

### **Circle Drive Option**

This option would use three small portions of the Palace of Fine Arts property, located west of Palace Drive. The areas are located near the north end of the Exploratorium building where Girard Road would extend to Marina Boulevard, at the location of the proposed traffic circle near the center of the Exploratorium building, and at the southern end of the Exploratorium building where Circle Drive approaches the intersection with Richardson Avenue. These areas combined would cover an area of 0.07 hectares (0.18 acres).

### ***Preferred Alternative - Refined Presidio Parkway***

#### **Recreational Component**

The Preferred Alternative would maintain Palace Drive as a two-way road and incorporate the modifications proposed by SFDRP at north and south ends where Palace Drive connects to Lyon Street. The Preferred Alternative would also maintain Lyon Street as a two-way street with connection to Bay Street.

To enhance pedestrian safety and accessibility, the Preferred Alternative would provide pedestrian access under Doyle Drive from the Gorgas warehouses to the Palace of Fine Arts and under Girard Road from the Palace of Fine Arts to the Mason Street warehouses.

The Preferred Alternative would maintain the existing parking supply by reconstructing Palace Drive in its existing location to provide perpendicular parking on both sides of a two-way Palace Drive. This is not considered a use of the Palace of Fine Arts property.

#### **Historic Component**

There would be no actual use of the contributing features of the historic property (lagoon and landscaping, the rotunda, and the colonnade) which make it eligible for the NRHP. The nomination of the Palace of Fine Arts to the NRHP was accepted by the Keeper of the NRHP and listed in the NRHP in December 2005.

## **7.6 Avoidance and Minimization**

Doyle Drive is the south access to the Golden Gate Bridge. To reach the Golden Gate Bridge, Doyle Drive must pass through the Presidio – there are no alternative routes outside the Presidio that can make this connection. There is no feasible and prudent avoidance alternative to passage through the Presidio per 23 CFR 774.3(a)(1) and 774.17, as no alternative that completely avoids the use of land from the Presidio could meet the purpose and need of the project. Alternatives were considered as part of alternatives development process, as described in Chapter 2 of this document that could minimize impacts to all facilities in the Presidio – as a parkland, including natural resource features and cultural resources. The Preferred Alternative - Refined Presidio Parkway as described in Chapter 2 of this FEIS/R is the alternative with the greatest

opportunity to minimize an array of resource impacts to the Presidio, balancing an array of resource considerations, while meeting the purpose and need for the project (23 CFR 774.3(c)). For example, when compared to the existing facility, the Preferred Alternative is a better complement to the spectacular natural environment the facility resides in and restores scenic views of the Presidio and the San Francisco Bay by eliminating the existing concrete structures.

The relationship of the proposed project to the nearby Palace of Fine Arts and the Exploratorium was also considered and measures to avoid or minimize impacts were an integral part of the alternatives development and selection process.

This section summarizes the alternatives considered in minimizing impacts to the Presidio and the Palace of Fine Arts, having received public and agency input during scoping on a wide array of alternatives – all of which would need to go through the Presidio. All were evaluated to determine if they minimized harm to the *Section 4(f)* resources. After the initial screening, it was determined that the most prudent alternatives would be those that utilized as much of the existing Doyle Drive easement as possible while minimizing impacts on the Presidio. Subsequent to the DEIS/R, a preferred alternative was selected with the greatest opportunity to minimize an array of resource impacts while meeting the purpose and need for the project. For example, the Parkway Alternative no longer includes underground parking at the Palace of Fine Arts. The lead and cooperating agencies have rigorously explored and objectively evaluated all the alternatives considered to date. For more detail refer to Chapter 2 in this FEIS/R.

### 7.6.1 Alternatives Development Process

Meetings were held with elected officials, planning and engineering staff, and community residents to discuss potential project alternatives and access options. Scoping meetings, open houses, and small community meetings were conducted in early 2000 and continued throughout the process. As a result of these meetings, evaluation criteria based on the goals and objectives for the project were developed to help eliminate alternatives and access options. The criteria were then applied through successive layers of screening.

As a result of the initial screening in October 2000, the original set of 16 alternatives (including the No-Build Alternative) and six access options were reduced to a set of six alternatives that could be paired with two access options. Additional screening for traffic operations in April 2001 resulted in the inclusion of a new alternative. In June 2001, these seven alternatives were renamed and numbered.

