corridors (originally open, later glazed) which allowed easy movement of patients and maximized light and air circulation throughout the hospital, providing all the spaces with views out to beautifully landscaped grounds. See Figure 12, *Historic Images of North and Courtyard of Letterman Hospital*.

⁶ For the purposes of the Section 106 consultation on the Letterman Residential Project, the entire PTMP Letterman Planning district serves as the Area of Potential Effect (APE). This accounts for the description of the site history including areas outside of the project site.



Edie Road looking east from Girard at the north edge of the project site, 1916

Source: National Archives & Records Administration



Medal ceremony at Letterman's lushly landscaped grounds, 1943

Source: Acme Photo

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 12

Historic Images of North and Courtyard of Letterman Hospital

Together, the grouping of buildings and associated landscapes create Letterman's distinct urban and landscape character, visible in the following extant (character defining) features:

- Building complexes were created by linking smaller buildings together. Breezeways and enclosed galleries provided the linking devices. A system of courtyards and planted landscapes were defined by building edges. Today, the spaces between the former ward buildings and the central parking lot of Tides Connect are evidence of this.
- Most of the buildings are very plain, with little applied decoration. They are simple, straightforward buildings.
- Throughout the Letterman Complex, building form is determined by function. Considerable variety is evident in building shape and size because of the broad mix of functions housed in the buildings.
- There is a broad range of building types in the Letterman Complex, ranging from residential, administrative, and medical to service buildings and warehouses. However, similar building types are grouped together by use, creating distinct clusters within the district.
- Architectural detail and materials are used to differentiate the ceremonial public buildings from the service and functional buildings. Architectural detail and decorative features are used sparingly.
- Buildings are typically very long and thin with tall floor-to-floor heights, resulting in distinctive proportions.
- A basement story is often clearly visible. Because of the slope of the site, the basement story is often fully above ground, at least on one side of the building.
- Fenestration is characterized by tall, thin windows, which are used singly, in repetitive "punched openings" (as is seen in a hospital ward building) or grouped together to create large expanses of glazing (as is seen on galleries and laundry building).
- Building elevations are highly regular in organization. The placement of window and door openings is carefully laid out according to symmetry and geometric regularity.
- Buildings have overhanging eaves. Frequently, the eave line of a building contains decorative architectural elements.
- Consistent use of white paint and red roofs tie the district together visually.

The designed landscape provides a rich cultural context and a sense of place and historically consisted mainly of small formal open spaces with ornamental plantings and formally planted streets.

Historic resources within and around the project site have already been substantially altered by Army-era, NPS, and Trust projects over the past 60 years. Minimizing further alterations to these remnant character defining features and ensuring compatibility of new elements will be essential to avoiding impacts to the historic resources of the Letterman District and the NHLD as a whole.

Environmental Consequences

Would the Letterman Residential Project adversely affect any historic buildings or landscape features or the Presidio NHL district?

Project Details

Historically, the Letterman General Hospital complex formed an independent post within the larger Presidio, consisting of medical treatment, laboratory, administrative, light-industrial and residential buildings, along with associated ornamental landscapes. The proposed project will construct 196 new residential units in six buildings on the west and north edges of the original hospital quadrangle. The 159,752 square feet of new construction will consist of three two-story stand-alone walk-up buildings with 17 to 31 units per building, and three three-story buildings connected via bridges at levels two and three, with 42 to 46 units per building (see Figures 4 through 7). At the northwest corner of the project site, Building E will include approximately 9,866 square feet of common areas and amenities for the overall development. Two-story buildings would have a maximum height of 30 feet and three-story buildings would have a maximum height of 45 feet.

The historic roadways that surround the project site - Lincoln Boulevard, Girard Road, Edie Road, and General Kennedy Avenue, will continue to provide access to the site. The south side of Edie Road will be modified to include a curbside loading area and a parallel parking area with bump outs in between to calm traffic and provide planting areas. The intersection of Girard and Edie Roads (already altered by the Doyle Drive project) will be improved with new bulb outs, crosswalks, curbs and sidewalks. The intersection of General Kennedy Avenue and Edie Road will be improved with crosswalks, curbs and sidewalks. The other roadways will not be changed.

Primary parking for the site is provided in the existing parking lot in the center of the site (the former landscaped courtyard for the hospital complex). The parking lot will be redesigned to include a single point of entry on Edie Road, and the number of parking spaces will be reduced from 205 to 172. Improvements to the parking lot will include resurfacing and restriping, as well as vegetated stormwater capture areas and trees. A trash enclosure will be sited near the center of the lot.

The ornamental landscaping currently at the south edge of the site, along Lincoln Boulevard and the existing historic buildings (Buildings 1016, 1014, 1013, 1012) will extend into the project site, around and between the new buildings. Pathways will be provided between buildings and adjacent to the parking lot (see Figure 10). The project will include new street furniture and lighting standards consistent with current Trust standards and guidelines, and subject to input from the Trust's Design Review process.

Physical Impacts to Individual Buildings

The project will include modifications to the existing, non-historic stairs that extend west from Building 1016 near proposed building A, and the non-historic stairs that extend north from Building 1007 near proposed building F (both added during the 1998 NPS rehabilitation). Otherwise, the project will not directly alter any of the existing historic buildings adjacent to the project site.

Construction activity for the new structures, utilities, landscape and site circulation features will occur adjacent to historic Buildings 1016 and 1007 (at the south and northeast edges of the project site, respectively). The Trust will manage construction activities adjacent to existing historic resources to avoid any inadvertent damage by establishing buffer zones, utilizing construction fencing and implementing general contractor equipment safety best practices. See project conditions of approval, Historic Resources, included in Appendix B.

Project construction will not generate ground borne vibration at levels that could impact adjacent structures. The project will employ standard construction practices/equipment for low-rise buildings with slab-on-grade foundations with relatively shallow footings. The project does not have significant deep excavations; pile driving or other heavy vibration construction methods will not be employed.

PTMP Planning Principles and Development of Design Guidelines

The PTMP includes a maximum amount of demolition and new construction, as well as Concepts and Guidelines for each planning district. The proposed project, and project alternatives, would include 159,752 square feet of new construction on the site, an amount below these thresholds for the Letterman District in the PTMP. The PTMP EIS did not specify the exact location of new construction in the district, but did stipulate that new construction should conform with the PTMP Planning Principles, the Planning District Guidelines, and other, subsequent analysis, to avoid impairing the integrity of the NHLD.

In 2007, the Trust developed the Letterman District Design Guidelines to provide a site specific planning and design framework for the entire range of actions that was to take place in the 37-acre western portion of the Letterman Planning District, known as West Letterman (which includes the project site). In 2024, the Trust developed the West Letterman/Thornburg Design Guidelines, revising and updating the 2007 Guidelines, to reflect completed projects in and around the planning district and to encourage conformance to the Secretary of the Interior's Standards for Rehabilitation to avoid adverse effects to the historic properties of the Presidio. The Trust circulated the updated Design Guidelines for public and agency comment in 2023 and finalized them in February 2024. The 2024 document was instrumental in the development of the current proposal.

The 2024 Design Guidelines reiterate and elaborate on the 2002 PTMP Planning Principles and Design Guidelines for the Letterman Planning District.

2002 Planning Principles

- Re-establish the historic courtyard and connect it with other open spaces and formal landscapes.
- Use new construction to articulate the character and density of the historic district.
- Consider removal of the non-historic dormitories (Building 1028) and replacement with more compatible housing west of the historic hospital complex.*
- Maintain and enhance the pedestrian scale and mixed-use campus setting.

- Retain historic Lombard Gate as the primary, formal entrance to the park.*
- Create a new entrance from Doyle Drive into the park as part of the Doyle Drive reconstruction.*
- Protect and restore Tennessee Hollow.*

2002 Design Guidelines

- Re-establish the historic courtyard and connect it with other open spaces and formal landscapes.
- Use new construction to articulate the character and density of the historic district.
- Enhance pedestrian connections.
- Consider removal of non-historic dormitories (Building 1028) and non-historic garage/storage building (Building 1027) and replacement with more compatible housing west of the historic hospital complex.*
- Maintain and enhance the pedestrian scale and mixed-use campus setting.
- Re-establish the active character of the historic hospital district by rehabilitating the Thornburgh Road/Gorgas Avenue buildings and restoring key open spaces.
- Enhance connections to adjacent planning districts.

The Trust has completed items marked with an * as part of prior projects.

2002 Specific guidelines for buildings and structures:

- Retain and reinforce the fine-grained historic building patterns of the district. New construction should consist of multiple building volumes at a similar scale to the surrounding district rather than one or two monolithic buildings.
- Orient new buildings parallel to the street in keeping with the rhythm and character of historic buildings. Any new building forms should be simple and functional in the tradition of military architecture found at Letterman and throughout the Presidio.
- Ensure that any new buildings or building additions respect the historic building setting, scale, and design principles (e.g., rectangular building arrangements enclosing outdoor courtyards, slender hallways or breezeways between buildings). Scale, height, massing, color, and materials of new construction should be compatible with historic building clusters. Maximum height should be between 30 feet to 45 feet, depending on the location within the site.
- Ensure that infill buildings in the western historic portion of the site respect the edge of the historic former Letterman Hospital courtyard.

The proposed project responds to this guidance by enhancing the existing parking lot with new landscaping, trees and vegetated drainage features, and pedestrian circulation features tying into existing networks. New residential buildings will be oriented to the existing grid and remaining historic buildings to re-establish the historic density of the site lost by the Army-era demolition

of the west and north components of the hospital complex, within square footage caps allowed for the district under PTMP. The compatible, new residential buildings will reinforce the mixed-use character of the district at a scale that will not overwhelm the remaining historic buildings by remaining at or below designated height limits (30 to 45 feet).

West Letterman/Thornburg Design Guidelines

As described above, the Trust updated and expanded design guidelines applicable to the project site to reflect current conditions, and in anticipation of remaining PTMP projects. The West Letterman/Thornburg Design Guidelines include the following guidance for new construction:

- Respect the historic spatial relationships, open spaces, and orientation of the existing historic buildings.
- Maintain a landscaped setback of 15 to 20 feet from the east curb of Girard Road to maintain comfortable pedestrian access (including a sidewalk and plantings), while re-establishing the densely-built character of the historic site.
- Use the layout of buildings formerly on this parcel as a source of inspiration for replacement construction so that it relates to the historic context.
- New construction should complement the existing architectural style, color and material palette of the historic Letterman area.
- The new construction should be of its time and differentiated from the historic buildings, but it must also be compatible with the massing, size, and scale of the surrounding historic buildings.
- Literal copying of historic details or features is not recommended. Contemporary design based on simple massing and elegant proportions will result in a more complementary design strategy than attempting to recreate historic styles.
- The bulk of the new buildings should not be so large as to visually overwhelm the existing buildings, many of which are delicate frame structures.
- Height and location of the infill construction should comply with Figures 29 and 30 [see Figure 13, *Maximum Allowable Heights for New Construction*].
- Respect the similarities that exist among buildings in the distinct clusters that make up the Letterman District.

The proposed project responds to this guidance in terms of building orientation, architectural materials and details, and building heights. The rectangular new buildings are laid out parallel or perpendicular to surrounding roadways and buildings as to reinforce the historic character of the site. New volumes are held back from existing historic buildings and set back from perimeter roadways in a manner consistent with the original layout of the hospital complex, while reestablishing the historic density of the site. The residential buildings feature horizontal lap siding painted Presidio white, painted concrete at the foundations, red shingle and/or tile roofs that recall the remaining Letterman hospital buildings, as well as other early 20th century buildings around the post. Building E features open galleries and narrow brick cladding.



Source: The Presidio Trust, 2023

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 13
Maximum Allowable Heights for New Construction

Overall architectural details gesture toward the hospital's historic features, such as tall narrow windows, hipped and gable roofs, overhanging eaves, and circulation walkways, while using simple contemporary materials that do not mimic their historic inspirations. New buildings will follow height limits and be shorter than neighboring historic buildings, and façade details such as reveals on the east/west elevations, and corresponding articulated roofs, will break up the massing of the east/west oriented buildings so that they relate to the distinctive historic "finger wards" on the east edge of the site. The combined design elements are highly responsive to the design guidelines and will avoid impacts to the historic resources of the Letterman District, while meeting planning objectives in PTMP for re-establishing the historic character of the district that was lost during the later US Army years.

The West Letterman/Thornburg Design Guidelines includes the following direction for landscape and streetscape improvements:

- The decorative, gardenesque landscape of the southern part of Letterman should be preserved or rehabilitated. If new planting is introduced, it should be compatible with existing or historic plant palettes.
- Select street lighting and street furnishings only from the Presidio Landscape Standards. Avoid light pollution and light trespass in designing exterior lighting.
- Consider an incremental approach to moderating the hardscape character of the central parking lot, while retaining necessary parking. Introduce trees and planting to the parking area in a pattern consistent with the historic formal landscape.
- Plant the edges of the central parking lot with ornamentals and trees to soften the hardscape character, consistent with the historic landscaping of the central courtyard area.
- Locate trash storage and collection areas away from public open spaces, road corridors or important landscape features as much as possible. Their size and location should be reviewed with the Presidio waste and salvage coordinator.

The proposed project responds to this guidance with its landscape treatments, plantings and site furnishings. The proposed project includes landscape treatments that will preserve and extend the existing decorative, gardenesque character fronting the southern historic buildings (Buildings 1016, 1014, 1013, 1012), and the ornamental plantings on the east edge of Girard Road into and around the new buildings. Street furnishings will complement those present on adjacent paths and walks, which were selected for their compatibility with and consistency across the historic landscape of the Presidio. The existing parking lot, which replaced the Letterman Hospital's planted courtyard, will remain, enhanced by trees, bioswales and edge planting that will recall its historic character. Other site appurtenances to support the waste management needs of the new residential community and existing office tenants will be organized in a central, consolidated location within the parking lot so as not to detract from the historic landscaped areas at the site's perimeter. Landscaping and site improvements will be highly responsive to design guidance and avoid impacts to the cultural landscape of the Letterman District, while restoring some of the missing landscape character of the site's original design.

The proposed project is affirmatively responsive to and consistent with PTMP Planning Principles and Guidelines. It also substantively follows the updated 2024 Design Guidelines, which were drafted for consistency with the Secretary of the Interior’s Standards for Rehabilitation and to help avoid adverse effects to the historic properties of the Presidio. Therefore, the proposed project is consistent with the Secretary’s Standards, resulting in a new development that is compatible with the character defining features for the district and the NHLD contributing resources in the project area. The consistency of key project elements with established design criteria will enhance the historic qualities and characteristics of the project area and the NHLD as a whole.

The No Action and Mixed-Use alternatives will both include 159,752 square feet of new construction in six buildings - the same square footage, building size, location and configurations, architectural materials and details, and heights as the proposed project. These alternatives will also include the same landscape treatments, plantings and site furnishings as the proposed project. As such, these alternatives are affirmatively responsive to and consistent with PTMP Planning Principles and Guidelines and updated 2024 Design Guidelines, and consistent with the Secretary’s Standards, resulting in a new development that is compatible with the character defining features for the district and the NHLD contributing resources in the project area. The consistency of key project elements with established design criteria will enhance the historic qualities and characteristics of the project area and the NHLD as a whole.

3.1.2 Traffic and Circulation

Affected Environment

The Presidio’s transportation system is a multimodal network serving park visitors, residents, and employees. The roadway system includes primary access corridors, such as Lincoln Boulevard, Presidio Boulevard and Arguello Boulevard, and connects to the San Francisco street network and U.S. 101 by several gates. Existing traffic conditions reflect both park-generated trips and a substantial volume of regional “pass-through” trips, or traveling through the Presidio without stopping.

Today, the park’s transportation network is largely the same as envisioned in the PTMP, however weekday PM peak hour traffic volumes through the Presidio’s gates in 2024 are only 71 percent of the total volume anticipated under the PTMP EIS Final Plan Alternative.⁷ Current weekday daily traffic volume through the park’s gates is 11 percent greater than in 1998, and weekend volumes are about 9 percent less than in 1998.

There have been several changes to the Presidio’s transit options since publication of the PTMP EIS in 2002. The Muni 43 route was extended to the Presidio Transit Center in the Main Post district, and the Muni 30 route was extended on Mason Street to a layover location just east of

⁷ The PTMP EIS included the following alternatives: No Action Alternative (GMPA 2000), Final Plan Alternative, Final Plan Variant, Resource Consolidation Alternative, Sustainable Community Alternative, Cultural Destination Alternative and Minimum Management Alternative. The Final Plan Alternative, also referred to as the preferred alternative and proposed action, was the alternative adopted by the Presidio Trust Board of Directors.

Building 640. The Presidio GO shuttle system, an element of the park’s Transportation Demand Management (TDM) Plan, has two routes, an intrapark route and a route connecting park users with regional transit in downtown San Francisco. Both routes operate daily.

As envisioned in the PTMP, the park’s current pedestrian network includes more sidewalks and trails and bike facility improvements. There are now eight bike share stations within the park and one just outside the Lombard gate.

Since 2002, parking fees were implemented park-wide as a key element of the park’s TDM Plan, and parking supply has been reduced in key areas such as the Main Post to provide more outdoor recreational space.

Current Traffic Conditions

The project site is served by Girard Road, Lincoln Boulevard, and Edie Road, which provide access to local Presidio destinations and U.S. Route 101. Sidewalks, bike lanes, and the Presidio GO Shuttle provide multimodal connectivity.

The Trust collected traffic volumes during the weekday evening peak period (3:30 to 6:30 p.m.) and the Saturday (i.e., weekend) afternoon peak period (1:00 to 5:00 p.m.) at intersections throughout the Presidio, including several around the project site in September and October 2024.⁸ At each intersection, the peak hour of traffic was defined as the one-hour period with the highest traffic volume. Table 4, *Existing Total Intersection Volume Comparison*, compares the total intersection volume during the weekday and weekend peak hours at the four intersections most likely to be affected by the project. In general, the weekend peak hour traffic volumes are within 5 percent of the weekday PM Peak Hour traffic volumes, which is within the typical day-to-day fluctuations.

**TABLE 4
EXISTING TOTAL INTERSECTION VOLUME COMPARISON**

Intersection	Weekday PM Peak Hour	Weekend Peak Hour	Percent Difference
Girard Road/U.S. Route 101 NB Ramps	1,628	1,571	-4%
Girard Road/U.S. Route 101 SB Off-Ramp/Gorgas Avenue	1,486	1,520	+2%
Girard Road/Edie Road	951	901	-5%
Girard Road/ Lincoln Boulevard	1,400	1,421	+1%

Notes: NB = Northbound; SB = Southbound

Source: Fehr & Peers 2026

⁸ Traffic volumes in September are typically higher than those observed during most other times of the year.

Environmental Consequences

Would the Letterman Residential Project substantially increase traffic congestion?

Addition of Project-Generated Traffic

Once constructed, the proposed project will comprise 159,752 square feet of new development. As described in Section 2, the following three alternatives are under consideration: (1) the Proposed Action (proposed project), which will comprise 196 market-rate residential units; (2) the No Action/PTMP Alternative, which will consist of 152 residential units—the maximum number of dwelling units considered in the PTMP for the Letterman District; and (3) a Mixed-Use Alternative, which will consist of 152 residential units, plus approximately 30,000 square feet of commercial space.

Each alternative will reconfigure the central parking lot by consolidating vehicle access to a single driveway on Edie Road, reduce the total parking supply in the project area by 33 spaces (from 960 to 927), and install a sidewalk, curb, and intersection improvements along Edie Road, Girard Road, and General Kennedy Avenue. Each alternative includes substantial pedestrian and bicycle facility upgrades intended to enhance multimodal circulation.

Project-Generated Trips by Mode

Project development under all three alternatives will result in an increase in person trips. Different modes of transportation include automobiles, taxis and transportation network companies (e.g., Uber, Lyft, Waymo), public transportation, walking, and biking. Table 5, *Person Trips by Mode*, shows the mode split estimated from the person-trip generation for the three alternatives using the 2019 Transportation Impact Analysis (TIA) Guidelines methodology and assumptions. Under the proposed project and No Action alternatives, the trip mode with the highest usage is automobile, and under the Mixed-Use Alternative, the trip mode with the highest usage is walking.

**TABLE 5
PERSON TRIPS BY MODE**

Person-Trip Mode	Proposed Project		No Action/PTMP Alternative		Mixed-Use Alternative	
	Daily	PM Peak Hour	Daily	PM Peak Hour	Daily	PM Peak Hour
Auto	464	41	361	32	702	63
Taxi/TNC	42	5	32	3	87	8
Public Transit	231	20	180	16	395	35
Walk	409	36	318	28	817	73
Bike	47	4	36	3	68	6
Total Person Trips	1,193	106	927	82	2,069	185

Note: PTMP = Presidio Trust Management Plan; TNC = transportation network companies

Source: Fehr & Peers 2026

Vehicle Trip Generation

Table 6, *Vehicle Trips by Mode*, shows the weekday daily and PM Peak Hour vehicle trips estimated from the person-trip generated for the three alternatives using the 2019 TIA Guidelines methodology and assumptions.

**TABLE 6
VEHICLE TRIPS BY MODE**

Vehicle Trip Mode ¹	Alternative 1 (Proposed Action)		Alternative 2 (No Action/PTMP Alternative)		Alternative 3 (Mixed-Use)	
	Daily	PM Peak Hour	Daily	PM Peak Hour	Daily	PM Peak Hour
Auto	364	32	283	25	543	49
Taxi/TNC	28	3	22	2	58	5
Total Vehicle Trips	392	35	305	27	601	54

Notes: PTMP = Presidio Trust Management Plan; TNC = transportation network companies

1. Calculated by dividing person trips by average vehicle occupancy (AVO) rates. For this project, the San Francisco Planning 2019 Transportation Impact Analysis Guidelines assumes AVO rates of 1.2 to 1.4, depending on the use and the origin and destination of a trip.

Source: Fehr & Peers 2026

The three alternatives are estimated to generate comparable number of trips on weekends as on weekdays. Commercial uses may have higher trip generation rates during the weekend peak hour than during the weekday peak hour, and office uses generate substantially fewer trips during the weekend peak hour compared to the weekday peak hour. Accordingly, all three alternatives are anticipated to generate similar or fewer vehicle trips during the weekend peak hour compared to the weekday PM Peak Hour.

Table 7, *Trip Generation Summary*, summarizes the person and vehicle trip generation for all three alternatives and compares them to the estimated trip generation for the project site under the Final Plan Alternative as documented in the PTMP EIS. As shown in the table, the proposed project and the No Action Alternative are estimated to generate fewer person and vehicle trips on a daily basis and during the PM Peak Hour than evaluated in the PTMP EIS. The Mixed-Use Alternative is estimated to generate more person and vehicle trips on a daily basis and more person trips on average, but fewer vehicle trips during the PM Peak Hour.

