

Letterman Residential Project Preliminary Finding of Effect March 20, 2026

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Executive Summary

The Presidio Trust (Trust) proposes to construct six architecturally compatible residential buildings with 196 dwelling units, along with associated site, circulation, and parking improvements, within the West Letterman area of the Presidio of San Francisco National Historic Landmark District (NHLD). The 4.66-acre project site is located within the 63.7-acre Letterman District (Area of Potential Effect), a residential and working campus and one of seven PTMP planning districts within the Presidio, located near the park's northeast corner. As envisioned in the Presidio Trust Management Plan (PTMP, p. 82), the Letterman Residential Project, is intended to reestablish the historic character and density of historic Letterman General Hospital complex, increase revenue for park operations, add housing in a part of the park well served by transit, and focus new construction in an already developed area. In this document, the Presidio Trust assesses the effects of the Letterman Residential Project on historic resources within the NHLD under the terms of its Programmatic Agreement (PTPA, 2025), which governs the agency's compliance with the National Historic Preservation Act (NHPA).

Concurrently, the Trust is evaluating the undertaking and alternatives in the March 2026 Letterman Residential Project Environmental Assessment (EA) for compliance with the National Environmental Policy Act (NEPA). Complementing the NEPA and NHPA analysis, the Trust is also reviewing the proposal by offering public comment opportunities, alongside consultation with parties to the PTPA, which the agency initiated in November 2025. The Trust has identified a preferred alternative in the EA that is the "undertaking" analyzed in this preliminary Finding of Effect report (FOE). The Trust has relied upon two planning documents to generate this analysis, each of which guides development in this area of the park: the PTMP Planning Principles & Guidelines for the Letterman District (PTMP Principles, pp. 79-85), and the 2024 West Letterman/Thornburgh Design Guidelines (Guidelines). Applicable PTMP Principles are included in this document's analysis, and the Guidelines are available online.

The Trust has released the EA and the preliminary FOE for the Letterman Residential Project for a 30-day comment period. The Trust will address comments received on the undertaking and EA, and this preliminary FOE analysis, by signatory and concurring parties to the PTPA through consultation, as well as the public, with the goal of obtaining concurrence with the signatories on its findings. The Final EA and associated Finding of No Significant Impact (FONSI), as well as the final FOE, are anticipated in the third quarter of 2026. Should the Trust secure signatory party concurrence on the FOE, its Section 106 responsibilities will be complete per Stipulation IV.C.2.d.i.4. of the PTPA. The Trust will not make a final decision on the proposed project until both the NEPA and NHPA processes conclude.

This preliminary FOE describes the direct and indirect effects of the undertaking. It also assesses the combined effects of all actions in the undertaking as well as the cumulative effects of all applicable actions within the NHLD. In sum, the Trust finds that the undertaking is wholly consistent with applicable design guidance for the PTMP Letterman Planning District, and the West Letterman/Thornburgh sub-district. Accordingly, the project will not adversely affect individual resources within the Area of Potential Effect or the NHLD as a whole. The Trust further concludes that cumulative projects, including the current undertaking, will have no direct or indirect adverse effect on the Presidio of San Francisco NHLD, especially when added to the aggregate effects of past individual projects and the overall level of change within the NHLD.

SECTION 1

Introduction

Note: This section largely follows the corresponding Introduction to the Environmental Assessment

The Presidio Trust (Trust) is considering constructing six architecturally compatible residential buildings with 196 dwelling units to reestablish 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 \(PTMP\)](#). The project is intended to meet many of the PTMP goals by increasing revenue for park operations, adding housing in a part of the park well served by transit, and focusing new construction in an already developed area.

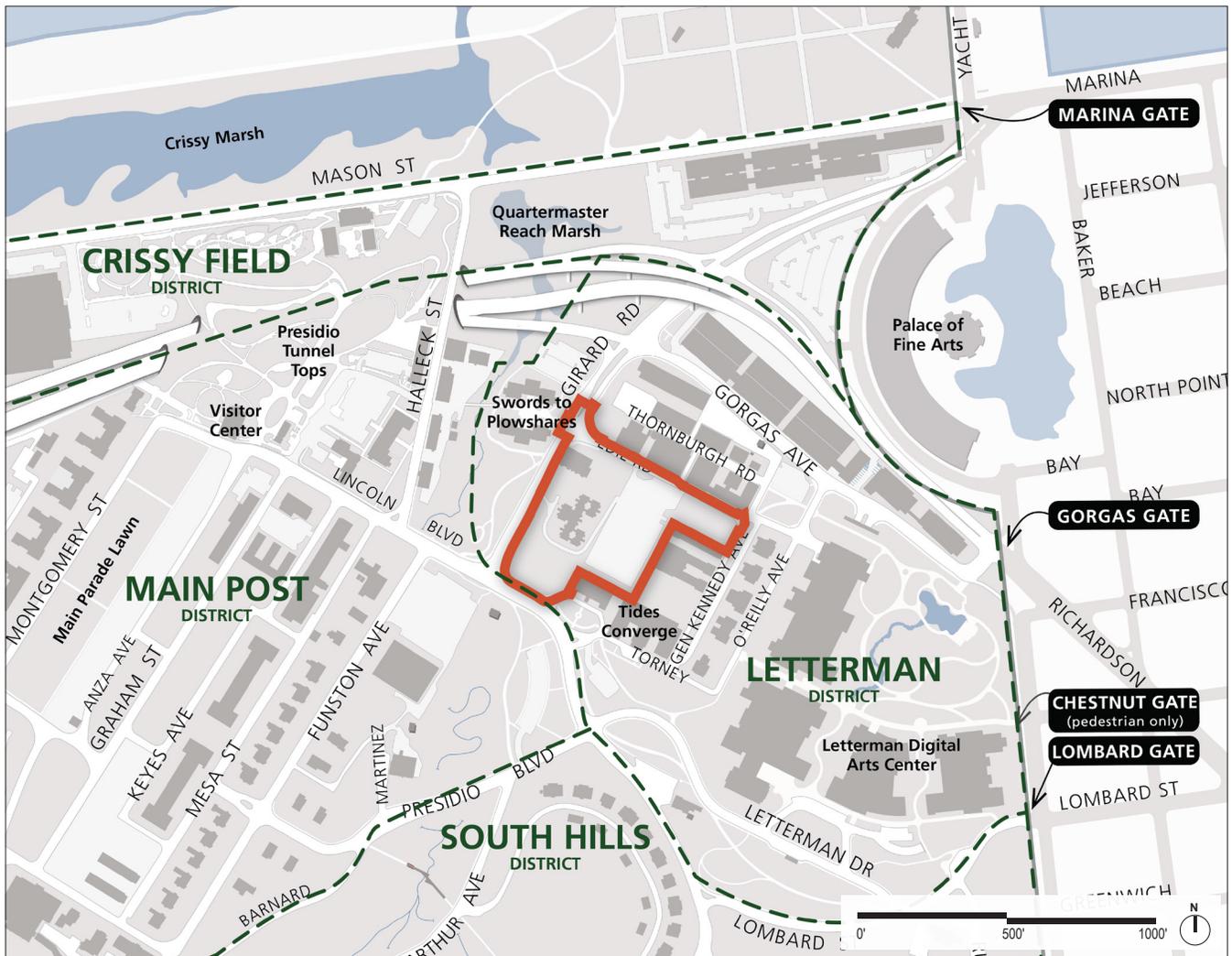
Presidio of San Francisco National Historic Landmark District

The Presidio is a national park site and a National Historic Landmark District (NHLD) at the northern San Francisco Peninsula (Figure 1). This land is 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.

Letterman District

The 63.7-acre Letterman District, a residential and working campus and one of seven PTMP planning districts within the Presidio, is near the park's northeast corner. The 18-acre western portion of the Letterman District is known as the West Letterman/ Thornburgh area. The project site is 4.66 acres within this area, the centerpiece of which is the former U.S. Army (later Letterman) General Hospital, established in 1899 and once the second largest military hospital in the country (Figure 2). Remnants of West Letterman's past, including select buildings, street layouts and open spaces associated with the former Letterman General Hospital are contributing features of the NHLD. Nonetheless, the project site is missing much of the historic built fabric including many of the wards, galleries and administration buildings and garden landscaped central courtyard that once comprised the hospital complex. Starting in 1973, the U.S. Army demolished all the historic hospital structures north and west of the Administration Building (Building 1016) including the central courtyard and surgery gallery north of Building 1016 (Figure 3).

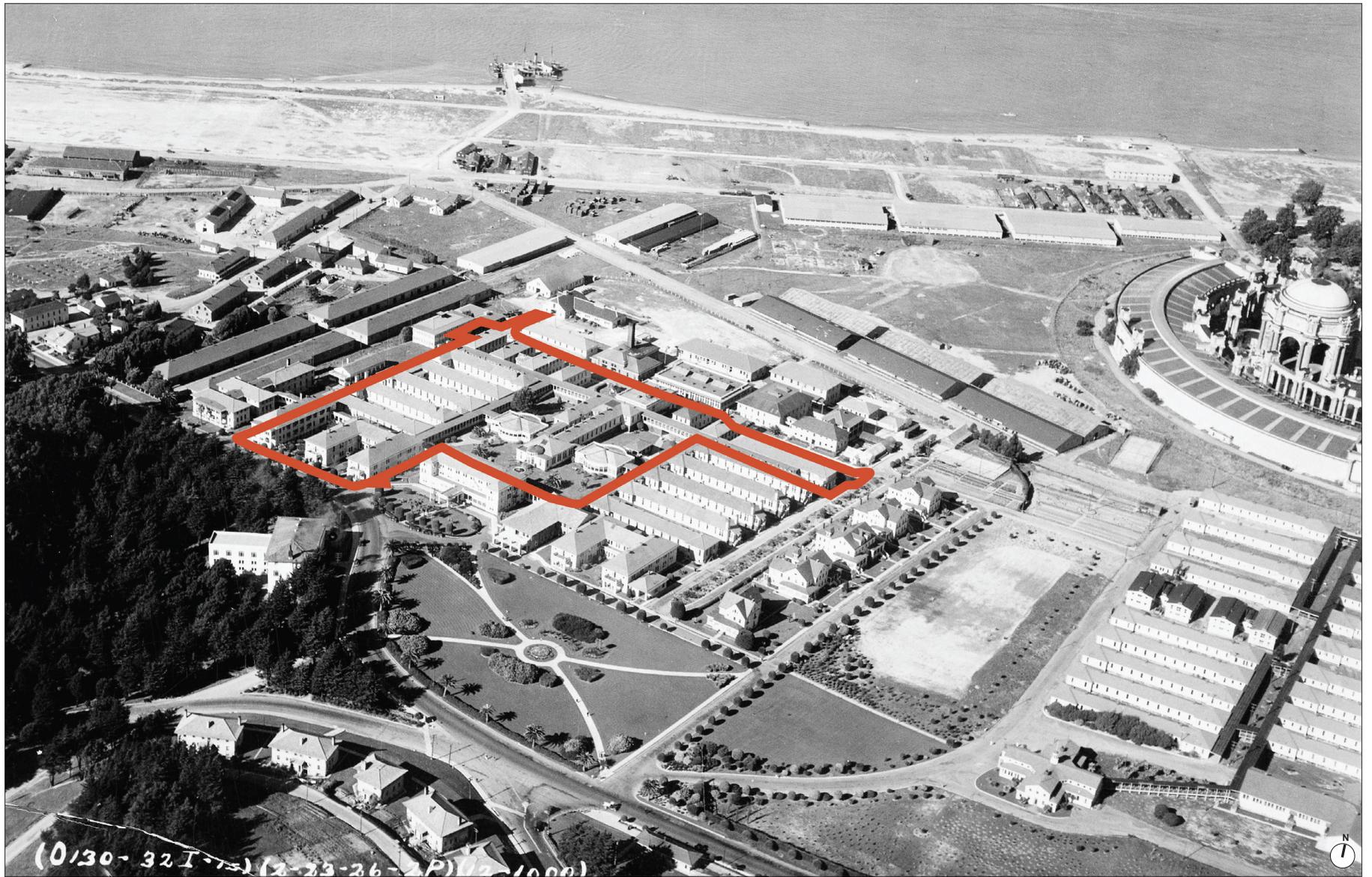
The Army built the non-historic Nurses' Dormitories (Building 1028) and related garage/storage building (Building 1027) in 1976. In recent years, the Trust has used Building 1028 to provide market rate housing known as the Letterman Apartments, and the U.S. Park Police (USPP) has used Building 1027 for storage. As a separate project (Trust compliance record 25-027), the USPP is relocating to another location in the Presidio; the move will address space deficiencies at the existing facility, while also relocating the storage function. Also as a separate project (Trust compliance record 25-033), the Presidio Trust will demolish non-historic Buildings 1027 and 1028. Both are aging and underutilized buildings that pose long-term financial, operational, and safety challenges. Both contain building materials that require



Source: Presidio Trust, 2023

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 1
Regional Context and Project Vicinity



Source: The National Archives and Records Administration

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 2
1926 Aerial



Source: The Presidio Trust, 2025

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 3
Aerial of Project Site

abatement, including asbestos, and have significant accessibility deficiencies. In addition, Building 1028 has significantly high maintenance costs that exceed rental income potential.

