

APPENDIX A

Federal and State Listed Species Known to Occur in Camden County, Georgia

**FEDERAL AND STATE LISTED SPECIES KNOWN TO OCCUR
IN CAMDEN COUNTY, GEORGIA**

Species	Federal Status	State Status	Habitat	Threats
Mammal				
Humpback whale <i>Megaptera novaeangliae</i>	E	E	Coastal waters during migration	Entanglement in commercial fishing gear and collisions/disturbance associated with boats and barges
Right whale <i>Eubalaena glacialis</i>	E	E	Mate and calve in shallow coastal waters; critical habitat designated from the mouth of Altamaha River south to Sebastian Inlet, FL (from shoreline east 5-15 nautical miles)	Initial decreases probably due to overharvesting. Slow population growth after exploitation halted may be due to collisions/disturbance associated with boats and barges, inbreeding, inherently low reproductive rates, or a reduction in population below a critical size for successful reproduction.
Round-tailed muskrat <i>Neofiber alleni</i>	No Federal Status	T	Bogs and ponds; creates pyramid-shaped nest in vegetation	Habitat loss from human activities and natural succession. Loss of bog/floating mat vegetation-type habitat due to man's suppression of wildfires.
West Indian manatee <i>Trichechus manatus</i>	E	E	Coastal waters, estuaries, and warm water outfalls	Initial decreases probably due to overharvesting for meat, oil and leather. Current mortality due to collisions with boats and barges and from canal lock operations. Declines also related to coastal development and loss of suitable habitat, particularly destruction of seagrass beds.
Bird				
Bachman's warbler <i>Vermivora bachmanii</i>	E	E	Probably extinct; last seen in Georgia in 1976	

Bald eagle <i>Haliaeetus leucocephalus</i>	No Federal Status	E	Inland waterways and estuarine areas in Georgia. At least two active eagle nests were documented in 2008.	Major factor in initial decline was lowered reproductive success following use of DDT. Current threats include habitat destruction, disturbance at the nest, illegal shooting, electrocution, impact injuries, and lead poisoning.
Peregrine Falcon <i>Falco peregrinus</i>	No Federal Status	R	Extreme north Georgia is the southern limit of the historic nesting range. Peregrines are commonly seen along the Georgia coast during winter migration.	Major factor in initial decline was lowered reproductive success from DDT concentrations. While DDT use in South America is still a concern, expansion of human population and subsequent loss of undisturbed nesting habitat and foraging areas is a factor currently.
Gull-billed tern <i>Sterna nilotica</i>	No Federal Status	T	Nests in colonies on sandy sites; forages over salt marsh, dunes and other grassy areas for insects, spiders, and other invertebrates	Nest disturbance and loss of habitat to beach-front development are the major threats to this species.
Piping plover <i>Charadrius melodus</i>	T	T	Winter on Georgia's coast; prefer areas with expansive sand or mudflats (foraging) in close proximity to a sand beach (roosting)	Habitat alteration and destruction and human disturbance in nesting colonies. Recreational and commercial development has contributed greatly to loss of breeding habitat.
Wilson's Plover <i>Charadrius wilsonia</i>	No Federal Status	T	Atlantic Coast breeding populations range from New Jersey to northern South America. Nesting habitat includes beaches, sand flats and spits.	Loss of nesting habitat from human development; predation from wild, feral, and domestic animals; and human disturbance in the form of pedestrians and vehicles are primary threats to this species.
Least Tern <i>Sterna antillarum</i>	Not listed in GA; interior U.S. populations Endangered	R	Atlantic Coast breeding populations range from Massachusetts to Florida. Nesting colonies have been	Human disturbance of nesting colonies is the primary threat to this species' success. Predation also is a concern.

			documented in all Georgia coastal counties.	
American Oystercatcher <i>Haematopus palliates</i>	Not Listed	R	Nests on marsh islands, upland dunes, beaches, and dredge spoils. Atlantic Coast population nests from Massachusetts to southern Florida.	Human disturbance, loss of nesting habitat to development, and predation are known threats to this species' success.
Black Skimmer <i>Rynchops niger</i>	Not Listed	R	Atlantic Coast population nests on barrier island beaches and man-made dredge spoil islands primarily in the mid-Atlantic states. Winters in southern U.S. and Caribbean.	Main threats include loss of nesting habitat due to beachfront development and human disturbance at nesting colony sites.
Red Knot <i>Calidris canutus</i>	C	R	Nests in the Arctic and winters on southern tip of South America. Georgia coast serves as a stopover for winter/early spring migrants.	Reduction in population is thought to be related to lack of preferred food sources during migration and subsequent decline in body condition.
Red-cockaded woodpecker <i>Picoides borealis</i>	E	E	Nest in mature pine with low understory vegetation (<1.5m); forage in pine and pine hardwood stands > 30 years of age, preferably > 10" dbh	Reduction of older age pine stands and encroachment of hardwood midstory in older age pine stands due to fire suppression
Wood stork <i>Mycteria americana</i>	E	E	Primarily feed in fresh and brackish wetlands and nest in cypress or other wooded swamps. Active rookeries were located in Camden County 1991-2002.	Decline due primarily to loss of suitable feeding habitat, particularly in south Florida. Other factors include loss of nesting habitat, prolonged drought/flooding, raccoon predation on nests, and human disturbance of rookeries.

Reptile				
Eastern indigo snake <i>Drymarchon corais couperi</i>	T	T	During winter, den in xeric sand ridge habitat preferred by gopher tortoises; during warm months, forage in creek bottoms, upland forests, and agricultural fields	Habitat loss due to uses such as farming, construction, forestry, and pasture and to overcollecting for the pet trade
Gopher tortoise <i>Gopherus polyphemus</i>	No Federal Status	T	Well-drained, sandy soils in forest and grassy areas; associated with pine overstory, open understory with grass and forb groundcover, and sunny areas for nesting	Habitat loss and conversion to closed canopy forests. Other threats include mortality on highways and the collection of tortoises for pets.
Green sea turtle <i>Chelonia mydas</i>	T	T	Rarely nests in Georgia; migrates through Georgia's coastal waters	Exploitation for food, high levels of predation, loss of nesting habitat due to human encroachment, hatchling disorientation due to artificial lights on beaches, and drownings when trapped in fishing and shrimping nets
Hawksbill sea turtle <i>Eretmochelys imbricata</i>	E	E	Migrates through Georgia's coastal waters	Primary causes of population decline are development and modification of nesting beaches and exploitation for the shell. Secondary causes include egg consumption, use of the skin for leather, and heavy predation of eggs and hatchlings.
Kemp's ridley sea turtle <i>Lepidochelys kempii</i>	E	E	Migrates through Georgia's coastal waters	Overharvesting of eggs and adults for food and skins and drowning when caught in shrimp nets
Leatherback sea turtle <i>Dermochelys coriacea</i>	E	E	Rarely nests in Georgia; migrates through Georgia's coastal waters	Human exploitation, beach development, high predation on hatchlings, and drowning when caught in nets of commercial shrimp and fish trawls and longline and driftnet fisheries

Loggerhead sea turtle <i>Caretta caretta</i>	T	T	Nests on Georgia's barrier island beaches; forages in warm ocean waters and river mouth channels	Loss of nesting beaches due to human encroachment, high natural predation, drownings when turtles trapped in fishing and shrimping trawls, and marine pollution
Fish				
Shortnose sturgeon¹ <i>Acipenser brevirostrum</i>	E	E	Atlantic seaboard rivers	Construction of dams and pollution, habitat alterations from discharges, dredging or disposal of material into rivers, and related development activities.
Plant				
Ball-moss <i>Tillandsia recurvata</i>	No Federal Status	T	Branches of live oak in Georgia, especially near the coast	
Climbing buckthorn <i>Sageretia minutiflora</i>	No Federal Status	T	Calcareous rocky bluffs, forested shell middens on barrier islands, and evergreen hammocks along streambanks and coastal marshes	
Hartwrightia <i>Hartwrightia floridana</i>	No Federal Status	T	Peaty muck of pine flatwoods, sedge meadows, and wettest parts of poorly drained ditches/sloughs; often with water-spider orchid (<i>Habenaria repens</i>)	
Pondspice <i>Litsea aestivalis</i>	No Federal Status	T	Margins of swamps, cypress ponds, and sandhill depression ponds and in hardwood swamps	
Wagner spleenwort <i>Asplenium heteroresiliens</i>	No Federal Status	T	Marl outcrops, damp limestone ledges, and tabby masonry	

Key: E = Endangered; T = Threatened; C= Candidate for listing; SC = Species of Concern; R = Rare

Source: U.S. Fish and Wildlife Service Georgia Ecological Service Field Office

APPENDIX B

Mitigation Measures and Best Management Practices

MITIGATION MEASURES AND BEST MANAGEMENT PRACTICES

Potential Adverse Effect on:	Mitigation Measure or Best Management Practice
Cultural Resources	<p>Extant historic portions of The Grange and Stafford Beach House that require reconstruction or restoration would be documented as called for in the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> (NPS 1995b) prior to any disassembly.</p> <p>Documentary evidence from period plans, maps, and drawings and from the presence of existing structural elements would be used to provide for accurate reconstruction, repair, and rehabilitation of structures. Wherever possible, the design, texture, color, materials, and scale of the original elements would be ascertained from existing information.</p> <p>Wherever feasible, historic elements such as bricks would be retained and reused. New materials (bricks and mortar) of the appropriate color, shape, size, texture, and appearance would be carefully selected to accurately replicate the form and character of the original structure.</p> <p>To minimize ground disturbance, all staging areas, materials stockpiling, vehicle storage, and other construction-related facilities and areas would be located in a previously disturbed area or on hardened surfaces such as the existing parking areas. Mortar would be mixed at the staging areas and transported to the part of the structure under restoration, rehabilitation, or repair.</p> <p>Areas around the exterior of The Grange and Stafford Beach House disturbed by restoration or rehabilitation would be revegetated with grass and landscape plantings and other landscape elements as appropriate. The types and locations of replacement vegetation would be carefully chosen to, where possible, replicate historic elements of the cultural landscape while avoiding introduction of problem exotic plants.</p> <p>Historical, architectural, and archeological records would be reviewed to determine the levels of previous disturbance in the area of potential effect. Should areas of archeological potential be identified, further investigations would be conducted and appropriate mitigating measures would be developed prior to ground-disturbing activities.</p> <p>Potential ground-disturbing activities such as removal of existing walks or full demolition would be carefully planned because these areas may harbor presently unknown archeological resources. Construction</p>

	<p>documents would include stop-work provisions should archeological resources be uncovered and the contractor would be apprised of these protective measures during the pre-construction conference.</p> <p>Work limits would be established and clearly marked to protect resources, and all protection measures would be clearly stated in any construction/demolition specifications. Workers would be instructed to avoid conducting activities beyond the construction/demolition zone and their compliance monitored by the project Contracting Officer's Technical Representative.</p> <p>Archeological monitoring of ground disturbance in currently inaccessible paved areas or areas beneath and adjacent to existing structures (walkways, steps, flooring, etc.) would help ensure that all cultural resources were identified and documented during the construction/demolition process.</p> <p>If previously unknown archeological resources were discovered, work would be stopped in the area of any discovery, protective measures would be implemented, and procedures outlined in 36 <i>Code of Federal Regulations</i> 800 would be followed. Resources would be evaluated for their National Register of Historic Places significance, and adequate mitigation of project impacts (in consultation with appropriate agencies) and adjustment of the project design would take place to avoid or limit the adverse effects on resources.</p> <p>To reduce unauthorized collecting, construction/demolition personnel would be educated about cultural resources in general and the need to protect any cultural resources encountered. Work crews would be instructed regarding the illegality of collecting artifacts on federal lands to avoid any potential Archeological Resources Protection Act violations. This would include instructions for notifying appropriate personnel if human remains were discovered.</p>
Construction-related effects on soils	<p>Standard best management practices to limit erosion and control sediment release would be employed during any ground-disturbing activities. Such measures include use of silt fencing, limiting the area of vegetative disturbance, use of erosion mats, and covering banked soils to protect them until they are reused.</p>
Public Health and Safety	<p>An accident prevention program would be a required submittal. This plan would include job hazard analyses associated with each major phase of the proposed project and would emphasize both worker and public safety. It would include planning for emergency situations, including fires, tornados, building collapse, explosions, power outages, and rainstorms.</p>

	<p>The plan would also take into consideration the nature of the construction, site conditions, including seasonal weather conditions and the degree of risk or exposure associated with the proposed activity. Regular project inspections and safety meetings would ensure the safety of the premises both to construction staff and visitors.</p> <p>A defined work area perimeter would be maintained to keep all work-related impacts within the affected area. All areas that are subject to vehicular and pedestrian traffic would be kept clean of construction debris and soils. Sweeping of these areas would be implemented as necessary.</p> <p>Visitor safety would be ensured both day and night by fencing of the construction/demolition limits of the proposed action. Areas not safe for public entry would be marked and signed for avoidance. Unsafe conditions would be inspected for and corrected as soon as practicable to minimize the potential for staff or visitor injury.</p> <p>To the degree possible, impacts would be mitigated by the use of best management practices to reduce generation of dust and by limits on the types of chemicals (e.g., ones with high VOC ratings) used in new construction and rehabilitation.</p>
Visitor Experience	<p>Specific provisions would ensure that the majority of material deliveries were made during the week, rather than on weekends or holidays.</p> <p>All construction equipment would be equipped with mufflers kept in proper operating conditions, and when possible, equipment would be shut-off rather than allowed to idle. Standard noise abatement measures would include the following elements: a schedule that minimizes impacts to adjacent noise-sensitive areas, use of the best available noise control techniques wherever feasible, use of hydraulically or electrically powered impact tools when feasible, and location of stationary noise sources as far from sensitive public use areas as possible.</p>
Sustainability and Conservation Potential	<p>Shipment of materials in full loads would be encouraged, and vehicles and equipment would be maintained to minimize pollution generation.</p> <p>Restoration and rehabilitation work would incorporate energy efficient and sustainable design to minimize energy consumption.</p>

APPENDIX C

Impairment Determination

IMPAIRMENT DETERMINATION

The Prohibition on Impairment of Park Resources and Values

NPS Management Policies 2006, Section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the Nation Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

What is Impairment?