Further screening reduced the set of seven alternatives to four alternatives (the No-Build Alternative and three build alternatives) and two access options. Two of the build alternatives were paired with the access options to form four alternatives (for a total of six alternatives).

These six alternatives were analyzed in the environmental preliminary review for the Doyle Drive Project. This preliminary review took place in June 2002.<sup>3</sup>

The Couplet Alternative was developed during the alternative refinement process to maximize views of the Palace of Fine Arts and the Golden Gate Bridge from the roadway and to enhance pedestrian accessibility by separating east and westbound traffic.

Following review of the six alternatives, an additional alternative was brought forward (Presidio Parkway Alternative) and a feasibility study was conducted.<sup>4</sup> The Presidio Parkway Alternative provided an alternative closer to the Parkway concept developed as part of the Doyle Drive Task Force (1993). The alternative featured wide lanes and medians to emphasize the park-like setting and used two shallow tunnels to improve access and linkage among Presidio elements across the Doyle Drive corridor. Halleck Street would be raised over the tunnel portal to allow a low level parkway to pass over an area planned for future expansion of the Crissy Marsh.

Access to the Presidio is provided via signalized intersections at an extension of Girard Road to Marina Boulevard. The Parkway Alternative includes several options including two east-end Presidio access options, two Park Presidio Interchange options, and a slip ramp to Merchant Road.

Based on the results of the feasibility study, the project team determined that the additional alternative should be added to the list of existing alternatives. This new alternative was presented to community members and agencies.

Based upon the inclusion of this alternative, in November 2003, the project team recommended elimination of four of the six alternatives which appeared in the preliminary environmental review. This recommendation was accepted by the participating agencies and the public at a meeting in February 2004. As a result, the DEIS/R was based on the evaluation of one No-Build Alternative and two build alternatives – each of which has two access options.

Following release of the DEIS/R in December 2005, individuals and agency staff provided almost 800 comments regarding the environmental analysis and project alternatives. Based on these comments and agency/public workshops, it was determined that Alternative 5: Presidio Parkway, would best meet the purpose and need of this Doyle Drive Project, if certain modifications to the proposed design were made.

In response to these comments, and to address traffic circulation, tidal inundation issues, the elimination of the underground parking below Doyle Drive and the

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<sup>3</sup> More detail of the six alternatives is provided in the Final Alternatives Report prepared for the Doyle Drive Project San Francisco County Transportation Authority [the Authority] 2000.

<sup>4</sup> The feasibility study performed by Arup (Doyle Drive SPUR Alternative Feasibility Study) was completed in October 2003.

provision of additional surface parking to more closely match existing conditions, the refinements were made to the Presidio Parkway Alternative as described in Section 7.2.4 of this FEIS/R.

The Doyle Drive Subcommittee to the Citizens' Advisory Committee (CAC), the Doyle Drive Executive Committee comprised of lead, cooperating and responsible agencies and the Authority CAC all held meetings in July 2006 to consider recommendations for a preferred alternative and design options. All three groups made identical recommendations for selection of the Presidio Parkway and design options.

The recommendations were: Alternative 5, Presidio Parkway, with specific design elements including the modified Hook Ramp Option for the Presidio Parkway Interchange and the Diamond Option for Presidio Access.

## 7.6.2 Alternatives Considered and Withdrawn

Each alternative was developed to better meet the purpose of the Doyle Drive Project and to use as narrow a corridor as possible to minimize impacts to resources within the Presidio. During the NEPA process, options were screened for their ability to:

- satisfy the objectives of the project;
- minimize visual impact;
- minimize the roadway footprint;
- provide pedestrian access;
- maintain traffic safety; and
- improve traffic operations.

### *Eliminated During Initial Evaluation and Traffic Screening*

Using the evaluation criteria, the initial alternatives and access options were evaluated. Based on the findings, the following alternatives and access options were withdrawn from further study:

#### Retrofit Without Widening (Minimal Improvements)

This alternative was withdrawn from further consideration because minimal improvements would not provide wider travel lanes, a median barrier, or shoulders, and would not meet the project's purpose and need of improving traffic safety.

#### Transit Exclusive Alternative

This alternative was withdrawn from further consideration because Doyle Drive would no longer serve its current function as part of the local and regional transportation network and would not improve vehicular access to the Presidio; therefore, it would not meet the Doyle Drive project's purpose and need.