Project Purpose and Need

The purpose and need of the project consists of the following:

- Use new construction to reestablish 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 (see below table).
- Achieve LEED (Leadership in Energy and Environmental Design) Homes Gold.
- Be compatible with the National Historic Landmark District through conformance as closely as practicable to PTMP guidance and West Letterman/ Thornburgh Design 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](#).

See below for more information on these points.

Guidelines and Strategies for Planning Decisions

The Trust has established the following guidance to inform land use and implementation decisions for West Letterman, including the project site:

Presidio Trust Management Plan

In 1996, in recognition of the Presidio's singular character and of the challenges and expense attending preservation, Congress established the Presidio Trust to oversee the Presidio as a distinct part of the GGNRA (16 U.S.C. § 460bb appendix). The [Presidio Trust Act](#) also delineated its jurisdiction within the Presidio (Area B) from that of the National Park Service (NPS) (Area A), required the Trust to be financially self-sufficient by 2013, and gave the Trust the authority to lease property in order to generate the revenue needed to operate the park and undertake the necessary capital improvements. With this evolution of governance also came an evolution of land use laws and policies starting with the PTMP directing 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. The PTMP states that a

maximum of 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 contains the following goals for future development for West Letterman (PTMP Figure 3.4):

- 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 historic Lombard Gate as the primary, formal entrance to the park.

The last three bullets above have 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 as a formal entrance to the park; plaques, lights and a kiosk have been added. In addition, the demolition of Buildings 1028 and 1027 were approved in 2025 as a separate project.

The PTMP notes that residential use is the most reliable long-term source of revenue available to the Trust and provides for changes in the composition of housing through removal of non-historic dwelling units and creation of smaller dwelling units. The PTMP also envisions clustering housing close to major activity areas to contribute to community vitality, help reduce traffic and pollution, and support park operations such as transit and community policing.

West Letterman/Thornburgh Design Guidelines

In addition to the PTMP, the [West Letterman/Thornburgh Design Guidelines \(Guidelines\)](#) also address the proposed project. 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. The document includes specific guidelines for infill construction and landscape characteristics. The Trust wrote the Guidelines to help ensure future projects would conform to the Secretary of the Interior's Standards for Rehabilitation. The Trust also circulated a draft of the Guidelines for NPS and SHPO comment in November 2023 prior to finalization and incorporated those comments into the final document. Project consistency with the Guidelines is intended to facilitate project decisions and activities, while reinforcing agency goals including avoiding harm to historic resources.

Current Mix of 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 the below table, *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. This does not include the 63 SRO/Dorm units in Building 1028. 2. Percentages may not add up to 100 due to rounding. Source: Trust 2026		

Forever Park Strategy

The [Forever Park strategy](#) 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.

SECTION 2

Summary of Section 106 Activities to Date

Activities under Stipulation IV of the PTPA to date have included identification of the project as an undertaking that involves new construction (IV.A.2.c); initiating consultation under this stipulation; establishing an Area of Potential Effects (APE) for the undertaking; identifying affected historic properties therein (IV.B.4); and distributing consultation packages to the SHPO, NPS and concurring parties in coordination with its public outreach process under NEPA

(IV.C.2). This document constitutes a determination of effect and includes other supporting materials as described under Stipulation IV.C.2.d.1.

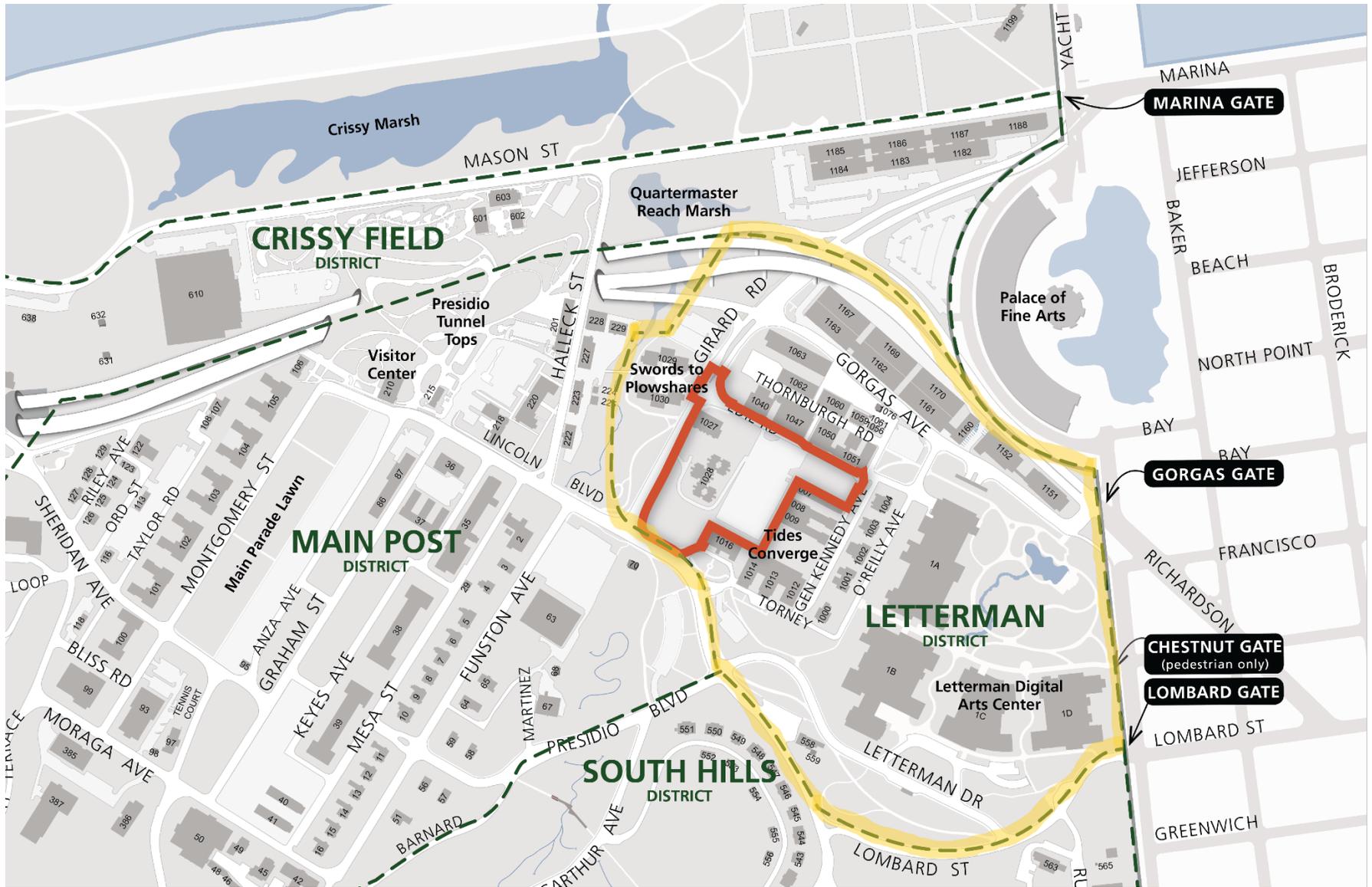
Area of Potential Effects and Identification of Historic Properties

The entire NHLD, including the area encompassed by the APE, has been the subject of a variety of surveys. The Presidio was designated a National Historic Landmark (NHL) in 1962 and listed in the NRHP (National Register of Historic Places) in 1966. The original Presidio of San Francisco NHL designation from June 13, 1962 included the entire former Army reservation (Areas A and B), which encompasses approximately 1,500 acres. The original site of El Presidio, including four Spanish cannons and the Officers' Club were the only resources recommended for NHL classification. In 1976, a partial survey of the landmark expanded the list of contributing buildings to 277, but a complete survey of all buildings within the NHLD did not take place until 1993. The Keeper of the National Register approved the "upgraded NHL documentation" that was prepared and submitted by the NPS in 1993.

The 1993 nomination stated that the Presidio possesses national significance under combined NHL Criteria 1, 4, 5, and 6, and that it possesses national significance under combined NRHP criteria A, C, and D. The 1993 update defined the period of significance for the Presidio of San Francisco NHLD as 1776-1945 and identified 662 contributing buildings, sites, structures, and objects. In January of 2008, the Trust initiated an update to the NHL form, which evaluated the Cold War period for inclusion in the NHL. That effort resulted in a proposed extension of the period of significance to 1958 and addition of 116 resources (mostly post-War housing in the southern and western parts of the park) to the NHL forms. In 2016 CalTrans/FHWA completed a focused update of the NHLD to account for changes brought about by the Doyle Drive/Presidio Parkway replacement project. The 2008 and 2016 updates remain in draft form pending further review by the NPS or a comprehensive update of the NHLD; properties identified as eligible therein are considered historic under the terms of the PTPA.

In the first consultation package (November 2025) for the Letterman Residential Project, hereby defined as the undertaking, the Trust identified a preliminary Area of Potential Effect (APE). 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 is outlined in the APE map and defined in the Presidio Trust Management Plan (PTMP), including 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. There are no known archaeological sites within the APE. The justification for this APE is as follows (see the accompanying APE map):

- The Letterman Residential Project is located exclusively within the Letterman Planning District, identified under PTMP as one of seven planning districts in Area B (the Trust-administered portion of the NHLD); the Trust will use the Planning Principles and



Letterman Residential FINAL APE

APE Boundary

Project Boundary

Planning District Guidelines contained in PTMP, along with the Secretary's Standards and 2024 West Letterman/Thornburgh Design Guidelines, to direct the compatibility of the project with the Letterman district and the NHLD as a whole.

- The undertaking involves 159,752 square feet of new construction to add 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. The undertaking does not involve rehabilitation of historic buildings, or the demolition of any contributing elements to the NHLD. New construction or other alterations would not be visible from other planning districts, beyond the adjacent parking lot of the non-historic YMCA building (built 1971) located in the Main Post Planning District. As such, the potential for the undertaking to affect the NHLD as a whole is negligible.
- The project area is located in the northeast corner of the NHLD and constitutes a discrete cluster of buildings separated from the adjacent Crissy Field and Main Post planning districts by the Presidio Parkway, distance and tree cover.
- The vertical APE resulting from construction of new building foundations will generally be 24" to 36" below current grade, with some limited locations up to 72". 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" below current grade. There are no known historic or pre-contact archaeological areas located within the project site. Trust analysis has concluded that the Army excavated over 5 and up to 15 feet of soil from the Letterman Residential Project site. This disturbance would have removed any buried archaeological sites and eliminates the potential for archaeological resources to be affected during the proposed project.

Public Participation

The [Trust website](#) added a [page for the project on October 31, 2025](#). The webpage included a summary of the project as well as historic, existing and proposed project images, and details for an Informational Open House. Links to the West Letterman/Thornburgh Design Guidelines, PTMP, and project renderings, floor plans and elevations were included. Per Stipulation IV.C.2.a of the PTPA, the Trust coordinated its NEPA and Section 106 processes by releasing a first consultation package in tandem with the NEPA Notice of Intent on November 3. On the same day, the agency updated the project webpage with a link to a form and an email address for the submittal of public comments.

In late October, the Trust held meetings with tenants adjacent to the project site to share information on the project. The Trust has email distribution lists for volunteers, residents, commercial tenants and visitors/general 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.