NPS *Management Policies 2006*, Section 1.4.5, *What Constitutes Impairment of Park Resources and Values*, and Section 1.4.6, *What Constitutes Park Resources and Values*, provide an explanation of impairment.

Impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

Section 1.4.5 of *Management Policies 2006* states:

An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Per Section 1.4.6 of *Management Policies 2006*, park resources and values that may be impaired include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park, but this would not be a violation of the Organic Act unless the NPS was in some way responsible for the action.

How is an Impairment Determination Made?

Section 1.4.7 of *Management Policies 2006* states, "[i]n making a determination of whether there would be an impairment, an NPS decision-maker must use his or her professional judgment. This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969 (NEPA); consultations required under Section 106 of the National Historic Preservation Act (NHPA); relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.

Management Policies 2006 further defines "professional judgment" as "a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision-maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities relative to the decision.

Impairment Determination for the Preferred Alternative

This determination on impairment has been prepared for the preferred alternative described in Section 2.4 of this FRPMP. An impairment determination is made for all resource impact topics

analyzed for the preferred alternative. An impairment determination is not made for visitor use and experience, park operations and facilities, and public health and safety because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

Findings on Impairment for Archeological Resources

Under the preferred alternative (Alternative B), removal of specified non-historic structures from five former reserved properties could result in injury or destruction to archeological resources (assuming such resources exist, which they may not). Mitigation actions would ensure that any impacts to archeological resources under Alternative B would be negligible to minor, direct, long term, and adverse. Cumulative impacts to archeological resources from past and reasonably foreseeable future actions would be moderate to major, long-term, and adverse. Alternative B would contribute a negligible to minor increment to this cumulative impact.

The preferred alternative would **not impair** archeological resources resource because any impacts, should they occur, would be negligible to minor, would be mitigated, and would only take place after consultation with the Georgia SHPO.

Findings on Impairment for Historic Structures

Under Alternative B, The Grange, Beach Creek Dock House, and Stafford Beach House would be re-used and NPS would undertake an active maintenance and repair program for both structures. Impacts to historic structures would be direct and indirect, long-term, and beneficial. Cumulative impacts to historic structures from past and reasonably foreseeable future actions would be long-term, minor to major, and adverse. The actions in Alternative B would offset adverse cumulative impacts to a minor degree.

The preferred alternative would **not impair** historic structures because impacts to historic structures under this alternative would be beneficial.

Findings on Impairment for Cultural Landscapes

This alternative envisions the removal of non-historic structures at The Grange and elsewhere in the Dungeness Historic District. These removals would result in long-term, direct and beneficial impacts to the cultural landscape. Overall cumulative impacts to cultural resources from past and reasonably foreseeable future actions would be long-term, minor to moderate and adverse. Alternative B would offset these cumulative impacts to a minor degree.

The preferred alternative would **not impair** cultural landscapes because impacts to cultural landscapes under this alternative would be beneficial.

Findings on Impairment for Soils

Under Alternative B, specified non-historic structures would be removed from five former reserved properties, necessarily entailing impacts to soils. However, the long-term diminution of

human disturbance resulting from the removals could eventually result in revegetation and other direct and indirect, long-term, and beneficial impacts to soils. Cumulative impacts to soils from past and reasonably foreseeable future actions would be direct, long-term, minor to moderate, and adverse. Alternative B would offset these cumulative impacts to a negligible degree.

The preferred alternative would **not impair** soils because impacts to soils under this alternative would be beneficial in the long term.

Findings on Impairment for Water Quality

Potential adverse impacts to water quality from the removal of structures and attendant erosion would be more than offset by discontinued use of septic systems, resulting in impacts to water quality that were direct, long-term, and beneficial. Cumulative impacts to water quality from past and reasonably foreseeable future actions would be direct, long-term, minor to moderate, and adverse. Alternative B would offset these cumulative impacts to a minor degree.

The preferred alternative would **not impair** water quality because impacts to water quality under this alternative would be beneficial.

Findings on Impairment for Vegetation

Removal of non-historic structures under this alternative would have impacts to vegetation that were direct and indirect, short- and long-term, and both beneficial and adverse. However, adverse impacts would be short-term and generally limited to ground disturbance associated with removal. The long-term impacts of revegetation and habitat restoration would be direct and indirect and beneficial. Cumulative impacts to vegetation from past and reasonably foreseeable future actions would be direct and indirect, short- and long-term, minor, and adverse. Alternative B would offset these cumulative impacts to a negligible degree.

The preferred alternative would **not impair** vegetation because impacts to vegetation under this alternative would be beneficial over the long term.

Findings on Impairment for Wildlife

Removal of non-historic structures under this alternative would have impacts to wildlife that were direct and indirect, short- and long-term, and both beneficial and adverse. Adverse impacts would be short-term and would be primarily related to noise impacts arising from demolition and removal activities. The long-term impacts of habitat restoration would be direct and indirect and beneficial. Cumulative impacts to wildlife from past and reasonably foreseeable future actions would be direct and indirect, short- and long-term, minor, and adverse. Alternative B would offset these cumulative impacts to a negligible degree.

The preferred alternative would **not impair** wildlife resources because impacts to these resources under this alternative would be beneficial over the long term.

Findings on Impairment for Wilderness Character

Alternative B would result in the removal of structures at Toonahowie, thereby enhancing the wilderness character of the Cumberland Island Wilderness. Impacts to wilderness character would be long-term, direct, and beneficial. Cumulative impacts from past and reasonably foreseeable future actions would be long-term, moderate to major, and adverse. Alternative B would offset these cumulative impacts to a moderate degree.

The preferred alternative would **not impair** wilderness character because impacts to wilderness character under this alternative would be long-term and beneficial.

APPENDIX D

Choosing By Advantages / Value Analysis Report

Choosing By Advantages / Value Analysis Report

Note to Reader: This choosing by advantages/value analysis (CBA/VA) report was completed prior to preparation of the public release draft of the Former Reserved Properties Management Plan and Environmental Assessment (FRPMP). Please note that as a result of subsequent deliberation and consideration of additional information that was not available during the initial CBA workshop, there exist some discrepancies between the terminology and recommendations found herein and the text of the FRPMP. Specifically, the “Exclusive Residential Lease” management option described below is called “Reuse for Residential Purposes” in the FRPMP. In addition, the CBA/VA report below recommends that certain structures on the Schwartz-Jenkins property be reused as park housing, while the FRPMP calls for all structures on the property to be removed. Please refer to pages 36-37 and page 40 of the FRPMP for a detailed explanation of the rationale for both of these changes/discrepancies.

Preparation Date: February 28, 2011
Park: Cumberland Island National Seashore
Project Title(s): Former Reserved Properties Management Plan

Background

Stakeholder input was solicited regarding possible future uses of structures associated with expiring reserved estates in a series of internal and public scoping meetings held in 2009. The National Park Service (NPS) used that input to develop five management actions potentially applicable to each estate. These management actions (alternately referred to as management options) are thought to represent the full range of feasible approaches for managing resource conditions and visitor experiences at each tract. The management options are conceptual in nature. Specific design or development decisions related to the implementation of a preferred management option will be explored and determined in subsequent planning and design processes.

During the week of August 23, 2010, a value analysis panel convened for three days at Cumberland Island National Seashore (CUIS) in St. Mary’s Georgia. The purpose of the meeting was to identify a preferred management option for the following tracts:

- The Grange
- Goodsell-Phillips
- Schwartz-Jenkins
- Nancy’s Fancy
- Stafford Beach House
- Toonahowie

Participants

Tim Bemisderfer facilitated the CBA and VA processes. An evaluation panel composed of Fred Boyles, CUIS Superintendent; Carl David, CUIS Chief of Maintenance; John Fry, CUIS Chief of Resources Management; Dennis Parsons, CUIS Chief Ranger; and Julie Meeks, CUIS Administrative Officer formed the CBA decision making body.

Management Options

The five potential management options considered for this analysis are:

- Exclusive Residential Lease
- Reuse for Park Administrative Purposes
- Reuse for Visitor Service/Education/Recreation Purposes
- Removal and Disposal
- Reuse as Employee Housing

Exclusive Residential Lease

The NPS provides for leasing of historic as well as non-historic properties in park areas. A lease may not authorize an activity that could be authorized by a concessions contract or commercial use authorization. All leases must provide for fair market value rent as determined by an appraisal. All net income is reinvested to fund historic preservation, capital improvements of the historic properties, park infrastructure, and any deferred maintenance needs.

The NPS Director may issue a request for bids if the amount of rent is the only criterion for award of a lease. The Director must issue a request for proposals when the award of a lease is based on selection criteria other than the rental rate. A request for proposals may be preceded by issuing a request for qualification. The purpose of the qualifications solicitations is to select a "short list" of potential offerors that meet minimum management, financial and other qualifications necessary for submission of a proposal in response to a request for proposals.

The NPS recognizes the ongoing operations and maintenance costs of its facilities and the need to be able to sustain them over time. The NPS must also avoid the future operation and maintenance costs of unnecessary or ineffective facilities, regardless of how assets are funded.

Implementation of this management option presumes that the terms of a historic or non-historic lease would insure some level of benefit to the American public. As lessor, the NPS would exchange some of its risk and liability for maintaining the property for granting limited exclusive use rights to the lessee.

Negotiation of the terms and conditions of any future lease agreement is beyond the scope of this planning process.

Reuse for Park Administrative Purposes

Scoping comments indicate a need for additional NPS administrative office space, storage, etc...on the island. Facilities with high communication capability are preferred.

When management facilities must be located inside the park, they will be located away from primary resources and features of the park and sited so as to not adversely affect park resources or values or detract from the visitor experience.

Existing non-historic structures may be used for management facilities, including administrative offices, storage, and maintenance structures. Historic properties will be used to the maximum extent practicable, provided that the use will not affect their significance.

Architectural details of renovations or rehabilitations will be modified to (1) reflect regional and park design themes and harmonize with the natural surroundings; (2) preserve the natural and cultural environments; (3) provide for resource conservation; (4) provide for energy efficiency or the use of renewable energy sources; (5) limit chemical emissions; and (6) foster education about sustainable design.

Negotiation of the terms and conditions of any future lease agreement is beyond the scope of this planning process.

Reuse for Visitor Service/Education/Recreation Purposes

Scoping comments indicate a need for additional infrastructure that supports visitor service, interpretive and educational programs for visitors.

Informational and interpretive facilities are provided to assist park visitors in appreciating and enjoying the park and understanding its significance.

Such facilities must be developed without impairing the park's natural or cultural resources and will be constructed only when it has been determined that indoor media are the most effective means of communicating major elements of the park story and that a central public contact point is needed.

A visitor service facility may include information services, sales of educational materials and theme-related items, audiovisual programs, exhibits, and other staffed or self-help programs and spaces necessary for a high-quality visitor experience.

Additionally, the need for restrooms, drinking fountains, and other basic visitor requirements will be considered during the planning and design stage. The size and scope of all visitor centers will be evaluated using the Visitor Center Planning Model or similar tool before submitting any visitor center project to the Director for approval. Prescribing specific development details or construction techniques is beyond the scope of this planning process.

Implementation of this management option does not preclude, but rather encourages engaging in partnerships and lease arrangements to achieve its informational and interpretive goal in ways that lower NPS costs and reduce maintenance responsibilities. Negotiation of the terms and conditions of any future lease agreement is beyond the scope of this planning process.

Removal/Disposal

NPS management policy requires that structures that are no longer functional in their present locations or are determined to be inappropriately placed in important resource areas, will be removed subject to appropriate compliance.

Park staff and stakeholder scoping comments indicate a deep concern about the potential impacts of non historic structures in park areas that currently express wilderness character, or areas that could be modified to express more wilderness character.

The NPS will exercise an appropriate level of sensitivity to the emotional ties previous reservers and other stakeholders may sustain for structures identified for removal. However, prescribing the methods and means of removing specific structures is beyond the scope of this planning process.

Reuse as Employee Housing

When management facilities must be located inside the park, they will be located away from primary resources and features of the park and sited so as to not adversely affect park resources or values or detract from the visitor experience. Historic properties will be used to the maximum extent practicable, provided that the use will not affect their significance. Design and development plans will be modified to (1) reflect regional and park design themes and harmonize with the natural surroundings; (2) preserve the natural and cultural environments; (3) provide for resource conservation; (4) provide for energy efficiency or the use of renewable energy sources; (5) limit chemical emissions; and (6) foster education about sustainable design.

Occupancy of NPS employee housing is permitted or may be required to provide for timely response to park protection needs, to ensure reasonable deterrence to prevent threats to resources, and to protect the health and safety of visitors and employees. Acceptable and appropriate locations for employee housing will be determined based on these prevention or response services provided for the benefit of the government in meeting the NPS mission.

Park housing can be provided for persons who are essential to the management and operation of the park. These may include not only NPS employees, but also concession employees, volunteers in the parks, Student Conservation Association volunteers, researchers, essential cooperators (for example, schoolteachers, health personnel, contractors, state or county employees), and employees of another federal agency.

Evaluation of Management Options

Methodology

A preferred management option was selected using Choosing by Advantages (CBA) - a decision making process based on calculating and compiling the advantages of different alternatives for a variety of factors and subfactors.

Factors and Subfactors

The NPS uses the term “factor” to describe five standard categories of information that should be considered in the CBA decision making process. The five standard NPS CBA factors are:

- Prevent loss, maintain and improve condition of resources
- Protect public and employee health, safety, and welfare
- Improve operational efficiency, reliability, and sustainability.
- Provide visitor services and educational and recreational opportunities
- Provide other advantages to the NPS

For project-specific CBA analysis, the standard NPS factors can be further defined by a series of “subfactors” which more closely represent the most important on-site project conditions.

Ten subfactors were identified for use in this CBA analysis.