### Veterans Boulevard (Highway 1) Alternative

This alternative was withdrawn from further consideration because a substantial amount of right of way to provide space for up to seventeen additional lanes would be needed to accommodate improved intersections along Veterans Boulevard, affecting both parkland and residential properties. Additional right of way would also be needed along the Geary Boulevard corridor from commercial and residential properties to accommodate an additional eleven lanes. However, even with the increased number of lanes, the intersections of Veterans Boulevard at both California Street and Geary Boulevard would operate at unacceptable service levels.

### Doyle Boulevard Alternative

This alternative was withdrawn from further consideration because the Doyle Boulevard intersections would require at least eight lanes to accommodate the turning volumes and increase the width of the project footprint by 7.2 meters (24 feet) that would affect historic and aesthetic resources in this area. The increase in congestion of Doyle Drive would increase the volume of cut-through traffic on local park roads. The Veterans Boulevard southbound approach to the California Street and Geary intersections would also require three additional approach lanes to accommodate double left turn lanes and an exclusive right turn lane. Additionally, the level of improvements which would be needed on Veterans Boulevard and Geary Boulevard to sufficiently reduce demand on Doyle Drive was considered unreasonable for purposes of NEPA.

### Parallel Construction-Elevated

This vertical alignment was eliminated from further consideration because it would require the removal of historic Buildings 105 and 106 of the Montgomery Barracks, both integral and contributing structures to the National Historic Landmark District, and would take a portion of the San Francisco National Military Cemetery. This profile does not provide enough depth to pass under these resources without removal.

### Parallel Construction-Depressed

This vertical alignment was eliminated from further consideration because it would not accommodate the restoration of Tennessee Hollow to the more natural state of open hydrological flow included in the *General Management Plan Amendment* and it would limit pedestrian and bicycle access to overpass structures. Pedestrians and bicycles crossing Doyle Drive could only cross at overpasses constructed to “bridge” the depressed roadway or over park extension over the east tunnel.

### Detour Construction-Elevated

This vertical alignment was eliminated from further consideration because it would require the removal of historic Buildings 105 and 106 of the Montgomery Barracks, both integral and contributing structures to the National Historic

Landmark District, and would take a portion of the San Francisco National Military Cemetery. This profile does not provide enough depth to pass under these resources without removal.

#### Detour Construction-Depressed

This vertical alignment was eliminated from further consideration because it would not accommodate the restoration of Tennessee Hollow to the more natural state of open hydrological flow included in the *General Management Plan Amendment* and it would limit pedestrian and bicycle access to overpass structures. Pedestrians and bicycles crossing Doyle Drive could only cross at overpasses constructed to “bridge” the depressed roadway or over park extension over the east tunnel.

#### Lombard to Lincoln Alternative

This alternative was eliminated from further analysis because it would require the removal of Buildings 4, 5, 34, 38, 102, and 103 on the Main Post, all of which are integral and contributing structures to the National Historic Landmark District. In addition, it would require the taking of large amounts of parkland while destroying the relationship between the historic buildings and historic landscape features. It would also conflict with the development of the Letterman Digital Arts Complex. This alternative would also require a small portion of the National Cemetery, and would result in a dramatic change to the visual setting of the Presidio.

#### North of Corridor Alternative

This alternative was eliminated from further analysis because it would require the removal of two Laundress Quarter buildings on Crissy Crescent, both of which are integral and contributing structures to the National Historic Landmark District. It would also destroy the relationship between the historic buildings and the landscape features. In addition, this alternative would require a significant portion of the recently completed Crissy Field and wetland restoration area and conflict with possible expansion of Crissy Marsh.

#### Gorgas Access Alignment Access Option

This design option was withdrawn from further analysis because it would require the removal of historic buildings, warehouses, the historic gymnasium, and indoor pool along Gorgas Avenue, all of which are integral and contributing structures to the National Historic Landmark District. It would also destroy the relationship between the historic buildings and historic streetscape features. This alternative would conflict with the development of the Letterman Digital Arts Center by removing Gorgas Avenue as the primary internal vehicular and bicycle circulation road. Moving Doyle Drive south of the existing historic buildings would also degrade the Historic Landmark District boundary.

### No New Presidio Access Option

This option was withdrawn from further analysis because it was not consistent with the project's purpose or the *General Management Plan Amendment* and *Presidio Trust Management Plan's* objectives to improve direct intermodal or vehicular access to the Presidio.