Also in early November, the Trust offered informal walking tours of the project site to historic preservation organizations in San Francisco. The Presidio Historical Association (who were not yet a concurring party to the PTPA) and San Francisco Heritage accepted these invitations and

joined Federal Preservation Officer Rob Thomson and Director of Planning & Compliance Prakash Pinto on walks around the site to discuss the Guidelines and the undertaking.

On November 18 the Trust held an Informational Open House 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 to ask questions.

By the close or shortly after the public scoping period for the project that ended December 8, 2025, the Trust received two letters from public agencies (CA SHPO and DTSC), one organization and 40 interested individuals. Issues raised to date by the public are summarized below.

- 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.

Responses to the public comments received, organized by issue topic, are provided as a supplement at the end of this document.

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 NHLD. The Trust has entered into a [Programmatic Agreement \(PTPA 2025\)](#) with the SHPO, the ACHP, the NPS (signatory parties), and the Presidio Historical Association (concurring party as of December 2025) 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 Stipulation IV.C.2 (Coordination of Section 106 of NHPA with an Environmental Assessment (EA) or Environmental Impact Statement (EIS) Process) of 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 undertaking, and initiated consultation on the Letterman Residential Project on November 3, 2025. The first consultation package contained a summary of preliminary project information, a proposed area of potential effect (APE) and a request for early input. Per Stipulation IV.C.2.d. of the PTPA, the Trust is now submitting the draft EA to all PTPA parties as a supplemental consultation package along with the enclosed summary of comments gathered during public scoping, agency responses, this preliminary Finding of Effect (FOE) and finalized APE, 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 would not adversely affect historic properties in the Presidio NHLD prior to execution of the finding of no significant impact (FONSI).

Public Agency Consultation

Per the terms of the PTPA, the Trust will continue consultation with the National Park Service and California State Historic Preservation Officer until concurrence is reached on the agency's preliminary determination of no adverse effect, or other resolution pathway provided for in the Trust's agreement document. The Trust notified the Advisory Council on Historic Preservation (ACHP) of the initiation of consultation in its first consultation package and will continue to include it in future communications concerning the consultation going forward.

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.

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. The letter notes that the SHPO agrees the Letterman Residential project constitutes an undertaking with the potential to effect historic properties, and that the draft Area of Potential Effect (APE) provided by the Trust was “generally sufficient”. The SHPO requested additional information about anticipated depth of ground disturbance for the project, and details of archaeological survey efforts within the APE, which is included in the Archaeological Resources section of this report (See pp 17, 21). Furthermore, the SHPO requested additional information concerning tribal consultation, which is provided below.

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 exceedingly low likelihood for encountering pre-contact archaeological resources during excavation for the project (see Archaeological Resources section for details), 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 (Nov/Dec edition) and invited them to comment through the agency’s public process on the Environmental Assessment (the Trust has yet to receive comments from the ARO).

SECTION 3

Description of the Undertaking & Alternatives

Note: This section largely follows the corresponding Proposed Action and Alternatives section of the Environmental Assessment

Letterman Residential Project (Undertaking/Proposed Action Alternative)

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

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. The dwelling units will be market rate, rental units, with a mix of unit types as detailed in Table 3. Two-story buildings would have a maximum height of 30 feet and three-story buildings would 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.

The buildings are rectangular and laid out parallel or perpendicular to surrounding roadways and buildings as to relate to the historic context of the site. The building forms would be simple and functional in the tradition of military architecture found at Letterman and throughout the Presidio. The material palette will include Presidio white painted fiber cement siding, thin brick and storefront at the lobby building, painted concrete at the foundations, red shingle and/or tile roofs with built-up roofs at mechanical wells. Buildings will include a combination of hipped and gable roof forms, overhanging eaves, and divided windows.

The project will include modifications to the existing non-historic stairs that extend west from Building 1016 near proposed building A and the stairs that extend north from Building 1007 near proposed building F.

The residential buildings and project site circulation will meet or exceed Federal Architectural Barrier Act (ABA) standards. New construction will achieve a minimum Leadership in Energy and Environmental Design (LEED) Homes Gold rating. Some LEED measures include waste diversion during construction, all electric buildings meeting Title 24/LEED energy efficiency requirements, locally sourced materials, tenant education, concrete embodied carbon analysis, installing Energy Star appliances, meeting minimum indoor air quality requirements, and using no invasive plants.

All buildings are proposed as Type V wood framed construction with slabs on grade and approximately 30-inch-deep perimeter grade beam foundations. The common amenity spaces are proposed as a combination of concrete, steel and wood framed construction.

See Figures 4-10 for illustrations of the above descriptions. Also see Supplemental Renderings & Floor Plans and Elevations at the end of this document for additional images describing the proposed project.



Source: David Baker Architects, 2025

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

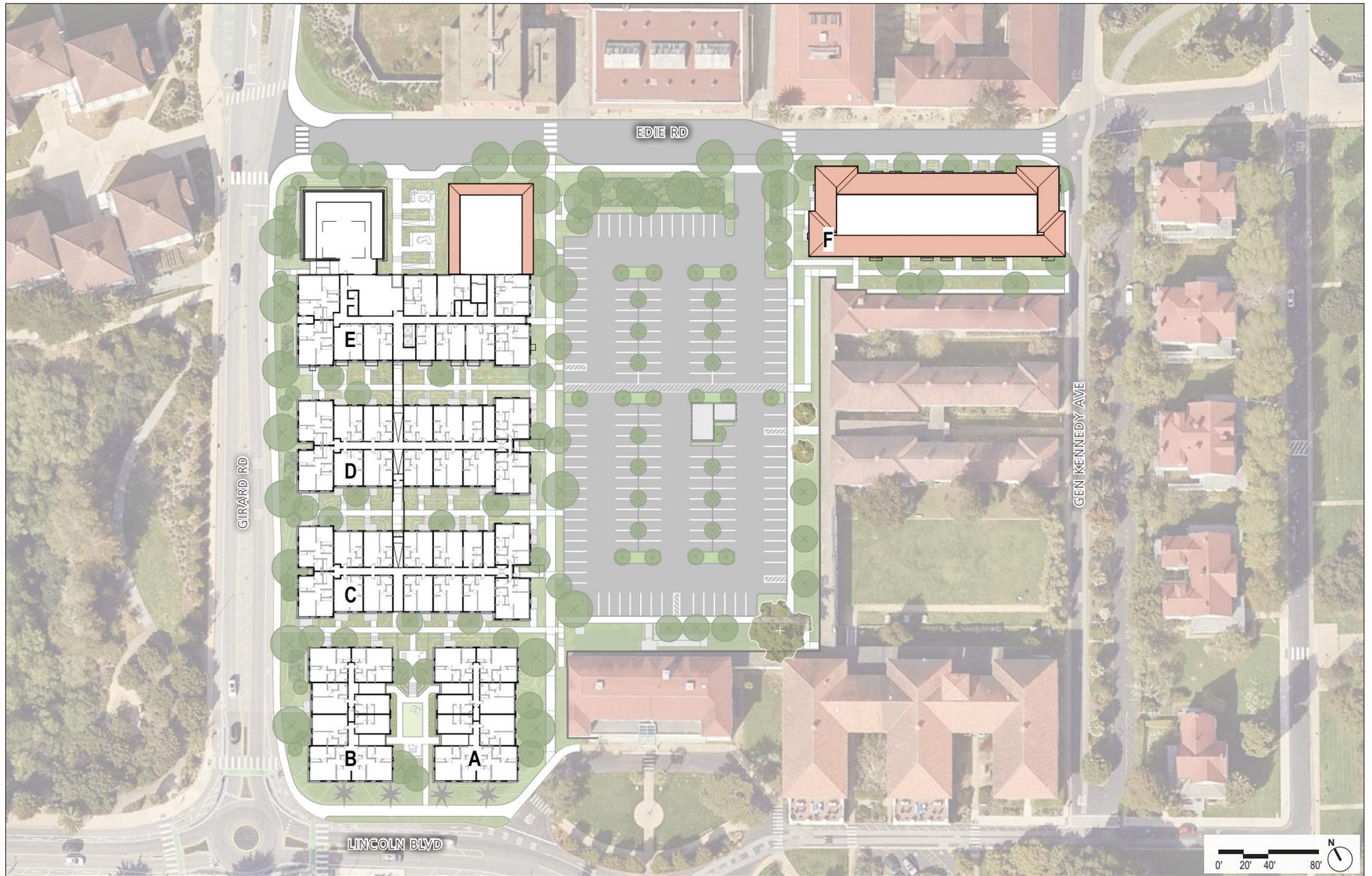
FIGURE 4
Floor Plan — Ground Level



Source: David Baker Architects, 2025

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

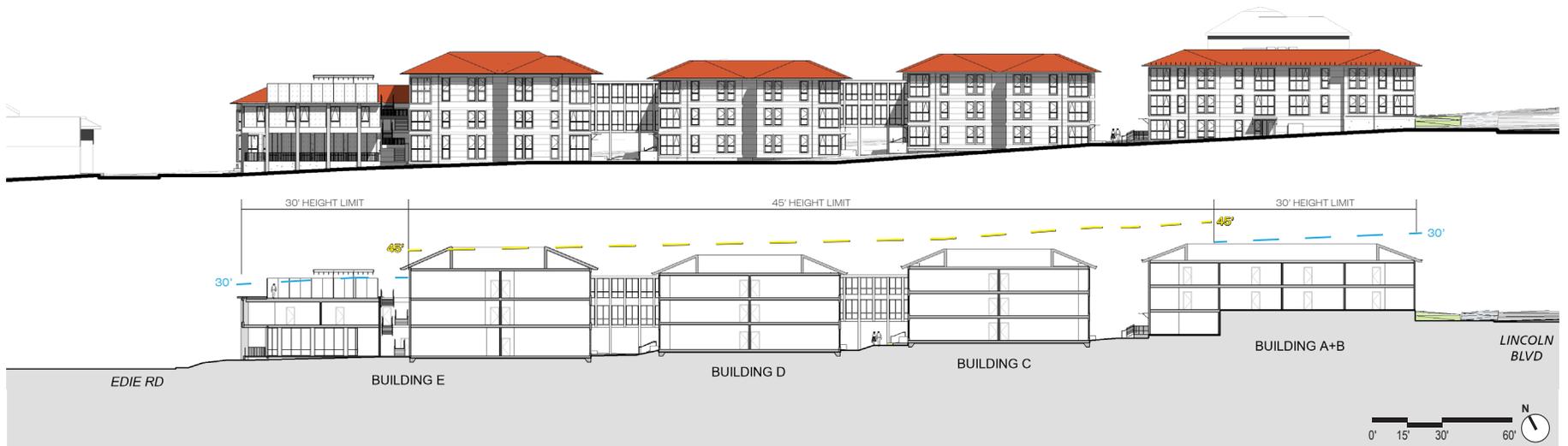
FIGURE 5
Floor Plan — Level 2



Source: David Baker Architects, 2025

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 6
Floor Plan — Level 3



Source: David Baker Architects, 2025

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 7
Site Elevation — Girard Road



Source: David Baker Architects, 2025



LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 8
Lincoln Boulevard View Northwest — before and after