- Reduces the visible and audible evidence of human occupation
- Enhances natural resource protection
- Enhances preservation of a historic structure or landscape
- Enhances employee, volunteer, and/or visitor safety
- Provides additional office and storage space for NPS use.
- Enhances energy conservation or reduces energy consumption.
- Provides infrastructure for visitor service, interpretation, and educational programs.
- Minimizes the NPS maintenance and operational burden.
- Provides additional indoor facilities that would allow persons to stay in the park overnight.
- Improves access for persons with disabilities.

High and Minimum Assessment Criteria

High and minimum assessment criteria were developed for each subfactor. High criteria generally describe the most favorable or desirable conditions that could be achieved under ideal circumstances. Minimum criteria generally reflect the associated minimum standards permitted by Federal Law or NPS policy. In instances where minimum criteria have not been established by law or policy, none are specified. High and minimum assessment criteria for each subfactor are described below:

Reduces the visible and audible evidence of human occupation

- **High Criteria:** Site exists in an untrammelled condition. Removing structures within existing designated wilderness or areas with existing high wilderness character is preferred. The absence of sounds related to human occupation, particularly noise associated with motor traffic, is the preferred condition.
- **Minimum Criteria:** Changes to existing conditions would comply with applicable Federal and State laws and NPS policy. Management options that do not meet the minimum criteria are considered not feasible.

Enhances natural resource protection

- High Criteria: Natural resources are preserved in such a manner that life cycles, processes, and/or systems are virtually undisturbed from their inherent course. Preserving threatened, endangered, and rare species is a high priority along with unique and critical habitat. Activities that promote the health of natural resources are preferred. Also preferred is the removal of activities that would destroy or disturb individuals, communities, processes, or systems.
- Minimum Criteria: Changes to existing conditions that comply with the National Environmental Policy Act, Endangered Species Act, other Federal and Georgia regulations relevant to natural resources, and/or agency policies and orders. Management options that do not meet the minimum criteria are considered not feasible.

Enhances preservation of a historic structure or landscape

- High Criteria: Historic landscapes and the interiors and exteriors of historic structures are preserved in a condition that best reflect the period of their historic significance. Preserving National Register or National Register eligible properties is a high priority. Preservation of existing material is preferred over restoration. The use of non historic structures to relocate non-compatible uses from existing historic structure is encouraged.
- Minimum Criteria: Rehabilitation of a historic structure or landscape would comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Changes to existing conditions would comply with applicable Federal and State laws and NPS policy. Management options that do not meet the minimum criteria are considered not feasible.

Enhances employee, volunteer, and/or visitor safety

- High Criteria: Minimizing risk to personnel and maintaining environmental conditions that are healthy and safe is the preferred condition. Improving the safety level to reflect the risks associated with the island's remote location and existing environmental conditions is strongly desired.
- Minimum Criteria: Alternatives will satisfy all applicable NPS health and safety standards. Changes to existing conditions would comply with applicable Federal and State laws and NPS policy. Management options that do not meet the minimum criteria are considered not feasible.

Provides additional office and storage space for NPS use

- High Criteria: New facilities satisfy an identified need. Space provides opportunities for personnel or equipment essential to the enjoyment of the area by visitors
- Minimum Criteria: Facility is consistent with the protection of park values. Changes to existing conditions would comply with applicable Federal and State laws and NPS policy.

Enhances energy conservation or reduces energy consumption

- High Criteria: All facilities and operations incorporate sustainable design elements and practices to ensure that water and energy efficiency, pollution prevention, and waste prevention and reduction are standard practice. Opportunities to demonstrate energy conservation leadership by NPS are preferred. Energy conservation measures that lower operating costs are preferred.
- Minimum Criteria: New facilities and operations incorporate sustainable design elements and practices to ensure that water and energy efficiency, pollution prevention, and waste prevention and reduction are standard practice. Existing facilities and operations are modified as practicable. Changes to existing conditions would comply with applicable Federal and State laws and NPS policy.

Provides infrastructure for visitor service, interpretation, and educational programs

- High Criteria: Creating multi-use facilities that can support a variety of visitor services is preferred. Alternatives that support large and small interpretation programs are preferred. Alternatives that support opportunities for interpretation of historic and natural resources are preferred. Alternatives that provide new visitor services that are not already provided are preferred. Public use facilities that satisfy an existing or anticipated visitor operational need (visitor contact stations, comfort stations, first aid station, overnight cabins, etc) are preferred. Structures that increase personal interpretive services are preferred. Structures situated to stimulate the use of alternate transportation routes, bicycle routes, and pedestrian routes are preferred. Structures that harmonize with the area and cultural resources in proportion, color and texture are preferred. Structures that are not vulnerable to wildfire and other natural hazards are preferred.
- Minimum Criteria: New facilities must be necessary for the enjoyment of the area and consistent with the protection of park values. Changes to existing conditions would comply with applicable Federal and State laws and NPS policy. Management options that do not meet the minimum criteria are considered not feasible.

Minimizes the NPS maintenance and operational burden

- High Criteria: Allows the NPS to efficiently maintain resources and conduct operations without the need to increase staff or purchase specialized equipment.
- Minimum Criteria: Minimum maintenance standards as specified by NPS management policy, including the Secretary of the Interior's Standards for the Treatment of Historic Properties where appropriate, and other Federal and State regulations.

Provides additional indoor facilities that would allow persons to stay in the park overnight

- High Criteria: Well built and fully functional structures are preferred. Structures with adequate and existing utility connections are preferred. Structures capable of housing a variety of group types are preferred. Structures that provide types of overnight accommodation not currently available are preferred. Flexibility in use is preferred over non-flexibility in use. Structures with full kitchens and multiple bathrooms are preferred. Structures not located in environmentally sensitive areas are preferred. Facilities that serve the entire scope of the American or visiting public are preferred.

- Minimum Criteria: New facilities must be necessary for the enjoyment of the area and consistent with the protection of park values. Changes to existing conditions would comply with applicable Federal and State laws and NPS policy. Management options that do not meet the minimum criteria are considered not feasible.

Improves access for persons with disabilities

- High Criteria: Universally accessible structures are preferred. Structures located near accessible transportation are preferred. Structures with water access are preferred. Structures situated to stimulate the use of alternate transportation routes, bicycle routes, and pedestrian routes are preferred. Structures that harmonize with the area and cultural resources in proportion, color and texture are preferred. Structures that are not vulnerable to wildfire and other natural hazards are preferred.
- Minimum Criteria: Visitor facilities must be necessary for the enjoyment of the area and consistent with the protection of park values. Wilderness recreation should balance the intent of access and wilderness laws and provide the highest levels of protection to the wilderness resource.

Assessment of Alternatives

The scale below was used by the CBA evaluation team to measure the extent each alternative satisfied the established criteria for each reserved property.

- Exceptional – results of implementing the alternative clearly meet and exceed the high criteria. An assessment of exceptional is the most desirable assessment and indicates that implementing the alternative would most likely result in a highly desirable, unique, or beneficial condition.
- Moderate – results of implementing the alternative generally satisfy many of the conditions described in the high criteria. An assessment of moderate is a positive assessment and indicates that implementing the alternative would result in a significantly improved and beneficial, but not perfect, condition.
- Minor – results of implementing the alternative do not satisfy conditions described in the high criteria but clearly exceed the minimum criteria and fall well short of resource impairment. An assessment of minor is a neutral assessment acknowledging that implementing the alternative would result in a less than optimum condition but that the associated negative issues can be successfully managed to minimize their impact on park efficiency, visitor experience, or resource protection goals.
- Negligible – results of implementing the alternative fall well short of the high criteria but still exceed minimum criteria for the factor and do not cause resource impairment. An assessment of negligible generally indicates that implementation of the alternative would result in a flawed condition that negatively affected park efficiency and/or was perceived by visitors as a negative distraction, inconvenience, or unfulfilled desire.

A Summary Table that highlights the subfactor assessments for each alternative is shown in Attachment 3.

Differences

Differences between alternatives were determined by comparing the subfactor assessments. The table shown in Figure 1 was used to express the advantage of one alternative over another for each subfactor.

		Lowest subfactor assessment for alternatives (noted by an underline in CBA Analysis Summary Table)				
		Exceptional	Moderate	Minor	Negligible	
Subfactor assessment for action alternative being compared	Exceptional	(no advantage)	small advantage	medium advantage	large advantage	← Advantage ←
	Moderate		(no advantage)	small advantage	medium advantage	
	Minor			(no advantage)	small advantage	
	Negligible				(no advantage)	

Note: a "no advantage" advantage is represented in the CBA Analysis Summary Table by a blank cell

Advantage = amount of difference
between compared assessments

Figure 1. Subfactor to Advantage Conversion Table

Total Importance Value

Once the advantages for each subfactor were determined, a compiled list of advantages was created. A most important advantage was selected from the compiled list and assigned an importance value of 100. The remaining advantages were then given importance values relative to the most important advantage and totals calculated for each action alternative.

A summary matrix of Total Importance Values for each property for all management options is shown in Attachment 1. A more detailed matrix of subfactor assessments and total importance values for each alternative is shown in Attachment 2.

Cost Estimates

A Class C cost estimate was prepared for each viable management option.

Value Analysis

A cost/importance curve was created for each alternative based on the total importance value calculated in the CBA process and a Class C cost estimate. Cost Importance Curves are shown for each alternative in Attachment 2.

Selection of Preferred Alternative Action

The preferred alternative action for each property was selected based on its superior cost/importance curve relative to the other alternative actions. Superior cost importance curves typically exhibit a higher importance value relative to cost. Cost curves that rise at a slope

greater than 45 degrees were considered more desirable. Cost curves that are flat or descending were considered less desirable.

Summary of Analysis

The Grange

Overview of Importance Value Assessment: Evaluators placed a higher level of importance on the site's potential for preserving historic resources and promoting educational programs when used for visitor services than minimizing the NPS's maintenance and operational burden when leased. Removal was not considered a feasible management option because of the structure's historic significance.

Overview of Value Analysis: Lower cost and moderate importance value was associated with leasing, lower cost and lower importance values were associated with park operations and housing, and higher cost and higher importance value was associated with visitor services.

Summary Recommendation: Reuse for Visitor Service/Education/Recreation Purposes. Incorporating the Grange into the Seashore's interpretive program for cultural and natural resources would significantly enhance visitor experience and understanding. This structure is ideally situated for inclusion in the "Footsteps Tour" presently offered to visitors. The house and grounds are well suited for use as an environmental and cultural education facility. A historic lease would not allow nearly the same level of public access and appreciation. Better sites exist to meet the Seashore's housing and administrative needs.

Nancy's Fancy

Overview of Importance Value Assessment: Evaluators placed a higher level of importance on reducing the evidence of human occupation, preserving natural resources, and reducing the NPS maintenance burden when removing the structure.

Overview of Value Analysis: Lower cost and higher importance value was associated with removal. Moderately low importance value and high costs associated with the visitor service option. Lower importance values and higher costs were associated with lease, housing, and park operations options.

Summary Recommendation: Removal. Nancy's Fancy is deteriorated and cannot be brought up to NPS standards at reasonable cost. It is located in a natural area near the beach and dunes that has the potential to revert to a more primitive character. The location is not ideal for park administrative or housing purposes.

Goodsell/Phillips

Overview of Importance Value Assessment: Evaluators placed a higher level of importance on enhancing preservation of a historic structure or landscape when the site was reused for housing or park operations because of the benefits obtained by relocating current non-compatible park functions from historic structures near the historic district to this site.

Overview of Value Analysis: Lower cost and lower importance values were associated with removal and lease options. Higher cost and higher importance values were associated with reuse for housing. Higher cost and moderately high importance were associated with reuse for park operations. Higher cost and lower importance were associated with reuse for visitor Service/education/recreation purposes.

Summary Recommendation: Reuse as Housing. Two houses on this tract are located near existing employee housing in the “Davisville” portion of the Seashore. Using this site for housing would allow NPS to move personnel out of historic structures in the Dungeness Historic District. The historic structures could then be better interpreted to the public. If further study reveals that the existing structure cannot be adapted at reasonable cost, the structure can be removed and the site used for new housing.

Schwartz-Jenkins

Overview of Importance Value Assessment: Evaluators placed a higher level of importance on improving access for persons with disabilities when the site was not removed. Evaluators placed a higher level of importance on minimizing the NPS maintenance burden when the site’s structures were leased or removed. Evaluators placed a higher level of importance on providing storage space for the NPS when the site was reused for park operations, visitor services, and housing.

Overview of Value Analysis: Lower cost and lower importance values were associated with removal and lease options. Higher cost and higher importance values were associated with reuse for housing. Higher cost and moderately high importance were associated with reuse for park operations. Higher cost and lower importance were associated with reuse for visitor Service/education/recreation purposes.

Summary Recommendation: Reuse efficiency-type structure and guest cabin as Housing. The original house on this tract is deteriorated and cannot be brought up to NPS standards at reasonable cost and should be removed.

Stafford Beach House

Overview of Importance Value Assessment: Evaluators placed a higher level of importance on minimizing the NPS maintenance burden when the site was leased. Evaluators placed a moderately higher level of importance on enhancing energy conservation when the site was reused for visitor services, housing, or leased. Evaluators placed a moderately high level of importance on providing infrastructure for visitor services, interpretive, and education programs when the site was reused for visitor services. Removal was not considered a feasible management option because of the structure’s historic significance. While reuse of the site as housing was included among the highest importance values in only one subfactor, it was seen as having value across a relatively broader range subfactors than the other management options and received the highest aggregate total importance value.

Overview of Value Analysis: Relatively moderate cost and lower importance values were associated with the park operations option. Higher cost and lower importance values were associated with the visitor service option. Lower cost and moderately high importance values were associated with the lease management option. Moderately high cost and high importance values were associated with reuse of the site for housing.

Summary Recommendation: Housing. This structure is well-placed to house personnel, researchers, and volunteers working on scientific and other research projects.

Toonahowie

Overview of Importance Value Assessment: Evaluators placed a higher level of importance on reducing the evidence of human occupation, enhancing natural resource protection, and preservation of a historic structure or landscape when the structure was removed. Reuse of the structure for park operations, employee housing and leasing were not considered feasible management options because of the structure's location in a designated wilderness area.