### No Marina Access Option

This design option was withdrawn from further analysis because it would result in additional traffic on Richardson Avenue and would hamper traffic operations. Changing traffic patterns would increase intrusion in the residential areas of Cow Hollow, Pacific Heights, and the Marina by increasing local traffic between Marina Boulevard and Richardson Avenue.

### *Alternatives and Access Options Eliminated after Further Review*

Following selection of the initial alternatives and access options, alternatives were renamed and paired with the access options. At this time, a new alternative (Couplet) was also added. This resulted in seven alternatives (including the No-Build). Further analyses then were performed. Based on these studies, the following alternatives (and access options) were eliminated from further study.

### Parallel Construction Alternatives

All four parallel construction alternatives were eliminated from further review following additional analyses and evaluations. The alternatives were:

- Tunnel (Alternative 6a, Phased Construction, Tunnel under Halleck – Direct Marina Connector)
- Tunnel (Alternative 6b, Phased Construction, Tunnel under Halleck –Signalized Marina Connector)
- At-Grade (Alternative 7a, Phased Construction, Bridge over Halleck-Direct Marina Connector)
- Depressed (Alternative 7b, Phased Construction, Bridge over Halleck-Signalized Marina Connector).

The alignment requirements of these alternatives unavoidably put them under the northern portion of the National Cemetery. After much iteration, moving the alignment as far north as possible, the Parallel Construction Alternatives could not avoid placement of the tunnel under 149 gravesites. Additional information from the Department of Veterans Affairs (VA) raised concerns about the uncertainty of the depth of the actual graves. There is a minimum depth to structure of 5.5 meters (18 feet) below the existing ground line (from top of tunnel to the existing ground line). The VA records do not clearly show the precise depths of the graves and in some cases, more than two graves were placed on top of each other making the depths of the graves greater than anticipated.

Therefore, it could not be assured that a tunnel would not result in disinterment. In addition, these alternatives would have resulted in adverse impacts to historic buildings 105, 106, 107, 108, 122, and 129 in the Main Post area. The Parallel Construction Alternatives would have required longer construction durations, more complex traffic staging, and higher construction costs versus the detour construction alternatives. As a result, the Parallel Construction Alternatives were eliminated from further consideration.

#### Couplet Alternative (Alternative 5, Renamed Detour Construction, Tunnel under Halleck)

Because the Couplet Alternative would have additional adverse impacts over the tunnel alternatives to historic buildings on Gorgas Avenue and the National Historic Landmark District boundary, as well as traffic and noise impacts, it was dropped from further consideration.

#### Other Adjustments to Options and Alternatives

The original alternative "Retrofit with Widening" included two possibilities, either:

- Retrofit (Rehabilitate) and widen the existing structures; or
- Replace and widen the existing structures.

The possibility of rehabilitating and widening the existing high- and low-viaducts was considered and withdrawn for numerous reasons. At the high-viaduct, the geometry of the substructure of the west approach precluded widening and required replacement of the entire west approach. The Sufficiency Rating based on Caltrans' biennial maintenance inspections indicated deterioration has compromised the ability of the gravity load carrying capacity of the structure as well as the lateral load carrying capacity (seismic safety) of the structure. The Retrofit by Rehabilitation and Widen Alternative cannot meet the seismic performance goals of the Corridor given that the structure is designated as an "important route". The poor structural condition of the existing facility precludes rehabilitation; therefore, the structure must be replaced to meet structural safety standards.

At the low-viaduct, the Retrofit by Rehabilitation and Widening Alternative is not a feasible option due to the fact that the existing structure cannot be retrofitted to meet Maximum Credible Earthquake design standards and as a result has been recommended for replacement prior to the year 2008.

The other option for the original alternative, Retrofit by Replace and Widen, was renamed to Replace and Widening, and was carried forward for further evaluation.



### *Alternatives and Design Options Presented in the Preliminary Environmental Analysis and Withdrawn*

Following development of a new alternative (Presidio Parkway), additional evaluations and analyses were performed.

A public meeting was held in February 2004 to inform the public of the decision to drop Alternatives 3a, 3b, 4a, and 4b while adding the Presidio Parkway Alternative. The meeting presented the reasons for the decision and allowed the public an opportunity to talk with members of the project team about various aspects of the project and provide verbal and written comments. The project team also met with various neighborhood and stakeholder groups to present the decision to drop Alternatives 3a, 3b, 4a, and 4b and add the Presidio Parkway Alternative. This change was supported by the public.