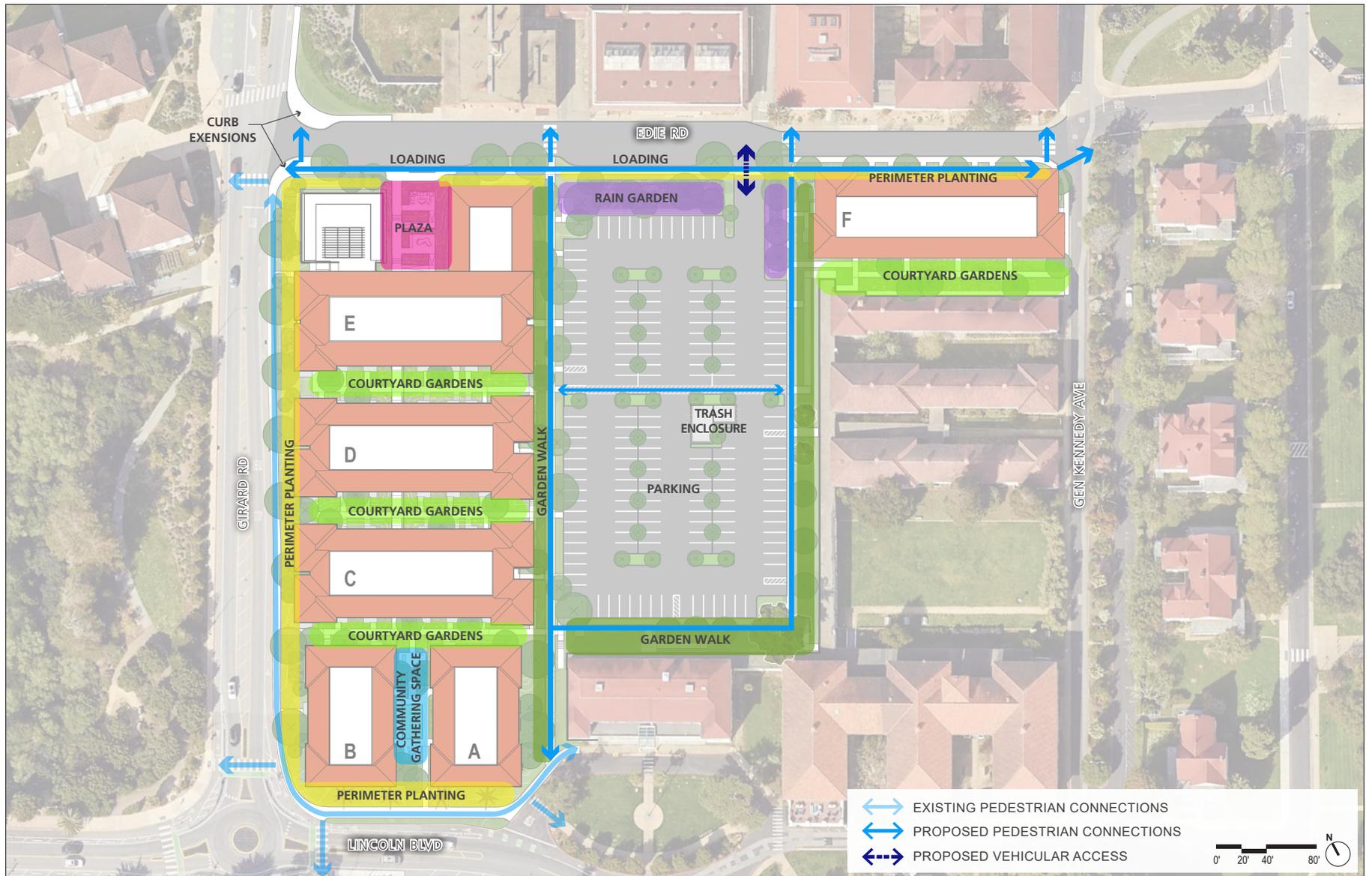
Source: David Baker Architects, 2025



LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

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
<i>Total³</i>	<i>159,752</i>		<i>196</i>

Source: David Baker Architect, Presidio West Letterman Housing, Schematic Design, July 25, 2025

1. Square footages are calculated using the Presidio BEGA (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.

Table 3. Dwelling Units – Type, Number and Percentage

Unit Type	Existing Parkwide		Proposed Project		Parkwide with Project	
	Number	Percent	Number	Percent	Number	Percent
SRO/Dorm¹	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

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.

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, 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.

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

The project will include new landscape vegetation along roadway frontages, as well as new areas between and around the residential buildings. Landscape will be drought tolerant, include native plants, and take into consideration existing and historic plant palettes. Landscape design will be subject to the [Vegetation Management Plan](#), West Letterman/Thornburgh Final Design Guidelines, [Landscape Plant Selection List](#), as well as the [Presidio Trust Design Review process](#).

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

Utilities

Existing utilities (water, wastewater, storm water, 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 bio retention 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 and transformers and vehicle chargers.

Site Work

The project site slopes down to the north; the Edie Road side of the site is approximately 20 feet lower in elevation than the Lincoln Boulevard side (see Figure 7). The buildings are stepped down the site to reduce the amount of cut and fill required and to provide accessibility. 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. Approximately 4,500 cubic yards will be used for fill on the site and approximately 4,880 cubic yards will be exported.

Project Schedule

Project will be constructed in a single phase. Site preparation is anticipated to begin in summer 2027 followed by full construction in fall 2027. The project will be completed by winter 2028-29.

No Action Alternative & Mixed-Use Alternative

The Letterman Residential Project EA considers No Action and Mixed Use Alternatives, in addition to the Preferred Alternative (undertaking). The No Action and Mixed Use alternatives

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

Both alternatives would result in the same assessment of effect as the Preferred Alternative, so they will receive no further independent analysis.

SECTION 4

Identification of Historic Properties

Presidio of San Francisco National Historic Landmark District

Over 750 historic properties (including buildings, archaeological sites, landscape features, and more) qualify as contributing or eligible in the Presidio NHL. Three NHL forms describe these contributing resources and their character-defining features: the comprehensive 1993 NHL form, and draft 2008 and 2016 NHL updates.

The NPS established NHL criteria to identify properties of national significance that possess “exceptional value to the nation”, a higher standard than for those eligible for listing in the National Register of Historic Places. NHLs that are important as collective entities, like the Presidio NHL, must exhibit an association with a nationally significant event, movement, or broad pattern of national development. Similarly, contributing archaeological resources must be of major scientific importance. Furthermore, the NHL program was established to “encourage the long range preservation of nationally significant properties.”

The description of historic properties in an FOE document typically includes information on the criteria for which the historic property is eligible, levels and periods of significance, property boundaries, and contributing and non-contributing elements.

The NPS’ 1993 NHL documentation summarizes the Presidio NHL’s significance criteria and level of significance as follows:

The Presidio of San Francisco possesses national significance under combined National Historic Landmark Criteria 1, 4, 5, and 6. The property is composed of a wealth of historic, architectural, and archaeological resources that collectively comprise a distinctive entity of exceptional historic significance (Criteria 4, 5, and 6) and whose archaeological study can amplify our understanding of those periods and peoples under-represented in the existing historical record. As a vast district entity, the Presidio possesses exceptional value in illustrating

the history of the United States through its association with important historic events and its outstanding representation of patterns of national development through multiple periods (Criterion 1). (Similarly, the Presidio possesses national significance under combined National Register Criteria A, C, and D. Criterion C relates to the property's distinction as a district entity, and Criterion A relates to the district's association with events and broad patterns of history, and D relates to information potential for both historic and anthropological research to be found in the Presidio's historic archaeological resources.)

The 1993 NHL documentation provides a seven-page summary statement of significance outlining the Presidio's history as the oldest Army installation in the American West and as one of the longest garrisoned posts in the country. It summarizes the Presidio NHLD's significance as:

...its association with a number of important historic events and people related to Spanish-colonial California, the development of the American West, U.S. relations and cross cultural exchange with the Pacific Rim, and the growth and development of the United States Army. Its significance is further based on its unique ensemble of military architecture, fortifications, and landscape design from every major period from the Civil War on as well as archaeological resources that hold important information about the earlier historic and pre-historic use of the site.

The 1993 nomination states that the Presidio's period of significance is 1776-1945, plus 1951. Section 7 (Description) and 8 (Statement of Significance) of that document describe the development of the post as occurring in over eight historic eras: Spanish-Mexican Settlement, 1776-1846; Early United States Occupation, 1846-1860; Civil War, 1861-1865; Indian and Military Affairs, 1866-1890; and Nationalistic Expansion, 1891-1914; World War I, 1915-1918; Military Affairs between Wars, 1919-1940; World War II, 1941-1945; and 1951, due to the important military pacts signed on post that year. The nomination discusses significant historic themes and sub-themes under NHL Criteria 1, 5, and 6 for the Presidio's association with important events, as an important collective entity, and for its archaeological/anthropological importance.

The draft 2008 Update proposes to extend the period of significance to 1958, and identifies 110 resources as eligible as contributors to the NHLD (105 buildings, 11 structures); the resources are primarily Cold War-era housing located in the Baker Beach, East Washington and Upper Portola residential neighborhoods (there are no Cold War-era resources identified under the 2008 Update within the Letterman Residential Project APE). The 2008 document only analyzed changes to the Presidio from 1945-1994; it did not examine resources or historic periods prior to 1945 for re-evaluation.

The Presidio NHLD contains approximately 1,500 acres. The boundary justification for the Presidio NHLD is as follows:

The historic district of the Presidio of San Francisco is composed of those lands referred to as the military reservation of the Presidio, including the lands of the historic Marine Hospital west of Mountain Lake, which was originally a part of the military reservation. Offshore submerged lands are also included because of location of shipwrecks and historic wharves, docks, and

refuse disposal. The boundary chosen constitutes the lands altered and developed historically by the military units that have been stationed at the Presidio, or by specific allowed civilian or other agency activities approved through the military command.

The Presidio NHL is a district that encompasses “forested hills and winding roads” of a large military reservation that stands in sharp contrast to the nearby densely developed urban neighborhoods of San Francisco. Historically, the military organized the post into several areas of development, including the Main Post, Fort Winfield Scott, Crissy Field, Marine/Public Health Service Hospital, and the Letterman General Hospital. In its planning documents, the Trust has organized the Presidio into park planning districts that are based on these historic areas.

Despite changes since the U.S. Army’s departure in 1994, the Presidio NHLD retains a high degree of visual unity that reinforces its historical importance and underscores its continuity as a military reservation throughout its long period of significance. The contributing buildings, structures, objects, and sites of the Presidio NHLD represent various periods and styles of architecture but, generally speaking “... the architecture is unified by the military’s basic and straightforward approach to construction and design. This approach generally tended toward formal symmetry and eschewed excessive ornamentation.

The 1993 NHL documentation identified the Presidio as a designed landscape, provided a description of its development, and listed some landscape characteristics as contributing features. However, this documentation acknowledged that the 1993 update was “an initial effort to identify and explain contributing landscape features.” The NPS and Trust have documented the cultural landscape of the Presidio, under various efforts including the 1992 Cultural Landscape Report – Phase One Priority Areas, which informed planning efforts for the General Management Plan Amendment (GMPA, 1994) and ultimately the PTMP. Since then, the Trust has prepared focus studies on the architectural and landscape character of various districts and sub-districts, including the 2007 West Letterman Planning & Design Guidelines, and its updated version, the 2024 West Letterman/Thornburgh Design Guidelines, which are the most germane to this FOE.

The archaeological resources of the Presidio are not readily observable. Therefore, Trust archaeology staff and their consultants performed a series of investigations between January and December 2008 to characterize some of the predicted features identified in the 1993 NHL Update to better inform the decision-making process. This effort included a review of the information contained in the 1993 Update and 2008 NHL Update, new archival research, geographic information system (GIS) analysis, and geo-archaeological assessments of Presidio soils and sediments. (See Presidio of San Francisco National Historic Landmark District Map of Predicted Archaeological Features on the next page, with the project site outlined in red.)

With a few minor exceptions, the archaeological identification of resources provided in the 1993 Update, and refined by the 2008 Update and subsequent research has proved to be reliable and very useful for both planning and preservation. Some of the contributing features are still “predicted” while others have since been verified. Because contributing status for these features has previously been established – and due to the reliability of the predictions – the Trust assumes that, unless contrary data exists, the features identified by the NPS in 1993 retain integrity. Relying on this assumption is preferable to destructive testing to evaluate their integrity.

Presidio of San Francisco National Historic Landmark District

Map of Predicted Archaeological Features

Legend

- Predicted Historic Archaeological Sites
- Prehistoric Sensitivity

ID	Name
A-01	El Presidio de San Francisco
A-02	Spanish Cemetery
A-03	Briones Adobe & El Polin Spring
A-04	Sanchez Adobe and Gardens
A-05	Rancho Ojo de Aqua de Figueroa
A-06	Old Post Cemetery
A-07	Mountian Lake Water Co. Tunnel
A-08	Civil War Barracks, Kitchens & Shops
A-09	Eastern Tributary Water Controls
A-10	Western Tributary Water Controls
A-11	Funston Avenue Officer's Quarters
A-12	Post Hospital and Meteorological Station
A-13	Non-Commissioned Staff Quarters
A-14	Laundresses and Enlisted Men's Quarters
A-15	Sultery
A-16	Stream Ravine Dump Area
A-17	Quartermaster Complex
A-18	Main Post Water Control
A-19	Laundress' Quarters
A-20	Old Merchant Marine Cemetery
A-21	Marine Hospital and Gardens
A-22	Merchant Marine Cemetery
A-24	Batteries Howe and Wagner
A-25	Battery Saffold
A-26	Battery Dynamite
A-27	Battery McKinnon and Stotsenberg
A-28	Battery Baldwin, Slaughter, Sherwood and Blaney
A-29	Radio Control Station
A-30	Quartermaster Dump
SFR6/26	Ohlone Shellmound



Integrity Assessment of Presidio of San Francisco National Historic Landmark District and APE

The buildings, cultural landscape and archaeological features of the Presidio NHLD retain their integrity to varying degrees and reflect the actions of the militaries of three nations during the period of significance. The Presidio retains integrity of location and setting; the park is today differentiated from the surrounding urban environment of San Francisco, overlooking the Bay and Golden Gate from a promontory of land selected by Spanish explorers in the 18th century.

