

**National Park Service
U.S. Department of the Interior**



**Selma to Montgomery National Historic Trail
Alabama**

**PROPOSED CONSTRUCTION OF THE
MONTGOMERY INTERPRETIVE CENTER**

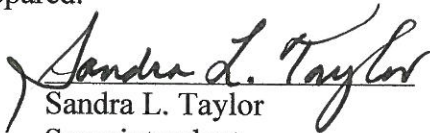
**Finding of No Significant Impact
November 2010**

The Preferred Alternative does not constitute an action that normally requires preparation of an EIS. The Preferred Alternative will not have a significant adverse effect on the human environment. There are no unmitigated adverse effects to physical resources, water resources, natural resources, cultural resources, or other unique resources within the region. No highly uncertain or controversial impacts, unique or unknown risks, or known cumulative effects were identified.

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal actions are consistent with existing national environmental policies and objectives as set forth in section 101(a) of NEPA and that they will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102 (2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended:


Sandra L. Taylor

Superintendent

Tuskegee Institute National Historic Site

Tuskegee Airmen National Historic Site

Selma to Montgomery National Historic Trail

Date: December 2, 2010

Approved:


For David Vela

Regional Director

Southeast Region

Date: 12/15/10

INTRODUCTION

The Selma to Montgomery National Historic Trail (NHT) is a 54-mile trail that begins at the Brown Chapel African Methodist Episcopal (A.M.E) Church in Selma, Alabama. The trail follows the historic Voting Rights March along Interstate 80 through Dallas County and Lowndes County. The trail continues into the city of Montgomery and ends at the Alabama State Capitol on Dexter Avenue. Historians view the 1965 Selma to Montgomery Voting Rights March as one of the last great grassroots campaigns for human rights in the U.S. and the summit of the modern civil rights movement which originated in the 1950s. The March and complimentary events brought voting rights issues to the forefront of the United States political agenda and raised the nation's consciousness about African-Americans' struggle for equal rights.

The purpose of this project is to construct an Interpretive Center for the Selma to Montgomery NHT in Montgomery, Alabama. When the trail was designated in 1996, it was with the intention of eventually developing interpretive centers at three locations along its length in order to serve visitors at each section of the trail. The Lowndes County Interpretive Center currently serves visitors at the trail's midpoint, and an Interpretive Center is under construction at the beginning of the trail in Selma. The Montgomery Interpretive Center would be the third center for the Selma to Montgomery NHT, providing visitors an opportunity to experience interpretation of the historic Voting Rights March along the trail. Montgomery, being the largest city along the trail, is expected to have the highest number of visitors.

It is the mission of the National Park Service (NPS) to preserve and interpret the history of the sites associated with the Voting Rights March and the ensuing signing of the Voting Rights Act on August 6, 1965.

SELECTION OF THE PREFERRED ALTERNATIVE

Selection of a preferred alternative was accomplished by using the CBA Value Analysis process developed by Jim Suhr (Suhr 1999). CBA is a decision making process based on calculating and compiling the advantages of different alternatives for a variety of factors. By using the CBA process, the NPS was able to determine which of the alternatives would be the best location for the Montgomery Interpretive Center. The alternatives were examined in detail, given the information available on existing conditions, and preliminary site plans were developed for each alternative. The project team, which consisted of individuals from the NPS Southeast Regional Office, ADOT, Alabama Historical Commission, and Montgomery Friends of the Historic Voting Rights Trail, met at the park headquarters during the week of March 10, 2008 to conduct the CBA process.

In the CBA process, factors represent areas of concern that were expressed by the NPS technical advisors and park staff. High and low assessment criteria were established for each factor. High criteria describe very favorable or desirable environmental conditions. Minimum criterion generally reflects the minimum standards permitted by federal law or NPS policy. Advantages were determined by calculating the difference between attributes for each factor among the alternatives.

The factors developed for the CBA process included: site development considerations, quality of visitor experience, resource protection considerations, and the potential for NPS partnership opportunities.

Elements of a “factor” are considered “attributes” in CBA parlance. Attributes were identified for each of the factors. Under the factor of “Site Development Considerations,” the “attributes,” or measures, of the factor were determined to be site size and ease of vehicular access. Attributes for visitor experience were proximity to the trail for interpretive opportunities, site arrival experience, and whether Voting Rights March activities were associated with the site. Attributes for resource protection were benefits to cultural resources. Attributes for partnership opportunities included those that could provide assistance with interpretation/visitor services, law enforcement/security, facility and grounds maintenance, and curatorial/research/archive assistance.