Although the No Action Alternative and the PTMP EIS Final Plan Alternative assume the same number of units, the No Action Alternative generates fewer vehicle trips because vehicle trip generation per household in San Francisco and the Presidio has generally decreased since the preparation of the PTMP EIS as evidenced in the trip generation rates used in this analysis. The decrease in vehicle trip generation rates is primarily the result of increased transit service and expansion of the pedestrian and bike infrastructure.

**TABLE 7
TRIP GENERATION SUMMARY**

Alternative	Total Person Trips (All Modes)		Total Vehicle Trips	
	Weekday Daily	Weekday PM Peak Hour	Weekday Daily	Weekday PM Peak Hour
Proposed Project	1,193	106	392	35
No Action/PTMP Alternative ¹	927	82	305	27
Mixed-Use Alternative ¹	2,069	185	601	54
PTMP EIS Final Plan Alternative (152 units) ²	1,201	174	558	81

Notes: EIS = environmental impact statement; PTMP = Presidio Trust Management Plan

1. See Table 6 for details.

2. The PTMP EIS Final Plan Alternative (152 Units) describes the No Action Alternative describes the predicted trips for the 152 units as analyzed in the PTMP in 2002 prior to the implementation of the Trust's TDM Plan.

Source: Fehr & Peers 2026; Trust 2002b.

Trip Distribution and Trip Assignment

Table 8, *Project Weekday PM Peak Hour Vehicle Trip Distribution*, shows the trips distribution for the three alternatives across the nine San Francisco districts, as well as the East Bay, North Bay, and South Bay for the PM Peak Hour using the 2019 TIA Guidelines methodology and assumptions. This analysis assumes that all project trips will use the driveway or curb space on Edie Road. The PM Peak Hour trips were then assigned to the local streets serving the project site based on the trip distribution shown in Table 8.

**TABLE 8
PROJECT WEEKDAY PM PEAK HOUR VEHICLE TRIP DISTRIBUTION**

Geographic Place	Proposed Project	No Action Alternative	Mixed-Use Alternative
Downtown/North Beach	3	3	5
SoMa	1	1	2
Marina/Western Market	15	11	16
Mission/Potrero	1	0	3
Outer Mission/Hills	4	3	5
Bayshore	0	0	0
Richmond	1	1	3
Sunset	1	1	4
Islands	0	0	0
South Bay	5	4	8
East Bay	2	2	5
North Bay	2	2	3
Total	35	28	54

Source: Fehr & Peers 2026

Table 9, *Project Weekday PM Peak Hour Trip Assignment*, shows the resulting estimated number of vehicle trips at the intersections near the project site. The project will add 10 or more weekday PM Peak Hour trips to the following four intersections:

- Girard Road/U.S. Route 101 Northbound Ramps
- Girard Road/Edie Road
- Girard Road/U.S. Route 101 Southbound Off-Ramp/Gorgas Avenue
- Girard Road/Lincoln Boulevard

TABLE 9
PROJECT WEEKDAY PM PEAK HOUR TRIP ASSIGNMENT

Intersection	Proposed Project	No Action Alternative	Mixed-Use Alternative
Girard Road/U.S. Route 101 NB Ramps	13	10	16
Girard Road/U.S. Route 101 SB Off-Ramp/ Gorgas Avenue	15	12	19
Girard Road/Edie Road	28	23	45
Girard Road/Lincoln Boulevard	13	10	26
General Kennedy Avenue/ Edie Road	7	5	9
O'Reilly Avenue/Edie Road	7	5	9

Notes: NB = Northbound; SB = Southbound
Source: Fehr & Peers 2026

Traffic Operations

This section evaluates the project's potential effects on traffic operations in the area by comparing the additional project-generated traffic to the existing volumes at key intersections and evaluating the need for signalization at the existing unsignalized intersections near the project.

Addition of Project-Generated Traffic

Table 10, *Trips Added by the Project and Alternatives Compared to Current Intersection Volumes (Weekday PM Peak Hour)*, compares the additional traffic generated by the project under the three alternatives with the existing traffic volumes at the four intersections most likely to be affected by the project and project alternatives.

At three of the four study intersections, the proposed project and No Action Alternative would increase the total intersection volume during the weekday PM Peak Hour by less than 1 percent, and the Mixed-Use Alternative would increase the intersection volume by less than 5 percent. At the Girard Road/Edie Road intersection, the proposed project and No Action Alternative would increase the total intersection volume during the weekday PM Peak Hour by no more than 3 percent, and the Mixed-Use Alternative would increase the total intersection volume by about 5 percent. These increases are within the typical day-to-day fluctuations in traffic flow, which can be as much as 5 percent. Thus, the intersections are estimated to continue operating similarly to current conditions with the addition of the project-generated traffic under all three alternatives.

TABLE 10
TRIPS ADDED BY THE PROJECT AND ALTERNATIVES COMPARED TO CURRENT INTERSECTION VOLUMES
(WEEKDAY PM PEAK HOUR)

Intersection	Existing Weekday PM Peak Hour	Traffic Added by Project		
		Proposed Project	No Action Alternative	Mixed-Use Alternative
Girard Road/U.S. Route 101 NB Ramps	1,628	13 (0.8%) ¹	10 (0.6%)	16 (1.0%)
Girard Road/U.S. Route 101 SB Off-Ramp/Gorgas Avenue	1,486	15 (1.0%)	12 (0.8%)	19 (1.3%)
Girard Road/Edie Road	951	28 (3.0%)	23 (2.4%)	45 (4.7%)
Girard Road/Lincoln Boulevard	1,400	13 (0.9%)	10 (0.7%)	26 (1.9%)

Notes: NB = Northbound; SB = Southbound
Percent of existing traffic volume
Source: Fehr & Peers 2026

As previously discussed, since the existing weekend peak hour traffic volumes at the four study intersections are similar to the weekday PM Peak Hour traffic volumes, and the project alternatives are estimated to generate similar trips during both the weekday and weekend peak hours, it is estimated that the project will have similar effects on traffic volumes and traffic operations during the weekend peak hour as during the weekday peak hours.

Signal Warrant Analysis

To assess the need for signalization of unsignalized intersections, the *California Manual on Uniform Traffic Control Devices* (MUTCD, 2026) includes eight signal warrants. Generally, meeting one or more of the signal warrants could justify signalization of an intersection. This analysis applies the California MUTCD peak hour vehicular volume warrant (Warrant 3B) for urban conditions to the two unsignalized intersections. The application of the peak hour vehicular volume warrant to each of the two unsignalized study intersections is described as follows:

Girard Road/Edie Road intersection—The intersection is currently all-way stop controlled. The intersection does not meet the peak hour signal warrant under current (2024 volume) conditions and will not meet the warrant with the addition of the project-generated traffic under any of the three alternatives.

Girard Road/Lincoln Boulevard intersection—Using the traffic volume counts collected in September 2024, the intersection, which is controlled by a mini-roundabout, currently meets the peak hour signal warrant and will continue to meet the peak hour signal warrant with the addition of the project-generated traffic under all three alternatives. This finding is consistent with the PTMP EIS Mitigation Measure TR-20, which consists of signalizing the intersection. However, the Trust installed a mini roundabout at the intersection instead because it is more compatible with the historic setting, and reduced vehicle speeds and potential conflict points between vehicles and pedestrians to better align with the overall goals of the Trust. As shown in Table 8, the Proposed Project and No Action Alternative would increase the intersection volume by less than 1 percent, and the Mixed-Use

Alternative would increase the intersection volume by less than 2 percent, which are within the typical day-to-day fluctuations in traffic flow. As a result, the intersection will continue to operate similarly to current conditions.

Conclusion

The analysis of existing conditions, projected travel demand, and circulation characteristics indicates that the Presidio's multimodal transportation network is able to accommodate the trips generated by the proposed project and the project alternatives. Under all three project alternatives, the incremental increase in person and vehicle trips will represent a small proportion of existing travel volumes. At the four most affected intersections, project-related peak hour vehicle additions range from less than 1 percent to approximately 5 percent—levels that fall within normal fluctuations in traffic. As a result, intersection operations are expected to remain similar to existing conditions during both weekday and weekend peak hours.

Signal warrant analysis confirms that the all-way stop at Girard Road/Edie Road will continue to operate adequately and does not require signalization under existing or project conditions. Although the Girard Road/Lincoln Boulevard intersection meets MUTCD peak hour signal warrants, the existing mini-roundabout—installed for safety, speed management, and historic resource compatibility—will continue to provide appropriate operational performance even with added project trips.

Would the Letterman Residential Project adversely affect site, bicycle, or pedestrian circulation?

Proposed Circulation Improvements

The project includes several modifications to the street network surrounding the site, which will improve access and circulation for all travel modes. These improvements, which will be the same under the three alternatives, include:

- Providing continuous sidewalks along the project frontages on Girard Road between Edie Road and Lincoln Boulevard and on Edie Road between Girard Road and General Kennedy Avenue. Currently, Girard Road provides a sidewalk on the east side along the project frontage, and Edie Road does not provide any pedestrian facilities on the south side. The project will provide continuous pedestrian facilities along its frontages, which will be separated from motor vehicle traffic by the existing bike lane on Girard Road and by the proposed parking/loading lane on Edie Road, improving pedestrian access and circulation along the project frontage.
- Reducing the number of curb cuts along Edie Road from four to one, which will reduce the number of conflict points between vehicles entering and exiting the parking lot and vehicles, cyclists, and pedestrians along Edie Road.
- Modifying the south side of Edie Road to accommodate curbside loading, parallel parking, and bump-outs, which will narrow the vehicle travel lanes and calm traffic. The curbside loading and parking will be located near the mail room, common spaces, and most residential units, encouraging most deliveries and passenger loading to use Edie Road and discouraging them from using other streets.

- Modifying the Girard Road/Edie Road intersection to provide bulb-outs and reduce the curb radii on northeast and southeast corners, providing marked crosswalks on all intersection approaches, and installing directional curb ramps for all crosswalks. These improvements will reduce the pedestrian crossing distance and reduce speeds for vehicles turning onto and from Edie Road.
- Modifying the General Kennedy Avenue/Edie Road intersection to reduce the curb radius on the southwest corner of the intersection and stripe a crosswalk on the west approach of the intersection with curb ramps on the west side of the intersection, which will improve pedestrian access at the intersection.

As a separate project, the Trust is exploring upgrades to the existing bicycle facilities on both sides of Girard Road between Edie Road and Lincoln Boulevard. The proposed improvements will convert the current striped bike lanes into separated bike lanes, increasing the buffer between motor vehicles and bicyclists, narrowing the motor vehicle lanes, and preventing motor vehicles from parking or stopping within the bicycle lane.

The Trust's TDM Plan includes several elements to encourage all park residents, employees, and visitors to use transit, walk, and bike rather than drive. These elements include parking fees and a free Presidio GO Shuttle with both an intra-park route and an express route to/from downtown San Francisco. In addition, the proposed project and project alternatives will include bike rooms, unbundled parking, and pedestrian paths through and around the project site.

Conclusion

The project's proposed circulation improvements—including continuous sidewalks, reduced curb cuts, new crosswalks, curb extensions, and enhanced bicycle connections—will provide safety and mobility benefits. These elements, combined with the free Presidio GO Shuttle and broader TDM strategies, will further reduce reliance on private vehicles and improve multimodal access.

Would construction of the Letterman Residential Project adversely affect traffic and circulation?

Construction activities may result in short-term, temporary transportation impacts. The PTMP EIS discusses the short-term impacts of construction traffic on the roadway network due to construction activities throughout the Presidio. The discussion concludes that, because construction vehicle trips traveling to and from the district would be dispersed, the vehicle trips on other regional roadways would not be substantial and will generally fall within the normal fluctuations of traffic.

The PTMP EIS requires adherence to Mitigation Measure TR-23: Construction Traffic Management Plan to adequately mitigate impacts due to construction traffic. This mitigation measure is implemented through the requirement of an encroachment permit (see Appendix B, Construction Management Plan). With implementation of a Construction Management Plan, traffic during construction of the proposed project and project alternatives will be consistent with impacts analyzed under the PTMP EIS, and no further analysis is required.

Parking

The Trust does not consider a lack of parking supply to be a significant environmental impact under NEPA because limited parking supply can encourage increased use of non-automobile travel modes and would not have a direct physical impact on the environment. Nevertheless, this analysis addresses parking supply and demand to inform the public and decision-makers.

Current Parking Conditions

Approximately 960 surface parking spaces are currently provided across multiple lots in the project area. Parking in the project area requires a fee on both weekdays and weekends and most is shared with other nearby park uses.

Because the area is largely occupied by office, educational, and recreational uses, parking demand typically peaks during weekday early afternoon periods and decreases during evenings and weekends. Parking occupancy surveys conducted in April and May 2025 indicate that maximum observed occupancy across the area is approximately 53 percent (509 occupied spaces), leaving 451 available spaces.

Parking Supply and Demand

The project will share the parking supply in the project area with other existing and foreseeable uses. Accordingly, this analysis evaluates parking conditions for the project area as a whole, accounting for the existing parking demand as well as the estimated parking demand generated by foreseeable nearby developments and the three project alternatives. Table 11, *Parking Supply and Weekday Afternoon Parking Demand*, summarizes parking supply, demand, and occupancy under various scenarios. Each element of the parking demand is described below.

Parking will not be included in the rental cost of an apartment. Thus, residents will need to purchase parking permits for each vehicle they own. Separating the cost of parking from housing reduces parking demand by attracting individuals who do not own vehicles and will not want to pay for parking. In addition, and consistent with current conditions in the area, visitors and employees at the project site will need to purchase hourly or daily parking permits.

TABLE 11
PARKING SUPPLY AND WEEKDAY AFTERNOON PARKING DEMAND

Scenario	Parking Supply (spaces)	Maximum Parking Demand (spaces)	Percent Occupancy	Unoccupied Spaces
Existing Conditions	960	509	53%	451
Existing Plus Foreseeable Projects	960	661	69%	299
Existing Plus Foreseeable Projects Plus Proposed Project	927	741	80%	186
Existing Plus Foreseeable Projects Plus No Action Alternative	927	723	78%	204
Existing Plus Foreseeable Projects Plus Mixed-Use Alternative	927	768	83%	159

Source: Based on parking data collected by Presidio Trust in April and May 2025 and summarized by Fehr & Peers (2026).

The project, under all three scenarios, will reconfigure the parking lot at the project site and eliminate 33 parking spaces, which will reduce the total parking supply in the project area to 927 spaces.

The project is estimated to generate parking demand for approximately 62 and 106 parking spaces during the weekday afternoon period, depending on the alternative. Accounting for the reduction in parking supply, the full occupancy of the project is estimated to increase the overall parking occupancy in the project area to 78 to 83 percent, corresponding to 159 to 204 unoccupied parking spaces. Because the overall parking demand in the area is expected to be lower during the weekday evenings/nights and on weekends, adequate parking supply is estimated to be available for project residents during these time periods, and the overall parking occupancy is expected to be below the available parking supply. Unbundled residential parking, paid public parking, and the Presidio's TDM program will continue to moderate automobile demand and support alternative travel modes.

In conclusion, the transportation analysis demonstrates that all project alternatives are consistent with the assumptions, methodologies, and findings of the PTMP EIS. The project will not result in new or more severe transportation impacts beyond those previously disclosed, and the proposed multimodal improvements will further enhance safety and access throughout the project area.

3.2 Resource Issues Considered but Dismissed from Further Analysis

The following resource topics are not considered further for analysis because the associated impacts will be zero, less than, or equal to impacts previously identified in the PTMP EIS.

3.2.1 Archaeology

The Presidio contains archaeological resources associated with thousands of years of precolonial Indigenous occupation, as well as over 200 years of military occupation under Spanish, Mexican, and U.S. control. Over 30 known and predicted archaeological areas have been identified as contributing to the Presidio NHLD.

Precontact archaeological sites at the Presidio do not contribute to the NHLD, because they fall outside of the military period of significance that forms the justification for the landmark designation. Precontact archaeological sites can be considered individually eligible for the National Register of Historic Places. Two known precontact sites are on the Presidio, both of which are outside of the Letterman District.

As discussed in the PTMP EIS, the potential for discovering precontact archaeological resources at the Presidio is high. A Predicted Archaeological Features map, prepared for the National Historic Landmark update in 1993, was developed as a planning tool to guide future investigations and was used in the development of the PTMP EIS. As shown in the 1993 National Historic Landmark update, portions of the project site are located in a delineated area for known or

suspected prehistoric remains resources. However, the “Presidio House” in the Letterman District is the only predicted archaeological feature identified in the PTMP EIS (Trust 2002b).

Since the completion of the PTMP EIS, additional efforts at modeling precontact sensitivity have identified the Letterman Residential Project area of potential effects as an area with very low to no sensitivity for precontact resources. The archaeological sensitivity model predicts the potential location of buried archaeological sites based on environmental factors that make areas hospitable for Indigenous occupation, including proximity to water, slope, and landform stability. Analysis of landform change completed since the PTMP EIS indicates that the entire Letterman Residential Project is within an area of landform that was cut by the U.S. Army. The Presidio Elevation Change Model compares mapped ground surface from 1871 to 2000 and demonstrates that over 5 and up to 15 feet of soil was removed from the Letterman Residential Project site (Trust 2008). This disturbance would have affected any buried archaeological sites and eliminated the potential for archaeological resources to be affected during the proposed project or project alternatives, which have a potential vertical extent of 4–6 feet. A single retaining wall up to 9 feet below current ground surface is proposed but will be in an area of previous ground disturbance (cut). The proposed project excavation has very low potential to affect archaeological resources because any archaeological deposits would have already been removed by the U.S. Army cut.

New construction was considered for this area in the PTMP EIS, and impacts are consistent with the PTMP EIS. Stipulation VII (Archaeology) of the PTPA will be followed to help ensure that any unanticipated archaeological deposits are not affected by the project. Specifically, preparation of an Archaeological Management Assessment, submittal and review of an excavation permit, and implementation of standard discovery protocols. See Appendix B, Resource Protection Measures. With adherence to all applicable conditions of approval, the proposed project and project alternatives will be consistent with impacts analyzed under the PTMP EIS, and no further analysis is required.

3.2.2 Natural Resources

Biological Resources

The Presidio provides a rich diversity of natural resources, many of which represent remnants of historic ecosystems found on the San Francisco Peninsula. Despite its isolation from undeveloped natural habitats, the Presidio is a valuable habitat for a variety of amphibians, reptiles, birds, and mammals, although species diversity is often low.

The project site is within the 2002 PTMP EIS “Landscape Vegetation Management Zone,” which consists of designed landscapes, including ornamental, nonnative, native, and other plant material that contribute to the Presidio’s historic character. The goal of this zone is to preserve and rehabilitate historic landscape vegetation; this area does not include native plant communities. The proposed project and project alternatives will not result in development in designated open space or critical habitat. Consistent with the construction activities analyzed under the PTMP, construction of the proposed project and project alternatives will be restricted to existing developed areas within the Letterman District. Standard conditions of approval regarding tree

protection and nesting bird surveys, included in Appendix B, Resource Protection Measures, will be implemented to help ensure the reduction of effects on wildlife and wildlife habitat.

Several resident and migratory birds could nest within or adjacent to the project site in trees and shrubs. The San Francisco Peninsula is an important migratory stopover for birds along the Pacific Flyway (one of the four major migratory routes in North America). Raptors, songbirds, shorebirds, and waterfowl stopover in the Presidio during their fall and spring migrations as its diverse natural communities offer suitable and attractive habitat for birds to forage and rest along this migration route. The project will install bird safe glazing at the bridges, glass windscreen around the Building E roof deck, and glazing over 24-feet at Building E. Bird safe glazing can be products that are fritted glass, reflect ultraviolet light, are etched, or have a film applied – all methods to break up reflections and make the surface visible to birds.

Impacts of the proposed project and project alternatives will be consistent with the PTMP EIS, and no further analysis will be required.

Water Resources

Approximately 58.5 acres of water features, including wetlands, are on the Presidio as described in the PTMP EIS. However, wetlands or other surface water features are not present on the project site (Trust 2015), and as such, no impacts will occur. The project site is not located in a Federal Emergency Management Act-designated flood hazard zone (EPA 2025).

Groundwater at the Presidio occurs within Colma formation, dunes, bay mud, and artificial fill and Franciscan bedrock; it occurs in both the bedrock and overlying unconsolidated sediments (Trust 2000). Groundwater at the project site is currently mapped as greater than 15 feet below ground surface (Rockridge Geotechnical 2023). The project will not involve the use of groundwater, and it will not affect groundwater. Impacts will be consistent with the PTMP EIS, and no further analysis will be required.

Visual Resources

The Presidio is part of the GGNRA and the National Park system. Under the Presidio Trust Act, Trust is required to manage the Presidio's significant scenic resources in a manner consistent with sound principles of land use planning and management, which protects the Presidio from development and uses that will destroy its scenic beauty and natural character.

The Presidio is both a major visual resource for the Bay Area and offers views of significant visual resources, such as the Golden Gate Bridge and the San Francisco Bay. Views of the San Francisco Bay from the Letterman District were determined to be of importance in the PMTP EIS, including one view in the project area, the view northeast along General Kennedy Avenue. The proposed project and project alternatives include a new two-story residential building at the corner of General Kennedy Avenue and Edie Road, adjacent to the two-story building at 1007 General Kennedy Avenue, and across the street from the two-story building at 1051 Edie Road. This new building will not affect views down General Kennedy Avenue, which currently contains two-story buildings and mature vegetation.

The Presidio is an NHLD and change in the visual character of the park could result in a potential impact. In addition to the PTMP, the Design Guidelines, updated in 2024, also address the proposed project (Trust 2024).⁹ The Design Guidelines include direction on building orientation, architectural materials and details, building heights, landscape treatments, and planting and site furnishing specifications. Proposed project building heights will be constructed in accordance to building height specifications to preserve surrounding viewpoints (See Figure 13). As detailed in Section 3.1.1, *Historic Resources*, the proposed project and all project alternatives substantively follow the Design Guidelines, which were drafted for consistency with the Secretary of the Interior’s Standards for Rehabilitation and to help avoid adverse effects to the historic properties of the Presidio. Therefore, the proposed project and project alternatives are consistent with the Secretary’s standards, resulting in a new development that is compatible with the character-defining features for the district and the NHLD contributing resources in the project area. The consistency of key project elements with established design criteria will enhance the historic qualities and characteristics of the project area and the NHLD as a whole.