In the built environment, the Presidio retains the essential hierarchies associated with a military post. These include the ceremonial relationships between built and open space, and an overall organization according to Army activities, such as barracks buildings fronting parade grounds. The Trust has actively restored and maintained the historic forest planted by the Army beginning in the 1880s, while also rehabilitating the residential and other landscaped areas throughout the park. Architecture in the Presidio today reflects changes in military design, materials and workmanship from the 1860s to the 1980s. Since 1994, the NPS, Trust and development partners have rehabilitated approximately three quarters of the contributing structures in the NHLD according to the Secretary's Standards for the Treatment of Historic Properties. Because the Presidio no longer functions as an active military base, most of these rehabilitations have been adaptive reuse projects. Crissy Field, the Letterman and Public Health Service Hospital districts, and the Doyle Drive corridor have sustained the most change since 1994, largely due to removal of non-contributing buildings, obsolete (albeit historic in some cases) infrastructure and replacement with new facilities and landscapes.

The Evolution of the Presidio within the Area of Potential Effect

Text adapted from the 2024 West Letterman/Thornburgh Design Guidelines

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.

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



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



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

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 half 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 National Park Service (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 in ca. 1995.

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 Connect) 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 NHLA-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 underutilized 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.

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.)

Together, the grouping of buildings and associated landscapes create Letterman's distinct urban and landscape character, visible in the following extant (character defining) features (illustrated in the 2024 Guidelines):

- 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.

Army-era, NPS and Trust projects have substantially altered historic resources within and around the project site 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.

Archaeological Resources

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. The “Presidio House” in the Letterman

District is the only archaeological feature identified in the PTMP EIS, but its predicted location is well outside of the current project area. (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, 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 and the excavation has a very low potential to affect archaeological resources because any archaeological deposits would have already been removed by the US Army cut. (See Presidio Archaeological Risk map on the subsequent page, with project area outlined in red.)

Integrity Assessment of the Area of Potential Effect

In order to arrive at an overall integrity statement for the APE, the seven criteria identified by the National Register for considering the integrity of a property are addressed in this document: location, design, setting, materials, workmanship, feeling, and association. Integrity is assessed in “real time” or as the property exists now in relationship to its period of significance. However, each successive period of development in the growth of the Presidio through more than two centuries affected the integrity of the earlier periods.

Looking at the APE from the perspective of the current moment, the integrity of the site for its total history varies considerably, with the greatest integrity found in the northern portion of the Letterman District (in the back-of-house medical buildings along Thornburgh Road and the Gorgas Avenue warehouses); moderate integrity in the original Letterman General Hospital (approximately half of which was demolished by the U.S. Army); and lowest integrity in the eastern portion of the district (where the current Letterman Digital Arts complex replaced 1960s and 70s-era medical facilities). The majority of the project site, however, has moderate integrity, due to Army-era building removals, replacement of landscape with parking lots, and alterations brought about by the Doyle Drive/Presidio Parkway project.

After the Presidio transferred from the Army in 1994, projects have largely conformed to the Secretary of the Interior’s Standards for the Treatment of Historic Properties and have endeavored to avoid or minimize diminishment of the NHL’s integrity. A significant exception was the replacement of historic but functionally obsolete Doyle Drive with the Presidio Parkway by Caltrans/Federal Highways Administration (2009-2015), which altered the northern and western edges of the APE and adversely affected the NHL.



Area A

THE PRESIDIO

Archaeological Risk Map

Archaeological Sensitivity Rating

- 1 - High
- 2 - Med
- 3 - Low
- 4 - None

An overall integrity assessment for the APE, using the aspects of integrity, follows:

Design, Materials, and Workmanship

The integrity of the design, materials, and workmanship of the APE is moderate.

- Of the approximately 50 buildings comprising the early 20th century hospital complex, the Army demolished all but 22 in the 1970s, replacing the central landscaped courtyard with a vast, unadorned parking lot; the NPS removed an additional building (1006, Bacteriological Laboratory) due to contaminated conditions in ca.1995.
- The Army completely removed the eastern portion of the district, comprised of wards and administrative buildings built during a second wave of development to construct a new LAMC General Hospital in 1964, and the Letterman Army Institute of Research (LAIR) facilities in 1971.
- The Trust replaced these non-historic and functionally obsolete medical buildings with the 900,000 sq/ft Letterman Digital Arts Center; though entirely new, the complex was developed in accordance with guidelines aimed at relating the design and materials of the new buildings with the of the Presidio's historic buildings (brick, concrete, tile roofs, divided windows); similarly, the new buildings are sited in a richly ornamental landscape similar in design to that found elsewhere in the Presidio.
- The NPS oversaw the award-winning rehabilitation by a development partner of the seven remaining hospital buildings plus five medical officers' residences in 1995-98, leveraging the historic preservation tax credit program; the project retained and restored the remnant hospital complex's design, materials and workmanship for the multi-tenant office use that has occupied it since.

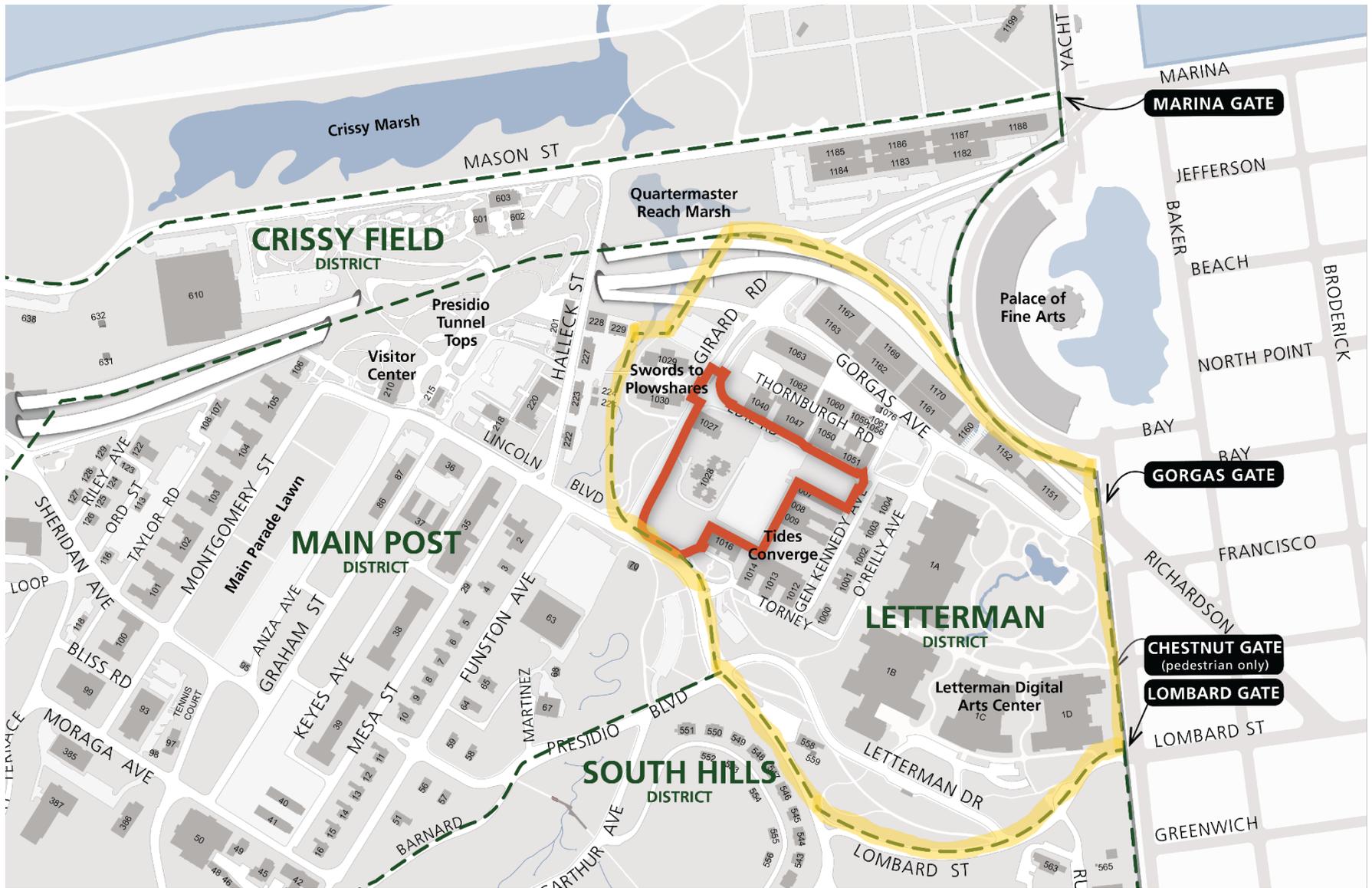
Location and Setting

The integrity of the location and setting of the APE is high.

- Letterman General Hospital, however diminished, remains at the geographic center of its namesake planning district, located on a relatively level area in contrast to hills to the south, the Tennessee Hollow watershed to the west and working waterfront (Gorgas and Mason warehouses) to the north.
- The ornamental Presidio Promenade landscape along Lincoln Boulevard connects the district to the Lombard Gate to the east and the Main Post to the west, as it has historically; the majority of roadways interlacing the project site also remain intact from the original hospital development.
- The relationship of remaining hospital administration buildings, wards and medical officers' housing with the back-of-house buildings along Thornburgh Road and medical supply warehouses along Gorgas Avenue remains intact.

Feeling and Association

The integrity of the feeling and association of the APE is moderate.



Letterman Residential FINAL APE

APE Boundary

Project Boundary

- Although no longer a hub for military medical care, the district retains its association with the larger Presidio under its cohesive management by the Trust, and the active tenant users in the Letterman Digital Arts buildings and Tides businesses in the former Letterman Hospital buildings.
- The overall feeling of low-scale (2-3 story) wood-frame pavilion buildings set in a lush, gardenesque landscape is retained, where the early 20th century buildings remain.
- Building patterns and street alignments from the hospital era have also remained relatively intact throughout the period of significance and can be interpreted for the visitor to help describe the history of the Letterman Hospital era of development.

Historic Properties in the Area of Potential Effects

All contributing resources in the APE, including buildings identified by number and period of construction, are listed below. They are listed by:

1. Contributing resources with no potential to be affected by the undertaking (11 resources)
2. Non-Contributing Resources in the APE (9 buildings)
3. Resources in the APE with the potential to be *directly* affected by the undertaking (zero resources), and
4. Resources in the APE with the potential to be *indirectly* affected by the undertaking (22 buildings, five roads)

The narrative descriptions that follow describe the buildings with the potential to be directly and indirectly affected. The descriptions were taken directly from the 1993 NHL Update, with modifications incorporated to reflect current conditions. Refer to the APE figure for building locations by number.

List of Contributing Resources in the APE with no potential to be affected

The following contributing resources are located within the APE, however due to distance, the presence of existing buildings, and grade changes, new construction associated with the undertaking will not be visible from, or otherwise affect the resources.

