

APPENDIX C: CHOOSING BY ADVANTAGES REPORT

**VALUE ANALYSIS / CHOOSING BY ADVANTAGES
RECONSIDERATION
February 21-22, 2008**

**Cumberland Island National Seashore
Transportation Management Plan**

Components Evaluated: Alternative Transportation Routes

PHASE I - INFORMATION

General

During the week of February 18, 2008, a value analysis panel convened for two days at Cumberland Island National Seashore (CUIS) Headquarters in St. Marys, Georgia. The purpose of this meeting was to reconsider the preferred alternative selected for the draft Transportation Management Plan in September 2007. (Note: preparation of a plan for transporting visitors to the north end of the island is mandated by Public Law 108-447 (2004).) The reconsideration was conducted primarily to take into account new information obtained since the original Choosing by Advantages (CBA) workshop. This new information dealt primarily with potential impacts to special status species and wetlands.

Choosing By Advantages Panel

The following individuals participated in the CBA reconsideration process.

Office	Name	Title	Panel Position
SERO	Richard Sussman	Chief, Planning & Compliance Division	Facilitator
	Mark Kinzer	Environmental Protection Specialist	Facilitator
CUIS	Steve McCoy	Acting Superintendent	Voting Participant
	John Fry	Resource Manager	Voting Participant
	Doug Hoffman	Biologist	Voting Participant
	Dennis Parsons	Chief Ranger	Voting Participant
	Julie Meeks	Administrative Officer	Voting Participant
	Ginger Cox	Ranger - Interpretation	Voting Participant
	John A. Mitchell	Curator	Voting Participant

Stakeholders

Stakeholders

- Island Residents
- Park Visitors
- The Nature Conservancy - Georgia
- Environmental Groups
- Savannah/Atlanta area citizens
- Wilderness Advocates
- United States Fish & Wildlife Service
- Georgia State Historic Preservation Office
- Georgia Department of Natural Resources
- St. Mary's and Camden County Economic Redevelopment and Tourism Authorities
- Jekyll Island, St. Simons Island, Fernandina Beach Tourism Officials
- Senator Bill Nelson (FL)
- Senator Saxby Chambliss (GA)
- Congressman Hank Johnson (GA)
- Congressman Jack Kingston (GA)
- Congressman Ander Crenshaw (FL)
- Georgia Trust for Historic Preservation
- National Trust for Historic Preservation
- Southern Environmental Law Center
- Special Population Accessibility Advocacy Groups

Choosing by Advantages

The analyses of the proposed transportation routes were done using the CBA method. The CBA reconsideration workshop initially considered four route alternatives that had been developed prior to the meeting by Hartrampf, Jordan, Jones and Goulding, the preliminary transportation planner and compliance A/E; public input during the scoping process, and the National Park Service (NPS). However, after consideration of new information received since the first CBA workshop, the team rejected one of these alternatives as not being feasible (see “Alternative Considered but Rejected” below for more information). Accordingly, the reconsideration panel analyzed three alternatives using the CBA process. These were:

Alternative 1 (No Action)

Alternative 1 calls for continuing existing management, i.e., providing access to CUIS via ferry, the rental of bicycles on the island, and continued ranger led pedestrian tours. Under this alternative, NPS would respond to future needs and conditions in the project area without initiating major new actions or implementing policy changes. The No Action Alternative provides a baseline against which the environmental consequences of the other alternatives can be compared. Consideration of the No Action Alternative is required by the National Environmental Policy Act (NEPA); however, actual selection of the No Action Alternative would mean that NPS was not in compliance with the requirements of Public Law 108-447 (2004).

Alternative 2 (North End Access)

Alternative 2 proposes to provide guided motorized trips that would also incorporate a shuttle service to the north end of the island using a combination of the Main Road, Plum Orchard Spur, and the North Cut Road. Trips could originate at the Dungeness Dock, Sea Camp, or the Plum Orchard Dock. No beach driving would be allowed.

Alternative 3 (Island Mobility)

The Preferred Alternative, and NPS's proposed action, calls for an integrated transportation plan to meet the diverse needs of the island's visitor population. It incorporates the north end access in Alternative 2 and offers a separate south end-only shuttle system. Implementation of this alternative would provide access to multiple destinations at both the southern and northern ends of the island. No beach driving would be allowed. The south end shuttle system would provide access to the beach at the Dungeness Crossing, with Stafford or Little Greyfield used as alternatives in the event of high water or other issues at Dungeness. Alternative 3 is designed to provide access to the north end of the island while also providing connections to destinations on the south end for less mobile visitors.

Alternative Considered but Rejected: Comprehensive Island Mobility

This alternative is essentially identical to Alternative 3, except that it would also allow beach driving as part of island tours. This alternative was rejected as infeasible primarily because of beach driving's potential impact to 14 special status species, including: bald eagle, piping plover, Wilson's plover, least tern, American oystercatcher, peregrine falcon, gull-billed tern, black skimmer, red knot, wood stork, gopher tortoise, loggerhead sea turtle, leatherback sea turtle, green sea turtle. Mitigation measures (including avoiding the beach during sensitive times) were considered but determined not to be feasible. Given the extensive array of potentially affected special status species and their widely varying habits and nesting behaviors, it was determined that beach driving would have to be curtailed for most of the year to protect all potentially affected species.