Therefore, consistent with the PTMP EIS, the proposed project has the potential for restoring historic views and creating positive visual changes. The proposed project and all alternatives will be consistent with the PTMP EIS, and no further analysis will be required.

Air Quality

The Bay Area Air District (Air District, formerly called the Bay Area Air Quality and Management District) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin.¹⁰ Under the Clean Air Act, the U.S. Environmental Protection Agency has established and continues to update the National Ambient Air Quality Standards for “criteria” air pollutants, including ozone (O₃), carbon monoxide (CO), inhalable particles with diameters that are generally 10 micrometers and smaller (PM₁₀), fine inhalable particles with diameters that are generally 2.5 micrometers and smaller (PM_{2.5}), nitrogen oxides (NO_x), sulfur dioxide (SO₂), and lead. The San Francisco Bay Area Air Basin is designated as either in *attainment* or *unclassified* for most criteria pollutants, with the exception of ozone, PM_{2.5}, and PM₁₀, which are designated as *non-attainment* for either the state or federal standards.¹¹

Consistent with development under the PTMP, the proposed project and project alternatives will involve construction that will require the use of heavy equipment, which will generate fugitive dust particulate matter (PM₁₀ and PM_{2.5}) and emissions of other pollutants described previously.

⁹ The 2024 Guidelines is an update to the 2007 *Letterman District Design Guidelines* as well as the 2000 *Planning and Design Guidelines for New Development and Uses on 23 Acres within the Letterman Complex*. This updated document provides guidelines for remaining projects by incorporating today’s conditions within the Letterman District. The Guidelines can be viewed on the Trust’s website at: <https://presidio.gov/about/presidio-trust/documents/project-documents>.

¹⁰ The Clean Air Act waives sovereignty immunity, requiring federal agencies to comply with state and local air regulation.

¹¹ *Attainment* status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant. *Non-attainment* refers to regions that do not meet federal and/or state standards for a specified criteria pollutant. *Unclassified* refers to regions where there are not enough data to determine the region’s attainment status.

Construction emissions will be intermittent and temporary and will adhere to standard conditions, including Exhaust Measures for Construction Equipment and Vehicles and Dust Prevention and Control Plan (see Appendix B). The proposed project and project alternatives are within the level of construction considered in the PTMP EISs and will implement measures to reduce air quality impacts during construction. As such, impacts during project construction will be consistent with those analyzed under the PTMP EIS and no further analysis is required.

Emissions associated with project operation will primarily result from additional traffic associated with the proposed project. In the PTMP EIS, the total emissions of reactive organic gases (ROG), NO_x, and PM₁₀ due to mobile sources (traffic) under the PTMP were found to be inconsistent with the 2000 Clean Air Plan, adopted on December 20, 2000, by the Air District. However, it was noted that future Clean Air Plan revisions will incorporate the growth expected under PTMP.

Since the publication of the PTMP EIS, the Air District has released the 2017 Clean Air Plan, adopted on April 19, 2017. The primary goals of the 2017 Clean Air Plan are to protect air quality and public health at the regional and local scale and protect the climate by reducing regional criteria air pollutant emissions and reducing local air quality-related health risks (by meeting state and national ambient air quality standards). To meet these goals, the 2017 Clean Air Plan includes 85 control measures aimed at reducing air pollutants in the air basin. These control measures are grouped into the following sectors: stationary (industrial) sources, transportation, energy, buildings, agriculture, natural and working lands, and waste management.

The vast majority of the control measures included in the 2017 Clean Air Plan do not apply directly to the proposed project or project alternative because they target facilities or land uses that do not currently exist and are not proposed by the project applicant (e.g., energy generation, waste management, agricultural, forest or pasture lands); vehicles or equipment that will not be employed in the project area (e.g., airplanes, farming equipment); and/or involve rulemaking or other actions under the jurisdiction of agencies not directly involved with design and approval of the project and its related actions. In addition, 40 of these measures address stationary sources (such as oil refineries and cement kilns, and large boilers used in commercial and industrial facilities) and will be implemented by the air district using its permit authority and are therefore not suited to implementation through local planning efforts. However, the project will include features, either by design, required as part of compliance with regulations, that support implementation of stationary-, energy-, and building-related measures included in the 2017 Clean Air Plan. Table 12 provides a consistency analysis of the project with applicable control measures of the 2017 Clean Air Plan. As indicated below, the project will not hinder, or delay implementation of any applicable control measures contained in the 2017 Clean Air Plan. Therefore, the project will be considered to support the primary goals of the 2017 Clean Air Plan, and the proposed project and project alternatives will have a less than significant impact than the impacts analyzed in the PTMP EIS, and no further analysis is required.

TABLE 12
CONSISTENCY WITH POTENTIALLY APPLICABLE CONTROL MEASURES IN 2017 CLEAN AIR PLAN

Control Measure	Description	Consistency Analysis
Stationary Source Control Measures		
SS21: New Source Review for Air Toxics	SS21 addresses air toxics emissions through BAAD Rule 2-5, New Source Review of Toxic Air Contaminants.	Consistent. No stationary sources are associated with the proposed project.
SS32: Emergency Backup Generators	SS32 will reduce emissions of DPM, TACs, and criteria pollutants from emergency backup generators by enforcing Rule 11- 18, resulting in reduced health risks to impacted individuals. This measure will also have climate protection benefits through reducing GHG emissions.	Consistent. No stationary sources are associated with the proposed project.
SS36: PM from Trackout	SS36 developed Regulation 6, Particulate Matter; Rule 6: Trackout (Rule 6-6) to address mud and dirt that can be "tracked out" from construction sites, bulk material storage, and disturbed surfaces onto public paved roads where vehicle traffic will pulverize the mud and dirt into fine particles and entrain them into the air.	Consistent. Construction activities associated with the project will implement BMPs required by the air district, which will reduce fugitive dust emissions and trackout of PM from construction areas; see Appendix B, Resource Protection Measures.
SS38 Fugitive Dust	SS38 reduces particulate matter (PM ₁₀ and PM _{2.5}) fugitive dust emissions from traffic and other operations on construction sites, large, disturbed surfaces, and other sources of fugitive PM emissions.	Consistent. project construction activities will implement dust control BMPs required by the air district. This will reduce fugitive dust emissions from construction areas; see Appendix B, Resource Protection Measures.
Energy Control Measures		
EN1: Decarbonize Electricity Production	EN1 focuses on lowering carbon emissions by switching the fuel sources used in electricity generation. The measure would promote and expedite a transition away from fossil fuels used in electricity generation (i.e., natural gas) to a greater reliance on renewable energy sources (e.g., wind, solar). In addition, this measure would promote an increase in cogeneration, which results in useful heat in addition to electricity generation from a single fuel source.	Consistent. The project is proposed development with no natural gas infrastructure.
Building Control Measures		
BL1: Green Buildings	BL1 is focused on identifying energy related improvements in school districts and finding ways to effectively implement CAL Green (Title 24) building energy codes.	Consistent. The project will meet Title 24 and LEED energy efficiency requirements.
BL2: Decarbonize Buildings	Control Measure BL2 seeks to reduce GHG emissions, criteria pollutants and TACs by limiting the installation of space- and water-heating systems and appliances powered by fossil fuels. This measure is to be implemented by developing model policies for local governments that support low- and zero-carbon technologies as well as potentially developing a rule limiting the sale of natural-gas furnaces and water heaters.	Consistent. The Project is proposed development with no natural gas infrastructure.
Waste Management Control Measures		
WA4: Recycling and Waste Reduction	WA4 is focused on developing, identifying, and promoting model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects	Consistent. The project will include waste diversion during construction to meet LEED standards.

Source: BAAQMD 2017; Compiled by ESA in 2026

The proposed project and the No Action Alternative will generate fewer vehicle trips than the PTMP EIS Final Plan Alternative (see Section 3.1.2, *Traffic and Circulation*). Although the Mixed-Use Alternative is estimated to generate more average person and vehicle trips on a daily basis, it will generate fewer person trips during the AM peak hour and fewer vehicle trips during the PM Peak Hour compared to the PTMP EIS Final Plan Alternative. Although there will be a slight increase in average daily trips for the project area relative to what was analyzed in the PTMP EIS Final Plan Alternative, the mixed-use alternative increase in trip generation will represent a small fraction of total trips that were analyzed in the PTMP EIS Final Plan Alternative.

In addition, since adoption of the PTMP, multiple TDM strategies have been implemented across the Presidio, including the Presidio Transit Center, Presidio GO shuttles, bicycle share, paid parking, and improved bicycle and pedestrian paths, which have reduced the need for Presidio residents and visitors to rely on personal motor vehicles and reduced the associated emissions. Therefore, the proposed project and project alternatives will be consistent with impacts analyzed in the PTMP EIS, and no further analysis is required.

Noise

As discussed in the PTMP EIS, traffic on the roadways of the Presidio is the major source of environmental noise. Certain areas, primarily centered around the Presidio's natural resources (such as Lobos Creek) were determined to be noise-sensitive, and therefore will be required to be buffered from additional noise sources such as traffic.

Both construction and traffic noise were analyzed in the PTMP EIS. The scale of construction required for the proposed project and all project alternatives is consistent with that considered in the PTMP EIS. Similarly, construction will adhere to standard conditions, including development and implementation of a Noise Suppression Plan, time restrictions for performing work, as well as community notification (see Appendix B). As such, potential construction noise impacts will be consistent with those analyzed under the PTMP EIS and no further analysis is required.

Traffic on the major highways and internal roadways of the Presidio is the primary existing permanent source of noise in the Presidio. As described in the PTMP EIS, there would be an increase in projected vehicle trips and associated traffic noise, and certain sensitive areas within the Presidio could be adversely affected. The Letterman District was determined not to be in a noise-sensitive area of the Presidio; however, increased traffic noise could be noticeable at portions of the San Francisco National Cemetery and the World War II Memorial on Kobbe at Lincoln. The Proposed Project and the No Action Alternative will generate fewer vehicle trips than the PTMP EIS Final Plan Alternative, (see Section 3.1.2, *Traffic and Circulation*), and impacts will be consistent with those analyzed under the PTMP EIS; therefore, no further analysis is required.

The Mixed-Use Alternative is estimated to generate more person and vehicle trips on a daily basis and more person trips during the PM Peak Hour but fewer vehicle trips during the PM Peak Hour than the PTMP EIS Final Plan Alternative. According to the U.S. Department of Transportation's guidance, doubling traffic volume results in an approximate 3 decibels increase in sound level, which is a difference considered to be perceptible (U.S. Department of

Transportation 2017). Because the Mixed-Use Alternative is assumed to generate approximately 7 percent more weekday daily vehicle trips and one-third fewer weekday PM Peak Hour vehicle trips, its traffic-related noise will fall below this threshold. Therefore, the noise impacts will not substantially differ from those analyzed under the PTMP EIS, and no further analysis is required.

The project and all project alternatives will adhere to all noise standards for interior spaces included in Title 24 of the California Code of Regulations (California Noise Insulation Standards). An acoustical basis of design has identified noise levels at the building façades along adjacent roadways and determined preliminary window ratings for each level along those façades. The acoustical basis of design additionally provided guidance for noise control and recommended continued analysis of expected sound levels in and adjacent to the property line. The Trust will enforce the noise insulation requirements equivalent to the standards of Title 24 during the building design phase. Impacts will be consistent with the PTMP EIS, and no further analysis is required.

3.2.3 The Community

Land Use

The PTMP EIS characterized the Presidio's land use pattern as mostly suburban and less intense than the neighboring areas of San Francisco. However, the pattern is diverse, consisting of seven distinct planning districts, with a range of uses and development character.

The proposed project is located in the Letterman District, which offers a mix of office and residential uses, as well as support services. Land uses on the project site at the time the NOI was published (November 3, 2025) included vacant residential buildings, office, storage, surface parking, and landscape vegetation. As part of a separate project, a vacant residential building and the office/storage building on-site were approved for demolition. Surrounding land uses include the following:

- South and East—Primarily office with restaurant and art gallery uses (Tides Converge).
- North—Vacant buildings across Edie Road.
- West—Open space (native plant community) and residential (Swords to Plowshares) across Girard Road.

As described in the PTMP EIS, the Letterman Planning District will allow for some infill construction while retaining its primarily office land-use orientation with some residential and support services. The proposed project and alternatives will not change the existing land uses in the Letterman District. Given that residential land uses were envisioned for the district, there will be no substantial conflicts with adjacent land uses. Therefore, potential impacts will be consistent with the PTMP EIS, and no further analysis is required.

Socioeconomic Issues/Housing Supply

The PTMP EIS analyzed socioeconomic issues and housing supply through a “jobs/housing balance,” which aims to strike a balance between the number of households and the number of

jobs in an area to support a healthy housing market. Other benefits can also result, such as shorter commutes for residents and a reduction in traffic congestion.

The PTMP EIS jobs/housing analysis was conducted for the Presidio as a whole, as opposed to by district. The proposed project includes 196 dwelling units, which is 44 more dwelling units than what was considered for the Letterman District in the PTMP EIS, but 71 fewer dwelling units than what was considered parkwide. As shown in Table 41c of the PTMP EIS, the Final Plan Alternative will introduce a total of 1,295 dwelling units, meeting 42 percent of new housing demand, 29 percent of total demand, and 87 percent of Presidio-based demand. The Final Plan Alternative achieves the highest jobs/housing balance ratio of all alternatives analyzed in the PTMP EIS. Although employment and housing stock projections have changed since the development of the PTMP EIS, the additional housing proposed under the proposed project will serve to meet additional housing demand in the Presidio.

The PTMP EIS included Mitigation Measure CO-2: *Jobs/Housing Balance Monitoring*, that directs the Trust to conduct ongoing review of housing demand, occupancy, and unit mix, and demonstrate progress toward the job/housing balance. To that end, the proposed project and project alternatives will consist of market-rate studio, 1-bedroom, and 2-bedroom housing units. Currently, most of the housing units in the Presidio are 3- and 4-bedrooms (see Table 3). People who work full-time in the Presidio get preference for housing, supporting the Trust's goal of reducing traffic and encouraging a strong live-work community.

The Trust continues to provide housing at a range of income levels and offers single room occupancy units at 41 Moraga Avenue in the Presidio to full-time Presidio-based employees with an income below 100 percent of the area median income. The Trust also offers housing for low-income veterans through a below-market lease to Swords to Plowshares, which provides permanent supportive housing for 108 formerly unhoused veterans. Given that the proposed project and project alternatives will continue to support the Presidio's housing objectives, potential impacts will be consistent with the PTMP EIS, and no further analysis is required.

Schools

The effect of a project alternative on schools is calculated by comparing the number of school children generated under each alternative to existing capacity at the Presidio-serving public elementary, middle, and high schools. The PTMP EIS determined that at full build-out, the Presidio will generate more students that can be served by public schools through the San Francisco Unified School District (SFUSD). However, the PTMP EIS acknowledges that projecting public school enrollment years into the future is not reliable. The PTMP EIS includes Mitigation Measure CO-3: *Collaboration with SFUSD*, which states that the Trust will make all reasonable efforts to collaborate with SFUSD to locate necessary space for students residing in the Presidio.

The proposed project and project alternatives are consistent with development covered in the PTMP EIS, and as part of project design process, the Trust has reached out to SFUSD, bringing this project and potential associated enrollment to their attention. Therefore, impacts will be consistent with the PTMP EIS, and no further analysis is required.

Visitor Experience

The Presidio has a number of programs and facilities that provide visitors with opportunities to learn about the Presidio's history, resources, and efforts to transform from a military post to a national park. The Presidio includes a visitor information center, field station, interpretive sites, interpretive waysides, exhibition halls, a native plant nursery, and more. Programs provided by the Trust, the NPS, and tenants give visitors a greater understanding of the park and its resources.

No visitor facilities are located within the project site; therefore, no visitor facilities will be directly affected by the proposed project or project alternatives. The proposed project and project alternatives' use and size are within those considered in the PTMP EIS, will therefore be consistent with the PTMP EIS, and no further analysis is required.

Recreation

The Presidio contains many of San Francisco's highly valued recreational sites and popular open space areas. Presidio users can be classified into four main groups: (1) neighborhood, (2) city, (3) regional, and (4) tourist. The places visited, the length of stays, and the frequency of visits vary among the groups. Recreational uses range from organized to informal, and active to passive, and include hiking, walking on trails, bicycling, baseball, tennis, basketball, golf, bird watching, and picnicking.

No recreational facilities are at the project site; therefore, no recreational facilities will be directly affected by the proposed project or project alternatives. The proposed project and project alternatives' use and size are within those considered in the PTMP EIS, will therefore be consistent with the PTMP EIS, and no further analysis is required.

3.2.4 Public Safety

Law Enforcement

As discussed previously, Area B of the Presidio is managed by the Trust; however, law enforcement services are provided by USPP from the San Francisco Field Office. As analyzed in the PTMP EIS, law enforcement services do not readily change in proportion to changes in population; however, an increase in resident and employee populations at the Presidio could potentially increase calls for police service. The PTMP EIS includes Mitigation Measure CO-12: *Expansion of Public Safety Services*, which states that as the PTMP is implemented, the Trust will work with USPP to review public safety standards, staffing, and equipment to help ensure adequate law enforcement coverage across the Presidio.

The proposed project and alternatives are consistent with development considered in the PTMP EIS, and as part of project design process, the Trust coordinated with USPP in fall 2025 regarding service levels in the Presidio. Currently, service levels are adequately met in the Presidio, and USPP has the capacity to adequately patrol additional dwelling units proposed under the proposed project and project alternatives. USPP additionally coordinates with the San Francisco Police Department if a large incident occurs and additional support is required

(Epstein, pers. comm. 2025). Therefore, impacts will be consistent with the PTMP EIS, and no further analysis is required.

Fire Protection and Emergency Response

At the time of the PTMP EIS preparation, fire protection and emergency medical services at the Presidio were provided by the NPS's Presidio Fire Department. Currently, the San Francisco Fire Department (SFFD) provides fire protection and emergency medical services. Fire Station 51, located 700 feet from the project site and in the Presidio, responds to all emergencies in the Presidio, as well as upper and lower Fort Mason, and the North District of GGNRA (e.g., Fort Baker, Fort Barry, Fort Cronkhite). Fire Station 51 presently has an average emergency response time of 4.5 minutes, consistent with the city average (SFFD 2025).

As analyzed in the PTMP EIS, fire protection and emergency response services do not readily change in proportion to changes in population; however, an increase in resident and employee populations at the Presidio could potentially increase calls for fire protection and emergency response. The PTMP EIS includes Mitigation Measure CO-12: *Expansion of Public Safety Services*, which states that as the PTMP is implemented, the Trust will work with NPS (now SFFD) to review public safety standards, staffing, and equipment to help ensure adequate fire protection and emergency response coverage across the Presidio.

The proposed project and all alternatives are consistent with development considered in the PTMP EIS. Fire Station 51 currently has the capacity to meet additional fire protection and emergency response needs (Epstein, pers. comm. 2025), and consistent with the PTMP EIS, the Trust will continue to coordinate with emergency services to adequately manage fire protection and emergency response within the Presidio. Additionally, all building plans will be reviewed by the Fire Marshal office to help ensure adequate fire safety. The proposed project and project alternatives will comply with all applicable building and fire codes enforced by the Trust at the time of construction. Therefore, impacts will be consistent with the PTMP EIS, and no further analysis is required.

Hazardous Substances

As described in the PTMP EIS, the Trust's environmental remediation program is an ongoing process involving site cleanup of hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act, addressing petroleum contamination and removing lead in soils. The Trust's remediation program is overseen by the California Environmental Protection Agency, the Department of Toxic Substances Control (DTSC), and the regional water quality control board.

When many of the buildings on the project site were demolished in the 1970s, a portion of the building debris was left underground on-site as fill. This debris contains residual lead from the U.S. Army's use of lead-based paint. In 2014, testing of the fill in the project vicinity indicated that lead levels were present above cleanup levels in some locations. As a result, DTSC established Land Use Controls (LUCs) for the larger site, referred to as Fill Site 6B to help ensure that any future uses will take lead contamination into account (Trust 2014). In 2023, the Trust conducted

more extensive testing and analysis of the LUC areas comprising the proposed project site, which indicated that lead levels were relatively low. As a result, the Trust has requested from DTSC that LUCs be removed from a portion of the site. The Trust is working with DTSC on next steps in this process. The Trust received a comment letter from DTSC regarding Fill Site 6B, which is discussed in detail in Section 4 and is included as Appendix D.

During construction and project implementation, if the LUC is still in place, the Trust will continue to follow the existing LUC guidelines and implement a DTSC-approved soil management plan, construction mitigation measures, and construction of a cover to prevent access to fill soils (see project condition of approval: Hazardous Materials – Soils, included in Appendix B). With adherence to applicable LUC requirements, impacts will be consistent with the PTMP EIS, and no further analysis is required.

The project will also include modifications to the existing stairs that extend west from Building 1016 and the stairs that extend north from Building 1007. It is anticipated that the stairs at Building 1007 include lead paint. Work will be conducted in conformance with condition of approval: Hazardous Materials – Lead (see Appendix B).

Geologic and Seismic Hazards

Geologic and soil conditions underlying buildings influence their potential damage as a result of an earthquake, and the greatest risk of earthquake damage is structures built on unconsolidated sediments (differentiated superficial deposits). A review of available geologic hazard databases confirms that the project site is not located in an Alquist-Priolo Earthquake Fault Zone, or an area that is prone to both landslides and liquefaction (CGS 2024). The project site is located in a seismically active region. A geotechnical report has been completed for the project site (Rockridge Geotechnical 2025). The primary geotechnical issue affecting the proposed project area is providing adequate foundational support for the proposed buildings. The geotechnical report provided multiple foundation support recommendations, including using spread footing¹² foundations or mat foundations.¹³ Geotechnical design recommendations also accommodate seismic hazards related to seismic groundshaking. Project proponents will be required to implement all geotechnical recommendations as part of project design.

In addition, the proposed project and project alternatives will be designed and constructed in compliance with all applicable adopted agency codes and federal regulations, including current seismic safety standards. These measures will help ensure that the buildings and their occupants are protected and that life safety is maintained in the event of an earthquake.

With adherence to all geotechnical recommendations outlined in in the geotechnical report and adherence to all applicable regulatory requirements, the proposed project and project alternatives will adequately manage risks associated with geologic and seismic hazards present in the project area. The project and project alternatives will not result in any new significant impacts on geological processes or conditions that have been examined as part of previous environmental documents.

¹² A *spread footing foundation* spreads the load of a structure over a large area to prevent settlement or structural failure.

¹³ A *mat foundation* is a large concrete slab that extends over a wide area, supporting multiple columns and walls.