Overview of Value Analysis: Relatively higher importance value and lower cost were associated with removal.

Summary Recommendation: Removal. The house and related structures at Toonahowie are located in the Seashore's designated wilderness area. Under the Wilderness Act of 1964, designated wilderness is to be an area without permanent structures. 16 U.S.C. § 1133(b), (c). Accordingly, these structures need to be removed in order to restore the area's wilderness character.

ATTACHMENT 1

CBA SUMMARY MATRIX OF IMPORTANCE VALUES

Property	Suitability Analysis of Alternative Uses					Proposed Use
	Exclusive Residential Lease	Reuse for Park Operational Purposes	Reuse for Visitor Svcs, Educ, or Rec Purposes	Removal and Disposal	Reuse as Employee Housing	
The Grange	183	90	297	0	72	Visitor Services
Goodsell Phillips	138	245	165	173	265	Housing for Employees, Volunteers, and/or Cooperators
Schwartz Jenkins	205	347	322	245	407	Housing for Employees, Volunteers, and/or Cooperators
Nancy's Fancy	102	120	150	353	134	Removal and Disposal
Stafford Beach House	110	125	90	0	125	Housing for Employees, Volunteers, and/or Cooperators
Toonahowie	0	0	0	238	0	Removal and Disposal

Key:  Highlights the alternative use with the highest advantage score

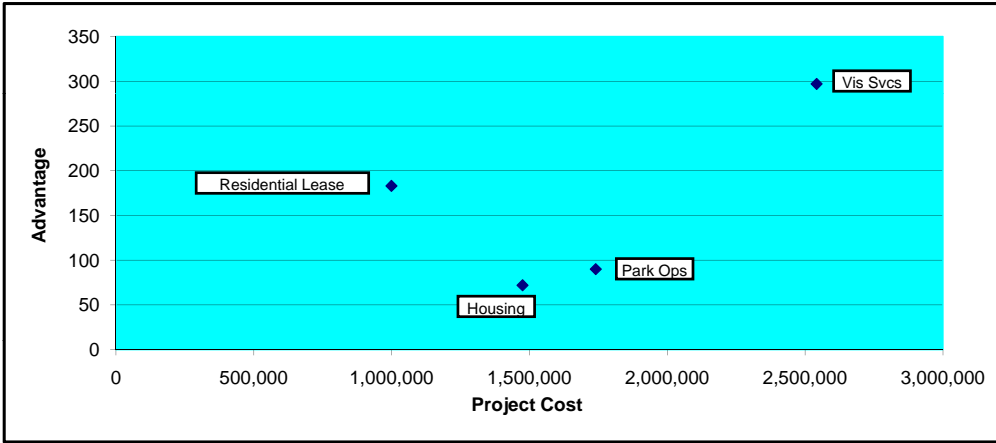
ATTACHMENT 2

CBA Analysis Summary Table
Tract Name: The Grange

			Alternative Not Feasible									
			Action Alternatives									
Subfactors			Exclusive Residential Lease	Impt. Value	Reuse for Park Operational Purposes	Impt. Value	Reuse for Visitor Svcs, Educ, or Rec Purposes	Impt. Value	Removal and Disposal	Impt. Value	Reuse as Employee Housing	Impt. Value
1	Reduces the evidence of human occupation.	Attr.	Negligible		Negligible		Negligible				Negligible	
		Adv.										
2	Enhances natural resource protection	Attr.	Minor		Minor		Negligible				Minor	
		Adv.	small adv	45	small adv	45					small adv	45
3	Enhances preservation of a historic structure or landscape.	Attr.	Minor		Minor		Moderate				Minor	
		Adv.					small adv	90				
4	Enhances employee, volunteer, and/or visitor safety.	Attr.	Minor		Minor		Moderate				Minor	
		Adv.					small adv	50				
5	Provides office and storage space for NPS use.	Attr.	Negligible		Moderate		Moderate				Minor	
		Adv.			medium adv	25	medium adv	25			small adv	15
6	Enhances energy conservation or reduces energy consumption.	Attr.	Moderate		Moderate		Moderate				Minor	
		Adv.	small adv	20	small adv	20	small adv	20				
7	Provides infrastructure for vis svc, interpretive, and educational programs.	Attr.	Minor		Minor		Exceptional				Minor	
		Adv.					medium adv	100				
8	Minimizes the NPS' maintenance and operational burden.	Attr.	Moderate		Negligible		Negligible				Negligible	
		Adv.	medium adv	96								
9	Provides opportunity for general public to stay indoors over night	Attr.	Minor		Negligible		Negligible				Negligible	
		Adv.	small adv	10								
10	Not Used	Attr.										
		Adv.										
11	Improves access for persons with disabilities	Attr.	Minor		Negligible		Minor				Minor	
		Adv.	small adv	12			small adv	12			small adv	12
12	Not Used	Attr.										
		Adv.										
Total Importance Value			Exclusive Residential Lease	183	Reuse for Park Operational Purposes	90	Reuse for Visitor Svcs, Educ, or Rec Purposes	297	Removal and Disposal	0	Reuse as Employee Housing	72

ATTACHMENT 2

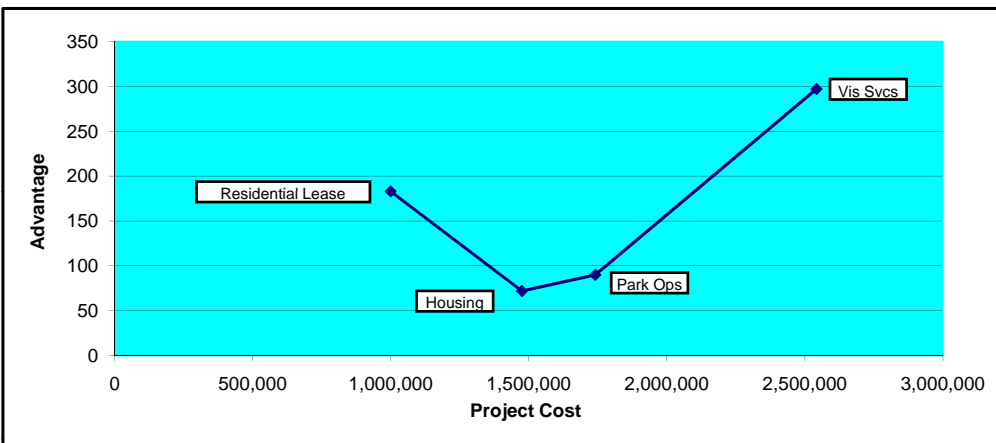
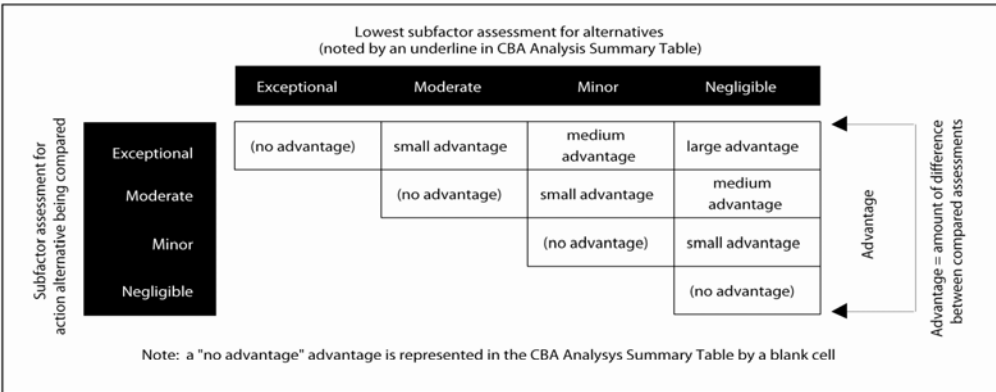
CBA Analysis Summary Table
Tract Name: The Grange
(continued)



Assessment Scale	
1	
2	Exceptional
3	Moderate
4	Minor
5	Negligible

Data Block		
999,601.57	183	Lease
1,740,810.32	90	Park Ops
2,541,888.60	297	Vis Svcs
0	0	Removal
1,475,114.54	72	Housing

Cost Hierarchy		
0.00	0	Removal
999,601.57	183	Lease
1,475,114.54	72	Housing
1,740,810.32	90	Park Ops
2,541,888.60	297	Vis Svcs



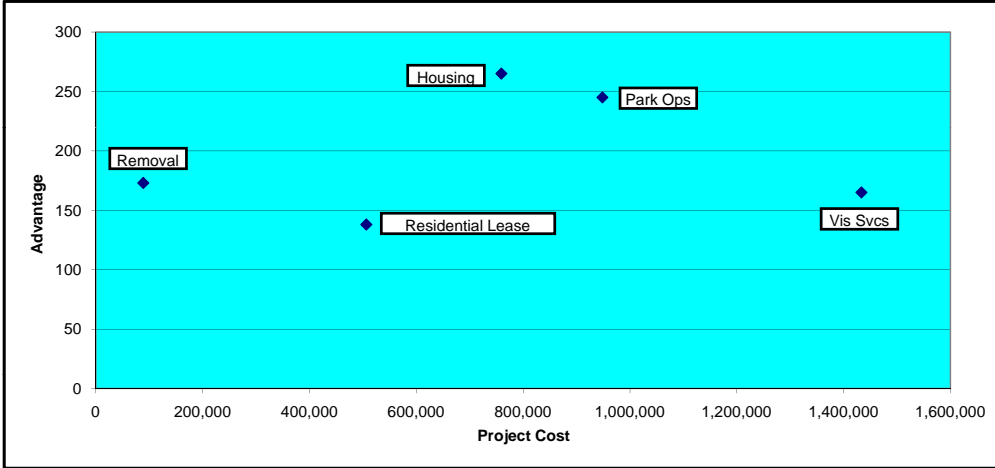
ATTACHMENT 2

CBA Analysis Summary Table
Tract Name: Goodsell and Phillips

Subfactors			Action Alternatives									
			Exclusive Residential Lease	Impt. Value	Reuse for Park Operational Purposes	Impt. Value	Reuse for Visitor Svcs, Educ, or Rec Purposes	Impt. Value	Removal and Disposal	Impt. Value	Reuse as Employee Housing	Impt. Value
1	Reduces the evidence of human occupation.	Attr.	Negligible		Negligible		Negligible		Minor		Negligible	
		Adv.						small adv	20			
2	Enhances natural resource protection	Attr.	Negligible		Minor		Negligible		Minor		Minor	
		Adv.			small adv	55			small adv	55	small adv	55
3	Enhances preservation of a historic structure or landscape.	Attr.	Negligible		Minor		Negligible		Negligible		Moderate	
		Adv.			small adv	70					medium adv	100
4	Enhances employee, volunteer, and/or visitor safety.	Attr.	Minor		Minor		Minor		Negligible		Minor	
		Adv.	small adv	50	small adv	50	small adv	50			small adv	50
5	Provides office and storage space for NPS use.	Attr.	Negligible		Moderate		Minor		Negligible		Negligible	
		Adv.			medium adv	45	small adv	30				
6	Enhances energy conservation or reduces energy consumption.	Attr.	Minor		Minor		Minor		Moderate		Minor	
		Adv.							small adv	20		
7	Provides infrastructure for vis svc, interpretive, and educational programs.	Attr.	Negligible		Minor		Minor		Negligible		Negligible	
		Adv.			small adv	25	small adv	25				
8	Minimizes the NPS' maintenance and operational burden.	Attr.	Moderate		Minor		Minor		Moderate		Minor	
		Adv.	small adv	78					small adv	78		
9	Provides opportunity for general public to stay indoors over night	Attr.	Minor		Negligible		Negligible		Negligible		Negligible	
		Adv.	small adv	10								
10	Not Used	Attr.										
		Adv.										
11	Improves access for persons with disabilities	Attr.	Negligible		Negligible		Minor		Negligible		Minor	
		Adv.					small adv	60			small adv	60
12	Not Used	Attr.										
		Adv.										
Total Importance Value			Exclusive Residential Lease	138	Reuse for Park Operational Purposes	245	Reuse for Visitor Svcs, Educ, or Rec Purposes	165	Removal and Disposal	173	Reuse as Employee Housing	265

ATTACHMENT 2

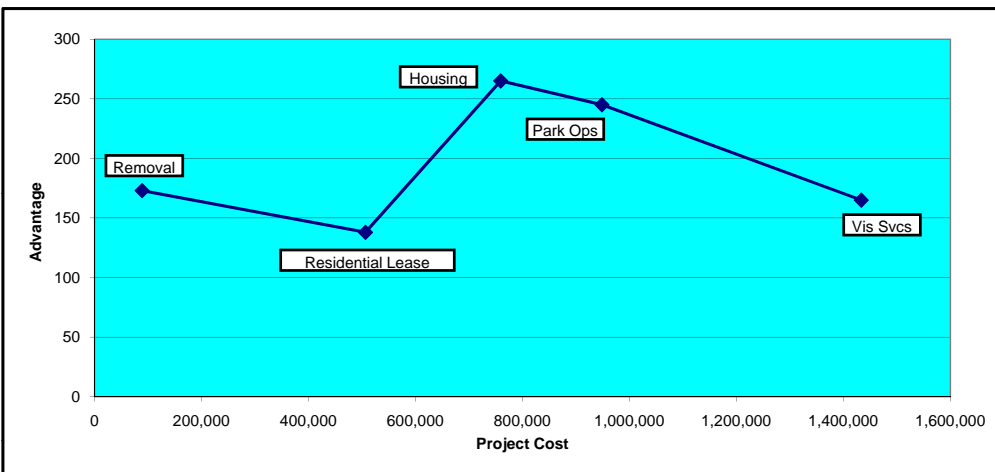
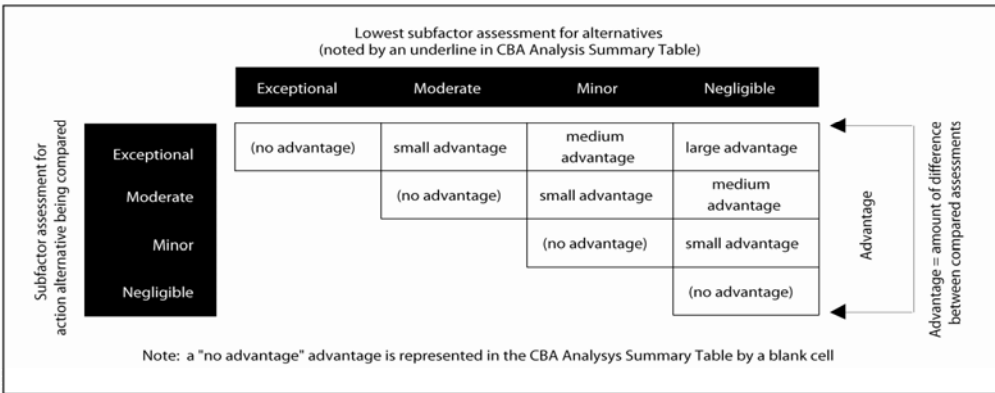
CBA Analysis Summary Table
Tract Name: Goodsell and Phillips
(continued)