The advantages of each factor were determined and these advantages were compared to one another, to determine which advantage was most important to this project, or “paramount.” The next step was to compare the other advantages to this “paramount advantage” to determine their importance relative to the paramount advantage and then to assign an appropriate score for each. After this exercise was completed, the scores of each alternative were calculated, and the alternative that scored the highest was considered the preferred alternative.

The results of the CBA concluded that the St. Jude Fairview Plaza site was the preferred location of the Montgomery Interpretive Center based on the site’s advantages. However, a Cost Benefit Analysis was then used to compare the costs of site acquisition and building based on preliminary schematic designs, as well as life cycle costs. The costs of acquiring and developing the ASU site were much lower, and therefore ASU became the preferred alternative site for the Montgomery Interpretive Center of the Selma to Montgomery NHT.

PREFERRED ALTERNATIVE

Alabama State University Site

The Preferred Alternative includes the construction and implementation of an Interpretive Center at Alabama State University (ASU). The proposed Interpretive Center would be 15,000 square feet and would include a parking area that would accommodate 76 cars, 8 buses, and 2 recreational vehicles. The Interpretive Center would include interpretive exhibits, a museum, restrooms, and an outside picnic area. A paved access road, including curbs and sidewalks, would be constructed to the Interpretive Center from the existing road infrastructure.

ASU will provide a 5.12-acre site at no cost to the NPS. Interstate 85 is located less than 200 feet from the northeastern corner of this site, but the highway’s impacts would be shielded by an earthen berm planted with trees. The site is on the Montgomery Area Transit System (MATS) bus route. The site is approximately one mile from the Selma to Montgomery NHT, but many historical events took place on or near the ASU campus in the period leading up to and after the Voting Rights March.

The site is currently covered with lawn grasses and has several deciduous trees. A parking lot is located to the east of the site. Utility infrastructure including electricity, gas, water, stormwater management, and sewer is present on the site. ASU would provide maintenance, grounds upkeep, security and monthly utility costs for the Interpretive Center. Parking would either be on-site or on other adjacent ASU parking lots planned for construction under other projects.

OTHER ALTERNATIVES CONSIDERED

In addition to the Preferred Alternative, the NPS analyzed the No Action Alternative and three additional locations for the proposed Interpretive Center.

No Action Alternative

Under the No Action Alternative, the NPS would not construct a Montgomery Interpretive Center for the Selma to Montgomery NHT. Without the Interpretive Center, visitors to the Montgomery section of the NHT would lack adequate interpretation of the 1965 Voting Rights March. The Montgomery section of the NHT is expected to receive the highest numbers of visitors. The Selma to Montgomery NHT has an existing Interpretive Center at the trail's midpoint, and an Interpretive Center is currently under construction at Selma.

Action Alternatives

Alternative 2 Former Durr Drug Site

Alternative 2 includes construction and implementation of an Interpretive Center at the former Durr Drug site. The former Durr Drug site is a 5.8-acre site which includes several interconnected warehouse buildings and an office building. The property and buildings are being offered to the NPS for \$3.0 million, which includes lease buy-outs and relocation of existing businesses. This site is located on the south side of West Fairview Avenue directly across the street from the City of St. Jude. Access to and from Interstate 65 is located less than a half mile from the site, which is currently on the MATS bus route.

The former Durr Drug site is located on the Selma to Montgomery NHT and is near the historic Campsite 4. The former Durr Drug Building was built in the late 1950s and thus existed on the site during the March. However, the original Durr Drug building was torn down and replaced with a newer structure. The warehouse portions of the site would need to be demolished to provide adequate parking for the Interpretive Center. A 2005 Phase I Environmental Site Assessment noted there is a strong possibility that hazardous materials are present, and that if significant renovations or demolition were to occur, asbestos and lead surveys should be conducted by certified inspectors.

Utility infrastructure including electric, gas, water, storm, and sewer is present at the site. If chosen, the NPS would be responsible for all costs associated with maintenance, grounds upkeep, security, and monthly utility costs. The Value Analysis analyzed a 15,000-square-foot Interpretive Center within the existing renovated building, with an additional 5,000-square-foot warehouse area within the existing building to be used for future expansion.