3.2.5 Utilities

Water Supply and Distribution

The Trust operates a facility that treats water from Lobos Creek to provide potable water to the Presidio under permit from the California State Water Resources Control Board, Division of Drinking Water Programs. Supplemental water is purchased from the City and County of San Francisco (CCSF) as needed.

Long-term water demand for the proposed project and project alternatives will primarily be for residential uses, as well as commercial uses in the case of the Mixed-Use Alternative. With implementation of the proposed project, the Presidio will have 71 fewer dwelling units than what was considered parkwide in the PTMP EIS. Both the Trust and SFPUC have included water demand projections for development under the PTMP EIS as part of long-term water supply planning (SFPUC 2021). Given that the proposed project and project alternatives will include fewer dwelling units than considered under the PTMP EIS, the proposed project and project alternatives will be consistent with impacts related to water supply and distribution as discussed in the PTMP EIS.

Furthermore, the Trust is committed to implementing water conservation measures to help ensure long-term water supply sustainability. As outlined in the PTMP, the Trust, in cooperation with tenants and residents, implements best management practices that encourage water conservation, including identifying and repairing leaks, installing water meters and developing a consumption-based billing system, conducting water audits, installing water-conserving devices as part of all building rehabilitation projects, implementing parkwide irrigation guidelines, and implementing low-water landscaping designs and plant materials. The project will employ water conservation measures such as metering all water use, installing low flow plumbing fixtures, selecting lower water-use plants and employing an efficient irrigation system.

The project will not alter any fire-flow water storage in the Presidio. Therefore, impacts will be consistent with the PTMP EIS, and no further analysis is required.

The Trust operates and maintains approximately 51 miles of water distribution system at the Presidio. Upgrades to the water distribution system consist of many small individual projects, as well as new water connections required for building rehabilitation and new construction (Trust 2002b). The proposed project will include construction of laterals for domestic, irrigation, and fire water to service each building from the adjacent water distribution system. New fire hydrants will be placed around the site. Impacts will be consistent with the PTMP EIS, and no further analysis is required.

Presidio Sanitary Sewer System

The storm and sanitary sewer collection systems are two separate systems at the Presidio. Approximately 50 miles of sewer lines are analyzed in impacts discussed in the PMTP EIS. Sanitary sewage (wastewater) is collected from buildings at the Presidio and discharged into the city's sanitary sewer system. Use of the city's sewer system is paid for by the Trust (Trust 2002b).

Maximum sewer outflows (approximately 78,000 gallons per day) analyzed in the PTMP EIS were determined to not burden the city and county of San Francisco wastewater treatment facilities because the city has the capacity to handle the estimated sewage discharge (Trust 2002b).

As discussed in the PTMP EIS, wastewater from the project area will be transported to the city's Southeast Water Pollution Control Plant. The plant is San Francisco's largest wastewater facility, with a designed average dry-weather flow treatment capacity of 85.4 million gallons per day (MGD) and a designed peak wet-weather flow capacity of 250 MGD. Average dry weather flows in 2018 were 52.6 MGD (SFPUC 2018). Therefore, the plant will have adequate capacity to treat wastewater generated by the proposed project or project alternatives. Additionally, with implementation of the proposed project, the Presidio will have 71 fewer dwelling units than what was considered parkwide in the PTMP EIS. Therefore, the proposed project or project alternatives will not contribute more wastewater than projected for the Presidio.

The proposed project will include new lateral connections to the Trust's own sewer distribution system upstream of where it is metered and discharged to the city at Lift Station 1076. Sanitary sewer mainlines run north-south along both the east and west sides of the site's parking lot. Each building will have laterals that connect to those main sanitary sewer lines. The buildings will implement water conservation measures standards described above, minimizing additional wastewater flows. With utility upgrades and water conservation efforts, impacts associated with the proposed project will be consistent with those analyzed in the PTMP EIS; therefore, no further analysis is required.

Storm Drainage

Stormwater is collected from the Presidio and routed to outfalls that discharge into the Crissy Field Marsh, the San Francisco Bay, or the Pacific Ocean, with the exception of a small area located on the southwest boundary of the park.

A Stormwater Management Plan has been drafted for the project site, and includes a large, approximately 250-square-foot, bioretention area north of the parking lot and smaller, bioretention areas west of each building. In addition, landscape areas will be included between buildings, along the project frontages, and in the parking lot. Storm drainage pipes will extend across the site and connect to the main in Edie Road. The stormwater management plan follows guidelines from the Bay Area Municipal Stormwater Collaborative, low impact development standards from CalGreen, and LEED Homes for Multi-family Low-Rise rainwater management guidance. The project will be in compliance with the Clean Water Act. Furthermore, the PTMP EIS determined that the Letterman District, which encompasses the proposed project site, has a drainage system able to accommodate stormwater runoff during a 10-year storm event, even if impervious surfaces in the area reach 100 percent. Therefore, changes in stormwater drainage due to project implementation will be minimal and will be consistent with impacts analyzed under the PTMP EIS. No further analysis is required.

Project construction will disturb an area of approximately 4.66 acres and will be subject to the National Pollutant Discharge Elimination System Construction General Permit for Stormwater. The permit requires a Stormwater Pollution Prevention Plan, and permit compliance will

minimize pollutants such as sediment, chemicals, and debris from entering waterways. See the stormwater project condition of approval included in Appendix B.

Solid Waste

The PTMP EIS estimated that in 2002, approximately 22,000 tons of solid waste from demolition, construction, and rehabilitation were generated at the Presidio each year. The square footage of new construction proposed for the project falls within that considered in the PTMP EIS. As such, impacts will be consistent with those analyzed in the PTMP EIS, and no further analysis is required. Furthermore, the project will meet LEED Homes for Multi-family Low-Rise, which requires a comprehensive construction waste management plan that diverts at least 50 percent of non-hazardous debris from landfills.

The Trust partners with Recology, a waste management service that services the city of San Francisco. Since 2002, the Trust has worked to reduce waste by implementing waste diversion, salvage, and green waste composting programs. The proposed project and all alternatives will include a trash room in each building, with an area for trash, recycling, and compost, and a covered trash enclosure near the center of the parking lot.

Energy Consumption and Distribution

Electricity for the Presidio is purchased from Western Area Power Administration and Pacific Gas and Electric Company. The proposed project and project alternatives will demand energy. As mentioned in Section 2.1.1, *Residential Buildings*, the proposed project and project alternatives will achieve a minimum LEED Homes Gold rating. Some LEED measures include waste diversion during construction, all-electric buildings that meet Title 24/LEED energy-efficiency requirements, locally sourced materials, tenant education programs, concrete embodied carbon analysis, installation of ENERGY STAR appliances, and compliance with minimum indoor air quality requirements. The square footage of the new construction proposed for the project falls within that considered in the PTMP EIS and energy conservation measures will be implemented. As such, the resulting impacts will be consistent with the PTMP EIS, and no further analysis is required.

The Trust operates and maintains the electrical distribution system at the Presidio. Since the PTMP EIS, multiple energy infrastructure improvements have been implemented. Currently, power for customers within the Presidio comes from three different locations—Substation 107, 568, and Public Health Service Hospital at 12.47-kilovolts (kV). It is then distributed throughout the Presidio via Trust-operated 12.47 kV and 4.16 kV-distribution systems. The 4 kV system is fed by six substations and consists of approximately 6 miles of overhead primary conductors and 19 miles of primary underground conductors. The system feeds approximately 180 transformers and approximately 1,200 metered customers.

As part of the Presidio Forward program, the Trust is actively preparing to underground portions of the primary distribution system and convert the entire system to 12 kV. This includes replacing the entire 4 kV system with new conductors rated for 12 kV, replacing all 4 kV transformers at service points, replacing the 4 kV substations with 12 kV switching stations, and subsequently

replacing/relocating associated secondary and communication overhead lines underground where overhead services are being undergrounded.

In 2025, the Trust completed two backfeeds to allow for re-routing of power, allowing for the Trust to upgrade the Presidio's grid with minimal disruptions. In 2026, the Trust is designing a new electrical system in an effort to provide adequate power over the next 5 years, concurrent with the development of the proposed project. The proposed project and project alternatives will include new electrical connections to the adjacent system, transformers and other distribution equipment, and vehicle chargers. All electricity will be metered. The primary electrical distribution line will be running north-south along Girard Road and north-south along the east side of the parking lot. It will run along the south side of the parking lot and between Building 1016 and proposed Building A out to Lincoln Boulevard. There will be a secondary line from each building connecting to the primary line. The design scope of the proposed project is being coordinated with planning efforts of the Presidio Forward program to help ensure that any work performed will sufficiently facilitate planned electrical concepts of the Presidio Forward program in a "dig once" approach.

SECTION 4

Agency Consultation and Public Involvement

4.1 NHPA Review Process

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires the Trust to take into account the effect of its undertakings on historic and cultural resources, including the Presidio NHL. The Trust has entered into a Programmatic Agreement (PTPA 2025) with the SHPO, the Advisory Council on Historic Preservation (ACHP), the NPS (signatory parties), and the Presidio Historical Association (concurring party) that applies to the proposed undertaking. The PTPA provides a framework for reviewing different types of projects and for consulting with other parties under certain circumstances.

Consistent with the PTPA and ACHP regulations that recommend early integration of Section 106 compliance with NEPA and other agency processes, the Trust notified the PTPA parties of the project undertaking and initiated consultation on the Letterman Residential Project on November 3, 2025, which included delivery of a consultation package containing a summary of project information, a proposed area of potential effect (APE), and a request for early input. The Trust will submit this EA to all PTPA parties as a supplemental consultation package along with a summary of comments gathered during public scoping, agency responses, a finalized APE, a detailed Finding of Effect (FOE), and a request for a consultation meeting. If necessary, the Trust will hold a consultation meeting with the signatory parties to seek consensus that the undertaking of the project will not adversely affect historic properties in the Presidio NHL prior to execution of the finding of no significant impact (FONSI) (see Appendix A).

4.2 Agency Review

The Trust coordinated with the following agencies for their review of the project and to ensure compliance with any substantive environmental requirements, including consultation under the NHPA.

4.2.1 Advisory Council on Historic Preservation

The ACHP is an independent federal agency that promotes the preservation, enhancement, and productive use of the nation's historic resources, and advises the President and Congress on national historic preservation policy. Among other responsibilities, the ACHP administers the NHPA's Section 106 review process and works with federal agencies to help improve how they consider historic preservation values in their programs. The ACHP is a signatory party to the PTPA and principally comments on process and procedures related to the document and the NHPA and resolves objections among parties to the PTPA during consultation. The Trust sent

copies of the first consultation package to our agency contact at the ACHP and did not receive comments in response.

4.2.2 National Park Service

The Presidio Trust Act, as amended, describes the statutory framework for the relationship between the Trust and the NPS. The NPS manages Area A of the Presidio, including Crissy Field north of Mason Street. The NPS is also a signatory party to the PTPA. The Trust sent copies of the first consultation package to contacts at the NPS Regional Office (Regions 8, 9, 10, 12) and Golden Gate National Recreation Area and did not receive comments in response.

4.2.3 California State Historic Preservation Officer

Like the NPS, the SHPO is a signatory party to the PTPA, and thus received a consultation package upon the opening of public scoping/initiation of consultation for the project on November 3. The SHPO provided a letter to the Trust dated December 2, 2025 (Appendix C).

The letter notes that the SHPO agrees the Letterman Residential Project constitutes an undertaking with the potential to affect historic properties and that the draft APE provided by the Trust was “generally sufficient.” The SHPO requested additional information concerning archaeological resources and tribal consultation, which is provided below.

Archaeological Resources

All alternatives include construction of new building foundations that will generally be 24 to 36 inches below current grade, with some limited locations up to 72 inches. A single retaining wall running east-west roughly 100 feet north of the sidewalk along Lincoln for a portion of Buildings A and B will require excavation of up to 108 inches below current grade. Landscape and site improvements, including stormwater basins/swales and utility connections are generally at 6 to 18 inches below current grade, with a possible single connection point no greater than 60 inches at the utility mainline. Analysis of landform change completed since the PTMP (2002) indicates that the entire Letterman Residential Project is within an area of landform that was cut by the US Army. This disturbance most likely damaged any buried archaeological sites and eliminated the potential for archaeological resources to be impacted during the current project. The Trust will follow mitigation measures identified in the PTMP and applicable provisions of the 2025 Trust Programmatic Agreement to ensure that any unanticipated archaeological deposits are not impacted by the project. Additional details concerning depth of ground disturbance and archaeological characterization efforts are found in the EA Section 3.2.1, *Archaeology* as well as Section 3.2.4, *Public Safety*.

Tribal Consultation

Per the 2025 PTPA, “the Trust has made a good faith effort to locate federally recognized Indian Tribes that may attach religious and cultural significance to properties under the administrative jurisdiction of the Trust or with which the Trust could consult under the Native American Graves Protection and Repatriation Act (NAGPRA) and the Trust has determined that there are no such federally recognized Tribes.” Because of the low likelihood for encountering pre-contact

archaeological resources during excavation for the project, the Trust has not conducted outreach to Tribes or tribal organizations via the California Native American Heritage Commission list for San Francisco County. The Trust has notified program partners, the Association of Ramaytush Ohlone (ARO), of the project's scoping notice via a monthly newsletter (November/December edition) and invited them to comment through the agency's public comment process on the Environmental Assessment. The Trust has not received comments from the ARO.

4.3 Other Agency Review

A Notice of Intent (NOI) was emailed to eight state and local agencies that may have an interest in the proposed project. One comment letter was received, as described below.

4.3.1 Department of Toxic Substances Control DTSC

The Department of Toxic Substance Control (DTSC) provided a letter to the Presidio dated December 4, 2025 (Appendix D). The letter notes that the proposed project encompasses multiple active and nonactive mitigation and clean-up sites where DTSC has conducted oversight that may be impacted. These sites include the Presidio of San Francisco Fill Site 6B.

Hazardous Materials

The letter notes that the proposed development includes Fill Site 6B, which is under operation and maintenance requirements due to contamination left in place. This area is subject to the Fill Site 6A and Fill Site 6B Land Use Control Site-Specific Addendum to the Presidio Trust Land Use Controls Master Reference Report (LUC) dated March 26, 2014 (Trust 2014). The LUC includes sensitive use restrictions, tenant restrictions on soil-disturbing activities, and soil management requirements. DTSC requested analysis of historic hazardous materials, current hazardous materials, as well as operation and maintenance requirements for contamination left in place.

Furthermore, the DTSC recommends that all imported soil/fill material be tested per DTSC recommendations to ensure all chemicals of concern (COCs) meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment Guidance Manual. DTSC also advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary.

Response

The Trust addressed DTSC's comments under Section 3.2.4 *Public Safety*. Additionally, Appendix B includes project conditions related to Hazardous Materials, which describes how work will be performed in accordance the Fill Site 6A and Fill Site 6B Land Use Control Site-Specific Addendum to the Presidio Trust Land Use Control Master Reference Report. Additionally, all imported soil/fill material will be tested pursuant to the 2001 DTSC Fill Advisory and Trust Environmental Standard Operating Procedure for Import Materials. Test results will be sent to DTSC for review and approval for materials placed in a LUC.

4.4 Public Participation

As part of the development of the proposed project, the Trust invited the public to provide feedback and comment. Public participation was considered in the development of this environmental assessment and will continue to inform project development.

On October 31, 2025, the Trust added a page for the proposed project on the publicly-accessible Trust website (<https://presidio.gov/about/planning/letterman-residential-project>). The webpage included a summary of the proposed project, as well as historic, existing, and proposed project images. Background information used to develop the environmental assessment, such as the West Letterman/Thornburgh Design Guidelines, PTMP, and project design plans is also included on the project website. On November 3, the Notice of Intent was posted to the project webpage, along with a link to a form for the submittal of comments; the NOI included an email address for the submittal of comments.

In late October, meetings were held with tenants adjacent to the project site to share information on the proposed project. The Trust has email distribution lists for volunteers, residents, commercial tenants and visitors to the Presidio, totaling approximately 42,800 interested parties or subscribers. The November emails included an introduction to project along with a link to the project webpage and NOI.

The Trust also held an Informational Open House on November 18, at the Presidio Officers' Club (50 Moraga Avenue). Twenty-two individuals attended the open house to hear a presentation and review boards on the project and ask questions.

During the public scoping period for the project that ended December 8, 2025, the Trust received two letters from public agencies (described above), one organization and 40 interested individuals. Responses to the public comments received, organized by issue topic, are provided in Appendix E.

- The EA should analyze whether exceeding the PTMP maximum of 152 units requires an amendment to the PTMP itself.
- The EA should include a true No Action Alternative maintaining current site conditions with no new residential development.
- Consideration should be given to providing underground parking to allow for more landscaping.
- The single southern building is incompatible with the district's historic pattern and landscape character and would adversely affect neighboring historic resources.
- The buffer zone setback and landscape screening on Lincoln Blvd and Girard Road should be increased.
- Potential vibration impacts to adjacent historic buildings from project construction should be studied.

- The story of the nurses housing, Building 1028, should be memorialized to honor the Presidio's commitment to historic interpretation of the Presidio and the US Army's presence there.
- The park currently does not enough resources to address safety issues about dogs; adding hundreds of additional residents would strain these resources further and put residents and visitors at further risk.
- The EA should study tree root protection.
- The EA should study construction staging and traffic management.
- The EA should assess and acknowledge that new market rate housing creates a demand for below market rate housing.
- Requests the project include some affordable housing.
- Asks the status of residents in B1028.
- The EA should study wastewater and storm drain capacity.
- The project should include bird strike prevention as a goal.
- The project will impact traffic, safety, and parking; these issues need study. Mitigation should be included to improve pedestrian safety.
- The circular created on Girard/Lincoln has a design flaw for circulars and should be modified.
- Increase the buffer zone setback and landscape screening on Lincoln Blvd and Girard Road.
- The EA should analyze traffic volumes for delivery vehicles, rideshare services, and passenger drop-offs, and evaluate whether roadway modifications are needed on Girard Road.
- The EA should analyze traffic, access and pedestrian safety as it pertains to schools in the area, the YMCA and the Chestnut Street commercial corridor.
- The EA should analyze whether the project is consistent with the traffic objectives established in the Presidio Parkway Final EIS.
- The EA should address San Francisco Parking Permit eligibility.
- The EA should address restrictions on use for short-term rentals.

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SECTION 5

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SECTION 6

References

- David Baker Architects. 2025. *Presidio Trust: Letterman Residential Project*, Conceptual Plans. Dated October 21.
- Census (U.S. Census Bureau). 2025. “QuickFacts, San Francisco city, California.” <https://www.census.gov/quickfacts/fact/table/sanfranciscocitycalifornia/AGE135224#AGE135224>. Accessed December 22, 2025.
- CGS (California Geological Survey). 2024. “Earthquake Zones of Required Investigation.” [Online mapping tool]. Available online: <https://maps.conservation.ca.gov/cgs/information/warehouse/eqzapp/>. Accessed February 23, 2026. David Baker Architects. 2025. *Presidio West Letterman Housing*, Schematic Design. July 25, 2025.
- EPA (U.S. Environmental Protection Agency). 2025. “NEPAssist.” [Online mapping tool.] Accessed January 15, 2026. <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>.
- Epstein, M. 2025. “Personal Communication from M. Epstein (Presidio Trust, Director of Public Safety).”
- Fehr & Peers. 2026. *San Francisco Planning 2019 Transportation Impact Analysis Guidelines*. In “Appendix F: Travel Demand.”
- United States Department of Transportation. 2017. *Highway Traffic Noise Analysis and Abatement Policy and Guidance: Noise Fundamentals*. Available online: https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm.
- Rockridge Geotechnical. 2024. *Geotechnical Investigation, Revision 1: Proposed Residential Development West Letterman Site at the Presidio, San Francisco, California*.
- SFFD (San Francisco Fire Department). 2025. “San Francisco Fire Incident Dashboard.” [Online database.] Accessed January 15, 2026. <https://sfgov.maps.arcgis.com/apps/dashboards/43ae951ea054471aaf9145f23eaac1e9>.
- SFPUC (San Francisco Public Utilities Commission). 2018. *Pretreatment Program Annual Report*. Accessed February 16, 2026. https://www.sfpuc.gov/sites/default/files/programs/AnnualPretreatmentReport_2018.pdf.

- SFPUC. 2021. *2020 Urban Water Management Plan for the City and County of San Francisco*. June 2021. Accessed February 15, 2026. https://www.sfpuc.gov/sites/default/files/programs/UWMP_2020.pdf.
- Trust (The Presidio Trust). 2000. *Final Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex*.
- Trust. 2001. *Presidio of San Francisco Vegetation Management Plan and Environmental Assessment*. December 2001. https://wp.presidio.gov/wp-content/uploads/2023/07/PLN-344-VmpEa_200112.pdf.
- Trust. 2002a. *Presidio Trust Management Plan: Land Use Policies for Area B of the Presidio of San Francisco and Final Environmental Impact Statement*. San Francisco, CA. May 2002.
- Trust. 2002b. *Presidio Trust Management Plan: Land Use Policies for Area B of the Presidio of San Francisco Final Environmental Impact Statement (PTMP EIS)*.
- Trust. 2003. *Presidio Trails and Bikeways Master Plan & Environmental Assessment*. Accessed 2003. https://wp.presidio.gov/wp-content/uploads/2023/07/PLN-344-PresidioTrailsEa_200307-1.pdf?_ga=2.26278334.249580031.1768500552-543045018.1761936306.
- Trust. 2008. *Presidio Elevation Change Model*.
- Trust. 2014. *Presidio of San Francisco Fill Site 6B is subject to the Fill Site 6A and Fill Site 6B Land Use Control Site-Specific Addendum to the Presidio Trust Land Use Controls Master Reference Report (LUC)*. March 26, 2014.
- Trust. 2015. *Presidio Trust Wetland Inventory Project: Preliminary Jurisdictional Determination Report*.
- Trust. 2020. *Landscape Standards, Site Furnishing Guidelines (Draft)*.
- Trust. 2020. *Outdoor Lighting Policy* Trust. 2024. *West Letterman/Thornburgh Final Design Guidelines*. San Francisco, CA. Dated February.
- Trust. 2025. *Programmatic Agreement Among the Presidio Trust, National Park Service, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer Regarding the Presidio Trust Management Plan and Various Operation and Maintenance Activities for Area B of the Presidio of San Francisco National Historic Landmark District, Golden Gate National Recreation Area San Francisco, California*. https://wp.presidio.gov/wp-content/uploads/2025/08/ca.pt_management-plan-pa.2025.pdf?_ga=2.6129457.364467533.1770328241-894060881.1746458631.
- Trust. 2026. “Forever Park Strategy.” <https://presidio.gov/about/forever-park-strategy>.