Assessment Scale	
1	
2	Exceptional
3	Moderate
4	Minor
5	Negligible

Data Block		
Cost	Adv	Alt
506,426.09	138	Res Lease
948,502.91	245	Park Ops
1,433,375.17	165	Vis Svcs
88,876.20	173	Removal
759,294.14	265	Housing

Cost Hierarchy		
Cost	Adv	Alt
0	0	
88,876.20	173	Removal
506,426.09	138	Res Lease
759,294.14	265	Housing
948,502.91	245	Park Ops
1,433,375.17	165	Vis Svcs



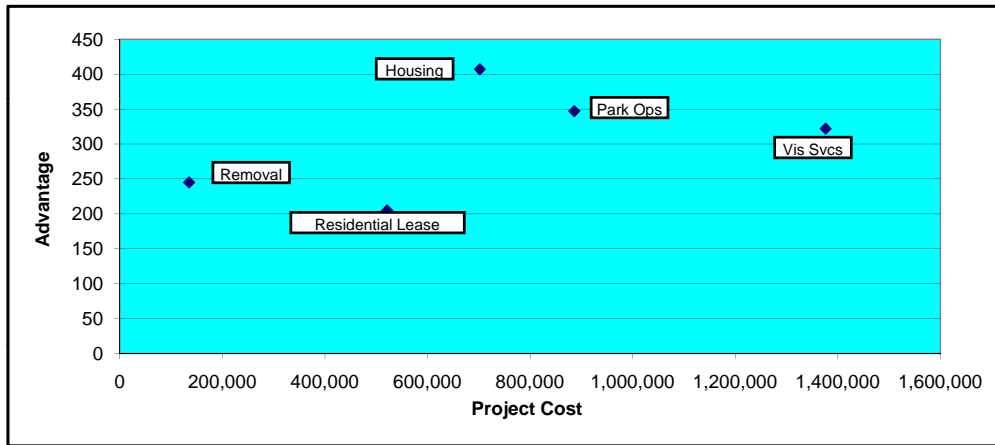
ATTACHMENT 2

CBA Analysis Summary Table
Tract Name: Schwartz-Jenkins

Subfactors			Action Alternatives									
			Exclusive Residential Lease	Impt. Value	Reuse for Park Operational Purposes	Impt. Value	Reuse for Visitor Svcs, Educ, or Rec Purposes	Impt. Value	Removal and Disposal	Impt. Value	Reuse as Employee Housing	Impt. Value
1	Reduces the evidence of human occupation.	Attr.	Negligible		Minor		Negligible		Exceptional		Minor	
		Adv.			small adv	15			large adv	50	small adv	15
2	Enhances natural resource protection	Attr.	Negligible		Minor		Negligible		Exceptional		Minor	
		Adv.			small adv	25			large adv	80	small adv	25
3	Enhances preservation of a historic structure or landscape.	Attr.	Negligible		Minor		Minor		Negligible		Minor	
		Adv.			small adv	40	small adv	40			small adv	40
4	Enhances employee, volunteer, and/or visitor safety.	Attr.	Minor		Minor		Minor		Minor		Minor	
		Adv.										
5	Provides office and storage space for NPS use.	Attr.	Negligible		Moderate		Moderate		Negligible		Moderate	
		Adv.			medium adv	92	medium adv	92			medium adv	92
6	Enhances energy conservation or reduces energy consumption.	Attr.	Minor		Minor		Minor		Moderate		Minor	
		Adv.							small adv	20		
7	Provides infrastructure for vis svc, interpretive, and educational programs.	Attr.	Negligible		Minor		Moderate		Negligible		Moderate	
		Adv.			small adv	75	medium adv	90			medium adv	90
8	Minimizes the NPS' maintenance and operational burden.	Attr.	Moderate		Negligible		Negligible		Moderate		Minor	
		Adv.	medium adv	95					medium adv	95	small adv	45
9	Provides opportunity for general public to stay indoors over night	Attr.	Minor		Negligible		Negligible		Negligible		Negligible	
		Adv.	small adv	10								
10	Not Used	Attr.										
		Adv.										
11	Improves access for persons with disabilities	Attr.	Moderate		Moderate		Moderate		Negligible		Moderate	
		Adv.	medium adv	100		100	medium adv	100			medium adv	100
12	Not Used	Attr.										
		Adv.										
Total Importance Value			Exclusive Residential Lease	205	Reuse for Park Operational Purposes	347	Reuse for Visitor Svcs, Educ, or Rec Purposes	322	Removal and Disposal	245	Reuse as Employee Housing	407

ATTACHMENT 2

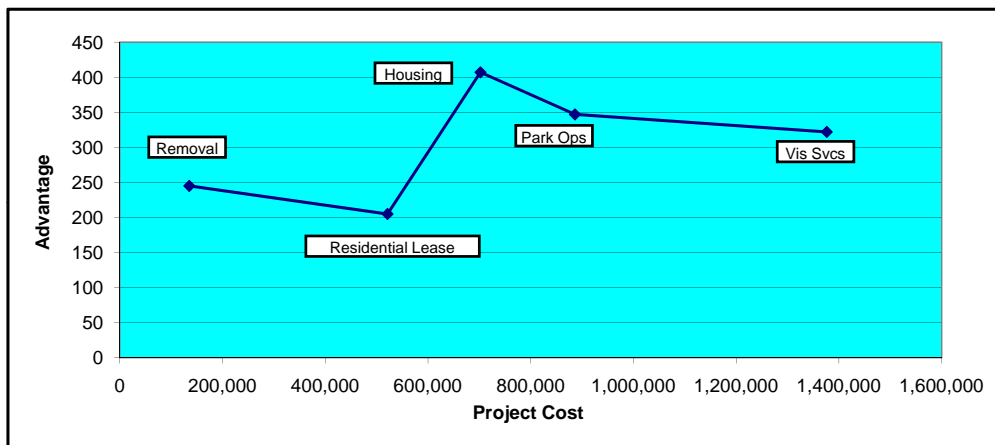
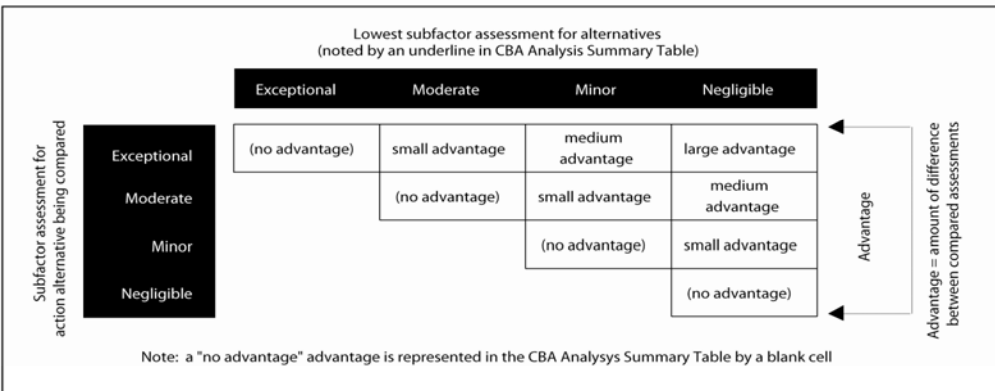
CBA Analysis Summary Table Tract Name: Schwartz-Jenkins (continued)



Assessment Scale	
1	
2	Exceptional
3	Moderate
4	Minor
5	Negligible

Data Block		
Cost	Adv	Alt
521,205.11	205	Res Lease
886,013.37	347	Park Ops
1,376,156.28	322	Vis Svcs
135,306.77	245	Removal
702,018.28	407	Housing

Cost Hierarchy		
Cost	Adv	Alt
0	0	
135,306.77	245	Removal
521,205.11	205	Res Lease
702,018.28	407	Housing
886,013.37	347	Park Ops
1,376,156.28	322	Vis Svcs



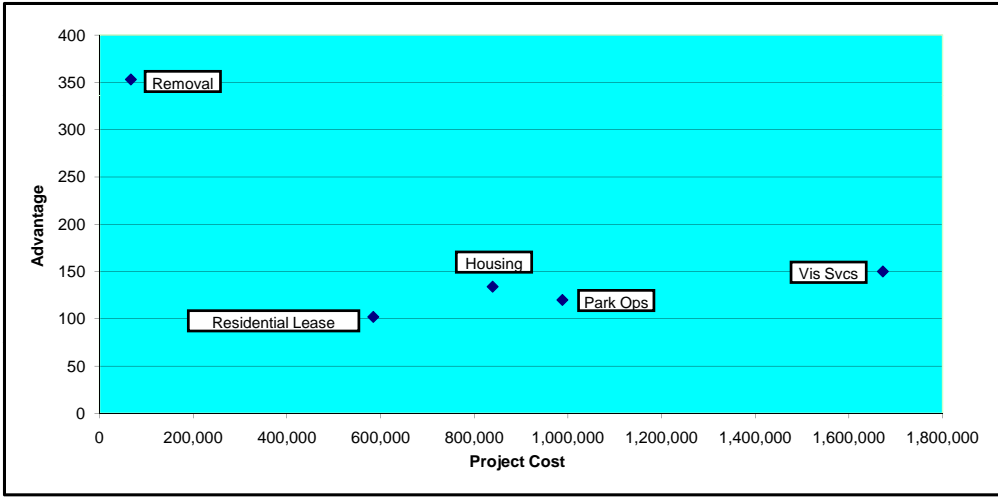
ATTACHMENT 2

CBA Analysis Summary Table
Tract Name: Nancy's Fancy

Subfactors			Action Alternatives									
			Exclusive Residential Lease	Impt. Value	Reuse for Park Operational Purposes	Impt. Value	Reuse for Visitor Svcs, Educ, or Rec Purposes	Impt. Value	Removal and Disposal	Impt. Value	Reuse as Employee Housing	Impt. Value
1	Reduces the evidence of human occupation.	Attr.	Negligible		Minor		Negligible		Exceptional		Minor	
		Adv.			small adv	15			large adv	100	small adv	15
2	Enhances natural resource protection	Attr.	Negligible		Minor		Negligible		Exceptional		Minor	
		Adv.			small adv	37			large adv	95	small adv	37
3	Enhances preservation of a historic structure or landscape.	Attr.	Negligible		Minor		Negligible		Minor		Minor	
		Adv.			small adv	33			small adv	33	small adv	33
4	Enhances employee, volunteer, and/or visitor safety.	Attr.	Minor		Moderate		Moderate		Minor		Minor	
		Adv.			small adv	20	small adv	20				
5	Provides office and storage space for NPS use.	Attr.	Negligible		Moderate		Minor		Negligible		Minor	
		Adv.			medium adv	15	small adv	10			small adv	10
6	Enhances energy conservation or reduces energy consumption.	Attr.	Minor		Minor		Minor		Moderate		Minor	
		Adv.							small adv	35		
7	Provides infrastructure for vis svc, interpretive, and educational programs.	Attr.	Negligible		Negligible		Moderate		Negligible		Negligible	
		Adv.					medium adv	80				
8	Minimizes the NPS' maintenance and operational burden.	Attr.	Moderate		Negligible		Negligible		Moderate		Minor	
		Adv.	medium adv	90					medium adv	90	small adv	39
9	Provides opportunity for general public to stay indoors over night	Attr.	Minor		Negligible		Negligible		Negligible		Negligible	
		Adv.	small adv	12								
10	Not Used	Attr.										
		Adv.										
11	Improves access for persons with disabilities	Attr.	Negligible		Negligible		Minor		Negligible		Negligible	
		Adv.					small adv	40				
12	Not Used	Attr.										
		Adv.										
Total Importance Value			Exclusive Residential Lease	102	Reuse for Park Operational Purposes	120	Reuse for Visitor Svcs, Educ, or Rec Purposes	150	Removal and Disposal	353	Reuse as Employee Housing	134