Alternative 3 Mt. Zion A.M.E. Zion Church Site

Alternative 3 includes construction and implementation of an Interpretive Center at the Mt. Zion A.M.E. Zion Church. The City of Montgomery would provide a 1.8-acre site at no cost to the NPS. In addition, the City of Montgomery would provide an adjacent 1.48-acre site for the required parking areas. The site is located less than 500 feet northeast of the intersection of Interstates 65 and 85. Currently there is no direct access to either of the interstates from the site, however the City of Montgomery has indicated that they would construct an entry-exit ramp.

The site is on the Selma to Montgomery NHT and contains the Mt. Zion A.M.E Zion Church, a building that was on the site during the 1965 Voting Rights March, and was the setting for several historic meetings related to Civil Rights and Voting Rights history. The Church has been recently stabilized and is in the process of further improvements.

The site is located in an area of development as identified in the City of Montgomery's Downtown Plan. The building directly to the north of the church would be demolished prior to construction of the Interpretive Center, and the buildings across the street would be demolished to provide space for its associated parking lot. There are no plans to demolish Mt. Zion A.M.E Zion Church with this alternative.

Utility infrastructure including electricity, gas, water, storm and sewer are present at this site. The City of Montgomery would provide costs associated with facility maintenance, grounds upkeep, security, and monthly utilities. The Interpretive Center parking area would be located on the 1.48-acre site across the street, with additional parking sites available if needed.

Alternative 4 St. Jude Fairview Plaza Site

Alternative 4 includes construction and implementation of an Interpretive Center at St. Jude Fairview Plaza. The St. Jude Fairview Plaza site is a 10-acre site which includes a 41,000 square foot strip mall, a gas station, a vacant fast food restaurant, a retail store, and a shed. The property is being offered to the NPS for "fair market value," which several years ago was estimated at \$1.2 million. There may be additional lease buy-out fees required, depending on the timing of the purchase. St. Jude Fairview Plaza is located on the north side of West Fairview Avenue and is bordered by Oak Street to the west and Interstate 65 to the east. The site is adjacent to an entry-exit system connecting to Interstate 65, and is currently on the MATS route.

The site is near the City of St. Jude complex and is across the street from historic Campsite 4. None of the existing buildings on the site were present during the 1965 Voting Rights March, and would therefore not be used as part of the Interpretive Center. Therefore, building demolition and site clearing would be required. The following businesses that currently exist on the St. Jude Fairview Plaza site would be closed or relocated and the buildings demolished: Simply Fashion, Family Dollar, Rent-A-Center, Calhoun Foods, Cash Advance, MoMoney Taxes, Shoe Show, and one additional business that has already closed. Construction of the buildings on the site predates bans on asbestos and lead paint, so the required hazardous material surveys would need to be conducted by certified inspectors. A gas station and another business on the site would remain in operation.

Utility infrastructure including electricity, gas, water, storm and sewer are present. The NPS would be responsible for all costs associated with maintenance, grounds upkeep, security, and monthly utilities.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria from Section 2.7 (D) of NPS Director's Order 12. These are the same criteria outlined in the National Environmental Policy Act (NEPA), which is guided by the Council on Environmental Quality (CEQ) regulations. CEQ regulations provide direction that "the environmentally preferable alternative is the alternative that will best promote the national environmental policy" as expressed in Section 101(b) of NEPA:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assure for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
5. Achieve a balance between population and resource use that would permit high standards of living and a wide sharing of life's amenities; and
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources (NEPA, Section 101)

Simply put, this means that the environmentally preferred alternative is the alternative that causes the least damage to the biological and physical environment; it also means it is the alternative that best protects, preserves, and enhances historic, cultural, and natural resources.

Both the Preferred Alternative and Alternative 3, the ASU site and the Mt. Zion A.M.E. Zion Church site, meet the Selma to Montgomery NHT purposes and the NEPA goals. The ASU Site (Preferred Alternative) and Mt. Zion A.M.E. Zion Church site (Alternative 3) are the environmentally preferred alternatives.

THE PREFERRED ALTERNATIVE AND SIGNIFICANCE CRITERIA

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an Environmental Impact Statement (EIS):

During demolition and construction of the Preferred Alternative, there would be short-term, minor, adverse impacts to soils, air quality, noise and vibration, wildlife, aesthetics, infrastructure, energy requirements and conservation. Impacts to public health and safety during

demolition and construction would be negligible since public access would be restricted from construction areas. At the ASU site, there would be long-term, minor, adverse impacts to vegetation and wildlife due to clearing of the sites for construction of the proposed Interpretive Center and parking area.