Appendix A

Draft Finding of No Significant Impact

LETTERMAN RESIDENTIAL PROJECT

Finding of No Significant Impact

Project Purpose and Overall Vision

The Presidio Trust (Trust) is proposing a residential development in the West Letterman area of the Presidio of San Francisco to restore the area's historic character and density while supporting long-term park sustainability. The proposed project would construct six architecturally compatible residential buildings totaling 196 dwelling units on a 4.66-acre site. This development aligns with the Presidio Trust Management Plan (PTMP) by generating revenue for park operations, adding housing in a transit-accessible location, and concentrating new construction in an already developed area.

Housing has historically been a key component of the Presidio Trust. The Trust views residential use as the most reliable long-term revenue source. The existing housing stock is dominated by larger units, and the PTMP supports rebalancing the mix by removing non-historic units and introducing smaller, more diverse housing types clustered near activity centers to reduce traffic and emissions.

Planning for the proposed project is guided by three main documents: the PTMP, the West Letterman/Thornburgh Final Design Guidelines, and the Forever Park strategy. Together, these emphasize historic compatibility, preservation of cultural landscapes, financial self-sufficiency, and long-term stewardship of the park.

The proposed project's purpose and need is defined by the following objectives:

- Use new construction to re-establish and articulate the historic character and density of the district.
- Beautify the Girard Road gateway to the Presidio and improve the sense of arrival into the park and reinforce the identity of the Letterman District.
- Achieve PTMP housing goals for planned replacement for the West Letterman area to the extent practicable given site-specific assessments of building configuration and financial feasibility.
- Provide housing types that diversify the composition of housing within the park.
- Achieve Leadership in Energy and Environmental Design (LEED) Homes Gold.
- Be compatible with the National Historic Landmark District (NHL) through conformance as closely as practicable to PTMP guidance and the Guidelines.
- Meet Trust financial goals by furthering its financial stability, increasing revenue for park operations, and increasing its ability to sustain a Forever Park.

- Minimize environmental impacts to threshold levels analyzed and mitigated in the PTMP EIS

Preferred Alternative

The proposed project would redevelop the north and west portions of the former Letterman General Hospital block with six new residential buildings, providing a total of 196 market-rate rental dwelling units within 159,752 square feet of new construction. The proposed project is designed to be consistent with the historic character and density of the Letterman District.

The proposed project includes three two-story walk-up buildings and three three-story buildings connected by bridges, with building heights ranging from 30 to 45 feet. One building will contain shared amenities for residents: a lobby, coworking space, fitness area, elevator, mail room, and rooftop deck. All buildings will achieve a minimum Leadership in Energy and Environmental Design (LEED) Homes Gold rating by incorporating all-electric systems, energy-efficient design, sustainable materials, and indoor air quality measures. Architectural design emphasizes simple, functional forms and materials that are consistent with the Presidio's historic military context.

Vehicular access will continue to be provided from surrounding roadways, with targeted improvements along Edie Road and nearby intersections to enhance pedestrian safety. The existing central parking lot will be reduced to a total of 172 parking spaces and will include electric vehicle and EV-ready spaces. These spaces will remain available to tenants and the public for a fee. Pedestrian circulation will be improved through new and extended sidewalks and internal pathways. Landscaping will feature drought-tolerant, native plantings consistent with Presidio guidelines.

Utilities serving the site will be modified to support the new development, including water, sewer, storm drainage, and electrical infrastructure. The sloped site will be developed with stepped buildings to minimize grading, with soil leveled through on-site reuse and off-site export. Following completion of a separate demolition project, construction is anticipated to begin in summer or fall of 2027, with project completion expected between winter 2028 and 2029.

Other Alternatives

No Action Alternative

The No Action Alternative would include the same six buildings, same total square footage (159,752 square feet), and same building heights and configurations as the proposed project. However, it would provide 152 dwelling units, consistent with the maximum allowed under the PTMP for the Letterman District. Compared to the proposed project, this alternative would result in larger individual units but 44 fewer total dwelling units.

Mixed Use Alternative

The Mixed-Use alternative would include the same six buildings, same total square footage (159,752 square feet) and same building configurations and heights as the proposed project. It would provide 152 dwelling units, consistent with the PTMP maximum for the Letterman District which is 44 fewer units than the proposed project all while maintaining the same unit sizes, and approximately 30,000 square feet of commercial use. This alternative aligns with the PTMP's vision for the Letterman District as a compact, urban, mixed-use area that combines residential, office, support services, visitor amenities, and transit access.

Alternatives Considered but Eliminated from Further Consideration

The Trust has considered, but is not pursuing, the following alternatives:

- **All-commercial project.** Due to high commercial vacancy rates in the Bay Area, this would prevent the project from meeting financial goals, and other park areas with existing buildings are better suited for commercial uses.
- **Underground parking** was also evaluated but rejected due to its high cost and the additional expenses for soil remediation and groundwater management. This would make the project financially infeasible and lack the sufficient historic or visual benefits described in the PTMP.

Disposition Of Significant Environmental Effects

Based upon the environmental assessment (EA), the Trust determines that the proposed project will not have significant impacts on the human environment, with incorporation of resource protection measures. The analysis supporting this conclusion is presented in Draft EA Section 3, *Affected Environment and Environmental Consequences*. The following summarizes factors considered in this determination.

Historic Resources

The 2002 PTMP Planning Principles and Design Guidelines for the Letterman Planning District and 2024 West Letterman/Thornburg Design Guidelines were developed to encourage redevelopment of the area to conform with the Secretary of the Interior's Standards for Rehabilitation to avoid adverse effects to the historic properties of the Presidio. The proposed project responds to both in terms of building orientation, architectural materials and details, and building heights, as well as its landscape treatments, plantings and site furnishings. The proposed project will not have an adverse effect on the NHLD and will not remove or substantially alter any contributing historic buildings. The proposed project will comply with the PTMP, the West Letterman Design Guidelines, and the Secretary of the Interior's Standards, which will preserve the historic character of the Park. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Traffic and Circulation

The analysis of existing conditions, projected travel demand, and circulation characteristics indicates that the Presidio's multimodal transportation network is able to accommodate the trips generated by the proposed project. Under the proposed project, the increase in person and vehicle trips represents a small fraction of existing traffic volumes, with peak-hour vehicle additions at the four most affected intersections ranging from less than 1 percent to approximately 5 percent—within normal day-to-day traffic fluctuations. As a result, intersection operations are expected to remain similar to existing conditions during both weekday and weekend peak hours. The proposed project will provide circulation enhancements, including continuous sidewalks, reduced curb cuts, curb extensions, marked crosswalks, and improved bicycle connectivity. In addition, the Trust's TDM Plan includes several elements to encourage all park residents, employees, and visitors to use transit, walk, and bike rather than drive. Implementation of a construction-period traffic management will ensure that temporary construction-related vehicle activity is minor. Area-wide parking supply remains adequate under the proposed project. Even with reconfiguration and a modest parking reduction, peak occupancy is estimated at 78 to 83 percent, leaving 159–204 unoccupied spaces during the busiest weekday period. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Resource Issues Considered but Dismissed from Further Analysis

Archeological Resources

The proposed project will not likely adversely affect any known or predicted archaeological properties in the area. Additionally, the site has very low to no sensitivity due to extensive slope cut by the US Army that removed 5–15 feet of soil. Stipulation VII (Archaeology) of the Presidio Trust Programmatic Agreement will be followed to help ensure that any unanticipated archaeological deposits are not affected by the project. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Biological Resources

The proposed project will not result in development in designated open space or critical habitat. Consistent with the construction activities analyzed under the PTMP, construction of the proposed project will be restricted to existing developed areas within the Letterman District. Resource protection measures regarding tree protection and nesting bird surveys will be implemented to help ensure the reduction of effects on wildlife and wildlife habitat. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Water Resources

Wetlands or other surface water features are not present on the project site. The site is not located within a Federal Emergency Management Agency (FEMA)-designated flood hazard zone. The proposed project would not involve the use of groundwater and would not affect groundwater conditions. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Visual Resources

The PTMP identifies one important view in the project area, the view northeast along General Kennedy Avenue. Given the height of the proposed buildings, height of adjacent buildings and existing mature vegetation, this view will not be impacted. The proposed project complies with the PTMP Planning Principles, the 2024 Design Guidelines, and the Secretary of the Interior's Standards for Rehabilitation, ensuring compatibility with historic and visual resources. As a result, the proposed project is expected to maintain or enhance historic views and visual quality and create positive visual changes. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Air Quality

The proposed project is within the level of construction considered in the PTMP EIS and will implement resource protection measures to reduce air quality impacts during construction. The proposed project will not hinder, or delay implementation of any applicable control measures contained in the 2017 Clean Air Plan. In addition, since adoption of the PTMP, multiple transit demand management (TDM) strategies have been implemented across the Presidio, including the Presidio Transit Center, Presidio GO Shuttles, bicycle share, paid parking, and improved bicycle and pedestrian paths, which have reduced the need for Presidio residents and visitors to rely on personal motor vehicles and reduced the associated emissions. Therefore, impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Noise

The proposed project will adhere to all noise standards for interior spaces included in Title 24 of the California Code of Regulations (California Noise Insulation Standards). An acoustical basis of design has identified noise levels at the building façades along adjacent roadways and determined preliminary window ratings for each level along those façades. The acoustical basis of design additionally provided guidance for noise control and recommended continued analysis of expected sound levels in and adjacent to the property line. Traffic-related noise impacts will not be perceptible in noise-sensitive areas of the Presidio in comparison to existing conditions. Therefore, impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

The Community

Land Use

The Letterman Planning District will allow for some infill construction while retaining its primarily office land-use orientation with some residential and support services. The proposed project consists of residential land use, which was envisioned for the district, and will not change the existing land uses in the Letterman District. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Socioeconomic Issues/Housing Supply

PTMP EIS Final Plan Alternative was found to introduce a total of 1,295 dwelling units, meeting 42 percent of new housing demand, 29 percent of total demand, and 87 percent of Presidio-based demand. The proposed project will similarly serve to meet additional housing demand. The PTMP

EIS included Mitigation Measure CO-2: *Jobs/Housing Balance Monitoring*, that directs the Trust to conduct ongoing review of housing demand, occupancy, and unit mix, and demonstrate progress toward the job/housing balance. To that end, the proposed project will consist of market-rate studio, 1-bedroom, and 2-bedroom housing units. Currently, most of the housing units in the Presidio are 3- and 4-bedrooms. People who work full-time in the Presidio get preference for housing, supporting the Trust's goal of reducing traffic and encouraging a strong live-work community. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Schools

The PTMP acknowledges that projecting public school enrollment years into the future is not reliable, and as such includes Mitigation Measure CO-3: *Collaboration with SFUSD*, which states that the Trust will make all reasonable efforts to collaborate with SFUSD to locate necessary space for students residing in the Presidio. To comply with that requirement, as part of project design process, the Trust reached out to SFUSD, bringing this project and potential associated enrollment to their attention. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Visitor Experience

No visitor facilities are located within the project site; therefore, no visitor facilities will be directly affected by the proposed project. The proposed project's residential use, buildings, and dwelling units are within those considered in the PTMP EIS. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Recreation

No recreational facilities are at the project site; therefore, no recreational facilities will be directly affected by the proposed project. The proposed project's residential use, buildings, and dwelling units are within those considered in the PTMP EIS. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Public Safety

Law Enforcement

As analyzed in the PTMP EIS, law enforcement services do not readily change in proportion to changes in population; however, an increase in resident and employee populations at the Presidio could potentially increase calls for police service. The PTMP EIS includes Mitigation Measure CO-12: *Expansion of Public Safety Services*, which states that as the PTMP is implemented, the Trust will work with the U.S. Park Police (USPP) to review public safety standards, staffing, and equipment to help ensure adequate law enforcement coverage across the Presidio. The Trust coordinated with USPP in fall 2025 regarding service levels in the Presidio. Currently, service levels are adequately met in the Presidio, and USPP has the capacity to adequately patrol additional dwelling units under the proposed project. USPP additionally coordinates with the San Francisco Police Department if a large incident occurs and additional support is required. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Fire Protection and Emergency Response

Fire Station 51, the station that serves the Presidio, currently has the capacity to meet additional fire protection and emergency response needs, and consistent with the PTMP EIS, the Trust continues to coordinate with emergency services to adequately manage fire protection and emergency response within the Presidio. Additionally, all building plans will be reviewed by the Fire Marshal office to help ensure adequate fire safety. The proposed project will comply with all applicable building and fire codes enforced by the Trust at the time of construction. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Hazardous Substances

The project site falls within Fill Site 6B and is subject to Department of Toxic Substances Control (DTSC) Land Use Controls (LUCs). However, additional testing and analysis indicates that lead levels are relatively low. The Trust has requested from DTSC that the LUCs be removed and is working with DTSC on next steps in the process. During construction and project implementation, if the LUCs are still in place, the Trust will continue to follow the existing LUC guidelines and implement a DTSC-approved soil management plan, construction mitigation measures, and construction of a cover to prevent access to fill soils. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Geologic and Seismic Hazards

Review of available geologic hazard databases confirms that the project site is not located in an Alquist-Priolo Earthquake Fault Zone or an area that is prone to both landslides and liquefaction. A preliminary geotechnical report has been prepared for the project site, and the proposed project will be designed and constructed in compliance with all applicable adopted agency codes and federal regulations, including current seismic safety standards. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Utilities

Water Supply and Distribution

Long-term water demand for the proposed project will primarily be for residential uses. Both the Trust and SFPUC have included water demand projections for development under the PTMP EIS as part of long-term water supply planning. The Trust is committed to implementing water conservation measures to help ensure long-term water supply sustainability. The project will employ water conservation measures such as metering all water use, installing low flow plumbing fixtures, selecting lower water-use plants and employing an efficient irrigation system. The proposed project will not alter any fire-flow water storage in the Presidio. The PTMP EIS considered upgrades to the water distribution system across the park, including many small individual projects, as well as new water connections required for building rehabilitation and new construction. The proposed project will include construction of laterals for domestic, irrigation, and fire water to service each building from the adjacent water distribution system. New fire hydrants will be placed around the site. Impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Presidio Sanitary Sewer System

Maximum sewer outflows (approximately 78,000 gallons per day) analyzed in the PTMP EIS were determined to not burden the city and county of San Francisco wastewater treatment facilities. Wastewater from the project area will be transported to the city's Southeast Water Pollution Control Plant. This plant is San Francisco's largest wastewater facility, with a designed average dry-weather flow treatment capacity of 85.4 million gallons per day (MGD) and a designed peak wet-weather flow capacity of 250 MGD. Average dry weather flows in 2018 were 52.6 MGD. Therefore, the plant will have adequate capacity to treat wastewater generated by the proposed project. The proposed project will include new lateral connections to the Trust's own sewer distribution system upstream of where it is metered and discharged to the city at Lift Station 1076. The buildings will implement water conservation measures, minimizing additional wastewater flows. With utility upgrades and standard water conservation efforts, impacts associated with the proposed project will be consistent with those analyzed in the PTMP EIS, supporting a Finding of No Significant Impact.

Storm Drainage

A Stormwater Management Plan has been drafted for the project site, and includes a large, approximately 250-square-foot, bioretention area north of the parking lot and smaller bioretention areas west of each building. In addition, landscape areas will be included between buildings, along the project frontages, and in the parking lot. Storm drainage pipes will extend across the site and connect to the main in Edie Road. The stormwater management plan follows guidelines from the Bay Area Municipal Stormwater Collaborative, low impact development standards from CalGreen, and LEED Homes for Multi-family Low-Rise rainwater management guidance. The project will be in compliance with the Clean Water Act. Project construction will disturb an area of approximately 4.66 acres and will be subject to the National Pollutant Discharge Elimination System Construction General Permit for Stormwater. The permit requires a Stormwater Pollution Prevention Plan, and permit compliance will minimize pollutants such as sediment, chemicals, and debris from entering waterways. Changes in stormwater drainage due to project implementation will be consistent with impacts analyzed under the PTMP EIS, supporting a Finding of No Significant Impact.

Solid Waste

The PTMP EIS estimated that in 2002, approximately 22,000 tons of solid waste from demolition, construction, and rehabilitation were generated at the Presidio each year. The square footage of new construction proposed for the project falls within that considered in the PTMP EIS. Furthermore, the project will meet LEED Homes for Multi-family Low-Rise, which requires a comprehensive construction waste management plan that diverts at least 50% of non-hazardous debris from landfills. The proposed project will include a trash room in each building, with an area for trash, recycling, and compost, and a covered trash enclosure near the center of the parking lot. Therefore, changes in solid waste generation due to project implementation are consistent with impacts analyzed under the PTMP EIS, supporting a Finding of No Significant Impact.

Energy Consumption and Distribution

The square footage of the new construction proposed for the project falls within that considered in the PTMP EIS and energy conservation measures will be implemented. The proposed project will achieve a minimum LEED Homes Gold rating and will be all-electric buildings that meet Title 24/LEED energy-efficiency requirements. The proposed project and project alternatives will include new electrical connections to the adjacent system, transformers and other distribution equipment, and vehicle chargers. All electricity will be metered.

Because the square footage of the new construction proposed for the project falls within that considered in the PTMP EIS, the resulting impacts are consistent with the PTMP EIS, supporting a Finding of No Significant Impact.

Agency Consultation and Public Involvement

NHPA Review Process

Consistent with the Presidio Trust Programmatic Agreement and Advisory Council on Historic Preservation regulations that recommend early integration of Section 106 compliance with NEPA and other agency processes, the Trust notified the PTPA parties of the project undertaking and initiated consultation on the Letterman Residential Project on November 3, 2025.

The Trust will submit the EA to all PTPA parties as a supplemental consultation package along with a summary of comments gathered during public scoping, agency responses, a finalized APE, a detailed Finding of Effect (FOE), and a request for a consultation meeting. If necessary, the Trust will hold a consultation meeting with the signatory parties to seek consensus that the undertaking of the project will not adversely affect historic properties in the Presidio NHLD prior to execution of the FONSI.

Agency Review

The Presidio Trust coordinated with multiple federal, state, and local agencies to review the Letterman Residential project and ensure compliance with environmental and historic preservation requirements, including consultation under the National Historic Preservation Act (NHPA).

- **Advisory Council on Historic Preservation (ACHP).** As an administrator of the NHPA Section 106 process and a signatory to the Presidio Trust Programmatic Agreement (PTPA), the ACHP reviewed the initial consultation materials but provided no comments.
- **National Park Service (NPS).** The NPS, which manages nearby Area A of the Presidio and is also a PTPA signatory, received the consultation package through regional and local offices. No comments were provided.
- **California State Historic Preservation Officer (SHPO).** The SHPO agreed that the project is an undertaking with potential effects on historic properties and found the Area of Potential Effects generally sufficient. The SHPO requested additional information on archaeological resources and tribal consultation, which the Trust provided.

Other Agency Review

- **Department of Toxic Substances Control (DTSC):** DTSC commented on the project due to its location within active and inactive cleanup sites, including Fill Site 6B, which has contamination managed under land use controls. DTSC requested analysis of hazardous materials and soil management practices and recommended testing of any imported fill material. The Trust addressed DTSC's concerns in the Draft EA and included project conditions to ensure compliance with land use controls and soil testing requirements.

Public Involvement

The Trust conducted public outreach efforts to share information regarding project development and the Draft EA. The efforts included a project webpage, email notices, meetings with adjacent tenants, and an informational open house on November 18, 2025. The public scoping period closed on December 8, 2025.

During the scoping period, the Trust received comments from public agencies, one organization, and 40 individuals. Key issues raised included project consistency with the PTMP, the number of dwelling units, consideration of a true no-action alternative, underground parking, historic compatibility and landscape buffers, construction impacts (vibration, traffic, staging), infrastructure capacity, environmental protections (trees, birds), traffic and pedestrian safety, parking and permitting, housing affordability, and historic interpretation of Building 1028. Responses to these comments are provided in Draft EA Appendix E.

Resource Protection Measures

The Trust commits to carrying out all measures identified in the EA to avoid or minimize environmental impacts that could result from constructing the project. The resource protection measures are discussed in detail throughout Section 3, *Affected Environment and Environmental Consequences* and in Appendix B, and summarized below:

- Historic resources construction buffer zone
- Follow Stipulation VII (Archaeology) of the Presidio Trust Programmatic Agreement (PTPA)
- Nesting bird survey
- Tree protection plan
- Exhaust measures for construction equipment and vehicles
- Dust Prevention and Control Plan
- Noise Suppression Plan
- Time restrictions for construction
- Perform work in accordance with the Fill Site 6A and Fill Site 6B Land Use Control Site-Specific Addendum to the Presidio Trust Land Use Control Master Reference Report (LUC Addendum)

- Paint with lead best management practices
- Develop and implement a Stormwater Pollution Prevention Plan, along with the National Pollutant Discharge Elimination System Construction General Permit for Stormwater
- Transportation Demand Management
- Construction Management Plan
- Review by Design Review Committee
- Compliance with outdoor lighting policies and standards
- Community notification prior to and during construction

Finding

The Trust has considered the information and analyses in the environmental assessment and supporting environmental documentation, the comments of agencies and the public, and the project's administrative record. Based on Trust regulations on environmental quality (36 CFR 1010), PTMP policies, monitoring, and experience, including prior significance determinations documented in previous NEPA decisions and the adoption of enforceable measures outlined in the EA, it is the determination of the Trust that the project is not a major federal action having the potential to significantly affect the quality of the human environment. There are no significant effects on public health or safety, sites listed on the National Register of Historic Places, or other unique characteristics of the project area. Implementation of the project will not involve unique or unknown risks, cause loss or destruction of noteworthy park resources, or violate any Federal, State or local law. Implementation of the project is not precedent setting, nor will it automatically trigger other actions which may require environmental impact statements. Through the NHPA Section 106 process to include the parameters of the Conditional Finding of No Adverse Effect, and in accordance with Section 110 of the NHPA, the Trust has, to the maximum extent possible, undertaken such planning and actions as may be necessary to minimize harm to the landmark. Therefore, in accordance with the National Environmental Policy Act of 1969, an EIS will not be prepared. The Trust will implement the proposed project, the Letterman Residential Project, at the earliest possible time.

Jean Fraser
Chief Executive Officer, Presidio Trust

Date

APPENDIX B

Resource Protection Measures

Resource Protection Measures

The following resource protection measures will be conditions of project approval. Many of these conditions have evolved from the PTMP EIS Mitigation Measures, which have been incorporated into Trust standard operating procedures, permit processes, guide specification sections and standard construction details, and/or the Presidio Trust Programmatic Agreement.