Number, Structure or Archaeological Feature Name (Date)

558	post exchange and restaurant	1920
1151	indoor swimming pool	1945
1152	gymnasium	1945
1153	transformer enclosure	1941
1160	warehouse	1940

1161	warehouse	1919
1162	warehouse	1919
1163	warehouse	1919
1167	warehouse	1919
1169	warehouse	1919
1170	warehouse	1919

List of Non-Contributing Resources in the APE

Non-Contributing Buildings in the Proposed APE

001A	Letterman Digital Arts Office Building	2003
001B	Letterman Digital Arts Office Building	2003
001C	Letterman Digital Arts Office Building	2003
001D	Letterman Digital Arts Office Building	2003
001G	Letterman Digital Arts Office Building	2003
1027	Garage & Storage Building separate project)	1976 (Note: will be demolished under a
1028	Nurse's Dormitory separate project)	1976 (Note: will be demolished under a
1029	Swords to Plowshares Residential Facility	1989
1030	Swords to Plowshares Residential Facility	1989

List of Contributing Resources within the APE with the Potential to be Directly Affected

None of the contributing resources within the APE will be directly affected by the undertaking. The undertaking will modify non-historic exterior stairs at Buildings 1016 and 1007 added during the late 1990s rehabilitation to accommodate new site circulation and exiting requirements, but the historic buildings themselves will not be altered.

Contributing Resources within the APE with the Potential to be Indirectly Affected

Several of the contributing resources within the APE will be indirectly affected by the undertaking due to proximity to and visibility of new construction.

Number, Structure or Archaeological Feature Name (Date)

1000	officer quarters	1902
1001	officer quarters	1902
1002	officer quarters	1908
1003	officer quarters	1908
1004	officer quarters	1908
1007	barracks	1901
1008	ward, 76 beds	1931
1009	ward, 80 beds	1930
1012	ward, 76 beds	1931
1013	ward, 22 beds, receiving office	1933
1014	outpatient clinic	1924
1016	administration building	1899
1040	power house	1900
1047	laundry	1914
1050	ward, 80 beds	1918
1051	detention ward	1909
1056	animal house	1910
1059	storage for combustibles	1915
1060	medical and surgical warehouse	1916
1061	acid storage	1938
1062	quartermaster shops	1922
1063	medical supply warehouse	1941

Edie Road

Girard Road

Lincoln Boulevard

General Kennedy Avenue

Torney Avenue

Descriptions of Contributing Resources in the APE with the Potential to be Indirectly Affected (excerpted from the 1993 NHL Update, with modifications to reflect current status and use)

LC: No. 1000 Officers' Family Housing

Constructed in 1902 at a cost of \$10,000 as the Commanding Officer's (often the Commanding General's) quarters, the building is little modified, save the enclosure of the front veranda. Currently it is used as the residence for the general in charge of the hospital. It is a tall two-and-one-half-story house with an asymmetrical cross plan configuration, measuring roughly 45' x 63'. It is of wood frame construction with beveled lapped wood siding and a reinforced-concrete foundation sheathed in random-course rock-faced stone. The cross-gable roof, now covered with red asphalt shingles, has wall-enclosed brick chimneys centered at several of the gable ends. The entire half-story, within the tall gables, rests on a denticulated cornice, broken to form return-like projections at the gable corners. Gable ends have denticulated raking cornices. A one-story, full-front veranda is enclosed with glazing and has a hip roof, denticulated entablature, engaged Tuscan columns, and an engaged balustrade composed of turned balusters and molded handrail. Windows are double-hung sash, two over-two, with fascia surrounds, simple crowns, and lug sills. There are some fixed windows. The front gable contains a finely detailed Palladian-type window; the gables on the side elevations have pairs of round-headed windows with keystones. Architecturally, the house displays a format and standard elements common to domestic wood construction of the period. Combined with these are special architectural features and detailing, classical in derivation and related perhaps to the "Colonial Revival," just becoming popular at that time. This building was rehabilitated in 1995-98 and is currently occupied by office tenants.

LC: No. 1001 Officers' Family Housing

Built in 1902 at a cost of \$17,900, this duplex served as officers' housing and remains in that use today. Some alterations, including enclosure of the verandas, have been made. The building is two and one-half-story with a symmetrical cross plan, measuring roughly 71' x 82'. The large, slightly projecting, central portion is flanked by front single-story verandas. The wood-frame construction has lapped wood siding and a reinforced concrete foundation. The cross-gable roof, now covered with red asphalt shingles, has a boxed cornice and returns and internal brick chimneys at the peaks. The verandas have hip roofs, engaged chamfered posts, and an engaged balustrade composed of straight balusters and handrail. Sun porches are at the rear. The windows are double-hung sash, two-over-two, with fascia surrounds, simple crowns, and lug sills. A finely detailed Palladian window is placed in the front central gable end. Architecturally, the duplex displays a simple symmetrical format and standard elements common to domestic wood construction of the period. This building was rehabilitated in 1995-98 and is currently occupied by office tenants.

LC: No. 1002 Officers' Family Housing

Built in 1908 at cost of \$21,700, the duplex served as officers' housing, and continues today in that use. The building has been little altered, save for enclosure of the veranda and porch after 1910. It is two-and-one-half-story with a symmetrical plan configuration measuring roughly 50' x 59'. Lapped wood siding covers the wood-frame construction; the foundation is reinforced concrete, finished with random-course rock-faced stone. The cross-axial gable roof, now covered in red asphalt shingles, rests on a denticulated entablature. The gable ends have denticulated raking cornices and have the appearance of classical temple pediments set above the main entablature. Two large dormers, also with pediment-like gables, have double windows, paneled corner pilasters, and shingled cheeks. The front verandas are enclosed with glazing and flat roofs, entablatures, engaged Tuscan columns (sometimes paired), and an engaged balustrade composed of turned balusters and molded handrail. There are enclosed sun porches in the rear. Windows are double-hung sash, six over- two, with fascia surrounds, simple crowns, and lug sills. Architecturally, the duplex displays a simple, symmetrical format and standard elements common to domestic wood construction of the period. Combined with these are special architectural features and detailing, classical in derivation and related to the "Colonial Revival," just becoming popular at that time. This building was rehabilitated in 1995-98 and is currently occupied by office tenants.

LC: No. 1003-1004 Officers' Family Housing

Built in 1908 for about \$17,500 each, these duplexes served as officers' housing, and remain in the same use today. They are little modified, save for enclosure of the verandas. The duplexes are two and-one-half-story with basement. The symmetrical cross plans measure roughly 50' x 59'. The buildings are of wood-frame construction with lapped wood siding. The cross gable roof is now covered in red asphalt shingles and has corbel-capped internal brick chimneys at the roof peaks. There is a denticulated entablature with returns at gable ends. Two one-story entrance verandas flank the building and have low hip roofs, entablatures, engaged Tuscan columns, and an engaged balustrade composed of turned balusters and a molded handrail. Two sun porches are located at the rear. Windows have double-hung sash, six-over-two, with fascia surrounds, simple crowns, and lug sills. The top window in the cross-axial gable end has sidelights and four-over-two double-hung sash. Architecturally, the duplexes exhibit a symmetrical format and standard elements common to domestic wood construction of the period. Combined with these are special architectural features and detailing, classical in derivation and related perhaps to the "Colonial Revival," just becoming popular at that time. These buildings were rehabilitated in 1995-98 and are currently occupied by office tenants.

No. 1007 Ward or quarters (medical photo lab)

Built in 1901 at a cost of \$13,000, this building is the only extant wing of the original United States Army General Hospital "quadrangle" as developed between 1899 and 1902; it was perhaps built as a nurses' quarters. Some interior modernization and minor exterior alterations have been made; the building is now used as an educational center. It is two-story, consisting of a basement-like ground level and tall main floor above, and has an extended rectangular plan measuring roughly 26' x 155'. The building is of wood-frame construction on a concrete pier foundation and has lapped and beveled wood siding. A wooden balcony and stairway with tubular metal rails are on the east elevation. The hip and shed-type roof, now covered in red asphalt shingles, has five large metal vents at the peak and exposed rafter ends extending from a simple wall plate. Wood-paneled doors have glazing and transoms; there are some solid wood

doors as well. Windows are double-hung sash, one-over-one, with plain fascia surrounds and wooden lug sills. Most main floor windows have transoms above. The building is connected to surrounding buildings and to the original administration building (No. 1016) by the enclosed gallery corridor described with No. 1016, above. Architecturally similar to the administration building and the gallery corridor, the building displays conventional wood-construction design elements mixed with some formal classical-derived decorative elements. This building was rehabilitated in 1995-98 and is currently occupied by office tenants.

Nos. 1008-1009 Wards (offices)

Built in 1930 (No. 1008) and 1931 (No. 1009) for approximately \$50,000 each, these buildings, which are currently vacant, once served as wards and held 76 beds and 80 beds, respectively. These two roughly identical two-story buildings of stucco-finished reinforced-concrete construction have I-shape plans measuring roughly 35' x 181'. Hip roofs of Spanish tile have decoratively sawn, exposed rafter ends. Some of the wood doors are glazed and have transoms. Double-hung wood sash windows are one-over-one, with concrete lug sills. The windows on the second floor are tall and have transoms. The buildings are connected to the surrounding buildings and to the original hospital administrative building (No. 1016) by enclosed galleries (described with No. 1016). Although these buildings exhibit material elements associated with the "Spanish Colonial Revival," their basic form and design follow those established in 1901 by No. 1007, one of the early ancillary buildings that has survived from the original hospital complex. The two 1930s ward buildings appear to have been replacements for two existing buildings of the original hospital complex. These buildings were rehabilitated in 1995-98 and are currently occupied by office tenants.

Nos. 1012-1013 Wards (offices)

Built in 1933 as additions to No. 1014, built in 1924. See No. 1014 for description. These buildings were rehabilitated in 1995-98 and are currently occupied by office tenants.

No. 1014 Outpatient Clinic (offices)

Built in 1924 at cost of \$70,000 as an outpatient clinic, this building, in conjunction with attached Nos. 1012 and 1013 (erected later in 1933), forms a single "E"-shaped building, which is currently used as offices. The two-story building is of stucco-covered reinforced-concrete construction. The hip roof of Spanish tile has a boxed cornice and overhanging eaves extending from a broad plate. The full-front porte-cocheres are massive projecting arcades formed of broad segmental arches and surmounted by spacious balconies with decorative iron handrails between massive pedestals. Doors are of a double casement "French" type. Double-hung sash windows are six-over-six, with concrete lug sills. The building comprised of Nos. 1012, 1013, and 1014 is connected to various surviving wings of the Letterman complex and to the administration building (No.1016) by an enclosed gallery at the rear. The building comprised of Nos. 1012, 1013, and 1014 appears to have been a replacement for an existing building that was part of the original hospital complex. As such, the new building followed the size and configuration of the earlier building even so far as the hip form of its roofs. As the first of the three connected replacement buildings, No. 1014 served as the stylistic prototype for adjoining Nos. 1012 and 1013, which significantly expanded its design, creating a single unified edifice of an impressive tripartite composition. The edifice exhibits the simple and balanced use of elements associated

with the "Spanish Colonial Revival." This building was rehabilitated in 1995-98 and is currently occupied by office tenants.

No. 1016 Administration (offices)

This was the administration building for the original United States Army General Hospital quadrangle, designed in 1899 by local architect W. J. Willcox and built by J. T. Long for \$113,300. Most of the other buildings of the quadrangle have been razed. The administration building has three-stories and a U-shaped cross-axial plan, measuring roughly 58' x 134'. It is of wood-frame construction, with a reinforced concrete foundation and lapped wood siding. The building is articulated by belt courses, interpreted in wood by wider lapped boards, lining the tops and bottoms of the fenestration. A major original architectural feature, still extant, are the recessed second-floor balconies, which are located on the end wings and which include Ionic-derived columns in antis. The hip roof, now covered in red asphalt shingles, has exposed rafter ends. Windows are double hung sash, one-over-one, with plain wood fascia surrounds and lug sills. The enclosed gallery corridor at the rear of the building connects it with the hospital wards (the gallery corridor and one of the connected buildings, or wings, are original to the early quadrangle; see descriptions of No. 1007, below). The connecting gallery corridor is glazed and of wood-frame construction on concrete piers, decoratively concealed by lattice work.

The gallery corridor has a full denticulated entablature, glazing in the form of large double-hung two-over-two window sash, pedestal-level paneling with a dovetail motif, and Ionic pilasters supported on engaged paneled pedestals between the windows. Portions of the gallery corridor are less decorated, with only chamfered and paneled pilaster-like elements, simple paneling at the pedestal level, and a simpler treatment at the eaves. The administration building has been insensitively altered by the 1950s or early 1960s addition of a ground-level glazed gallery across the front elevation, between the two projecting end wings. The excrescent gallery is composed of faux stone-faced piers, standard aluminum-frame picture windows, a cantilevered entrance hood or marquee, and a standard commercial aluminum and glass front door (originally, at this same location, the building had an open veranda and projecting entrance portico, exhibiting Ionic columns and railings based on a classical clathrate motif). On the interior, the original main staircase and pressed metal ceiling remain. Architecturally, the building exhibits a straightforward symmetrical format and blends the basic elements of wood construction of the period with finely detailed classical-derived architectural elements--the Ionic columns and pilasters, the entablatures and pedestals (on the gallery corridors), and, originally, the clathrate railings. This building was rehabilitated in 1995-98 and is currently occupied by office tenants.