In addition, obtaining access to the beach on the north end of the island was found to be problematic. Access via the existing North Cut Road may infringe on the rights of a reserved-estate holder, which maintains a private beach structure immediately adjacent to the road. While alternative beach access is available via an earlier, abandoned route for North Cut Road, using this route would require the clearing of a substantial amount of vegetation and the filling of 8 wetland areas. Even if the necessary clearances could be obtained for opening this route to the beach, the issues with respect to special status species would remain, as discussed above.

Finally, this alternative was deemed by the reconsideration team to be inconsistent with the park's enabling legislation and its existing General Management Plan, both of which call for managing the island in such a way as to preserve its primitive character.

Factors and Variables:

The following set of factors and variables were developed prior to the meeting for the purpose of initiating discussion at the CBA. After reviewing these, the panel determined that (1) there was little or no difference among alternatives with regard to some of these initial considerations, or that (2) a particular variable was not pertinent to the analysis. Of the five NPS core factors, the factor, *Provide Other Advantages to the National Park System*, was combined with factor III. In addition, some of the variables were modified to express the plan's purpose and need better. These modifications are reflected in the CBA matrix included in this report.

I. Protect Natural and Cultural Resources

A. What extent of site disturbance is anticipated with the alternatives? Traffic and visitor impacts?

B. What opportunities for site protection/restoration/mitigation are offered by this alternative?

II. Provide for Visitor Enjoyment through Improved Educational and Recreational Opportunities

A. What educational opportunities are offered by this alternative? What opportunities to create or enhance outdoor recreation opportunities are offered by this alternative?

III. Operational Efficiency and Employee Welfare

A. What site maintenance difficulties might be presented by this alternative (road maintenance, increased personnel requirements, etc.)?

B. What opportunities are offered that further enhance employee health, safety and welfare?

IV. Provide Cost-effective, Environmentally Responsible, and Otherwise Beneficial Development for the NPS

A. Does the alternative meet the requirements of Public Law 108-447 (2004)?

PHASE II – EVALUATION

Alternative Selection Evaluation (see attached CBA matrix)

The panel determined that the advantage of Alternative 3, under NPS Factor III (see attached matrix), was the Paramount Advantage in the analysis. This advantage was given the score of 100. All other advantages were weighed relative to the importance of the paramount advantage and the importance of all other advantages. The total importance score of 315 for Alternative 3 was the highest of the three alternatives. Therefore, Alternative 3 is the Preferred Alternative.

A cost benefit analysis has not been completed. Once the National Environmental Policy Act process has been completed and a definitive preferred alternative selected, a Commercial Services Plan will be prepared.

Cumberland Island NS – Transportation Management Plan

Choosing by Advantages

(1 trip = No more than 30 people in 2-3 vehicles)

	Alternative A		Alternative B		Alternative C		
GENERAL THEME	<ul style="list-style-type: none"> • No Action • Currently, no public service provided (would continue) 		<ul style="list-style-type: none"> • Emphasis on north end access to include guided tours and shuttle service • No beach driving 		<ul style="list-style-type: none"> • North end and south end access to include guided tours and shuttle service • No beach driving • South end shuttle service • Shuttle includes drop-off at Dungeness beach; alternate drop-offs at Little Greyfield or Stafford Beach when Dungeness not available 		
PROTECT CULTURAL AND NATURAL RESOURCES							

	Alternative A		Alternative B		Alternative C		
FACTOR 1 - Prevent Loss of Natural Resources							
Attributes	<ul style="list-style-type: none"> • Small amount of contact w/ north end natural resources 		<ul style="list-style-type: none"> • Increased amount of contact w/ north end natural resources • Impacts to vegetation • Wildlife • Dunes • Wetlands 		<ul style="list-style-type: none"> • Increased amount of contact w/ north end natural resources • Impacts to vegetation • Dunes • Wetlands • Wildlife 		
Advantages	<u>Least Impact</u>	20	Less Impact	10	<u>More Impact</u>	0	
FACTOR 2 – Prevent Loss of Cultural Resources							
Attributes	<ul style="list-style-type: none"> • Small amount of contact w/ north end cultural resources 		<ul style="list-style-type: none"> • Increased amount of contact w/ north end cultural resources 		<ul style="list-style-type: none"> • Increased amount of contact w/ north end cultural resources 		
Advantages	<u>Greatest amount of neglect or loss</u>	0	<u>Less chance for neglect and loss to cultural resources</u>	70	<u>Less chance for neglect and loss to cultural resources</u>	70	
PROVIDE FOR VISITOR ENJOYMENT							
FACTOR 3 – Provide Visitor Educational Opportunities							