ATTACHMENT 2

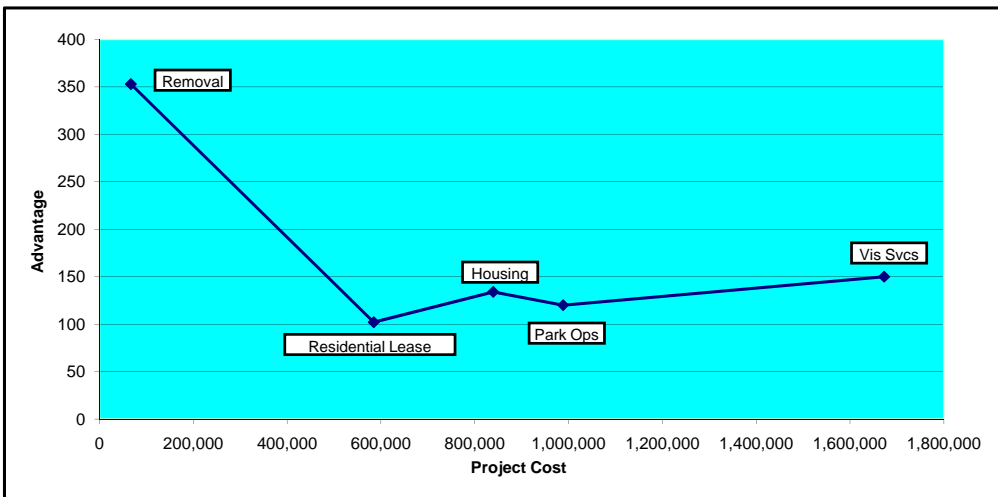
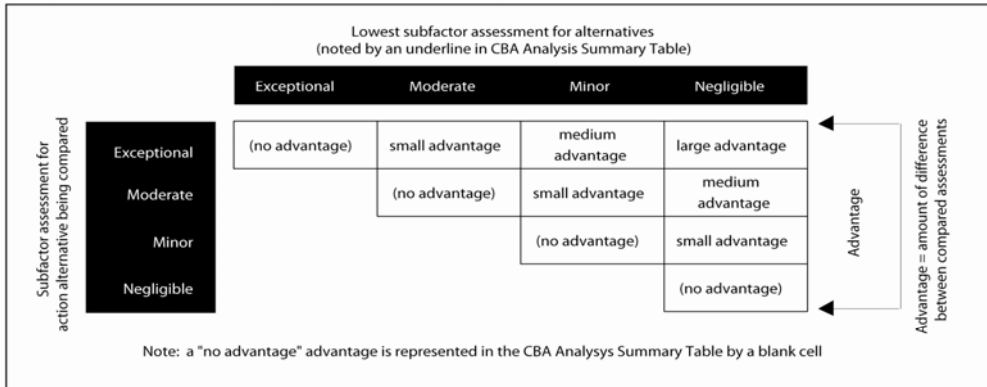
CBA Analysis Summary Table Tract Name: Nancy's Fancy (continued)



Assessment Scale	
1	
2	Exceptional
3	Moderate
4	Minor
5	Negligible

Data Block		
Cost	Adv	Alt
584,642.86	102	Res Lease
988,332.00	120	Park Ops
1,672,668.60	150	Vis Svcs
66,983.55	353	Removal
839,352.88	134	Housing

Cost Hierarchy		
Cost	Adv	Alt
0	0	
66,983.55	353	Removal
584,642.86	102	Res Lease
839,352.88	134	Housing
988,332.00	120	Park Ops
1,672,668.60	150	Vis Svcs



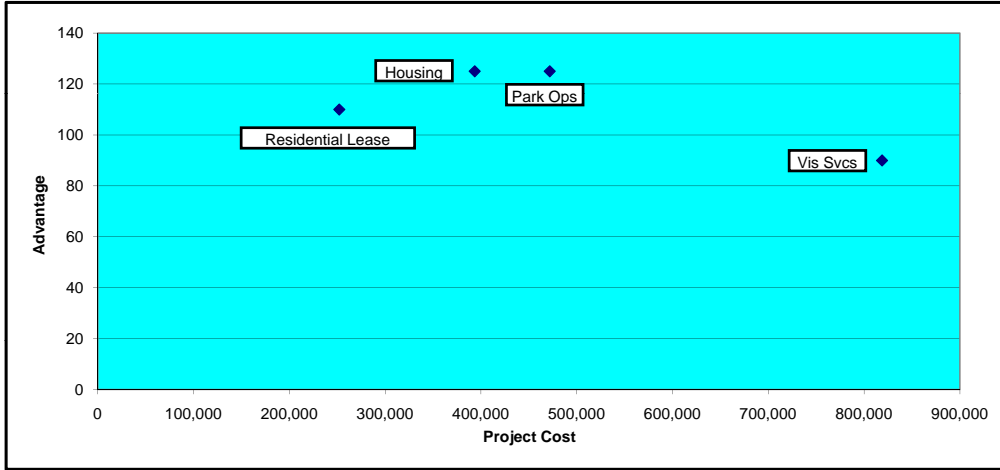
ATTACHMENT 2

CBA Analysis Summary Table
Tract Name: Stafford Beach House

Subfactors			Action Alternatives								Alternative Not Feasible	
			Exclusive Residential Lease	Impt. Value	Reuse for Park Operational Purposes	Impt. Value	Reuse for Visitor Svcs, Educ, or Rec Purposes	Impt. Value	Removal and Disposal	Impt. Value	Reuse as Employee Housing	Impt. Value
1	Reduces the evidence of human occupation.	Attr.	Negligible		Minor		Negligible				Minor	
		Adv.			small adv	30					small adv	30
2	Enhances natural resource protection	Attr.	Negligible		Minor		Negligible				Minor	
		Adv.			small adv	50					small adv	50
3	Enhances preservation of a historic structure or landscape.	Attr.	Moderate		Moderate		Moderate				Moderate	
		Adv.										
4	Enhances employee, volunteer, and/or visitor safety.	Attr.	Minor		Minor		Minor				Minor	
		Adv.										
5	Provides office and storage space for NPS use.	Attr.	Negligible		Minor		Minor				Minor	
		Adv.			small adv	20	small adv	20			small adv	20
6	Enhances energy conservation or reduces energy consumption.	Attr.	Minor		Minor		Minor				Minor	
		Adv.										
7	Provides infrastructure for vis svc, interpretive, and educational programs.	Attr.	Negligible		Negligible		Moderate				Negligible	
		Adv.					medium adv	50				
8	Minimizes the NPS' maintenance and operational burden.	Attr.	Moderate		Minor		Negligible				Minor	
		Adv.	medium adv	100	small adv	25					Small adv	25
9	Provides opportunity for general public to stay indoors over night	Attr.	Minor		Negligible		Negligible				Negligible	
		Adv.	small adv	10								
10	Not Used	Attr.										
		Adv.										
11	Improves access for persons with disabilities	Attr.	Negligible		Negligible		Minor				Negligible	
		Adv.					small adv	20				
12	Not Used	Attr.										
		Adv.										
Total Importance Value			Exclusive Residential Lease	110	Reuse for Park Operational Purposes	125	Reuse for Visitor Svcs, Educ, or Rec Purposes	90	Removal and Disposal	0	Reuse as Employee Housing	125

ATTACHMENT 2

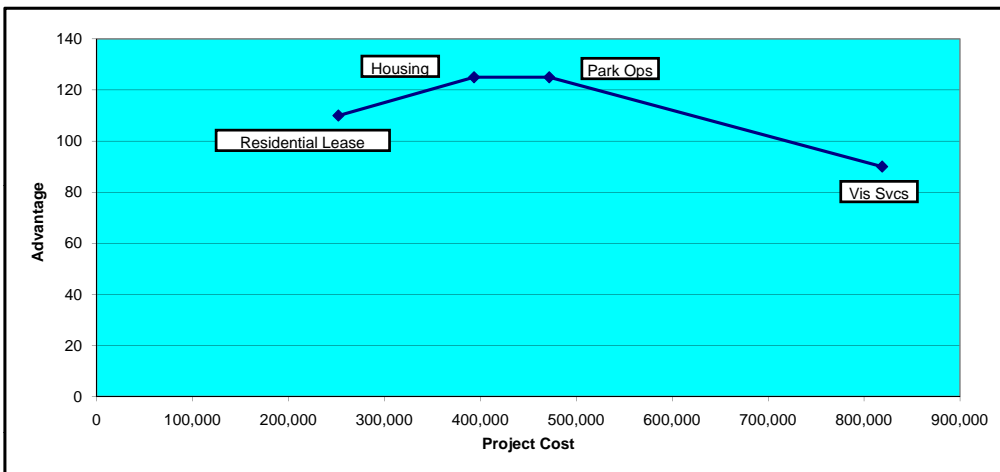
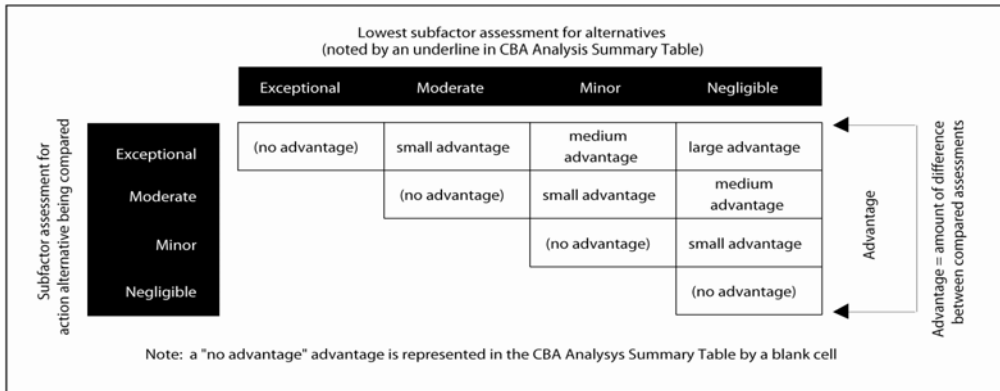
CBA Analysis Summary Table Tract Name: Stafford Beach House (continued)



Assessment Scale	
1	
2	Exceptional
3	Moderate
4	Minor
5	Negligible

Data Block		
Cost	Adv	Alt
252,107.15	110	Res Lease
471,805.51	125	Park Ops
818,754.75	90	Vis Svcs
	0	Removal
393,496.88	125	Housing

Cost Hierarchy		
Cost	Adv	Alt
0.00	0	
252,107.15	110	Res Lease
393,496.88	125	Housing
471,805.51	125	Park Ops
818,754.75	90	Vis Svcs



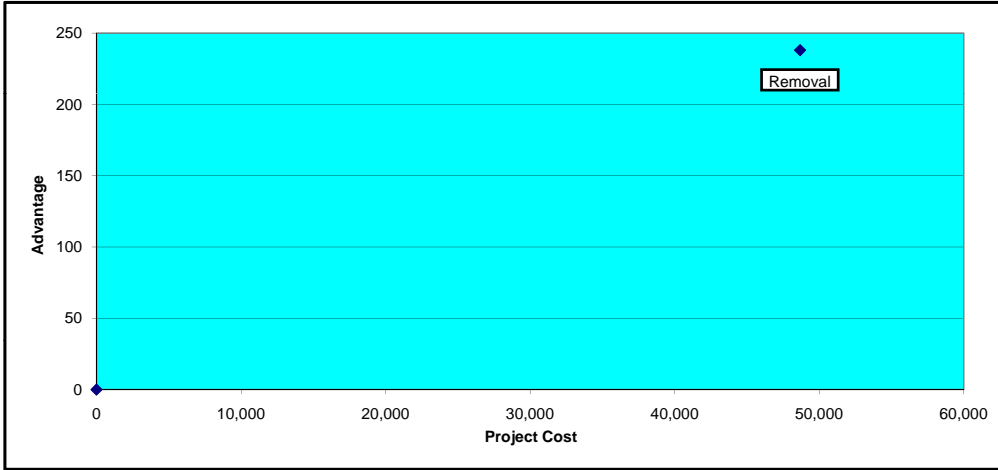
ATTACHMENT 2

CBA Analysis Summary Table
Tract Name: Toonahowie

			Alternative Not Feasible	Alternative Not Feasible		Alternative Not Feasible		Alternative Not Feasible				
			Action Alternatives									
Subfactors			Exclusive Residential Lease	Impt. Value	Reuse for Park Operational Purposes	Impt. Value	Reuse for Visitor Svcs, Educ, or Rec Purposes	Impt. Value	Removal and Disposal	Impt. Value	Reuse as Employee Housing	Impt. Value
1	Reduces the evidence of human occupation.	Attr.							Exceptional			
		Adv.							large adv*	100		
2	Enhances natural resource protection	Attr.							Exceptional			
		Adv.							large adv*	78		
3	Enhances preservation of a historic structure or landscape.	Attr.							Negligible			
		Adv.										
4	Enhances employee, volunteer, and/or visitor safety.	Attr.							Negligible			
		Adv.										
5	Provides office and storage space for NPS use.	Attr.							Negligible			
		Adv.										
6	Enhances energy conservation or reduces energy consumption.	Attr.							Moderate			
		Adv.							medium adv*	20		
7	Provides infrastructure for vis svc, interpretive, and educational programs.	Attr.							Negligible			
		Adv.										
8	Minimizes the NPS' maintenance and operational burden.	Attr.							Moderate			
		Adv.							medium adv*	40		
9	Provides opportunity for general public to stay indoors over night	Attr.							Negligible			
		Adv.										
10	Not Used	Attr.										
		Adv.										
11	Improves access for persons with disabilities	Attr.							Negligible			
		Adv.										
12	Not Used	Attr.										
		Adv.										
Total Importance Value			Exclusive Residential Lease	0	Reuse for Park Operational Purposes	0	Reuse for Visitor Svcs, Educ, or Rec Purposes	0	Removal and Disposal	238	Reuse as Employee Housing	0

ATTACHMENT 2

CBA Analysis Summary Table
Tract Name: Toonahowie
(continued)



Assessment Scale	
1	
2	Exceptional
3	Moderate
4	Minor
5	Negligible

Data Block		
Cost	Adv	Alt
0		Res Lease
0		Park Ops
0		Vis Svcs
238		Removal
0		Housing

Cost Hierarchy		
Cost	Adv	Alt
0	0	
48,674.71	238	Removal
0.00	0	Vis Svcs

Lowest subfactor assessment for alternatives (noted by an underline in CBA Analysis Summary Table)				
	Exceptional	Moderate	Minor	Negligible
Exceptional	(no advantage)	small advantage	medium advantage	large advantage
Moderate		(no advantage)	small advantage	medium advantage
Minor			(no advantage)	small advantage
Negligible				(no advantage)

Note: a "no advantage" advantage is represented in the CBA Analysis Summary Table by a blank cell