There would be short-term, beneficial impacts to socioeconomics and environmental justice during the construction phase with the creation of temporary demolition and construction jobs.

The operation of the proposed Interpretive Center would result in long-term, minor, adverse impacts to air quality, energy requirements and conservation. The proposed project would have long-term, beneficial impacts to visitor use and experience, socioeconomics, environmental justice, land use, recreation, and public health and safety. At the ASU site, partners would provide maintenance and operations costs; therefore, impacts to park operations would be long-term and beneficial. Long-term, minor, adverse impacts to noise and vibration are also expected under the Preferred Alternative due to the increase in car and bus traffic during operation.

No significant adverse impacts were found that would require analysis in an EIS.

The degree to which the action affects public health and safety:

During the construction period, negligible impacts to public health and safety are expected because active demolition and construction areas would be fenced off from public access to protect public safety.

The Preferred Alternative would have overall long-term, beneficial impacts to public health and safety. The Interpretive Center would be designed to comply with fire safety, mechanical and electrical codes, and regulations. The Interpretive Center would be in compliance with Americans with Disabilities Act requirements. Handicapped accessible parking spaces would be available and a ramp would allow the disabled access to the building. ASU would be responsible for dealing with all security issues and would integrate the Interpretive Center into the regular campus security routine. Law enforcement and security would be provided around the clock by the ASU Police Department.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:

The Preferred Alternative would have no short-term or long-term, adverse impacts to historic resources under this alternative. The ASU site has received extensive disturbance in the past, including the disturbance from the construction and demolition of former homes on the property. There are no extant structures within the project area. There are no recorded archaeological sites, NRHP listed resources, or Native American sacred or religious sites at the site. A consultation letter was mailed to the Alabama State Historic Preservation Office on April 30, 2009, describing the proposed project. This agency also had the opportunity to review and comment on the Environmental Assessment (EA). No response was received.

There are no prime farmlands, wetlands, wild and scenic rivers, ecological critical areas, or designated natural areas within the proposed project area for the Preferred Alternative; therefore, no impacts would occur.

Degree to which the effects on the quality of the human environment are likely to be highly controversial:

The overall effects on the human environment will be beneficial as a result of the implementation of the Preferred Alternative. The Preferred Alternative would provide educational opportunities for visitors and the local community in the Montgomery area. It is expected that the Interpretive Center would contribute to local businesses and the economy by attracting more visitors to the area. The construction of the center would also create some short-term construction jobs and a small number of long-term jobs or volunteer/internships opportunities for those in the local community or campus. Beneficial impacts to recreation would also occur from the implementation of the Preferred Alternatives. Picnic tables and a landscaped area would be available for limited recreation by visitors. Overall, there would be beneficial impacts to visitor use and experience. The Interpretive Center would include an information desk, exhibit space, theater, research area, and a book store. Ongoing transportation to visitors at the center would be available in order to tour other historic areas in close proximity to ASU.

There were no highly controversial effects identified during the preparation of the EA or the public review period associated with the project. The EA was made available for a 30-day public review from June 11, 2010, through July 11, 2010, and 113 public comments were received. Overall the majority of the comments supported the Preferred Alternative. However, some comments questioned the selection of the Preferred Alternative and are addressed in an Errata Sheet attached to this FONSI.

Degree to which the possible effects on the quality of human environment are highly uncertain or involve unique or unknown risks:

No uncertain risks associated with the construction and operation of the Interpretive Center at the ASU site are expected.

Unique or unknown risks associated with the construction and operation of the Interpretive Center at ASU are expected to be low to none.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:

The construction and operation of the Interpretive Center at ASU neither establishes a precedent for future actions with significant effects nor represents a decision in principle for future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:

When added to other past, present, or future actions in the ASU area, short-term, minor, adverse, cumulative impacts are expected to soils, air quality, and noise. Long-term, minor, adverse, cumulative impacts are expected to vegetation, wildlife, energy use, and park operations. Short-term and long-term, beneficial cumulative impacts to socioeconomics, and visitor use and experience are also expected.

No cumulative impacts to cultural resources, land use, recreation, aesthetics, public health and safety, and infrastructure are expected.