No. 1040 Powerhouse and Steam Plant

Built in 1900 for \$23,000 as the powerhouse and steam plant, this building was heavily altered after 1942: the original slate hip roof and circular brick smokestack were removed and the present concrete second story, with flat roof, was added. The original installation generated 850 hp and included 450 hp boilers; new boilers were installed in 1969. Currently, this utilitarian building is two-story and measures roughly 91' x 94' in plan. It has stretcher-bond brick walls and a reinforced concrete foundation. There is a concrete addition to the top and to the north side. A tall, square smokestack of brick rises from the center of the flat roof. Segmental-arch doorways have double, barn-type, solid wood doors. Window openings are round-head arches with radiating bricks and have double-hung sash, two-over-two, with rock-faced stone lug sills;

many windows are covered with security bars. The building is technologically significant as one of the earliest powerhouses at the Presidio. This building is currently unrehabilitated and vacant.

No. 1047 Disinfecting and Sterilizing Plant (laundry)

Built in 1914, for \$18,900, as a disinfecting and sterilizing plant, a concrete loading dock with horizontal wood siding was added to the north elevation in 1917. The original equipment was removed, and the building was converted to a laundry c. 1937; the laundry was rehabilitated in 1960. The stucco-covered one-story concrete building measures roughly 94' x 146' in plan. The roof is flat with a hipped apron covered in Spanish tile. Three very large gable-roof skylights rise above the flat roof; each skylight has three large sheet-metal stack vents rising from the ridge. The eaves display curved exposed rafter ends and decorative brackets. Doors are solid and wood-paneled with glazing and transoms. Windows are double-hung sash, six-over-six, with plain surrounds and wooden lug sills. A decorative X-patterned railing above the Spanish-tile roof has been removed. The existing decorative features relating to the "Spanish Colonial Revival" may date to the 1937 remodel rather than the 1914 construction date. This building is currently unrehabilitated and vacant.

No. 1050 Psychiatric Ward (storage)

The ward was built in 1918 for \$66,700 as an 80-bed psychiatric ward for Letterman General Hospital; it is used currently as offices and storage. A shed-roofed wing connects the building to No. 1051, forming a single E-shaped building. The ward is a three-story stucco-covered reinforced concrete building measuring roughly 74' x 93' in plan. The hip roof, now covered in red asphalt shingles, has exposed rafter ends with attached end boards and a plain frieze. A large gabled skylight with a long monitor vent structure at the ridge rises above the roof. Wood-panel doors are glazed. Large industrial metal sash windows (non-original), some hinged, have concrete lug sills; some are covered with metal security bars. This utilitarian building exhibits very simple design elements, harmonious with the "Spanish Colonial Revival." This building is currently unrehabilitated and vacant.

No. 1056 Animal House (storage)

Built in 1910 for \$500 to house laboratory animals used at Letterman General Hospital, the building is essentially unaltered and is used currently for storage. The single-story wood-frame building measures roughly 21' x 31' in plan, with horizontal wood siding on a concrete slab foundation. The hip roof is now covered in red asphalt shingles. Solid wood doors have transoms. Windows are placed high in the wall and are fixed with plain surrounds and wooden lug sills. This building is currently unrehabilitated and vacant.

No. 1059 Combustible Storage (linen service)

Built in 1915 for \$1,900 as a storage building for combustibles, the building was modified for its present use for linen service c.1942. It is a single-story concrete building measuring roughly 32' x 51' in plan. A concrete loading dock on the south elevation is protected by a shed roof supported on square posts. The main hip roof, covered in red asphalt shingles, has exposed rafter ends with attached end boards and is surmounted at its peak by a central monitor-like vent with gable roof. There are both hinged doors and horizontal sliding doors, both of wood. Windows have double hung, four-over-four sash with plain wooden surrounds and concrete lug sills. This building is currently unrehabilitated and vacant.

No. 1060 Medical and Surgical Warehouse (offices)

Built in 1916 for \$19,800 as a warehouse for Letterman General Hospital, the building is currently used as offices. The two-story reinforced concrete building, measures roughly 46' x 99' in plan and has a single-story wrap-around veranda with slender concrete piers and concrete stoops on two sides. The hip roof, clad in Spanish tile, has exposed rafter ends with attached endboards. Wood-paneled doors are glazed and have transoms. Windows have double-hung sash, six-over-six, with plain wood surrounds and concrete lug sills. The building exhibits simple "Spanish Colonial Revival" elements prevalent in Post architecture during the period. This building is currently unrehabilitated and vacant.

No. 1061 Acid storage (storage)

Erected in 1938 as an acid storage shed, this utilitarian building measures roughly 8' x 10' in plan configuration. It is of reinforced concrete construction and has a shed roof covered in corrugated metal. This building is currently unrehabilitated and vacant.

No. 1062 Quartermaster's Shop (storage)

This building was erected in 1922 for \$19,500 as a quartermaster's shop. The original shop equipment has been removed, and the building is currently used for storage. The two-story reinforced concrete building has a loading dock extending the length of its south side. The hip roof of Spanish tile has exposed rafter ends above a plain frieze. Doors are wood-panel. Double-hung sash windows are six-over-six, with iron bars, plain surrounds, and concrete lug sills. Many windows have been infilled. Architecturally, the utilitarian building is harmonious with the basic elements of the "Spanish Colonial Revival," prevalent in Post architecture beginning in 1910. This building is currently unrehabilitated and vacant.

No. 1063 Warehouse

Built in 1941 for \$17,400 as a medical supply warehouse, this tall single-story utilitarian warehouse measures roughly 61' x 257' and is of utilitarian "temporary"-type wood-frame construction covered with corrugated metal on a concrete-slab foundation. The gable roof is also covered in corrugated metal and has a row of vent stacks interspaced on the ridge. The building is illuminated by small upper-level windows. The warehouse relates to the emergency "temporary"-type construction associated with World War II, and more specifically with the important role and expanded activities of Letterman Hospital during the conflict. This building is currently occupied by a Trust maintenance shop.

SECTION 5

Application of the Criteria of Adverse Effect

Under Section 106 of the NHPA, an agency shall assess the effects on historic properties in accordance with 36 CFR 800.5 Assessment of adverse effects. The NHPA defines an effect as an alteration to the characteristics of a historic property that qualify it for inclusion in or eligibility for the NRHP:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

The criteria of adverse effect are applied to all historic properties within the area of potential effect, with consideration given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. The criteria of adverse effect are used as a "threshold" for determining whether an undertaking will have an "adverse effect" or will it have "no adverse effect" (i.e. does an undertaking diminish a property's integrity or not?). In this instance, the entire NHLD is the "historic property" consisting of numerous contributing resources (buildings, structures, archaeological sites, etc.). The integrity assessments for the Presidio NHLD and the APE that are used to support the finding of effect in this assessment are presented in Section 4 of this document.

According to 36CFR 800.5, an adverse effect on a historic property includes, but is not limited to:

- Physical destruction of damage to all or part of the property
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines
- Removal of the property from its historic location
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features
- Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization
- Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance

Adverse Effects - Definition

Adverse effects can be impacts to the physical material of a property (such as demolition, relocation, additions, deterioration, etc.), or an intangible element of a property (such as a view shed, visual relationship, ownership or management practices). According to 36 CFR 800.5(a)(1) "adverse effects may [also] include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative." Assessing effects for

a particular undertaking is dependent on evaluating the property's integrity as "the ability of a property to convey its significance." Past undertakings are considered because a series of actions could gradually erode a property's integrity. An effects assessment, therefore, examines the effects of a current undertaking within a broader cumulative context.

Format for Assessing Effects in this Document

The 2002 PTMP and 2025 West Letterman/Thornburgh Design Guidelines contain direction for project proposals in the Letterman Planning District for consistency with the Secretary of the Interior's Standards and avoiding adverse effects to individual resources and the Presidio NHL as a whole. This document analyzes the undertaking's responsiveness to this guidance in order to arrive at a preliminary determination of "no adverse effect" for the Letterman Residential Project. Details of the undertaking and their consistency with this design guidance is detailed in the following section to support this conclusion.

Analysis of the Undertaking's Consistency with Applicable Design Guidelines & Assessment of Effects

Note: This section largely follows the corresponding Affected Environment section of the Environmental Assessment

Please refer to the Supplemental Renderings & Floor Plans and Elevations at the end of this document for images to support the below project details

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. (See Figure 10)

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 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 part of Buildings 1016, 1007 or of the other existing historic buildings adjacent to the project site. (See images of these stairs on the subsequent page)

Construction activity for the new structures, utilities, landscape and site circulation features will occur directly 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. 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 mat 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



Non Historic Stair at West Elevation, Historic Building 1016



Non Historic Stair at West Elevation Historic Building 1007

in and around the planning district and to encourage conformance to the Secretary of the Interior's Standards for Rehabilitation in order 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.

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

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 PTMP 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.

2002 PTMP 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.

Analysis (Assessment of Effect)

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'-45').

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 15-20' 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 Figure 29 and Figure 30 [included in this document as Figures 7 and 13]
- Respect the similarities that exist among buildings in the distinct clusters that make up the Letterman District.

Analysis (Assessment of Effect)

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



Source: Presidio West Letterman/Thornburgh Final Design Guidelines, 2024

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 13
Maximum Allowable Heights for New Construction



Source: David Baker Architects, 2025

LETTERMAN RESIDENTIAL PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

FIGURE 7
Site Elevation — Girard Road

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. 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 U.S. 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 undertaking 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.

Conclusion – Built Resources

The undertaking 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.

Archaeology

The undertaking includes construction of new building foundations that will generally be 24" to 36" below current grade, with some limited locations up to 72". 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" below current grade. Landscape and site improvements, including stormwater basins/swales and utility connections are generally at 6-18" below current grade, with a possible single connection point no greater than 60" 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 U.S. Army. This disturbance has impacted 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.

Historic Resources Conditions in the Environmental Assessment

The following resource protection measures will be conditions of project approval included in the Environmental Assessment Finding of No Significant Impact (EA FONSI) and thus will be agency obligations for project implementation. 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.

1. 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.

2. 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.

Cumulative Effects to the Presidio NHLD

Cumulative effects analysis considers all past, present, and future projects in the NHLD which have the potential to combine with the effects of the undertaking to form an adverse cumulative effect on the NHLD. This analysis considers undertakings for which compliance has already been completed, as well as those that are anticipated by the Presidio Trust.

In terms of past and completed projects in the NHLD relevant to the cumulative analysis, the Trust has taken the following projects into consideration:

- The U.S. Army's removal of approximately half of the estimated 50 buildings comprising the early 20th century hospital complex in the 1970s, and replacement of the central landscaped courtyard with a vast, unadorned parking lot; the NPS removal of an additional building (B.1006, Bacteriological Laboratory) due to contaminated conditions in ca.1995.
- Rehabilitation of Crissy Field (completed in 2001), which removed 32 historic buildings to restore earlier historic and natural features and to introduce parking for recreational activities.
- The construction of the Letterman Digital Arts Center (completed in 2005), which replaced non-historic buildings and a large parking lot with compatibly designed new buildings and landscape.
- The Doyle Drive project (2009-2015), which replaced the historic elevated roadway with a new parkway, including the removal of historic buildings and streets, and the reconfiguration of the historic Main Post bluff to accommodate the new parkway and tunnels.

All four of these projects have affected the NHLD in the vicinity of the APE due to removal of contributing resources and the introduction of new elements.