ATTACHMENT 3

Summary of Subfactor Assessments

Subfactor: Reduces the evidence of human occupation.						
	Grange	Goodsel Phillips	Schw-Jenk	Nancys Fancy	Stafford	Toona
Exclusive Residential Lease	Negligible	Negligible	Negligible	Negligible	Negligible	0
	-- The area is already developed. Residential use would not lessen impacts in a way that visitors will readily notice. NPS administrative controls would be limited.	-- The area is already developed. Residential use would not lessen impacts in a way that visitors will readily notice. NPS administrative controls would be limited.	-- The area is predominantly undeveloped. Evidence of human occupation would be obvious to visitors. NPS administrative controls would be limited.	-- The area is predominantly undeveloped. Evidence of human occupation would be obvious to visitors. NPS administrative controls would be limited.	-- The area is predominantly undeveloped. Evidence of human occupation would be obvious to visitors. NPS administrative controls would be limited.	-- Alternative not feasible
Reuse for Park Operational Purposes	Negligible	Negligible	Minor	Minor	Minor	0
	-- The evidence of human occupation would be obvious in an area that is already developed.	-- The evidence of human occupation would be obvious in an area that is already developed.	-- The evidence of human occupation would be present but NPS administrative controls could slightly reduce some visual and audible impacts.	-- The evidence of human occupation would be present but NPS administrative controls could slightly reduce some visual and audible impacts.	-- The evidence of human occupation would be present but NPS administrative controls could slightly reduce some visual and audible impacts.	-- Alternative not feasible
Reuse for Visitor Svcs, Educ, or Rec Purposes	Negligible	Negligible	Negligible	Negligible	Negligible	0
	-- The evidence of human occupation would be obvious in an area that is already developed.	-- The evidence of human occupation would be obvious in an area that is already developed.	-- The evidence of human occupation would be obvious. NPS administrative controls would be limited.	-- The evidence of human occupation would be obvious. NPS administrative controls would be limited.	-- The evidence of human occupation would be obvious. NPS administrative controls would be limited.	-- Alternative not feasible
Removal and Disposal	0	Minor	Exceptional	Exceptional	0	Exceptional
	-- Alternative not feasible	-- The area is already developed. Removal would not lessen impacts in a way that visitors would readily notice.	-- The evidence of human occupation would be removed in an area that is predominantly undeveloped.	-- The evidence of human occupation would be removed in an area that is predominantly undeveloped.	-- Alternative not feasible	-- The evidence of human occupation would be removed in an area that is predominantly undeveloped.
Reuse as Employee Housing	Negligible	Negligible	Minor	Minor	Minor	0
	-- The evidence of human occupation would be obvious in an area that is already developed.	-- The evidence of human occupation would be obvious in an area that is already developed.	-- The evidence of human occupation would be present but NPS administrative controls could slightly reduce some visual and audible impacts.	-- The evidence of human occupation would be present but NPS administrative controls could slightly reduce some visual and audible impacts.	-- The evidence of human occupation would be present but NPS administrative controls could slightly reduce some visual and audible impacts.	-- Alternative not feasible

Summary of Subfactor Assessments

Subfactor: Enhances natural resource protection						
	Grange	Goodsel Phillips	Schw-Jenk	Nancys Fancy	Stafford	Toona
Exclusive Residential Lease	Minor	Negligible	Negligible	Negligible	Negligible	0
	-- Restricted public use of dock area would slightly reduce impacts to marsh. NPS administrative controls would be limited.	-- The surrounding area is predominantly developed. NPS administrative controls would be limited.	-- The surrounding area is predominantly undeveloped. NPS administrative controls would be limited.	-- The surrounding area is predominantly undeveloped. NPS administrative controls would be limited.	-- The surrounding area is predominantly undeveloped. NPS administrative controls would be limited.	-- Alternative not feasible
Reuse for Park Operational Purposes	Minor	Minor	Minor	Minor	Minor	0
	-- Restricted public use of dock area would slightly reduce impacts to marsh. NPS administrative use of dock area may occur.	-- The surrounding area is predominantly developed. NPS administrative controls would slightly decrease aggregate impacts to nearby resources.	-- The surrounding area is predominantly undeveloped. NPS administrative controls would not significantly reduce resource impacts.	-- The surrounding area is predominantly undeveloped. NPS administrative controls would not significantly reduce resource impacts.	-- The surrounding area is predominantly undeveloped. NPS administrative controls would not significantly reduce resource impacts.	-- Alternative not feasible
Reuse for Visitor Svcs, Educ, or Rec Purposes	Negligible	Negligible	Negligible	Negligible	Negligible	0
	-- Public use of dock area would slightly increase impacts to marsh. NPS administrative use of dock area may occur.	-- The surrounding area is predominantly developed. Public use would increase impacts to surrounding resources.	-- The surrounding area is predominantly undeveloped. Public use would increase impacts to surrounding resources.	-- The surrounding area is predominantly undeveloped. Public use would increase impacts to surrounding resources.	-- The surrounding area is predominantly undeveloped. Public use would increase impacts to surrounding resources.	-- Alternative not feasible
Removal and Disposal	0	Minor	Exceptional	Exceptional	0	Exceptional
	-- Alternative not feasible	-- The surrounding area is predominantly developed. Removal would slightly decrease aggregate impacts to nearby resources.	-- Removal would eliminate associated impacts to natural resources in a predominantly undeveloped area.	-- Removal would eliminate associated impacts to natural resources in a predominantly undeveloped area.	-- Alternative not feasible	-- Removal would eliminate associated impacts to natural resources in a designated wilderness area.
Reuse as Employee Housing	Minor	Minor	Minor	Minor	Minor	0
	-- Restricted public use of dock area would slightly reduce impacts to marsh. NPS administrative use of dock area may occur.	-- The surrounding area is predominantly developed. NPS administrative controls would slightly decrease aggregate impacts to nearby resources.	-- The surrounding area is predominantly undeveloped. NPS administrative controls would slightly reduce resource impacts.	-- The surrounding area is predominantly undeveloped. NPS administrative controls would slightly reduce resource impacts.	-- The surrounding area is predominantly undeveloped. NPS administrative controls would slightly reduce resource impacts.	-- Alternative not feasible

Summary of Subfactor Assessments

Subfactor: Enhances preservation of a historic structure or landscape.						
	Grange	Goodsel Phillips	Schw-Jenk	Nancys Fancy	Stafford	Toona
Exclusive Residential Lease	Minor	Negligible	Negligible	Negligible	Moderate	0
	-- The structure would be preserved to accepted standards. As a non-public use area the structure's interpretive value would be limited in an area of high visitor interest. Restrictions may be perceived as a significant distraction or unfulfilled desire.	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- The structure would be preserved to accepted standards. Interpretive value would be limited in an area of reduced visitor interest. Visitors are unlikely to perceive this as a significant distraction or unfulfilled desire.	-- Alternative not feasible
Reuse for Park Operational Purposes	Minor	Minor	Minor	Minor	Moderate	0
	-- The structure would be preserved to accepted standards. As a non-public use area the structure's interpretive value would be limited in an area of high visitor interest. Restrictions may be perceived as a significant distraction or unfulfilled desire.	-- These structures may be used to relocate existing park operational uses from less-compatible historic structures in other areas of the park.	-- These structures may be used to relocate existing park operational uses from less-compatible historic structures in other areas of the park.	-- These structures may be used to relocate existing park operational uses from less-compatible historic structures in other areas of the park.	-- The structure would be preserved to accepted standards and may be used to relocate existing park operational uses from less-compatible historic structures in other areas of the park..	-- Alternative not feasible
Reuse for Visitor Svcs, Educ, or Rec Purposes	Moderate	Negligible	Minor	Negligible	Moderate	0
	-- The structure would be preserved to accepted standards. As a public use area, the structure's interpretive value would be enhanced in an area of high visitor interest.	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- The structures are not historically significant and not located in an area of high historic interpretive value. The structures may provide services to visitors with disabilities that are not otherwise available in the park.	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- The structure would be preserved to accepted standards. As a public use area, the structure's interpretive value would be enhanced in an area of reduced visitor interest.	-- Alternative not feasible
Removal and Disposal	0	Negligible	Negligible	Minor	0	Negligible
	-- Alternative not feasible	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- Alternative not feasible	-- The structures are not historically significant and not located in an area of high historic interpretive interest.
Reuse as Employee Housing	Minor	Moderate	Minor	Minor	Moderate	0
	-- The structure would be preserved to accepted standards. As a non-public use area the structure's interpretive value would be limited in an area of high visitor interest. Restrictions may be perceived as a significant distraction or unfulfilled desire.	-- -- The structures are not historically significant, not located in an area of high historic interpretive value and have high potential to relocate existing housing units from less-compatible historic structures in other areas of the park.	-- -- The structures are not historically significant, not located in an area of high historic interpretive value and have moderate potential to relocate existing housing units from less-compatible historic structures in other areas of the park.	-- -- The structures are not historically significant, not located in an area of high historic interpretive value and have moderate potential to relocate existing housing units from less-compatible historic structures in other areas of the park.	-- -- The structures are historically significant, located in an area of reduced historic interpretive interest, and have high potential to relocate existing housing units from less-compatible historic structures in other areas of the park.	-- Alternative not feasible

ATTACHMENT 3

Summary of Subfactor Assessments

Subfactor: Enhances employee, volunteer, and/or visitor safety.						
	Grange	Goodsel Phillips	Schw-Jenk	Nancys Fancy	Stafford	Toona
Exclusive Residential Lease	Minor	Minor	Minor	Minor	Minor	0
	-- The property is privately operated. Occupancy is not continuous. Occupants not necessarily trained to handle emergency situations. Access by NPS personnel is limited.	-- The property is privately operated. Occupancy is not continuous. Occupants not necessarily trained to handle emergency situations. Access by NPS personnel is limited.	-- The property is privately operated. Occupancy is not continuous. Occupants not necessarily trained to handle emergency situations. Access by NPS personnel is limited.	-- The property is privately operated. Occupancy is not continuous. Occupants not necessarily trained to handle emergency situations. Access by NPS personnel is limited.	-- The property is privately operated. Occupancy is not continuous. Occupants not necessarily trained to handle emergency situations. Access by NPS personnel is limited.	-- Alternative not feasible
Reuse for Park Operational Purposes	Minor	Minor	Minor	Moderate	Minor	0
	-- The property may not be continuously manned by NPS personnel. Access to trained NPS personnel in emergency situations is possible. Safety and 1st aid equipment is located nearby at other NPS operated structures.	-- The property may not be continuously manned by NPS personnel. Access to trained NPS personnel in emergency situations is possible. Safety and 1st aid equipment is located nearby at other NPS operated structures.	-- The property may not be continuously manned by NPS personnel. Access to trained NPS personnel in emergency situations is possible. Safety and 1st aid equipment may be stored on site but location is not near areas of high visitor use.	-- Fire equipment may be stored on site. Safety and First aid equipment may be stored on site. Site is centrally located.	-- The property may not be continuously manned by NPS personnel. Access to trained NPS personnel in emergency situations is possible. Safety and 1st aid equipment may be stored on site.	-- Alternative not feasible
Reuse for Visitor Svcs, Educ, or Rec Purposes	Moderate	Minor	Minor	Moderate	Minor	0
	-- The property would often be manned by NPS personnel. Access to trained NPS personnel in emergency situations is possible. Safety and 1st aid equipment may be stored on site. Location is near areas of high visitor use.	-- The property may not be continuously manned by NPS personnel. Access to trained NPS personnel in emergency situations is possible. Safety and 1st aid equipment may be stored on site but location is not near areas of high visitor use.	-- The property may not be continuously manned by NPS personnel. Access to trained NPS personnel in emergency situations is possible. Safety and 1st aid equipment may be stored on site but location is not near areas of high visitor use.	-- The property would often be manned by NPS personnel. Could serve as storm shelter for larger groups. Access to trained NPS personnel in emergency situations is possible. Safety and 1st aid equipment may be stored on site. Centrally located.	-- The property may not be continuously manned by NPS personnel. Access to trained NPS personnel in emergency situations is possible. Safety and 1st aid equipment may be stored on site.	-- Alternative not feasible
Removal and Disposal	0	Negligible	Minor	Minor	0	Negligible
	-- Alternative not feasible	-- Removal would not substantially lower safety as ranger residences are located in close proximity.	-- Removal would slightly lower safety risk by reducing the number and frequency of visitors in the area.	-- Removal would slightly lower safety risk by reducing the number and frequency of visitors in the area.	-- Alternative not feasible	
Reuse as Employee Housing	Minor	Minor	Minor	Minor	Minor	0
	-- The property may not be continuously occupied. Non NPS personnel may reside in structure.	-- The property may not be continuously occupied. Non NPS personnel may reside in structure.	-- The property may not be continuously occupied. Non NPS personnel may reside in structure.	-- The property may not be continuously occupied. Non NPS personnel may reside in structure.	-- The property may not be continuously occupied. Non NPS personnel may reside in structure.	-- Alternative not feasible

Summary of Subfactor Assessments

Subfactor: Provides office and storage space for NPS use.						
	Grange	Goodsel Phillips	Schw-Jenk	Nancys Fancy	Stafford	Toona
Exclusive Residential Lease	Negligible	Negligible	Negligible	Negligible	Negligible	0
	-- Private occupancy would preclude NPS use.	-- Private occupancy would preclude NPS use.	-- Private occupancy would preclude NPS use.	-- Private occupancy would preclude NPS use.	-- Private occupancy would preclude NPS use.	-- Alternative not feasible
Reuse for Park Operational Purposes	Moderate	Moderate	Moderate	Moderate	Minor	0
	-- Structure would provide substantial storage and office area in an area where office and storage areas already exist.	-- Structures would provide substantial storage and office areas in a area used for ranger residences.	-- Structure would provide substantial storage and office area but in a less accessible location.	-- Structure would provide substantial storage and office area but in a less accessible location.	-- Structure provides a very limited storage area.	-- Alternative not feasible
Reuse for Visitor Svcs, Educ, or Rec Purposes	Moderate	Minor	Minor	Minor	Minor	0
	-- Structure would provide substantial storage and office area in an area where office and storage areas already exist.	-- Structures could provide a small amount of storage or office area when used in this way.	-- Structures could provide a small amount of storage or office area when used in this way.	-- Structures could provide a small amount of storage or office area when used in this way.	-- Structures would provide a very small amount of storage or office area when used in this way.	-- Alternative not feasible
Removal or Disposal	0	Negligible	Negligible	Negligible	0	Negligible
	-- Alternative not feasible	-- storage or office space not possible	-- storage or office space not possible	-- storage or office space not possible	-- Alternative not feasible	
Reuse as Employee Housing	Minor	Negligible	Negligible	Minor	Minor	0
	-- Structure would provide substantial storage and office area in an area where office and storage areas already exist.	-- storage or office space not possible	-- storage or office space not possible	-- Structures could provide a small amount of storage or office area when used in this way.	-- storage or office space not possible	-- Alternative not feasible