As a result, all four detour construction alternatives were eliminated from further review following additional analyses and evaluations. The alternatives were:

- **Alternative 3a:** Detour Construction, Tunnel under Halleck, Direct Marina Access
- **Alternative 3b:** Detour Construction, Tunnel under Halleck and Girard, Signalized Marina Connector
- **Alternative 4a:** Detour Construction, Bridge Over Halleck, Direct Marina Access and
- **Alternative 4b:** Detour Construction, Bridge Over Halleck and Girard, Signalized Marina Connector

All four alternatives would have some impacts to historic buildings within the Presidio, but the impacts as a result of the tunnel alternatives would be more significant. The tunnel alternatives would permanently displace between six and eleven historic buildings, while the Parkway Alternative would displace between four and five historic buildings, and the Replace and Widen Alternative would not permanently displace any historic buildings. In addition, only the Replace and Widen and the Parkway Alternatives would retain the historic Batteries Slaughter and Blaney, offer the greatest distance of the new structures from the cavalry stables area; and maintain (as opposed to lower) the elevation of the viaduct over Stilwell Hall. Neither the Replace and Widen nor the Parkway Alternatives would displace any of the Gorgas warehouses and, as such, take the greatest measures to minimize harm to cultural resources.

Alternatives 3a, 3b, and 4a require groundwater bypass systems to maintain the Tennessee Hollow hydrology due to the construction of tunnels in this area that would sever the natural hydrologic connections.

During construction of the long tunnel alternatives, the traffic capacity of the existing Doyle Drive facility would need to be maintained throughout the construction period, requiring a temporary detour structure. The detour structure would be built north of the existing facility to divert traffic away from

the existing facility during construction. The detour structure, as part of Alternatives 3a, 3b, 4a and 4b, would increase the construction costs, as well as the length of the construction period. The longer construction duration and more complex traffic staging associated with the tunnel alternatives would result in higher costs to construct (\$103 million to \$197 million more), depending on the alternative selected. Construction length would be seven years as compared to four to five years with the Replace and Widen and Parkway Alternatives.

The Operation and Maintenance (O&M) costs were also projected to be greater with the long tunnel alternatives. The tunnel alternatives' annual mechanical and electrical O&M costs would be between \$860,000 to \$1,250,000 due to the additional tunnel maintenance (cleaning, ventilation, lighting, surveillance and fire protection); whereas, the annual mechanical O&M costs for the Replace and Widen Alternative would be approximately \$50,000 if the moveable barrier option were selected, and the Parkway Alternative approximately \$500,000 for tunnel O&M costs due to the shorter tunnel lengths and only one bore needing mechanical ventilation.

#### *Additional Consideration and Analysis: Elimination of Auxiliary lane*

The Presidio Parkway Alternative has reduced lane widths (3.3 meters [11 feet] instead of 3.6 meters [12 feet]) and reduced inside shoulders to decrease the mass and scale of the structure. The Presidio Parkway Alternative also has a wide, heavily landscaped median separating the north and southbound roadways.

At the request of the GGNRA and Trust, the design team considered eliminating the auxiliary lane between the Park Presidio Interchange and the new Girard Road Interchange. The inclusion of the Girard Road Interchange is a necessary design feature to meet the objective of providing direct vehicular access to the Presidio from Doyle Drive. The elimination of the auxiliary lane would further reduce total area of pavement primarily to the inside, increasing the width of the median. A reduction in traffic by 11 percent would be needed to eliminate the auxiliary lane (DKS 2005).

The GGNRA also requested evaluation of the elimination of the Veterans Boulevard ramp. The Veterans Boulevard ramp accommodates trips from people south of Golden Gate Park to reach the downtown area by cutting through the Presidio. If the ramp was eliminated, these people would use alternative routes outside the Presidio.

A traffic operations analysis evaluated two options:

1. Reduce all traffic coming on to Doyle Drive by 11 percent by metering traffic at the Golden Gate Bridge Toll Plaza, Merchant Road and Veterans Boulevard on-ramp to Doyle Drive; and,
2. Eliminate the Veterans Boulevard on-ramp.

The results of the analysis of ramp metering (DKS 2005) shows that metering traffic at the merge point would divert traffic to Lincoln Boulevard, disrupting

local Presidio traffic; therefore, the Bridge and all ramps would have to be metered. In addition, if ramp meeting were implemented at the Golden Gate Bridge Toll Plaza, the delay would interfere with bridge operations and unreasonably delay Golden Gate Transit buses.