Degree to which the action may adversely affect districts, sites, highways, or objects listed on the National Register of Historic Places (NRHP) or may cause loss or destruction of significant scientific, cultural, or historical resources:

The Preferred Alternative would have no short-term or long-term, adverse impacts to historic resources. The ASU site has received extensive disturbance in the past, including the disturbance from the construction and demolition of former homes on the property. There are no extant structures within the project area. Surrounding the area is primarily modern construction: a parking lot, modern educational facilities, and a vacant lot. Historic resources within the view shed of the project area are the Nat King Cole House and an early-twentieth century bungalow. However, since the surrounding environment is already compromised due to modern construction and neither demolition nor alterations are planned for the houses, no long-term, adverse impacts are anticipated. There are no recorded archaeological sites, NRHP listed resources, or Native American sacred or religious sites in the alternative. A consultation letter, describing the proposed project was mailed to the Alabama State Historic Preservation Office on April 30, 2009. This agency also had the opportunity to review and comment on the EA. No response was received.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:

Consultation between the NPS and U.S. Fish and Wildlife Service (USFWS), Alabama Department of Conservation and Natural Resources, and the Alabama Natural Heritage Program occurred in April 2009. These agencies stated that no federal or state listed species or habitats are known to occur within the proposed project areas. Therefore, no impact to endangered or threatened species or its critical habitat would occur under the Preferred Alternative.

Whether the action threatens a violation of federal, state, or local environmental protection law:

The Preferred Alternative would not violate federal, state, or local environmental protection laws.

IMPAIRMENT STATEMENT

The NPS has determined that implementation of the Preferred Alternative will not constitute an impairment to the resources and values of the Selma to Montgomery NHT. This conclusion is based on a thorough analysis of the environmental impacts described in the EA, the public comments received, collected data, and the professional judgment of the decision maker guided by the direction in the *NPS Management Policies, 2006*. Although the project will have some adverse impacts, in most cases the adverse impacts will be the result of construction of the interpretive center at the ASU site. Overall the Preferred Alternative will result in benefits to visitor use and experience, socioeconomic, environmental justice, land use, recreation, hazardous materials, and public health and safety. Implementation of the Preferred Alternative will not result in major adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, (2) key to the natural or cultural integrity of the park, or (3) identified as a goal in the park's general management plan or other relevant NPS planning documents.

MITIGATION MEASURES FOR THE PREFERRED ALTERNATIVE

To minimize resource impacts, the following mitigation measures were part of the analyses in the EA and will be followed during implementation of the Preferred Alternative. These actions will lessen the potential for adverse effects of the Preferred Alternative, and have been proven to be very effective in reducing environmental impacts on previous projects.

MITIGATION MEASURES

Impact Topic	Mitigation Measure(s)
Soils	<ul style="list-style-type: none">Disturbed soils are susceptible to erosion until re-vegetation takes place, therefore, best management practices and sediment and erosion control measures would be used during the implementation of the Preferred Alternative. The potential for soil migration off site would be minimized through the use of sediment and erosion control measures as required by applicable state regulations.
Noise	<ul style="list-style-type: none">Demolition and construction activities would produce noise at the project area. Impacts of noise to the surrounding neighborhoods would be mitigated by restricting construction and demolition to daylight hours.
Vegetation and Wildlife	<ul style="list-style-type: none">Demolition and construction would require the use of heavy equipment, which would disturb vegetation and cause loss of wildlife habitat. These impacts would be mitigated by re-vegetating once the construction phase is complete.
Public Health and Safety	<ul style="list-style-type: none">During demolition and construction, members of the public could be affected by equipment or debris if they enter the construction site. The demolition and construction areas would be fenced during these activities to mitigate impacts on public health and safety.

Impact Topic	Mitigation Measure(s)
Hazardous, Toxic, and Radioactive Substances	<ul style="list-style-type: none"> • Prior to demolition and construction, the site would be inspected for hazardous waste. If these substances are found during the survey, the appropriate measures would be taken to contain, remove and dispose of them according to hazardous material regulations. Workers would wear the proper protective equipment to minimize risk from hazardous substances. • Asbestos abatement activities are regulated by the ADEM, USEPA, and the Occupational Safety and Health Administration. If asbestos is discovered during inspection of the site, the contractor would be responsible for removing the asbestos waste in accordance with the most recent state and federal regulations prior to transporting the hazardous waste to a permitted disposal facility.