ATTACHMENT 3

Summary of Subfactor Assessments

Subfactor: Enhances energy conservation or reduces energy consumption.						
	Grange	Goodsel Phillips	Schw-Jenk	Nancys Fancy	Stafford	Toona
Exclusive Residential Lease	Moderate	Minor	Minor	Minor	Minor	0
	-- The existing structure is very energy inefficient. A substantial historic rehabilitation effort would likely result in the wide use of more energy efficient products which could result in a significant reduction in energy consumption.	-- There is limited incentive for a private owner to invest the large sum of funds necessary to attain meaningful savings in energy consumption. The property is likely to continue in a seasonal use pattern.	-- There is limited incentive for a private owner to invest the large sum of funds necessary to attain meaningful savings in energy consumption. The property is likely to continue in a seasonal use pattern.	-- There is limited incentive for a private owner to invest the large sum of funds necessary to attain meaningful savings in energy consumption. The property is likely to continue in a seasonal use pattern.	-- There is limited incentive for a private owner to invest the large sum of funds necessary to attain meaningful savings in energy consumption. The property is likely to continue in a seasonal use pattern.	-- Alternative not feasible
Reuse for Park Operational Purposes	Moderate	Minor	Minor	Minor	Minor	0
	-- The existing structure is very energy inefficient. A substantial historic rehabilitation effort would likely result in the wide use of more energy efficient products which could result in a significant reduction in energy consumption.	-- There NPS would enhance energy inefficiency and some energy savings would be realized over time. An economy of scale may be realized because of the structure's close proximity to each other. There is limited opportunities for solar assistance.	-- There NPS would enhance energy inefficiency and some energy savings would be realized over time. An economy of scale may be realized because of the structure's close proximity to each other. There is limited opportunities for solar assistance.	-- The existing structure is very energy inefficient. A substantial rehabilitation effort would be necessary to realize a significant reduction in energy consumption.	-- There NPS would enhance energy inefficiency and some energy savings would be realized over time. An economy of scale may be realized because of the structure's close proximity to each other. There is limited opportunities for solar assistance.	-- Alternative not feasible
Reuse for Visitor Svcs, Educ, or Rec Purposes	Moderate	Minor	Minor	Minor	Minor	0
	-- The existing structure is very energy inefficient. A substantial historic rehabilitation effort would likely result in the wide use of more energy efficient products which could result in a significant reduction in energy consumption.	-- There NPS would enhance energy inefficiency and some energy savings would be realized over time. An economy of scale may be realized because of the structure's close proximity to each other. There is limited opportunities for solar assistance.	-- There NPS would enhance energy inefficiency and some energy savings would be realized over time. An economy of scale may be realized because of the structure's close proximity to each other. There is limited opportunities for solar assistance.	-- The existing structure is very energy inefficient. A substantial rehabilitation effort would be necessary to realize a significant reduction in energy consumption.	-- There NPS would enhance energy inefficiency and some energy savings would be realized over time. An economy of scale may be realized because of the structure's close proximity to each other. There is limited opportunities for solar assistance.	-- Alternative not feasible
Removal and Disposal	0	Moderate	Moderate	Moderate	0	Moderate
	-- Alternative not feasible	-- The structure is highly energy inefficient. Removal would eliminate energy consumption at the site.	-- The structure is highly energy inefficient. Removal would eliminate energy consumption at the site.	-- The structure is highly energy inefficient. Removal would eliminate energy consumption at the site.	-- Alternative not feasible	-- The structure is highly energy inefficient. Removal would eliminate energy consumption at the site.
Reuse as Employee Housing	Minor	Minor	Minor	Minor	Minor	0
	-- There is limited incentive to invest the large sum of funds necessary to attain meaningful savings in energy consumption for use as employee housing.	-- There is limited incentive to invest the large sum of funds necessary to attain meaningful savings in energy consumption for use as employee housing.	-- There is limited incentive to invest the large sum of funds necessary to attain meaningful savings in energy consumption for use as employee housing.	-- There is limited incentive to invest the large sum of funds necessary to attain meaningful savings in energy consumption for use as employee housing.	-- There is limited incentive to invest the large sum of funds necessary to attain meaningful savings in energy consumption for use as employee housing.	-- Alternative not feasible

ATTACHMENT 3

Summary of Subfactor Assessments

Subfactor: Provides infrastructure for interpretive and educational programs.						
	Grange	Goodsel Phillips	Schw-Jenk	Nancys Fancy	Stafford	Toona
Exclusive Residential Lease	Minor	Negligible	Negligible	Negligible	Negligible	0
	-- Private occupancy would limit public use of the structure's interior. Some interpretive value could be realized from viewing the structure from the outside.	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- The structures are not historically significant and not located in an area of high historic interpretive value.	-- The structure would be preserved to accepted standards. Private occupancy significantly reduces value and an interpretive and educational resource. Visitors are unlikely to perceive private use as a distraction.	-- Alternative not feasible
Reuse for Park Operational Purposes	Minor	Minor	Minor	Negligible	Negligible	0
	-- Park operations do not contribute significantly to the goals of interpretation and education programs. Some support value gained by proximity to area of high visitor use.	-- Park operations do not contribute significantly to the goals of interpretation and education programs. Some support value gained by proximity to ranger residences.	-- Park operations do not contribute significantly to the goals of interpretation and education programs. Some support value gained by proximity to dock and water access.	-- Enhanced park operations in this area will not contribute significantly to the goals of interpretation and education programs.	-- Enhanced park operations in this area will not contribute significantly to the goals of interpretation and education programs.	-- Alternative not feasible
Reuse for Visitor Svcs, Educ, or Rec Purposes	Exceptional	Minor	Moderate	Moderate	Moderate	0
	-- The structure would be preserved to accepted standards. Its significance, size, and location are valuable in an area of high visitor interest. Visitors would perceive the structure as a benefit.	-- The structures and location have little historic or natural significance. Location near ranger residences is in conflict with proposed use.	-- Universal accessibility enhances value of site for interpretation and education programs. Proximity to dock and water access is an asset. Visitors would perceive the structure as a benefit.	-- Size of structure enhances value of site for interpretation and education programs. Proximity to beach is an asset. Visitors would perceive the structure as a benefit.	-- Historic significance enhances value of site for interpretation. Proximity to beach enhances value as a natural resource program asset. Visitors would perceive the structure as a benefit.	-- Alternative not feasible
Removal and Disposal	0	Negligible	Negligible	Negligible	0	Negligible
	-- Alternative not feasible	-- Removal of the asset does not advance interpretation or educational goals	-- Removal of the asset does not advance interpretation or educational goals	-- Removal of the asset does not advance interpretation or educational goals	-- Alternative not feasible	-- Removal of the asset does not advance interpretation or educational goals
Reuse as Employee Housing	Minor	Negligible	Moderate	Negligible	Negligible	0
	-- As a non-public use area the structure's interpretive and educational value would be limited in an area of high visitor interest. Restrictions may be perceived as a significant distraction or unfulfilled desire.	As a non-public use area the structure's interpretive and educational value would be limited.	-- Universal accessibility provides opportunities not now available for disabled employees and cooperators to participate more fully in education and interpretation programs. Proximity to dock and water access is an asset.	As a non-public use area the structure's interpretive and educational value would be limited	As a non-public use area the structure's interpretive and educational value would be limited	-- Alternative not feasible

Summary of Subfactor Assessments

Subfactor: Minimizes the NPS' maintenance and operational burden.						
	Grange	Goodsel Phillips	Schw-Jenk	Nancys Fancy	Stafford	Toona
Exclusive Residential Lease	Moderate	Moderate	Moderate	Moderate	Moderate	0
	-- Lease holder would assume much of the maintenance cost burden. Some NPS administrative costs would remain.	-- Lease holder would assume much of the maintenance cost burden. Some NPS administrative costs would remain.	-- Lease holder would assume much of the maintenance cost burden. Some NPS administrative costs would remain.	-- Lease holder would assume much of the maintenance cost burden. Some NPS administrative costs would remain.	-- Lease holder would assume much of the maintenance cost burden. Some NPS administrative costs would remain.	-- Alternative not feasible
Reuse for Park Operational Purposes	Negligible	Minor	Negligible	Negligible	Minor	0
	-- NPS would bear full cost.	-- NPS would bear full cost. Proximity to ranger residences provides a slight economy of scale.	-- NPS would bear full cost.	-- NPS would bear full cost.	-- NPS would bear full cost. Small size of structure does not impose a high burden.	-- Alternative not feasible
Reuse for Visitor Svcs, Educ, or Rec Purposes	Negligible	Minor	Negligible	Negligible	Negligible	0
	-- NPS would bear full cost of a full service facility.	-- NPS would bear full cost of a full service facility. Proximity to ranger residences provides a slight economy of scale.	-- NPS would bear full cost of a full service facility.	-- NPS would bear full cost of a full service facility.	-- NPS would bear full cost of a full service facility.	-- Alternative not feasible
Removal or Disposal	0	Moderate	Moderate	Moderate	0	Moderate
	-- Alternative not feasible	-- Removal is a one time expense that eliminates future life cycle costs	-- Removal is a one time expense that eliminates future life cycle costs	-- Removal is a one time expense that eliminates future life cycle costs	-- Alternative not feasible	-- Removal is a one time expense that eliminates future life cycle costs
Reuse as Employee Housing	Negligible	Minor	Minor	Minor	Minor	0
	-- NPS would bear full cost.	-- Expense is slightly offset by rental income.	-- Expense is slightly offset by rental income.	-- Expense is slightly offset by rental income.	-- Expense is slightly offset by rental income.	-- Alternative not feasible

ATTACHMENT 3

Summary of Subfactor Assessments

Subfactor: Provides opportunity for general public to stay indoors over night						
	Grange	Goodsel Phillips	Schw-Jenk	Nancys Fancy	Stafford	Toona
Exclusive Residential Lease	Minor	Minor	Minor	Minor	Minor	0
	-- Public access limited.	-- Public access limited.	-- Public access limited.	-- Public access limited.	-- Public access limited.	-- Alternative not feasible
Reuse for Park Operational Purposes	Negligible	Negligible	Negligible	Negligible	Negligible	0
	-- Not permitted.	-- Not permitted.	-- Not permitted.	-- Not permitted.	-- Not permitted.	-- Alternative not feasible
Reuse for Visitor Svcs, Educ, or Rec Purposes	Negligible	Negligible	Negligible	Negligible	Negligible	0
	-- Potential for public overnight accommodations is limited	-- Potential for public overnight accommodations is limited	-- Potential for public overnight accommodations is limited	-- Potential for public overnight accommodations is limited	-- Potential for public overnight accommodations is limited	-- Alternative not feasible
Removal and Disposal	0	Negligible	Negligible	Negligible	0	Negligible
	-- Alternative not feasible	-- Removes overnight potential	-- Removes overnight potential	-- Removes overnight potential	-- Alternative not feasible	-- Removes overnight potential
Reuse as Employee Housing	Negligible	Negligible	Negligible	Negligible	Negligible	0
	-- Potential for public overnight accommodations is limited	-- Potential for public overnight accommodations is limited	-- Potential for public overnight accommodations is limited	-- Potential for public overnight accommodations is limited	-- Potential for public overnight accommodations is limited	-- Alternative not feasible

ATTACHMENT 3

Summary of Subfactor Assessments

Subfactor: Improves access for persons with disabilities						
	Grange	Goodsel Phillips	Schw-Jenk	Nancys Fancy	Stafford	Toona
Exclusive Residential Lease	Minor	Negligible	Moderate	Negligible	Negligible	0
	-- Central location and existing accessibility infrastructure provide opportunity for use by persons with disabilities. This opportunity is seen as a benefit even when broader public use could be limited by an exclusive lease agreement.	-- Low potential	-- The nature of the structure provides opportunity for use by persons with disabilities not otherwise available on the island. Water access is a benefit. This opportunity is seen as a benefit even when use is limited by an exclusive lease agreement.	-- Low potential	-- Low potential	-- Alternative not feasible
Reuse for Park Operational Purposes	Negligible	Negligible	Moderate	Negligible	Negligible	0
	-- Multiple floors makes full use of the structure for park operations problematic.	-- Distance to dock makes full use of the structure for park operations problematic.	-- Employees with disabilities could be better accommodated on island. Water access seen as a benefit.	-- Distance to dock makes full use of the structure for park operations problematic.	-- Distance to dock makes full use of the structure for park operations problematic.	-- Alternative not feasible
Reuse for Visitor Svcs, Educ, or Rec Purposes	Minor	Minor	Moderate	Minor	Minor	0
	-- Improvements to existing accessibility infrastructure could enhance opportunity for use by persons with disabilities.	-- Improvements to existing accessibility infrastructure could enhance opportunity for use by persons with disabilities.	-- The nature of the structure provides opportunity for use by persons with disabilities not otherwise available on the island. Water access is a benefit.	-- Improvements to existing accessibility infrastructure could enhance opportunity for use by persons with disabilities.	-- Improvements to existing accessibility infrastructure could enhance opportunity for use by persons with disabilities.	-- Alternative not feasible
Removal and Disposal	0	Negligible	Negligible	Negligible	0	Negligible
	-- Alternative not feasible	-- No potential when removed	-- No potential when removed	-- No potential when removed	-- Alternative not feasible	-- No potential when removed
Reuse as Employee Housing	Minor	Minor	Moderate	Negligible	Negligible	0
	-- Multiple floors makes full use of the structure for universal accessible housing problematic.	-- Distance to dock makes full use of the structure for universal accessible housing problematic.	-- Employees and or cooperators with disabilities could be better accommodated on island. Water access seen as a benefit.	-- Distance to dock makes full use of the structure for universal accessible housing problematic.	-- Distance to dock makes full use of the structure for universal accessible housing problematic.	-- Alternative not feasible