The analysis of the elimination of the Veterans Boulevard on-ramp (DKS 2005) shows that elimination of the on-ramp would reduce the need for the full auxiliary lane; however, the two-lane off-ramp to Girard Road would still be needed with 400 meters (1,312 feet) of auxiliary lane in advance of the exit. More importantly, traffic that would have used the ramp would travel northward and exit at the Merchant Road off-ramp, and then use local Presidio streets to reach the Merchant Road southbound on-ramp to Doyle Drive; other traffic would shift onto other Richmond District and Presidio streets. The additional traffic that would use the southbound Merchant Road on-ramp would create additional new southbound traffic queuing in the Toll Plaza area, which would need to be addressed.

#### ***Alternatives and Access Options Eliminated after Further Review in the DEIS/R***

The Doyle Drive Subcommittee to the Citizens' Advisory Committee (CAC), the Doyle Drive Executive Committee comprised of lead, cooperating and responsible agencies and the Authority CAC all held meetings in July 2006 to consider recommendations for a preferred alternative and design options. All three groups made identical recommendations for selection of the Presidio Parkway and design options. The recommendation was Alternative 5, Presidio Parkway, with specific design elements and modifications including the modified Hook Ramp Option for the Presidio Parkway Interchange and the Diamond Option for Presidio Access. Options which were included in Alternative 5 that were eliminated in the Preferred Alternative included:

- **Underground parking.** Due to improved pedestrian and vehicular circulation achieved with surface parking and the avoidance of potential disturbance to the existing groundwater regime and archaeological impacts, reconfigured surface parking was selected over an underground parking facility.
- **Merchant Road Option.** Since the additional impacts were considered too great to justify the improved access to Merchant Road, the Merchant Road Option was eliminated. The construction of the slip ramp would take an additional 0.5 hectares (1.2 acres) of parkland, require the removal of four residential buildings along Armistead Road and increase construction costs by \$28.1 million. The improvements to weekday PM traffic operations could be achieved through the addition of an all-way stop sign at the northern terminus of Merchant Road and weekend congestion reduced through improvements to the Golden Gate Bridge visitors' parking lot.
- **Loop Ramp Option.** Due to the increased impacts to biological resources and intrusion into scenic vistas, the Loop Ramp Option at the Park Presidio Interchange was eliminated. Careful design of the ramp connecting northbound Veterans Boulevard to southbound Doyle Drive minimized any

- impacts to Cavalry Hollow; therefore, the take of an additional 0.6 hectares (1.4 acres) to construct the Loop Ramp Option was not justified.
- Circle Drive Option. Since the development of the Circle Drive Option as presented in the DEIS/R, the SFDRP advanced their plans for the rehabilitation of the Palace of Fine Arts and identified the need to retain Palace Drive as a two way street. Although many configurations were developed, the Circle Drove Option remained incompatible with a two-way Palace Drive. Residents along Lyon Street were also adamant that Lyon Street should remain as a two-way street. In addition, the construction of Circle Drive would require the removal of Building 1151, the historic pool building. Since the refined Diamond Option accommodates a two-way Palace Drive and Lyon Street and retains the pool building, the Circle Drive option was eliminated.

## 7.7 Analysis of Harm

Under 23 CFR 774.3(c), when there exists no feasible and prudent alternative to the use of Section 4(f) property, FHWA may approve only the alternative that:

1. Causes the least overall harm in light of the statute's preservation purpose. The least overall harm is determined by balancing the following factors as applicable:
  - i) The ability to mitigate adverse impacts of each Section 4(f) property (including any measures that result in benefits to the property);
  - ii) The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;
  - iii) The relative significance of each Section 4(f) property;
  - iv) The views of the official(s) with jurisdiction over each Section 4(f) property;
  - v) The degree to which each alternative meets the purpose and need for the project;
  - vi) After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
  - vii) Substantial differences in costs among the alternatives.
2. The alternative selected must include all possible planning, as defined in §774.17, to minimize harm to Section 4(f) property.

Implementation of the Preferred Alternative – Refined Presidio Parkway would result in the use of *Section 4(f)* properties such as the removal of Doyle Drive and NHLD contributing Buildings 201, 204, 230, and 670. The Preferred Alternative would require 11.7 hectares (29.0 acres) of right of way which is 2.6 hectares (6.4 acres) more than the existing condition. In addition, there would be impacts to the cultural landscape of the Presidio NHLD. The existing grade of the historic