Historic Resources

The Project Manager will ensure that during site work and construction, the contractor will maintain a buffer of at least 10 feet from the exterior walls of adjacent historic buildings to avoid damage to roof eaves or other architectural elements. Buffer zones will be protected with construction fencing and contractors will implement best practices for equipment safety. Contact Rob Thomson, Federal Preservation Officer, rthomson@presidiotrust.gov or (415) 624-7205.

Archaeology

The Project Manager, in conjunction with the Trust Archaeologist, will ensure that Stipulation VII (Archaeology) of the Presidio Trust Programmatic Agreement (PTPA) will be followed:

- *Archaeological Management Assessment.* As outlined in Stipulation VII of the PTPA an Archaeological Management Assessment (AMA) shall be prepared by a qualified archaeologist as this undertaking involves ground-disturbing activities within or adjacent to archaeologically sensitive areas. The AMA will outline a course of action for the project.
- *Excavation Permit.* The Project Manager will ensure that the contractor obtains an Excavation Permit for all ground disturbing activities and follows stipulations for archaeological observation recommended by Presidio Trust Archaeology.
- *Standard Discovery Protocols* Any discoveries made during construction will be handled in accordance with the standard discovery protocols outlined in Appendix B of the PTPA.

Contact Kari Jones, Archaeologist, kjones@presidiotrust.gov or (415) 716- 8519.

Natural Resources

Nesting Bird Survey. The Project Manager will contact the Wildlife Biotechnician to conduct a bird survey should removal of any vegetation above 8 inches (trees, shrubs, grasses, etc.) occur between January 1 and July 31. Notification will be given at least two weeks prior to ground disturbance. The Wildlife Biotechnician may require implementation of measures for bird protection, such as delay of work or buffer zones around active nests. Contact Margarita Montenegro, Natural Resources Supervisors, MMontenegro@presidiotrust.gov or 415-940-2538.

Tree Protection Plan. The Project Manager will ensure that the contractor prepares and implements a Tree Protection Plan. The Plan will identify trees to be removed, trees to be protected, construction activities within tree protection zones and canopy drip line areas of all trees to be protected, and tree protection measures. Contact Steve Duffy, Forester, SDuffy@presidiotrust.gov or (415) 561-4231.

Air Quality

Exhaust Measures for Construction Equipment and Vehicles. At the direction of the Project Manager, the Contractor must develop an idling policy that complies with the *PTMP*'s *Environmental Impact Statement* condition for construction equipment emissions. Additionally, the Contractor must document that all construction equipment and vehicles conform to applicable requirements, which can be found on the California Air Resources Board website. These requirements include, but are not limited to, the following:

- No vehicles are to idle for more than five minutes.
- Engine horsepower is not to be increased.
- Vehicles must have particulate traps, oxidation catalysts and other suitable control devices.
- Vehicles must use ultra-low sulfur diesel fuel with sulfur content of 15 parts per million or less.
- Vehicles must be tuned to the engine manufacturer's specifications in accordance with a defined maintenance schedule.
- Vehicles are not to be unnecessarily operated or staged near occupied buildings, residences, lodging, schools or childcare facilities.

Dust Prevention and Control Plan (DPCP). A DPCP is required for all projects that will create dust emissions. The DPCP must either demonstrate that there will be no discharge of dust from the construction site or, if dust will be discharged, include documentation of how the Contractor will reduce construction-generated particulate matter emissions to a level acceptable to the Trust (PM-10 standard).

Depending on the scale of the project, a water truck may be required for dust control. In such cases, the Trust Designated Representative (TDR) or Trust construction manager will review the scope of earthwork activities to determine the appropriate amount of watering. Under dry conditions, a site may require watering three or more times per day. Trucks hauling soil, sand or any other loose material must be covered. Vehicle speeds on construction access roads and within any construction site may not exceed posted limits or 15 miles per hour, whichever is lower. The DPCP must include the name, mailing address, telephone number(s) (cellular) and email address of the person who will be available to the project on a 24-hour basis throughout the course of construction.

The DPCP must include a description of site conditions during construction operations, including outside of normal working hours and during each specific phase of construction. It must also detail how dust creation and transmission will be reduced or eliminated, including, but not limited to the following:

- Procedures that will be used to keep public streets and adjacent properties along the haul route free of dirt, dust and other debris;
- Plans to control dust on graded sites, if any, including areas not under construction; and

- Methods to help ensure that dust will not be generated during phases of work occurring after the above measures have been curtailed.

The DPCP shall be provided to Nina Larssen, Environmental Remediation Manager, Nlarssen@presidiotrust.gov and Shannon Allen, NEPA Compliance Manager, Sallen@presidiotrust.gov prior to any ground disturbance.

Noise

Noise Suppression Plan (NSP). At the direction of the Project Manager, the Contractor shall prepare an NSP. The NSP shall be based on project specific anticipated equipment and construction methods. It shall identify major noise sources, equipment muffling and maintenance assumptions, proximity to adjacent noise receptors, and mitigation strategies as needed (such as temporary plywood boarding). The NSP shall demonstrate general conformance with the San Francisco Noise Ordinance (San Francisco Municipal Code, Section 2907).

The NSP shall be provided to Shannon Allen, NEPA Compliance Manager, Sallen@presidiotrust.gov prior to any ground disturbance.

Time Restrictions for Construction. The Project Manager will ensure construction work is restricted to the following days and times:

- A. Except as modified by the Permit or instructed by Trust Representative, regular working hours in non-residential neighborhoods are from 7:00 A.M. to 5:00 P.M. In residential neighborhoods regular working hours are from 8:00 A.M. to 5:00 P.M. The Letterman Residential Project is subject to the neighborhood working hours. Work may be performed on as-needed basis after 5:00 P.M. until 8:00 P.M. and on Saturdays provided that Trust's Construction Manager is notified 24 hours in advance and approves the request.
- B. Noisy activities, such as pile driving, concrete sawing, metal deck cutting, and jackhammering are restricted to 8:00 A.M. to 4:30 P.M. Noisy activities may be performed Saturdays in non-residential areas from 9:00 A.M. to 5:30 P.M. provided Trust's Construction Manager is notified 24 hours in advance.
- C. No work is permitted on Sundays or federal holidays, unless requested through Trust's Construction Manager and approved by Trust Representative. Work approved will be subject to regular work hour restrictions unless approved otherwise by Trust.

Hazardous Materials - Soils

The Project Manager will ensure all work is performed in accordance with the Fill Site 6A and Fill Site 6B Land Use Control Site-Specific Addendum to the Presidio Trust Land Use Control Master Reference Report (LUC Addendum), and other applicable regulatory requirements, including the following:

- *Sensitive Use Restrictions* – Use of LUC Zone for construction of residential facilities with backyards or playground without tenant restrictions on soil disturbance is prohibited without

preparation and implementation of a Department of Toxic Substance Control (DTSC) approved Soil Management Plan. Requirements for the Soil Management Plan are described in Section 5 of the LUC Addendum.

- *Tenant Restrictions on Soil-Disturbing Activities* – Current tenant restrictions on soil-disturbing activities and prohibitions on installing raised beds, planting in-ground, or disturbing the ground surface will continue to be enforced.
- *Soil Management Requirements* – All soils excavated from the LUC Zone shall be managed and/or disposed in accordance with Presidio policies and procedures and applicable federal, state, and local laws and regulations. Earthwork for construction of residential facilities will be performed in accordance with a DTSC-approved Soil Management Plan.
- *Cover Requirements* – Placement of cover to provide a barrier between fill soil and receptors. Cover options are described in Section 5 of the LUC Addendum.
- *Import materials (e.g. soil, aggregate, compost, etc.)* - Shall be tested in accordance with the 2001 DTSC Fill Advisory and Presidio Standard Operating Procedures and must be approved by DTSC in advance of importing to the park.
- *Dust and Air Monitoring* – Shall be conducted in accordance with the DTSC Community Air Monitoring Plan guidance (January 2020).

Contact Nina Larssen, Environmental Remediation Manager, Nlarssen@presidiotrust.gov or (415) 561-5421.

Hazardous Materials – Lead

The Project Manager will ensure any demolition work that may include paint with lead follows the Presidio Trust Best Practices. Areas around/below the activity that could be affected will be protected, to the extent possible deconstruction will limit chipping. Contact Matt Epstein, Director of Public Safety, MEpstein@presidiotrust.gov or (415) 793-3205.

Stormwater

The Letterman Residential project is expected to disturb soil in an area larger than 4 acres therefore qualifying for coverage under the National Pollutant Discharge Elimination System Construction General Permit for Stormwater. The Trust will apply for coverage with the U.S. Environmental Protection Agency, through the Central Data Exchange portal or CDX. Consultation with US Fish and Wildlife Service must take place at least 90 days before any project groundbreaking activities begin to satisfy the federal Endangered Species Act requirements. A Stormwater Pollution Prevention Plan must be developed prior to the permit application and implemented throughout the duration of the project. Contact Debora Sanches, Environmental Protection Specialist, Public Safety, Dsanches@presidiotrust.gov or 415-271-0513.

Transportation and Circulation

Transportation Demand Management. With the PTMP, the Presidio Trust adopted an aggressive transportation demand management (TDM) program to reduce overall reliance on the

automobile, and the Trust has now implemented many of the TDM program measures identified in the PTMP, including a parking management program and the Presidio GO shuttle. Project residents will be eligible for Presidio GO shuttle passes, will be subject to parking fees and will be encouraged to participate in travel behavior surveys.

The Project Manager will work with the Trust Transportation Manager to incorporate the following physical measures into the design and construction of the project.

- Common areas suitable for posting transit information;
- Secure bicycle parking;

Contact Transportation Manager, Amy Marshall, Amarshall@presidiotrust.gov or (415) 317-8459.

Construction Management Plan. The Project Manager will be responsible for obtaining all applicable permits, including an Encroachment Permit, which will include a Traffic Control Plan. The plan will include information on construction phases and duration, scheduling, proposed truck routes, permit parking, staging area management, visitor safety, and detour routes for pedestrians and cyclists as well as motorists. Contact Rachel Krieger, Transportation Engineer, RKrieger@presidiotrust.gov or (628) 249-2946.

Design Review

Design Review Committee. The project is subject to review by the Design Review Committee. DRC reviewed Schematic Review drawings and will next review Design Development drawings. At future meetings, the DRC will continue to consider compliance with the West Letterman Design Guidelines, plantings, lighting and signage to ensure a consistent standard of design across the park. Contact Yarnie Chen, Urban Designer, YChen@presidiotrust.gov or (415) 961-7776.

Outdoor Lighting Design. The Project Manager will ensure that the outdoor lighting design is consistent with the Trust's policy for Outdoor Lighting, the PTMP, and Dark Sky standards. Outdoor lighting will be shown in the final permit set. Contact Yarnie Chen, Urban Designer, YChen@presidiotrust.gov or (415) 961-7776.

Community Notification

Notification Prior to Construction. The Project Manager will work with the Senior Advisor for Government & Community Relations, who will develop and implement a public notification strategy. The strategy may include on-site signage, targeted emails, notification to larger resident and/or tenant email lists and posting on the Trust website to ensure prior notification of work and associated closures to affected residents, tenants, staff, partners, and visitors. Outreach to Government & Community Relations shall be initiated at least three weeks prior to posting any detours or closures or otherwise commencing work. Contact Dana Polk, DPolk@presidiotrust.gov or (415) 640-1208.

Notification During Construction. The Project Manager will ensure that that the Contractor provides a monthly project update that includes a description of the current project phase of work, a “look ahead” to activities occurring in the next reporting period, identification of any traffic and pedestrian concerns, a description of noise-generating activities and a description of hauling and hauling and staging operations. The Project Manager will provide these reports to the Senior Advisor for Government & Community Relations, who may use information at their discretion. If the project site has a “web cam”, arrangements can be made with the Project Manager to post images on the Trust’s website. Contact Dana Polk, DPolk@presidiotrust.gov or (415) 640-1208.

Appendix C
**California State Historic
Preservation Officer Letter
(December 2025)**



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

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

December 2, 2025

VIA Email

In reply, refer to: TPT_2025_1104_001

Mr. Rob Thomson
Federal Preservation Officer
The Presidio Trust
1750 Lincoln Boulevard
San Francisco, CA 94129-0052

Subject: Letterman Residential Project, First Consultation Package, Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

The California State Historic Preservation Officer (SHPO) has received the Presidio Trust's letter dated November 3, 2025, initiating consultation on the Letterman Residential Project undertaking. In accordance with the Presidio Trust Programmatic Agreement (2025 PTPA), the Trust requests comments on the draft Area of Potential Effect (APE) and list of historic properties in the APE. Along with the letter, the Trust submitted a Notice of Intent to Prepare an Environmental Assessment and Invitation to Participate and Comment document and an APE map and narrative justification.

The undertaking, as described, involves the Trust constructing 196 units of housing spread across six new buildings on a 4.6-acre site on the west side of the Letterman Planning District, adjacent to the remnant historic Letterman General Hospital buildings. In addition to the new buildings, the project will include landscape rehabilitation, circulation and infrastructure upgrades, and reconfiguration of the existing parking lot.

The Trust has identified an APE for the Letterman Residential Project, hereby defined as the undertaking. The scale of undertaking is such that the APE for potential direct and indirect effects of the undertaking is limited to the Letterman Planning District. The Letterman Planning District includes roughly 30 buildings located in the northeastern corner of the Presidio (Area B), south of Crissy Field and northeast of the Main Post Planning Districts. In addition to historic residential, medical, warehouse and infrastructure buildings, the planning district is adjacent to the Letterman Digital Arts complex, a four-building group of non-historic office buildings constructed in 2003.

The Trust notes that there are no known archaeological sites within the APE, but there are several buildings that contribute to the Presidio National Historic Landmark District.

After reviewing the information submitted in this First Consultation Package, the SHPO offers the following comments.

- The SHPO agrees that the Letterman Residential Project constitutes an undertaking with the potential to affect historic properties.
- The SHPO finds the draft APE to be generally sufficient.
 - However, no anticipated depth of ground disturbance is included in the project description or APE justification.
 - Please provide the depth of ground disturbance and include it as the vertical APE for the undertaking.
- The second consultation package will include, among other items, further information regarding identification and evaluation efforts for historic properties in the APE.
 - The SHPO requests that the Trust include more details about archaeological survey efforts in the APE, any survey efforts planned for this undertaking, and general archaeological sensitivity of the APE.
 - The SHPO also requests information regarding the Trust's efforts to consult with Native American Tribes for this undertaking.

If you have any questions or concerns, please contact Mark Beason, State Historian, at (916) 503-8599 or at mark.beason@parks.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to be 'J. Polanco', with a long horizontal line extending to the right.

Julianne Polanco
State Historic Preservation Officer

Appendix D

Department of Toxic Substance Control Letter (December 2025)



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

December 4, 2025

Shannon Allen
NEPA Compliance Manager
Presidio Trust
1750 Lincoln Boulevard
San Francisco, CA 94129
Sallen@presidiotrust.gov

RE: NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL ASSESSMENT FOR
THE LETTERMAN RESIDENTIAL PROJECT

Dear Shannon Allen,

The Department of Toxic Substances Control (DTSC) reviewed the Notice of Intent to Prepare an Environmental Assessment for the Letterman Residential Project (Project). The Project includes the construction of six residential buildings with 196 dwelling units, in 159,752 square feet of new construction on a 4.66-acre site, to reestablish the historic character and density of the area. The Project is located in the western portion of the Letterman District within the Presidio of San Francisco (Presidio or park). Redevelopment of this area was envisioned in the Presidio Trust Management Plan (PTMP). The buildings will consist of three two-story stand-alone walk-up buildings with 17 to 31 units per building, and three three-story buildings connected via bridges at levels two and three, with 42 to 46 units per building. The buildings are rectangular and laid out parallel or perpendicular to surrounding roadways and buildings as to relate to the existing historic buildings, and the historic pattern of development. The building forms will be simple and functional in the tradition of military architecture found in the Letterman District and throughout the Presidio.

The Project will also include new sidewalks, walkways and bicycle paths, landscaping, lighting and street furniture, rerouting of utilities, and modifications to Edie Road, along with resurfacing and removal of parking spaces in the central parking lot.

The proposed Project encompasses multiple active and nonactive mitigation and clean-up sites where DTSC has conducted oversight that may be impacted including, the [Presidio of San Francisco Fill Site 6B](#). The Presidio of San Francisco (Presidio) is located at the northern tip of the San Francisco Peninsula and was historically used for a variety of Army activities. In 1996, the Presidio Trust (Trust) was created, and since 1999 the Trust has managed the environmental cleanup of the Presidio. The Trust, National Park Service, and DTSC entered into a Consent Agreement in 1999. Fill Site 6B (FS6B) is located on the northeastern side of the Presidio, approximately 1,000 feet west of the Gorgas Gate. Fill Site 6A (FS6A) and FS6B were formerly occupied by buildings including hospital wards, laboratories, and housing associated with the former Letterman Army Medical Center (LAMC). The northwestern portion of FS6B was formerly occupied by a paint shop, crematory, and vehicle maintenance facility. Many of these buildings were demolished in the 1970s, and a portion of the building debris was left onsite. This fill containing building debris defines the extent of FS6B and is the primary source of contaminants in soil at the Site. DTSC recommends and requests consideration of the following comments:

1. The Notice of Intent states that all environmental issues will be at least briefly described, and that the key topics are expected to be historic resources and transportation and circulation. The proposed development is in an area with operation and maintenance requirements due to contamination left in place. The [Presidio of San Francisco Fill Site 6B](#) is subject to the [Fill Site 6A and Fill Site 6B Land Use Control Site-Specific Addendum to the Presidio Trust Land Use Controls Master Reference Report \(LUC\)](#) dated March 26, 2014. The LUC includes restrictions for Zones 2 and 3, including sensitive use restrictions, tenant restrictions on soil-disturbing activities, and soil management requirements. In the Environmental Assessment, please discuss hazardous materials at the site (historically and currently), as well as

operation and maintenance requirements for contamination left in place.

Please discuss how the proposed development will adhere to operation and maintenance requirements and be protective of future receptors during construction and implementation.

2. DTSC recommends all imported soil/fill material be tested to ensure all chemicals of concern (COCs) meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment Guidance Manual](#). Furthermore, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil/fill material there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.

DTSC would like to thank you for the opportunity to comment on the Notice of Intent to Prepare an Environmental Assessment for the Letterman Residential Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

Shannon Allen
December 4, 2025
Page 4

cc: (via email)

Isabella Roman
Senior Environmental Scientist / Project Manager
SMRP-Berkeley Cleanup
Department of Toxic Substances Control
Isabella.Roman@dtsc.ca.gov

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

APPENDIX E

Scoping Comments and Responses

Letterman Residential Project Environmental Assessment Public Scoping Comments and Responses

By the close or shortly after the public scoping period for the Environmental Assessment (EA) that ended December 8, 2025, the Trust received two letters from public agencies, one organization and 40 interested individuals. The organization and individuals are listed below; concerns raised during scoping, organized by issues, with responses follows.

Organization	Date
Presidio Historical Association, Peg DiGiammarino, Board President	December 8, 2025
Individuals	Date
Susanna Benningfield	November 5, 2025
James Birk	November 5, 2025
Lucia Bogatay	December 8, 2025
Anna-Marie Booth	November 5, 2025
Tom Bochenek	December 7, 2025
Debbie Dettmer	November 3, 2025
Trevor Ditzler	December 8, 2025
Sofia Echegaray	November 5, 2025
Elizabeth	November 5, 2025
Emily	December 3, 2025
Jill Faber	November 17, 2025
Derek Foster	December 8, 2025
Diane Frankenstein	December 7, 2025 (email) and December 7, 2025 (web)
Cynthia Gissler and Amy Meyer	December 5, 2025
Joey Kotfica	November 25, 2025
John Kontrabecki	November 5, 2025
Shawn Lani	November 5, 2025 (web) and December 4, 2025 (email)
Catherine Ling	October 31, 2025
Annette Lonich	November 10, 2025
Marilyn Moffett	November 2, 2025
Jan Monaghan	December 8, 2025
Joe Murray	November 5, 2025
Sonia Murray	November 5, 2025
Jayme Ohlhaber	December 19, 2025
Guy Palmer	November 6, 2025
Janet Pellegrini	December 7, 2025
Richard Pellegrini	December 7, 2025
John Reynolds	December 5, 2025
Myron Roy	November 5, 2025

Individuals	Date
Shilpa Sarkar	November 1, 2025
Lynn Sondag	December 5, 2025
Laura Strazzo	November 6, 2025
Sue Thornley	November 13, 2025
Lucas Tobin	December 4, 2025
Victor Tong	December 4, 2025
Vinit Verma	November 12, 2025
Paul Wermer	December 8, 2025
Mark Yañez	December 3, 2025
Lily Zhen	December 8, 2025

Compliance with PTMP

Compliance with PTMP Development Limits

The PTMP established 152 dwelling units as the maximum for the West Letterman area based on comprehensive environmental review and public input. The proposed 196 units represents a 29% increase over this threshold.

Recommendation: The EA should explicitly analyze whether exceeding the PTMP maximum of 152 units requires an amendment to the PTMP itself, and if so, what additional environmental review and public process would be required for such an amendment. If the Trust believes it can approve 196 units without a PTMP amendment, the EA should provide the legal and planning basis for this determination. (Thomas P. Bochenek)

Response: The proposed project is a small adjustment, not a substantial change, from what was previously considered, and as is demonstrated in the Draft EA, would not result in significant new or different environmental impacts not addressed in the PTMP EIS. As such, the EA is the appropriate NEPA document. The PTMP and PTMP EIS included new construction housing west of the historic hospital complex to articulate the character and density of the historic district. As described in Draft EA Section 2.1.1, *Residential Buildings*, the 159,752 square feet of new construction considered under the proposed project is approximately 35,842 square feet less than that considered for the Letterman District in the PTMP. The 196 dwelling units will result in 44 dwelling units greater than what was considered for the Letterman district in the PTMP, but 71 dwelling units less than what was considered parkwide.

Alternatives

No Action Alternative

The Environmental Assessment must include a true “No Action Alternative” that maintains the current condition of the site as a baseline for comparing environmental impacts. The Notice of Intent describes a “No Action Alternative” with 152 dwelling units, but this is not a genuine baseline; it still represents significant new development. Without analyzing the impacts of

maintaining the status quo (no new residential construction), it will be impossible to properly assess the incremental environmental effects of either the 152-unit or 196-unit alternatives.

Additionally, the PTMP established 152 dwelling units as the maximum for the West Letterman area, yet the proposed action is 196 units—a 29% increase over this threshold. The EA's alternatives appear structured to present 152 units as a compromise position, when in fact 152 units is the established planning maximum and should be evaluated against a true no-build baseline.