	Alternative A		Alternative B		Alternative C		
Attributes	<ul style="list-style-type: none"> • Opportunities mostly limited to south end • Limited and less diverse visitor base 		<ul style="list-style-type: none"> • Expands opportunities to north end • Provides opportunities for wilderness education • Exposes visitors to history and culture of north end • Able to serve more diverse visitor population • Expands park's ability to interpret park-wide natural resources 		<ul style="list-style-type: none"> • Expands opportunities to north end • Expands opportunities to south end and beach • Provides opportunities for wilderness education • Exposes visitors to history and culture of north end • Able to serve more diverse visitor population • Expands park's ability to interpret park-wide natural resources • Increase opportunities for youth and formal education programs at south end and beach 		

	Alternative A		Alternative B		Alternative C		
Advantages	<u>Provides least amount of opportunities for visitor education</u>	0	Expands opportunities for visitor education	70	<u>Further expands opportunities for visitor education</u>	100	
FACTOR 4 - Provide Visitor Recreational Opportunities							

	Alternative A		Alternative B		Alternative C		
Attributes	<ul style="list-style-type: none"> • Opportunities mostly limited to south end • Limited and less diverse visitor base • More opportunities for solitude in wilderness 		<ul style="list-style-type: none"> • Expands opportunities to north end • Provides access for wilderness experience • Able to serve more diverse visitor population • Helps meet ADA accessibility requirements • Slightly diminished opportunities for solitude in wilderness 		<ul style="list-style-type: none"> • Expands opportunities to north end • Expands opportunities to south end and beach • Provides access for wilderness experience • Able to serve more diverse visitor population • Helps meet ADA accessibility requirements to more areas • Slightly diminished opportunities for solitude in wilderness 		
Advantages	<u>Provides the fewest opportunities for visitor recreation</u>	0	Expands opportunities for visitor recreation	50	<i>Further expands opportunities for visitor recreation</i>	80	

	Alternative A		Alternative B		Alternative C		
FACTOR 5 - Protect Public Health, Safety and Welfare							
Attributes	<ul style="list-style-type: none"> • Staff visitor contact remains same • Visitor exposure to the elements same • No impact to current visitor-resident interaction 		<ul style="list-style-type: none"> • Opportunity to pick up and/or assist visitors at north end • Reduces exposure to the elements • Provides rest rooms and visitor service • Some impact to current visitor-resident interaction • Some increased vehicle-pedestrian interaction 		<ul style="list-style-type: none"> • Opportunity to pick up and/or assist visitors at north end, south end, and beach • Reduces exposure to the elements • Provides rest rooms and visitor service • Some impact to current visitor-resident interaction • More increased vehicle-pedestrian interaction 		

	Alternative A		Alternative B		Alternative C		
Advantages	<u>Provides the least amount of protection for public health and safety; provides least impact to welfare of island residents</u>	10	Provides more protection for public health and safety; provides some impact to welfare of island residents	0	<i>Provides substantially more protection for public health and safety; provides some impact to welfare of island residents</i>	40	
OPERATIONAL EFFICIENCY AND EMPLOYEE WELFARE							
FACTOR 6 – Effects on Operational Efficiency and Sustainability (a plus symbol indicates an increased burden)							
Attributes	<ul style="list-style-type: none"> • Remains the same 		<ul style="list-style-type: none"> • Administration (+) • Visitor Protection (+) • Interpretation (+) • Resource Management (+) • Maintenance (++) 		<ul style="list-style-type: none"> • Administration (+) • Visitor Protection (+) • Interpretation (+) • Resource Management (++) • Maintenance (+++) 		

	Alternative A		Alternative B		Alternative C		
Advantages	<i>No additional effect</i>	50	Has increased effect on operational efficiency and sustainability	10	<u>Has greater effect on operational efficiency and sustainability</u>	0	
FACTOR 7 - Protect Employee Health, Safety and Welfare							
Attributes	<ul style="list-style-type: none"> Remains the same 	0	<ul style="list-style-type: none"> Staff support facilities provided at north end 	5	<ul style="list-style-type: none"> Staff support facilities provided at north end 	5	
Advantages	<u>No additional protection provided</u>		<u>Additional protection provided</u>		<u>Additional protection provided</u>		
PROVIDE COST-EFFECTIVE, ENVIRONMENTALLY RESPONSIBLE, AND OTHERWISE BENEFICIAL DEVELOPMENT FOR THE NPS							
FACTOR 8 - Complies with 2004 legislation							
Attributes	<ul style="list-style-type: none"> Not in compliance 	0	<ul style="list-style-type: none"> Complies 	20	<ul style="list-style-type: none"> Complies 	20	
Advantages	<u>Does not meet the requirements of the 2004 legislation</u>		<u>Meets the requirements of the 2004 legislation</u>		<u>Meets the requirements of the 2004 legislation</u>		

	Alternative A		Alternative B		Alternative C		
TOTAL IMPORTANCES OF ADVANTAGES		80		235		315	
Initial Cost (Net)							
Re-design Cost							
Compliance							
Life Cycle Cost (Net)							
TOTAL							