The Trust found the following current and future projects relevant to the cumulative effects analysis because they have a bearing on the effects of the undertaking:

- The NPS -led, award winning rehabilitation in collaboration with a development partner of the seven remaining Letterman Hospital buildings, plus five medical officers' residences, in 1995-98; this effort retained and restored the remnant hospital complex's design, materials and workmanship for the multi-tenant office use which has occupied it since.
- Rehabilitation of the six Gorgas Warehouses by the Trust (2006-2019); though not historically connected to the Letterman General Hospital function, they are located within the APE/Letterman Planning District.
- Future rehabilitation of the Thornburgh sub-district buildings; the Trust anticipates the rehabilitation and adaptive reuse of the ten NHLD contributing buildings that constitute the back-of-house functions of the former Letterman General Hospital complex (laundry, steam plant, medical supply warehouses, etc.).

The majority of projects that have occurred in the Presidio since the compilation of the 1993 NHL documentation have been rehabilitation and enhancement projects that have either improved the visibility and condition of the Presidio's character defining elements, or have not altered them greatly. Several large projects, however, including the Crissy Field and Marsh Restoration Project, the Letterman Digital Arts Center and the Doyle Drive Replacement project, have introduced new elements and/or have removed historic elements from the Presidio that resulted in the alteration of the appearance and character defining elements in large areas of the NHLD. The Letterman Residential Project, when added to the effects of these past projects, would not contribute to cumulative adverse effects to the NHLD, because it avoids localized adverse effects within the APE, while also adhering to district and Presidio-wide design guidance contained in PTMP and subsequent studies.

For these reasons, the undertaking would have no adverse cumulative effects on the NHLD in consideration of all relevant past, present, and future projects.

Cumulative Effects to Archaeological Resources

Ground-disturbing activities associated with this undertaking have a very low likelihood for affecting known or predicted archaeological resources in the Presidio NHLD due to Army-era grading activities, and therefore are not anticipated to contribute to any cumulative effect to archaeological resources within the NHLD.

END of FOE ANALYSIS

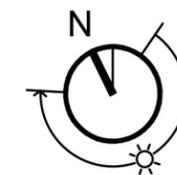
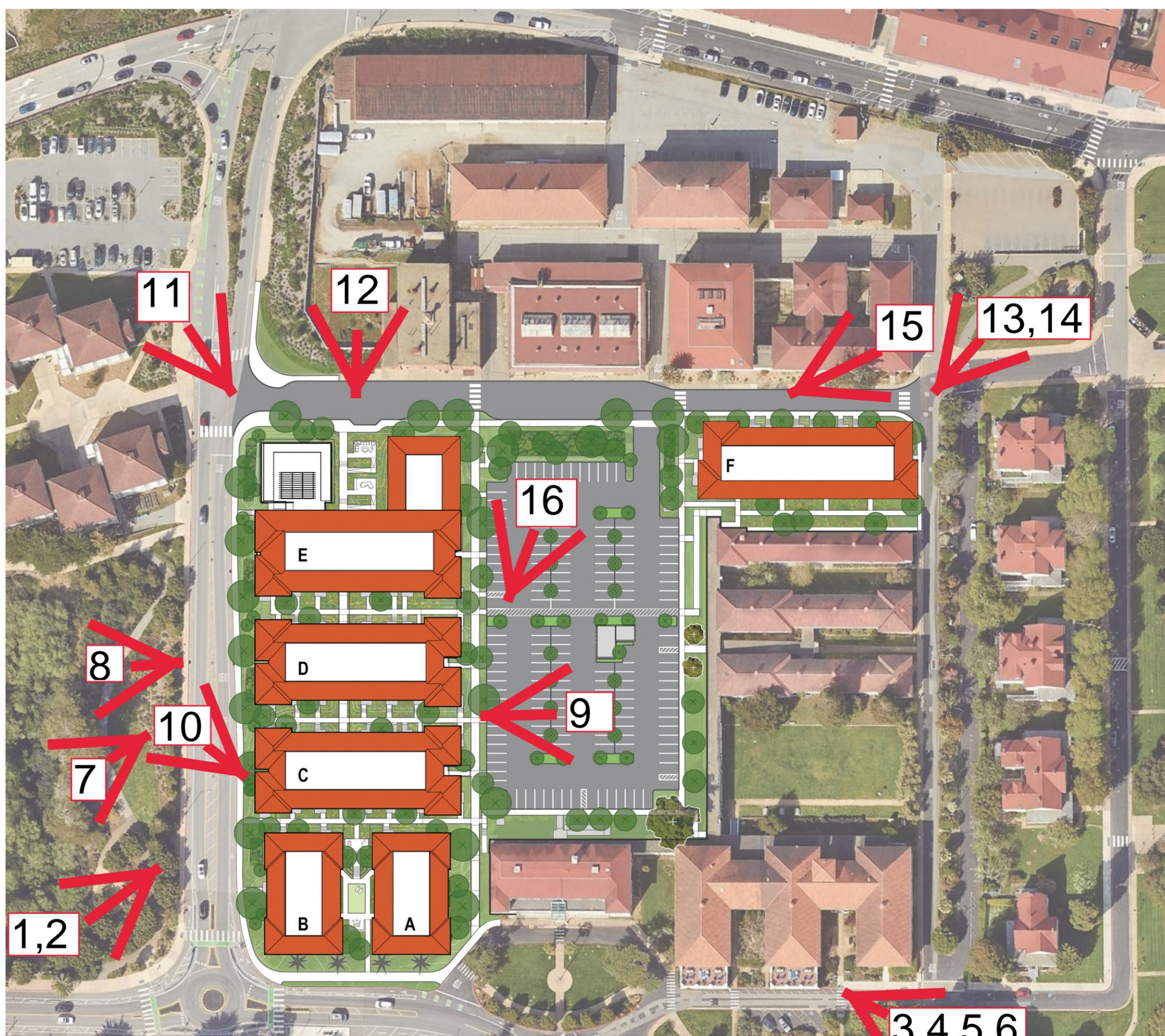
Letterman Finding of Effect
List of Supplemental Renderings & Floor Plans and Elevations

Renderings – View Locations Key

1. Aerial View of Current Site Conditions
2. Aerial View of Proposed Project
3. View from Lincoln Boulevard, Building 1016 Existing
4. View from Lincoln Boulevard, Building 1016, New Buildings A&B
5. View from Torney Ave, Building 1016 Existing
6. View from Torney Ave, Building 1016, New Buildings A&B
7. View from Girard Ave, New Buildings B, C, D, E
8. View from Girard Ave, Connectors between New Buildings C, D
9. View from Central Parking Lot, Connectors between New Buildings C, D
10. View from Girard Ave, New Buildings C, B
11. View from Corner Edie Rd, Girard Ave, New Building E Community Space
12. View from Edie Rd, South Elevation New Building E
13. View from Corner Edie Rd, General Kennedy Rd Existing
14. View from Corner Edie Rd, General Kennedy Rd New Building F
15. View from Edie Rd, New Building F South Elevation
16. View from Central Parking Lot, New Buildings D, C East Elevations, Building 1016

Floor Plans and Elevations

1. Level 1 Floor Plan Proposed
2. Level 2 Floor Plan Proposed
3. Level 3 Floor Plan Proposed
4. Roof Level Plan Proposed
5. Girard Ave. Street Elevation & Site Section





1



2



3



4



5



6



7



8





10







13



14



15



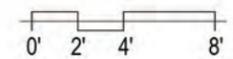
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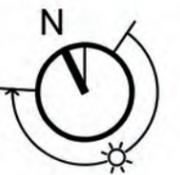
David Baker Architects | PRESIDIO TRUST

LETTERMAN RESIDENTIAL PROJECT

LEVEL 1 FLOOR PLAN



scale: 1/8" = 1'-0"
date: 2025-10-21



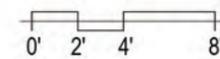
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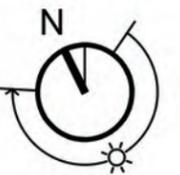
David Baker Architects | PRESIDIO TRUST

LETTERMAN RESIDENTIAL PROJECT

LEVEL 2 FLOOR PLAN



scale: 1/8" = 1'-0"
date: 2025-10-21



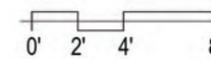
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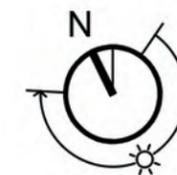
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LETTERMAN RESIDENTIAL PROJECT

LEVEL 3 FLOOR PLAN



scale: 1/8" = 1'-0"
date: 2025-10-21



A1.3



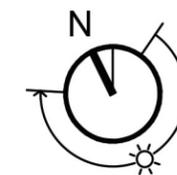
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LETTERMAN RESIDENTIAL PROJECT

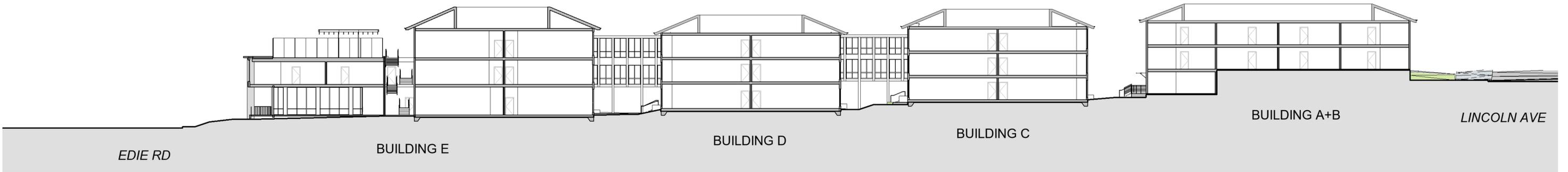
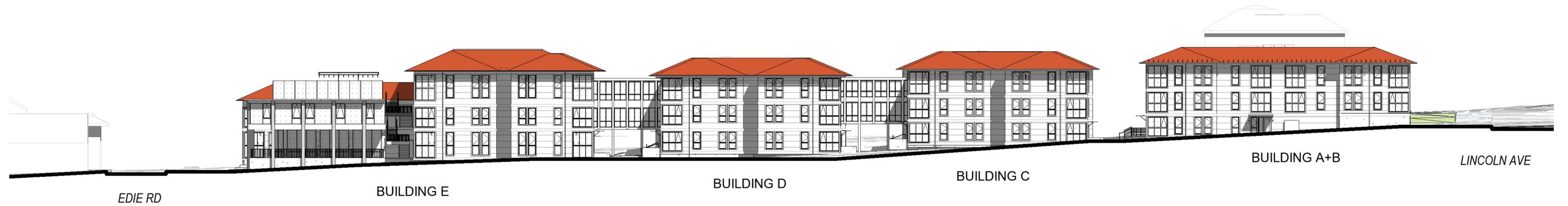
ROOF LEVEL PLAN

0' 2' 4' 8'

date: 1/8" = 1'-0"
2025-10-21



A1.4



**Letterman Residential Project
Public Scoping Comments and Trust Responses**

By the close or shortly after the public scoping period for the project 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
Jayne 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
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 action 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 Chapter 1, the 159,752 square feet of new construction considered under the Proposed Action 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. A no action alternative may mean "no change" from a current management direction.

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 Environmental Assessment Section 3.1.1, Historic Resources for additional discussion of cultural landscape treatments and Section 2.4, 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 Environmental Assessment Figure 2, and Figure 11, which shows the former Building 1017 next to extant Building 1016. **As shown in the accompanying graphic,** (See Figure [Slide 18]) 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 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’), which is shorter than neighboring Building 1016 (49’), 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 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 Environmental Assessment 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 Environmental Assessment 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 Environmental Assessment 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 action. 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 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: Please refer to the analysis in Environmental Assessment Section 3.2, Public Safety.

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.

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 standard conditions, including tree protection and construction management; see Appendix A.

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: The proposed project is described in Section 2.1; it 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 Department's 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, in the future, when it is proposed.

Please refer to the analysis in Environmental Assessment Section 3.2, 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 analysis in Environmental Assessment Section 3.2, 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 Environmental Assessment Section 3.2, Supply.3.2, Utilities, 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 proposed project will comply with San Francisco’s “Standards for Bird-Safe Buildings”. Please refer to the analysis in Environmental Assessment Section 3.2, Biological Resources.

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 Environmental Assessment 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 be modifying 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. Section 3.1.2, Traffic and Circulation also identifies possible improvements for pedestrians at the US101 ramp intersections with Girard Road. The Trust will explore these measures 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 Environmental Assessment 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 Environmental Assessment 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 Environmental Assessment 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 Section 3.1.2 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 Section 3.1.2 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 Section 3.1.2 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 Action Alternative, 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)