Recommendation: The EA should include three distinct alternatives for comparison: (1) a true No Action Alternative maintaining current site conditions with no new residential development; (2) an alternative with the PTMP maximum of 152 dwelling units; and (3) the proposed action of 196 dwelling units. This structure will allow for meaningful analysis of incremental impacts and proper NEPA compliance. (Thomas P. Bochenek)

The Environmental Assessment must include a true “No Action Alternative” that maintains the current condition of the site as a baseline for comparing environmental impacts. The Notice of Intent describes a “No Action Alternative” with 152 dwelling units, but this is not a genuine baseline; it still represents significant new development. Without analyzing the impacts of maintaining the status quo (no new residential construction), it will be impossible to properly assess the incremental environmental effects of either the 152-unit or 196-unit alternatives. (Diane Frankenstein, webform)

Response: Implementation of the PTMP is the appropriate No Action Alternative. According to the NEPA regulations (40 U.S. Code of Federal Regulations Section 1502.14(c)), the Trust must analyze the negative environmental impacts of not implementing the proposed agency action. That is, a no action alternative may mean “no change” from a current management direction. Therefore, for the Draft EA, implementation of the PTMP is considered the No Action Alternative.

Relocated Parking Underground

Consideration should be given to providing underground parking (as at the Lucas digital arts buildings) to allow for more landscaping and better protected parking. This could be accommodated under the buildings. Of course excavation would have to allow for the potential need for archaeological investigation. It would add to the cost, but would greatly enhance the livability of the project. (Lucia Bogatay)

I would like to see the parking spaces moved underground and an open, green space placed atop of it. (Joe Murray)

Inconsistency with Presidio Trust Management Plan Historic Open Space Goals. The PTMP explicitly calls for the Trust to “re-establish the historic courtyard and connect it with other open spaces and formal landscapes” (PTMP page 103) and to “re-establish the active character of the historic hospital district by...restoring key open spaces” (PTMP page 104). The PTMP shows a green open space rendering of the restored historic courtyard, copied below from page 102.

The current proposal appears to ignore these open space restoration objectives; the plan leaves the unattractive parking lot which was created in 1980 (PTMP page 104).

Recommendation: The EA should analyze an alternative that includes underground parking to accommodate one vehicle per residential unit (up to the PTMP maximum of 152 units) plus the maximum number of vehicles currently served by surface parking in this area, including Friends of the Urban Forest vehicles.

The underground parking approach was successfully implemented for the Letterman Digital Arts Complex and would allow the project to restore historic open spaces while meeting parking needs. The EA should evaluate the costs, benefits, and feasibility of underground parking as a means to better achieve the PTMP's historic preservation goals. (Thomas P. Bochenek)

Response: The Trust addressed the treatment of the parking lot/historic courtyard space in the 2024 Design Guidelines as follows:

Consider an incremental approach to moderating the hardscape character of the central parking lot, while retaining necessary parking. Introduce trees and planting to the parking area in a pattern consistent with the historic formal landscape.

All alternatives follow this guidance by improving the existing parking lot with the addition of robust edge planting, tree islands and bioswales, while meeting present-day parking needs. See Draft EA Section 3.1.1, *Historic Resources*, for additional discussion of cultural landscape treatments and Draft EA Section 2.1.9, *Alternatives Eliminated from Further Consideration, Underground Parking*.

Historic Resources

Omit the Southernmost Building

I support adding modest, compatible apartments in the Letterman District—particularly the multi-building cluster to the north, which restores the historic rhythm of narrow bars and courtyards. However, the single southern building proposed along Lincoln/Girard reads as an outlier. It wedges new mass between intact historic structures near the former hospital complex, disrupts the established density and spacing, and erodes a well-preserved pocket of canopy, understory, and views that give this stretch of the Presidio its character.

Please study an Alternative that omits this southernmost building and instead restores a landscape buffer consistent with the district's cultural landscape. This change would still allow meaningful unit yield while better expressing the district's fine-grained pattern, maintaining view corridors, and preserving mature vegetation. (Shawn Lani, webform)

I write as a tenant in a historic building immediately adjacent to the project's south edge near Lincoln Boulevard/Girard Road and the former Letterman Hospital complex (BLDG. 1007). I support well-scaled, compatible housing in the Presidio and appreciate the Trust's commitment to careful design review. I am, however, concerned that the single southern building shown in

current concept materials is incompatible with the district’s historic pattern and landscape character and would adversely affect neighboring historic resources.

I support the northern multi-building cluster. Its pattern of smaller volumes and courtyard spacing aligns with the West Letterman/Thornburgh Design Guidelines emphasis on fine-grained massing and compatibility. By contrast, the lone southern building appears as an outlier wedged between intact historic fabric near the former hospital complex, compromising key spatial relationships and a remarkably intact pocket of canopy and understory.

The Guidelines provide clear criteria that back this distinction:

- *Pattern & massing.* New construction should “retain and reinforce the fine-grained historic building patterns... [with] multiple building volumes at a similar scale... rather than one or two monolithic buildings.”
- *Compatibility with adjacent historic buildings.* New work must be “sensitive to the adjacent historic buildings and complement their scale and appearance,” and “compatible with the massing, size, and scale” of surrounding historic structures; bulk “should not be so large as to visually overwhelm” nearby, delicate frame buildings.
- *Historic spatial relationships & setbacks.* Infill should “respect the historic spatial relationships, open spaces, and orientation” of existing buildings, including maintaining a 15–20’ landscaped setback from the east curb of Girard Road to preserve pedestrian comfort and the district’s pattern while re-establishing appropriate density.
- *Southern landscape character.* The south portion of the district is described as a “decorative, gardenesque” landscape that should be preserved or rehabilitated; this existing canopy/understory is a character-defining feature that merits protection.
- *Footprint logic.* Where infill occurs, it should draw from a former building layout so that new footprints relate legibly to the historic context—not simply fill every allowable polygon on a diagram.

In light of those criteria, please include and seriously evaluate an Alternative that omits the southernmost building and restores a landscape buffer along the south edge (near Lincoln/Girard and the hospital complex). This would:

1. Reinforce the multi-volume, fine-grained pattern the Guidelines call for (as demonstrated by the northern group).
2. Preserve required setbacks, view/space relationships, and the small but significant gardenesque landscape pocket.
3. Avoid introducing new bulk that could visually overwhelm adjacent historic structures and degrade their setting. (Shawn Lani, email)

I support adding well-scaled housing in West Letterman, especially the northern multi-building cluster, which better reflects the district’s fine-grained rhythm. The southern single building, however, reads as an outlier wedged among intact historic resources near the former hospital

complex. It disrupts established spacing and erodes a small but remarkably intact landscape pocket. The Guidelines repeatedly prioritize pattern, landscape character, and compatibility over simplistic “fill the envelope” decisions.

First, the Guidelines direct new construction to “retain and reinforce the fine-grained historic building patterns... [with] multiple building volumes at a similar scale... rather than one or two monolithic buildings.”

The northern concept aligns with this intent; a lone southern block does not.

Second, compatibility is not optional; it’s the test. New construction must be “sensitive to the adjacent historic buildings and complement their scale and appearance” and be “compatible with the massing, size, and scale of the surrounding historic buildings.”

The Guidelines add that “[t]he bulk of the new buildings should not be so large as to visually overwhelm the existing buildings, many of which are delicate frame structures.”

A tight southern insertion risks exactly that.

Third, the historic spatial relationships and open spaces must be respected: “Respect the historic spatial relationships, open spaces, and orientation of the existing historic buildings.”

The same section requires a “landscaped setback of 15–20’ from the east curb of Girard Road” to maintain comfortable pedestrian conditions “while re-establishing the densely-built character of the historic site.”

A stand-alone southern mass presses against this edge condition and compromises these relationships.

Fourth, the Guidelines emphasize that the southern part of Letterman carries a distinctive “decorative, gardenesque landscape” and that it “should be preserved or rehabilitated.”

They further note that this pattern “remains today and should be perpetuated in any new landscaping proposals.”

Removing canopy/understory to fit a solitary building at the south edge conflicts with this explicit direction.

Fifth, infill should draw from former building layout logic so replacement construction “relates to the historic context.”

Figures 28–30 define allowable zones and heights, but the text makes clear that compliance also requires compatibility, not mere occupation of every permissible polygon (the Guidelines even cross-reference the figures while stressing compatibility).

Finally, the Guidelines “were established to conform to the Secretary of the Interior’s Standards” and are used as the criteria for Trust design review.

Those Standards also urge “minimal alteration to character-defining... spatial relationships between buildings and their settings,” which supports stronger protection for the south-edge historic context.

Request: Please include an Alternative that omits the southernmost building and restores a landscape buffer consistent with the district’s gardenesque character (south of Edie Road). This change would (a) reinforce the fine-grained multi-volume pattern the Guidelines call for, (b) preserve required setbacks and view/space relationships along Girard and near the hospital complex, and (c) protect the remaining canopy/understory that the Guidelines say should be “preserved or rehabilitated.”

If the south building remains under study, the EA/NHPA review should require: (1) tree/root-zone protection and replacement ratios tailored to historic landscapes; (2) pre-construction condition surveys and monitoring of adjacent historic fabric to ensure new bulk does not harm delicate structures (consistent with compatibility and minimal-alteration principles); and (3) construction staging/traffic management that maintains tenant access on Girard and respects the 15–20’ landscaped setback.

In short: Keep the northern apartments; drop the lone southern block. (Elizabeth)

Response: The two buildings referenced in the comment (not a single structure), known as “Buildings A and B” at the southwest corner of the project area, are an integral part of the project’s effort to meet the 2024 Design Guidelines for compatibility designed new construction and respect for the area’s historic pattern of development. Buildings A and B directly reference two previous structures on the site (Buildings 1017 and 1018, a ward and post exchange, respectively) that were part of the original Letterman hospital complex until the Army removed them in the late 1960s. See buildings in the lower left corner, within the project site boundary of Draft EA Figure 2, and Figure 11, which shows the former Building 1017 next to extant Building 1016. As shown in Draft EA Figures 4 and 5, Buildings A and B draw from the former building layout logic as the commenter suggests. They also “respect the historic spatial relationships, open spaces, and orientation of the existing historic buildings” per the Design Guidelines by re-establishing the symmetry of buildings flanking the central administration building (existing Building 1016). As with the other new structures, Buildings A and B fit within the height restrictions for their portion of the site (30 feet), which is shorter than neighboring Building 1016 (49 feet), in order to be “compatible with the massing, size, and scale” of surrounding historic structures” and not “... be so large as to visually overwhelm” nearby, delicate frame buildings” per the Design Guidelines. Landscaping setbacks and ornamental planting in keeping with the site’s historic character are also included in all alternatives.

Study impacts to/include mitigation for – design refinements to massing at southern edge

If the southern building remains under consideration, the EA/NHPA review should require: ... (4) design refinements to reduce apparent massing at the south edge. (Shawn Lani, webform)

Design refinements (height/massing modulation, footprint reduction, and courtyard relief) to mitigate apparent bulk and preserve view corridors. (Shawn Lani, email)

Response: The proposed Buildings A and B (referenced in the comment as a single building) both respond to the Design Guidelines that constrain massing and height, and dictate modulation and courtyard relief. See response to previous comment on the southern buildings, and to the detailed analysis of the proposed project's responsiveness to the West Letterman/Thornburgh Design Guidelines in the Draft EA Section 3.1.1, *Historic Resources*.

Destroying Historic Character

How in the world are you voting to destroy our HISTORIC Presidio with that terrible proposed new apartment building which will be a total nightmare. What part of HISTORICAL don't you people understand? While I agree apartments are needed I Do Not appreciate buildings that do not match the area. Please do not destroy what little San Francisco architecture we still have left. (Marilyn Moffett)

Response: New construction under all alternatives responds to the historic character of the site by conforming to Design Guidelines prepared by the Trust, along with PTMP guidance, to ensure such an outcome. Please refer to the detailed analysis in Draft EA Section 3.1.1, *Historic Resources*.

Study impacts to/include mitigation for – construction vibration

If the southern building remains under consideration, the EA/NHPA review should require: ... (2) vibration/settlement monitoring and pre-construction condition surveys for adjacent historic fabric. (Shawn Lani, webform)

Pre-construction condition surveys and vibration/settlement monitoring for adjacent historic fabric; limits on heavy equipment and staging near historic foundations. (Shawn Lani, email)

If the south building remains under study, the EA/NHPA review should require... (2) pre-construction condition surveys and monitoring of adjacent historic fabric to ensure new bulk does not harm delicate structures (consistent with compatibility and minimal-alteration principles); (Elizabeth)

Response: Project construction will not generate ground borne vibration at levels that could impact adjacent structures. Please refer to the detailed analysis in Draft EA Section 3.1.1, *Historic Resources*.

Include Mitigation – Story of Nurses Housing

There is one item that does require mitigation, relating to historic interpretation and architecture. Because the Presidio was a US army base for well over 100 years (and Spanish and Mexican before that), it highlights how military building designs - from fortifications to hospitals to housing - evolved over time. The Presidio illustrates a significant portion of the evolution of US Army base architecture, which was also reflective of the broader design patterns in America. Even buildings not considered of historic significance have a role to play in telling this

story. Building 1028 is an example of such a structure. PHA agrees that while replacing Building 1028 may be appropriate, the tales it tells are an important component of the Presidio story. Its use as nurses housing directly relates to the site's hospital and medical use as well as its patterns of development, and the story of this structure, and the reasons it has not been reused, should be memorialized to honor the Presidio's commitment to historic interpretation of the Presidio and the US Army's presence there. (PHA/Peg DiGiammarino)

Response: Removal of Building 1027 is a separate project from the proposed project. Nevertheless, the history of nursing personnel (which also includes Thompson Hall, a complex of buildings that stood just west of the project site until the US Army removed it in 1987) is an important component of Letterman Hospital's and the Presidio's history. The Trust has installed interpretive waysides along Lincoln Boulevard at Thompson's Reach and in front of Building 218 that address the Army Nurse Corps and the Women's Army Auxiliary Corps (WAAC), both of which operated in the area. There are also several interpretive signs inside the remaining, rehabilitated Letterman buildings (occupied by Tides Connect) and in the landscape around the site that describe the history of the hospital. While the National Park Service (NPS) carries primary responsibility for historic interpretation at the Presidio under the Trust Act, the Trust will consider working with our park partners to develop and incorporate some interpretive material into the public spaces of the new building (such as the lobby) that address the site's history.

Public Safety

If no capacity to manage off-leash dogs then no capacity for new housing

Several of us Presidio residents have been told by the Trust and the Park Police that there are currently not enough resources to address safety issues about dogs in the park. Residents have been bitten and otherwise injured by the many unleashed dogs (literally hundreds a day in the Ecology trail and Pop Hicks Field area) that are in violation of the park rules. Commercial dog walkers also routinely park on Quarry and Fernandez Rds. in violation of the parking rules. If the park does not have the resources to keep current residents safe, then adding hundreds of additional residents would strain these resources further and put residents and visitors at further risk. Please consider how you will address safety issues with this project. (Emily)

Response: The Trust's complete pet policy is described in its Compendium, see page 11, and Exhibits 6 and 7: [2024 Presidio Trust Compendium](#). If you experience a commercial dog walker with dogs off leash, please report them to the CUA office: goga_CUA@nps.gov. Please provide the company name, time and location of the incident; a photograph is also helpful. If you experience a dog showing aggression towards humans, wildlife, or other dogs, please immediately call the U.S. Park Police at: 415-561-5505.

In addition, please refer to the analysis in Draft EA Section 3.2.4, *Public Safety*.

Construction Impacts

Study impacts to/include mitigations – tree protection

If the southern building remains under consideration, the EA/NHPA review should require: (1) tree and root-zone protection and replacement ratios suited to historic landscapes; (Shawn Lani, webform and email)

If the south building remains under study, the EA/NHPA review should require: (1) tree/root-zone protection and replacement ratios tailored to historic landscapes; (Elizabeth)

Study impacts to/include mitigations – construction staging and traffic management

If the southern building remains under consideration, the EA/NHPA review should require: ... (3) construction staging and traffic management that maintains access to neighboring tenants (Shawn Lani, webform)

A construction staging and traffic management plan that maintains safe access for neighboring tenants and respects the 15–20' landscaped Girard setback. (Shawn Lani, email)

If the south building remains under study, the EA/NHPA review should require: ... (3) construction staging/traffic management that maintains tenant access on Girard and respects the 15–20' landscaped setback. (Elizabeth)

Response: The project will be subject to resource protection measures, including tree protection and construction management; see Appendix B for details.

Housing

Long-Range Housing Plans and Baker Beach (Wherry) Housing and Relationship Between Housing Replacement and Affordability

The Presidio Trust Management Plan adopted in the early 2000s identified the eventual removal of certain non-historic housing, including the Baker Beach/Wherry housing, to restore natural habitat and open space, with the possibility that housing units removed through that process could be replaced elsewhere in the Presidio. As a current resident, it is unclear how — or whether — this long-range vision remains active and how it relates to current development proposals.

Given this context, I respectfully request that the Environmental Assessment clarify:

1. Whether the proposed Letterman Residential Project is intended, in whole or in part, to replace existing housing that may be removed elsewhere in the Presidio, including Baker Beach/Wherry Housing.
2. Whether construction of new residential units at Letterman is anticipated to influence or accelerate future decisions regarding the removal of existing housing.

3. What future planning processes, environmental review, and public engagement would be required before any actions affecting Baker Beach/Wherry Housing could occur.

Clear answers to these questions are essential for residents and the public to understand the long-term implications of this project.

Questions about housing replacement are closely linked to affordability and displacement. If new housing at Letterman is intended to offset the future removal of existing units elsewhere in the Presidio, it is critical that the Trust evaluate not only the number of units replaced, but also their affordability to current and future residents. Replacing relatively affordable housing with higher-cost units would result in a net loss for middle-income households and undermine the goal of maintaining a diverse residential community. (Jayme Ohlhaber)

Response: As described in Draft EA Section 2.1, *Proposed Project*, the project does not include demolition or construction at Baker Beach/Wherry Housing. Buildings 1027 and 1028 were approved for demolition as a separate project (25-033).

Housing Demand

Environmental considerations of induced housing demand: The San Francisco Planning Departments Residential Nexus Studies (<https://sfplanning.org/resource/residential-nexus-analysis-supporting-san-franciscos-residential-affordable-housing>) make it clear that new market rate housing creates a demand for below market rate housing – something in short supply in San Francisco. This increases the likelihood of long commutes, increasing passenger miles traveled and the related adverse impacts on the environment and health. Given the financial constraints, it may be that this is an adverse impact that cannot be mitigated, but it should be assessed and acknowledged. (Paul Wermer)

Response: The cited nexus study was prepared to support San Francisco’s Inclusionary Affordable Housing Program, which requires certain residential development projects to pay an Affordable Housing Fee. Fees paid go into the Citywide Affordable Housing Fund to create or preserve affordable homes. If the proposed market-rate Letterman Residential Project were to create a demand for below market rate housing, that housing would be subject to environmental review at the time when it is proposed.

Please refer to the analysis in Draft EA Section 3.2.3, *Socioeconomic Issues/Housing Supply*.

Affordable Housing

I think building more housing in the Presidio is a wonderful idea and will bring more people to the site — hopefully more families as well. I do believe some of the housing should be affordable to ensure that everyone has an equal opportunity to benefit from this growth. I also hope that this opportunity is advertised throughout the entire city so that anyone interested has a fair chance to apply. Overall, it’s a beautiful project, and I look forward to seeing the finished product. (Derek Foster)

I was just wondering if any of the housing in this new project was going to be affordable housing or just all Market Rate? Will any of the units be for low income or park employees? (Mark Yanez)

As a current resident, I am increasingly concerned that rising rental rates within the Presidio are pushing out families and middle-income households who have long been part of the Presidio community. This year, several residents including myself have been notified of a 7% rent increase, which presents a significant financial burden for households that are “middle class” by San Francisco standards but do not have high or flexible incomes.

In this context, I request that the Environmental Assessment:

1. Describe the anticipated affordability of the proposed Letterman residential units, including how projected rents compare to existing Presidio housing and to regional middle-income affordability benchmarks.
2. Evaluate whether the project will support a diverse, mixed-income residential community or disproportionately serve higher-income households.
3. Analyze cumulative impacts of new residential development together with rising rents on existing residents, including families with children and moderate-income households.
4. Explain how the project aligns with the Presidio Trust’s statutory and policy goals related to social sustainability, public benefit, and long-term community stability.

Addressing these issues during scoping will help ensure that the Letterman Residential Project advances not only housing supply, but also the long-term inclusivity, affordability, and environmental stewardship goals of the Presidio. (Jayme Ohlhaber)

Response: All of the proposed residential units will be market rate. Apartments and houses for rent are posted on the Presidio’s webpage, along with frequently asked questions, such as who can live there: [Apartments for Rent](#) | [Houses for Rent](#) | [The Presidio \(San Francisco\)](#).

Please refer to the description of project objectives in the Draft EA, Section 1.3, *Project Purpose and Need*, and the analysis in Draft EA Section 3.2.3, *Socioeconomic Issues/Housing Supply*.

Existing Conditions – residents

Can you say more about whether there are current residents in the buildings being removed in the construction area -- if so, how are they impacted? (Lynn Sondag)

Response: Buildings 1027 and 1028 were approved for demolition as a separate project (25-033). Guided by the federal Uniform Relocation Act, the Trust provided support and funding to help all residents of Building 1028 successfully move to new homes.

Sewer

Sewer System/Storm Water Capacity

The only thing I would comment on would be raising a questions about the waste water system. I remember the YMCA Letterman pool getting flooded, in part because the system was overwhelmed with waste water. While it was (theoretically) a once in a lifetime event, the likelihood of increased storms and flooding will require the Trust to upgrade its systems. A project of this size would be a great chance for them to do that. (Trevor Ditzler)

Response: The proposed project will include bioretention areas and stormdrain pipes that connect to the adjacent system. Please refer to the analysis in Draft EA Section 3.2.5, *Presidio Trust Sanitary Sewer System*, and *Storm Drainage*.

Bird Strike Prevision

Bird Safe Glass

During the public presentation on November 18, oversized windows were mentioned as a feature. Please add bird strike prevention as a goal. FYI, at the recent new buildings added to the CCA campus on Hooper St, the architect, Studio Gang, specified oversized awning windows with an inconspicuous etched grid to ameliorate bird strikes. (Jan Monaghan)

Response: The project will install bird safe glazing at the bridges, glass windscreen around the Building E roof deck, and glazing over 24-feet at Building E. Bird safe glazing can be products that are fritted glass, reflect ultraviolet light, are etched, or has a film applied – all methods to break up reflections and make the surface visible to birds.