PUBLIC INVOLVEMENT

Both internal and external (public) scoping was conducted to inform various agencies and the public about the proposed construction of the Montgomery Interpretive Center. For this project, scoping began with a public meeting to discuss future development plans for the proposed Montgomery Interpretive Center. A public meeting notice was circulated to inform interested stakeholders of the public meeting held Thursday, December 6, 2007 at 9:00 am at the Lowndes Interpretive Center. Participation at the meeting assisted the NPS in developing plans for the project and helped to define potential locations for the Interpretive Center. Comments of those unable to attend the meeting were also accepted as part of the scoping process.

A press release informed the public of the posting of a scoping newsletter on the NPS website on March 10, 2009. The newsletter was also made available at the Lowndes County Interpretive Center. The newsletter notified the public of the proposed construction of the Montgomery Interpretive Center and described the four alternative sites. The newsletter provided information on the planning process and how it would affect the future of the park. The newsletter also notified the public of a 30-day comment period and procedures for making comments.

A consultation letter was mailed to eight local and federal agencies and stakeholders on April 30, 2009, requesting consultation and comments regarding the proposed project at Selma to Montgomery NHT. Responses were received from the USFWS, Alabama Department of Conservation and Natural Resources Wildlife and Freshwater Fisheries Division, and Alabama Natural Heritage Program stating that no special status species are located within the proposed project sites. A response was also received from the Alabama Federal Highways Administration stating that no direct impacts would be anticipated.

The EA was distributed to agencies, tribal governments, and the public for review and comment for a 30-day public review from June 11, 2010 through July 11, 2010. In total, 113 public comments were received. Overall the majority of the comments supported the Preferred

Alternative. However, some comments questioned the selection of the Preferred Alternative and are addressed in an Errata Sheet attached to this FONSI.

Errata Sheet on the Environmental Assessment for the Proposed Construction of the Montgomery Interpretive Center

Comments were received during the public comment period that warrants the preparation and distribution of an errata sheet on the above referenced Environmental Assessment. This sheet will become part of the project file. The representative comments and responses are as follows:

1. **Comment:** After reviewing the environmental assessment, it is obvious that the document is very subjective and biased to the benefit of ASU. There is no interstate or major thoroughfare access to the proposed site on the campus of ASU. When this fact is taken into consideration with the fact that the an interpretive center on the campus of ASU will be at least one mile away from the trail, large groups of potential visitors will not visit the museum on that campus. It will be hidden in obscurity and the interpretive center at Selma will probably boast more visitors than its counterpart in Montgomery. Why build a nice building, with little if any connection or significance to the individuals and places, which the building should commemorate? ASU should not even be remotely considered as the preferred alternative site of the Montgomery interpretive center. The Montgomery Interpretive Center should be placed at Mt. Zion A.M.E. Zion Church.
- a. **Response:** As detailed in the Environmental Assessment, a Value Analysis was conducted using the Choosing by Advantages (CBA) process during March 11-12, 2008. The results of the CBA concluded that the St. Jude Fairview Plaza site was the preferred location of the Montgomery Interpretive Center based on the site's advantages. However, the Cost Benefit Analysis process was then used to compare the costs of site acquisition, construction, and identified partnership opportunities based on preliminary schematic designs as well as life cycle costs. These costs were weighed against the total of the advantages for each alternative identified in the CBA process. As a result, Alabama State University site was selected as the preferred alternative for the Montgomery Interpretive Center of the Selma to Montgomery National Historic Trail.
- b. **Response:** Proximity to the trail was a Factor that was evaluated during the CBA process as well as visitor experience. The following set of factors and attributes were evaluated during the CBA process:

I. Site Development Considerations

- A. Site Size (parking and facilities)?
- B. Ease Vehicular Access (road capacity, slope, improvements needed)?

II. Quality of Visitor Experience

- A. Proximity to the Trail for interpretive opportunities?
- B. Site arrival experience (pleasant, pedestrian friendly, some historical setting)?
- C. March activities occurred on or were associated with site (primary, secondary, no association per Comprehensive Management Plan (2005)?

III. Resource Protection Considerations

- A. Beneficial affects to cultural resources?

IV. Potential for NPS Partnership Opportunities

- A. Assistance in interpretation/visitor services?
- B. Assistance in law enforcement/security?
- C. Assistance in maintenance for facilities and grounds?
- D. Assistance in curatorial/research/archives?