Transportation/Traffic

General

I live on Presidio Boulevard - the traffic has steadily increased to a point it is backed up a lot on weekends, and the drivers are getting restless with the Stop signs. As you add this new housing - please look at the traffic congestion and mitigation options. (Vinit Verma)

Adding 196 extra units is going to impact traffic, safety, and parking. More needs to be planned to address these issues especially since this area is at the entrance to Highway 101. (Janet Pellegrini)

It is my opinion that this project needs revision and more study. The impact this project will have as it stands will create gridlock in the area. It imperative that this project be suspended for more study and for the good of the community. (Richard Pellegrini)

Response: Please refer to the analysis in Draft EA Section 3.1.2, *Traffic and Circulation*. The direct access to U.S. 101 at Girard Avenue helps reduce traffic volumes at other park gates and associated impacts at and near those gates. The Trust must balance these benefits of the Girard on and off-ramps with cut-through traffic. The Trust continues to consider measures to reduce the volume of traffic passing through the park for convenience in order to accommodate park

residents, employees and visitors independent of the proposed project. The Trust will also continue to implement measures to reduce vehicle speeds and improve safety.

Girard/Lincoln

The circular created on Girard/Lincoln has a design flaw for circulars - the key for circulars is that traffic should keep flowing from all 4 directions ... putting pedestrian crossing at the intersection creates stop/go jams and the traffic does not flow. I suggest where needed, you can relocate the crossings further away from the circular. This will be safer for pedestrians and make the driving circular flow nicely.

**** Set-Back Crossings:** The crosswalks are not placed directly at the circular roadway. Instead, they are set back slightly on each entry and exit road. This gives drivers more time to focus on either yielding to pedestrians or merging into traffic, but not both at the exact same time."(Vinit Verma)

Response: The intersection control at Lincoln-Girard is a mini-roundabout. Mini-roundabouts are smaller than standard roundabouts by definition and dimensions differ from standard roundabouts. However, vehicle speeds are also lower at a mini-roundabout, resulting in reduced braking distances. The mini-roundabout was built as an alternative to a traffic signal as it is more compatible with the Presidio's historic and natural setting, and its smaller relative size requires less park land.

Pedestrian Safety

Traffic and pedestrian safety: With the increase in residents, and hence pedestrians and cyclists along and across Girard Rd, mitigations are needed to improve safety. As a driver who has often used US 101's on- and off-ramps at Girard, and as a pedestrian who has often crossed Girard at Gorgas and at Richardson, I have observed the wide range of motor vehicle numbers and speeds – and increasing regular traffic along Girard will only exacerbate risks, especially for pedestrians. (Paul Wermer)

Response: The project will modify the intersection of Girard-Edie to reduce the corner radii, which will shift the northeast and southeast corners of the intersection inward which will considerably shorten pedestrian crossing distances. A marked crosswalk and curb ramps will be added across the south leg of the intersection. The Trust is also exploring traffic calming measures to reduce vehicle speeds on Girard Road independent of the proposed project. The Trust will explore possible improvements for pedestrians at the US 101 ramp intersections with Girard Road with Caltrans.

Buffer: Increase the buffer zone setback and landscape screening on Lincoln Blvd and Girard Rd. The very busy streets on two sides and minimal landscaping does not communicate "upscale residential" nor "national park." Both streets are noisy and not pleasant to look at, and dangerous for children and unleashed pets. (Jan Monaghan)

Response: The Presidio Trust is exploring traffic calming measures to manage vehicle speeds on Girard Road independent of the proposed project. The project's landscape features will be

consistent with the West Letterman/Thornburgh Design Guidelines, as described in Draft EA Section 3.1.1, *Historic Resources*.

Inadequate Site Design for Vehicle Access and Deliveries

The project renderings do not show any widening of Girard Road to accommodate passenger drop-offs or delivery vehicle activity (including food delivery services such as DoorDash, which have become ubiquitous in residential areas). Even at the PTMP maximum of 152 residential units, the project would generate substantial delivery and rideshare traffic; the proposed 196 units would exacerbate these impacts. See photo of Girard Road from Edie Road, which shows non-historic building to be replaced by the proposed development.

The rendering of the proposed project shows a red car on Girard Road from the same view. Drop off and pick up would involve blocking vehicular and bike traffic.

Recommendation: The EA should analyze traffic volumes for delivery vehicles, rideshare services, and passenger drop-offs, and evaluate whether roadway modifications are needed on Girard Road to safely accommodate this activity without impeding through traffic or creating safety hazards. (Thomas P. Bochenek)

Response: The project will include ample space for passenger loading, freight loading and package deliveries on Edie Road, near the residential common space and mail and package room. Residents of southern buildings will be encouraged to use the space in front of 1016 Torney Avenue for food and grocery deliveries. Independent of the proposed project, the Trust is currently considering measures to slow vehicular traffic and create separated bike lanes on Girard Road.

Traffic Safety Impacts on School-Related Areas

The project will add significant pedestrian and vehicle traffic to Girard Road and Lincoln Boulevard at a critical location serving multiple educational institutions:

- The Bay School of San Francisco
- Adda Clevenger School's Presidio Campus (with at full planned expansion into second building)
- Bright Horizon

Currently, there are no traffic signals anywhere in the Letterman District. The intersection of Lincoln Boulevard and Girard Road serves as a key access point for these schools. For example, students often walk to The Bay School from the Starbucks in Letterman and use this intersection. Even the PTMP maximum of 152 residential units would substantially increase both pedestrian and vehicular traffic during peak school drop-off and pick-up times. See current intersection's current traffic management conditions: [image of traffic circle]

Recommendation: The EA should:

- Conduct a detailed traffic study of school drop-off and pick-up periods, including current baseline conditions from all three schools with no new development, then cumulative impact from the residential project
- Analyze pedestrian crossing patterns and safety needs, modeled for expansion of Adda Clevenger and considering peak overlap periods when school and residential traffic coincide
- Evaluate whether traffic signals, crosswalks, or other traffic calming measures are necessary at the Lincoln/Girard intersection (Thomas P. Bochenek)

Response: Please refer to the analysis in Draft EA Section 3.1.2, *Traffic and Circulation*. Traffic signals are a potential mitigation measure for managing intersections with high traffic volumes; however, the Trust added a mini-roundabout instead of a traffic signal at this intersection as it is more compatible with the Presidio’s historic and natural setting. The Trust focuses efforts on reducing traffic volumes in the park to avoid the need for traffic signals.

Impacts on YMCA Pool Access via Gorgas Avenue

Gorgas Avenue serves as a primary drop-off location for the YMCA pool, which experiences particularly heavy traffic during summer camp drop-off and pick-up periods. Even at 152 units (the PTMP maximum), the project would route substantial additional vehicle and pedestrian traffic through this area. The proposed 196 units compounds this concern.

Recommendation: The EA should analyze peak-period traffic impacts on Gorgas Avenue, particularly during summer months, and evaluate whether additional traffic management measures are needed to maintain safe access to the YMCA facility. (Thomas P. Bochenek)

Response: Please refer to the analysis in Draft EA Section 3.1.2, *Traffic and Circulation*. The Trust has made several improvements to Gorgas Avenue in recent years, including the addition of a sidewalk on the north side, a parking protected walking lane or sidewalk on the south side and traffic calming measures at several locations on Gorgas Avenue to manage vehicle speeds. The Trust continually evaluates the need for traffic management improvements throughout the park.

Traffic Safety Impacts toward Chestnut Street Commercial Corridor Access

The project will generate additional vehicle and pedestrian traffic flowing to the main Chestnut Street commercial corridor. Currently, the Richardson Avenue crossings at Gorgas, Lyon, and Chestnut have notably short green light cycles that by default do not activate walk signals: [image of signal]

Light signals only lengthen when pedestrians activate the walk signal by pushing the button—a feature of which many pedestrians are unaware or fail to use, especially when buttons are as confusing as the buttons at the intersection of Richardson & Chestnut you see pictured below: [image of signal]

The increase in pedestrian and vehicular traffic for 152 units allowed by the PTMP will endanger more people without adequate traffic safety infrastructure improvements, and 44 units beyond the PTMP maximum would be even worse.

Recommendation: The EA should:

- Analyze the project's impact on Richardson Avenue traffic signal timing and intersection operations
- Evaluate whether coordination with the San Francisco Municipal Transportation Agency (SFMTA) is needed to modify signal timing and make walk signal activated by default
- Assess the impact of any signal timing changes on overall vehicular traffic flow through this corridor
- Evaluate modifications to vehicular traffic flow patterns to accommodate increased pedestrian safety needs (Thomas P. Bochenek)

Response: See Draft EA Section 3.1.2, *Traffic and Circulation*, for an evaluation of the project's impacts on traffic conditions. An increase in the number of pedestrians and pedestrian push-button activation could reduce the hourly capacity for vehicle traffic on Richardson Avenue.

Consistency with Presidio Parkway Traffic Design Objectives

The Presidio Parkway (Doyle Drive replacement) Final Environmental Impact Statement established specific objectives and traffic flow strategies for this area. Specifically, the Final EIS committed to "maintain the functions that the Doyle Drive corridor serves as part of the regional and city transportation network."

The Addendum to the Final Traffic and Transit Operations Report (Section 7.1.1) stated:

By redesigning the Richardson connection as ramps connecting to an urban street, rather than mainline segments, the traffic balance between Richardson Avenue and Marina Boulevard is more closely matched to the existing condition in the refined alternative.

Furthermore, the Presidio Parkway FAQs specifically addressed traffic impacts:

The design achieves a traffic flow between Marina Boulevard and Richardson Avenue that is very similar to existing conditions. Also, some traffic in the area will be alleviated by the introduction of Girard Road access into the Presidio, which will attract local traffic to and from currently unavailable destinations within the Presidio and points south. Traffic models of the new configuration for this interchange show no increase in traffic delays for those traveling from the Marina to Doyle Drive, or along Doyle Drive to Richardson Avenue or Girard Road.

The Letterman Residential Project will fundamentally change the traffic assumptions underlying these Presidio Parkway commitments by adding residential units and their associated vehicle trips in the immediate vicinity of the Girard Road interchange.

Recommendation: The EA should:

- Analyze whether the project is consistent with the traffic balance objectives established in the Presidio Parkway Final EIS
- Model the project's impact on Richardson Avenue and Marina Boulevard traffic distribution
- Assess whether reviewer Frischen's commitment on page 432 of Volume III, Appendix L of the Presidio Parkway Final EIS (to implement traffic flow strategies to divert commuter traffic to Marina Boulevard if the traffic balance shifts to Richardson Avenue) will be triggered by this project
- Present proposed traffic flow management strategies to affected neighbors, particularly those who live on Marina Boulevard, showing how the committed Richardson/Marina Boulevard traffic balance will be achieved (Thomas P. Bochenek)

Response: See Draft EA Section 3.1.2, *Traffic and Circulation*, for traffic analysis of the proposed project, which includes distribution of traffic to the nearby roadway network. The Presidio Parkway Final EIS is an assessment of the impact of the Presidio Parkway project on the surrounding environment, including the Presidio. That analysis incorporated land use assumptions under the PTMP, and therefore assumed full occupancy of buildings in the Presidio, including the Letterman district as well as new construction on the project site.

San Francisco Residential Parking Permit Eligibility

Given the project's location within the Presidio (federal property) and the potential for spillover parking impacts on adjacent San Francisco neighborhoods (particularly areas with K or M parking permits), the EA should address parking permit eligibility.

Recommendation: The EA should confirm whether residents of the Letterman Residential Project will be eligible for San Francisco Residential Parking Permits (RPP) in K or M zones, and if so, analyze the impact on parking availability in adjacent neighborhoods. If residents will not be eligible for RPPs, this should be clearly stated as a project condition and enforced through lease terms. (Thomas P. Bochenek)

Response: Presidio residents are not eligible for San Francisco residential parking permits. The San Francisco Residential Parking Permit Program requires residents to provide proof of insurance in their name at an eligible address to receive a parking permit for any zone.

See Draft EA Section 3.1.2, *Traffic and Circulation*, for an evaluation of parking impacts, which does not indicate the likelihood of spillover parking impacts beyond the Presidio's boundary. The proposed project is surrounded by office, schools and recreational uses for which parking demand will be greatest during the day. Peak parking demand for the project will occur on evenings and weekends, allowing the project to share the same parking spaces. Residential parking permits for the proposed project will be purchased separately from the unit, encouraging occupancy by individuals with relatively low car ownership.

Short-Term Rental Restrictions

Short-term rentals (e.g., Airbnb, VRBO) in residential projects can increase transient traffic and impact parking demand patterns. Additionally, short-term rentals on federal property raise unique jurisdictional questions about enforcement of local regulations.

Recommendation: The EA should confirm whether residents will be permitted or prohibited from operating short-term rentals, and if this restriction will be enforceable through lease terms. The analysis should address how this restriction. (Thomas P. Bochenek)

See also comments requesting underground parking, which are categorized as an Alternative

Response: Short-term rentals are not permitted in any Presidio residences, and will not be permitted in the Project's units.

Other Comments

Other scoping comments received requested details of the proposed project which are now available in Section 2.1, *Proposed Project*, make design requests, or are outside of the scope of NEPA/NHPA. Comments expressing support for the project or objection to the project are also listed below. These comments do not warrant a response, but have been provided to Trust Subject Matter Experts and project decision makers for consideration.

Financing. I believe it's absurd and reckless to finance the project through the Treasury Department, which is the stated plan, when Trump has already made clear he wants to defund the Presidio Trust (because he, as usual, is ill informed and doesn't know it's not funded by federal funds) and will do anything he can to destroy the Presidio Trust and be a constant nightmare in anyway he can to SF, California and Democrats. Find financing elsewhere or wait until Trump is no longer in power, please. (Debbie Dettmer)

ADA accessible. Thanks for the proposal. It looks wonderful to me. Question: how many of these units will be ADA accessible? Many of the historic residential buildings are not accessible by wheelchair. I assume all the apartments will be single level living, including the two bedroom units? Is this correct? Is there any chance that current residents who have a future change in their mobility would be given priority to move into one of these accessible units if they could no longer comfortably live in their current unit in another presidio neighborhood? (Susanna Benningfield)

Why a walkway between buildings which would have people traffic day and night outside of rooms? (James Birk)

I would like truly accessible ground-floor apartments that open up directly to the outside. (Sofia Echegaray)

While technically, having grab bars in a shower/tub combo are all that is legally required for an ADA apartment, in practice, it is much MUCH easier to have a shower-only unit, preferably one a person could access by wheelchair. It would be great if it were bigger than your standard

shower stall so a carer can be in there too if need be. This is the big one. This is what I haven't found in your other accessible units. (Sofia Echegaray)

[Include] Other accessibility features like you have currently in accessible units eg Quarry. (Sofia Echegaray)

Bike Storage. Bicycle storage considerations: Most planning for bicycle storage is premised on conventional road bikes. With the advent of e-bikes, this premise is not longer valid. It is important that a project of this size provide bicycle storage serving the range of e-bikes in use today. The various 2- and 3-wheel form factors serve a variety of needs, with mobility impaired users able to use trikes, and families with small children using either trailers or cargo bikes to take children to school or manage shopping trips. Providing appropriate storage and charging facilities will help reduce car miles, with attendant reductions in GHG emissions, congestion, and PM 2.5 generation. (Paul Wermer)

EV Charging. Would the letterman residential have more overnight charging infrastructure? (Catherine Ling)

Outdoor space for young children. Outdoor space and family housing: It is encouraging to see that there will be 2-bedroom units, suitable for families. While older children will certainly be able to access the Tunnel Tops for outdoor play, that is not an option for younger children. The space between the new buildings should be evaluated for and designed to include safer, controlled access areas where younger children can play outside their homes. (Paul Wermer)

If renting to small families is a goal consider a small playground and if pets will be allowed, a fenced dog area will help preserve the landscaping. (Jan Monaghan)

Private Outdoor Space. The scheme as proposed seems to lack private outdoor space for all units. This is generally a desirable feature for residential buildings, especially for those with small children. Perhaps some could be provided at the ground floor units. There is one space at Building E which appears to be a shared protected landscaped area. Otherwise, outdoor space appears to be public. The potential exists for usable recreational roof area on the flat portion of roof inside the mansard roofs, but it is not so indicated. Not all that space would be needed for mechanical equipment. There is no description of the use for the larger spaces shown in corner buildings A, B and E. Are they community rooms? Administration? (Lucia Bogatay)

Balconies. It would be great to have at least some units with a little balcony or tiny area in front to sit. As a disabled person, sometimes I'm not well enough to leave my home. It would be nice to be able to get the sun on my face, and maybe have a little plant or two. Just a few square feet outside. (Sofia Echegaray)

Fenced Dog Area. If renting to small families is a goal consider a small playground and if pets will be allowed, a fenced dog area will help preserve the landscaping. (Jan Monaghan)

Interior Air Quality. Low VOC for people with chemical sensitivities. Actually, this would be great throughout the whole complex - carpeting can off-gas for years, so perhaps an upscale "modern" linoleum could be a design choice? Or other hard tiles? (Sofia Echegaray)

A large amount of attention given to airflow / ventilation / air quality / hvac. There are numerous studies showing sars-cov-2 and other germs being spread through hallways and within apartment buildings. A building with units that open to the outside (like Baker Beach) is safer than airtight buildings with units that open onto a hallway. Upgraded HEPA is safer than lower standards. Windows that open wide are better than windows that barely open. (Sofia Echegaray)

Who will be or Can I be a future tenant. Hi presidio trust can people who are not in military live in these houses. And what are your plans reduce gun violence against military personnel or people who are biased towards officers who may live in apartments when theirs rebuilt I notice some family members who are military sheriff or police were being assaulted at my family houses and I would like that be resolved plus how can handicapped people or musicians find housing or quiet apartments which have sound laws reduce noises of airplanes gun ranges and freeways. (Myron Roy)

I served two tours on the Presidio of San Francisco during my army career. I have no opposition to building housing as recommended with units only be rented to ex-military with honorable discharges with rent being no higher than active-duty military housing allowance. (James Birk)

Great ideas! What's the eligibility to live over there? Are they renting or able to purchase the house? The cost of living over there? (Lily Zhen)

I am very interested in purchasing (or renting) a 1-2 br apartment in the upcoming Letterman Residential Building. I know it's likely a ways off, is it possible to get added to a waitlist and be alerted as soon as apartments are available for sale or rent? (Shilpa Sarkar)

I was interested in getting on the waiting list for the new proposed housing in the Presidio. Looking for the waiting list to sign up. (Annete Lonich)

Also - how do I get on the list as a potential renter? I would love to live there. (Sue Thornley)

I am very interested in being put on the waitlist for a 2 bedroom apartment in your new apartment project described in the SF Chronicle. I understand you expect completion in early 2027. Please advise me if a deposit is necessary. (Jill Faber)

Unit Mix. Also, recommend units should be only 1 or 2 bedrooms. (James Birk)

Please disclose the quantity and size of each type of apartment in each building, studio, one and two bedrooms. (Jan Monaghan)

Perhaps consider including 3-bedroom apartments for small families. People with 2 kids also need housing! (Sonia Murray)

Include Parking. In the drawings I see zero parking spaces. Not everyone is able to use public transit. Please add at least some parking spaces. (Sofia Echegaray)

Include Trees. Please include trees for shade and amelioration of the wind. (Sue Thornley)

Amenities. Common amenities in a market rate residential building in San Francisco to consider. Staffed reception and perimeter security, central mail and package lockers or secure package storage, convenient shared laundry if not provided in each unit, additional storage lockers for each unit for rent, secure bicycle storage, daily custodial services for public and corridor areas, trash areas, perimeter sidewalks, and permitted parking for residences and designated visitor parking. (Jan Monaghan)

Support the Project. This is a brilliant idea and I support it 100%. You will remove an unattractive concrete building and replace it with a residential complex that compliments the scale and architecture of the Presidio. This is a prominent location that deserves good architectural design. You will also offer a range of unit sizes that are very much needed in this part of the city. They will attract young adults who need smaller apartments as well as young families. I hope you can keep the rental rates in a range that makes living here within the reach of the community. Good luck! (John Kontrabecki)

As a current resident of the Presidio (Baker Beach Apartments), I strongly support the Letterman Residential Project. This well-designed and thoughtful project will bring much needed housing to the Presidio and San Francisco. I hope the Presidio considers additional housing projects on other underdeveloped sites in the future. The Presidio is a wonderful place to live and needs projects like this to keep families in San Francisco. (Laura Strazzo)

I think it's a wonderful idea and I'm envious of the future residents. I think the Presidio is a treasure and I think the idea and concept of housing is huge. It's also brilliant because it will provide more funding for this national treasure and it will aid in creating a secure future for the Trust. Given the fact that Washington typically starves the national park service for funding it just validates the financial model that the Presidio is thriving under. Great idea, full steam ahead! (Guy Palmer)

Good to see additional housing coming online. (Vinit Verma)

The prospect of building new housing on the site of the former Letterman Hospital is thrilling. San Francisco needs more housing, so I fully support this project. Please pack as much housing as you reasonably can onto this project site! (Joey Kotfica)

What a great idea. I think housing is much needed. Especially safe housing. It would be very interesting to see who would be eligible and qualified to be living in these units as Housing in SF are expensive and hard to come by. With such amazing location I am sure this will be a hit and dream to live in. Good idea and I am 100% support it! (Victor Tong)

I fully support this project. It is not only necessary, it helps fulfill the intent of the Presidio Management Plan. The project is well designed to fit in the area designated for it. The addition of the tenets who will live here will add to the variety of the tenant population. (John Reynolds)

Thanks for adding more housing to SF, and adding more small units! I think this project is going to be massively successful! (Sofia Echegaray)

I think the idea is great and you have my support. (Joe Murray)

Great idea! (Sonia Murray)

I think this development is a superb idea and good use of the area. (Sue Thornley)

This project would bring much-needed housing to San Francisco, as well as revenue to the Presidio! I support this project wholeheartedly! (Lucas Tobin)

Amy Meyer and I [Cynthia Gissler] are writing in support of the Letterman Residential project which has taken into account the key aspects for a successful project honoring many of the Trust's goals including:

- this project is in line with the PT Management Plan
- it respects historic design guidelines
- it provides needed housing in one of the most accessible areas in the Presidio
- it will help the PT achieve its long term goals of continuing to invest in this treasure of a national park for all by adding residential housing of smaller units to balance the larger housing offerings within the Presidio (Amy Meyer and Cynthia Gissler)

Against the Project. I am absolutely against this plan. I think Tom [Tom Bochenek] mentioned his points of opposition and I am in agreement. There needs to be a third choice: no green light until more information is at hand so responsible decisions can be made. (Diane Frankenstein email)