# **II. Purpose and Need**

# A. Purpose and Need

## Purpose of the Plan

The purpose of this plan is to implement the legislation passed by Congress to include the former McLoughlin House National Historic Site as part of Fort Vancouver National Historic Site and to provide the National Park Service, the Association, and other stakeholders with long-term guidance for the management of the McLoughlin House Unit. The actions taken in this plan would preserve and protect the McLoughlin and Barclay houses and their associated landscape and would help park visitors to better understand the history and significance of the lives of Dr. John McLoughlin, Dr. Forbes Barclay, and their families.

## **Need for the Plan**

The plan is needed to fulfill the intent of the 2003 Fort Vancouver General Management Plan by providing detailed planning information regarding operations, staffing, and overall management of the McLoughlin House Unit. The plan is also intended to document and provide a smooth transition from the management of the site by the Association to management of the site by the National Park Service. Management Policies (NPS 2006) require the NPS to identify how park resources will be preserved and parks used and developed to provide for public enjoyment, usually in a General Management Plan (GMP). Although the GMP indicated that if the McLoughlin House National Historic Site was added to the park that a GMP amendment would be prepared, because this action was called for by the GMP, it does not constitute a new action or need a GMP amendment and as a result proposed actions are considered in this Environmental Assessment.

# B. Relationship to Laws, Policies and Park Planning Documents

This section lists the laws, executive orders, NPS policies, and operational procedures that are most pertinent to the planning for the future protection, use, and management of the McLoughlin House Unit.

#### 1. Laws and Executive Orders

## **National Park Service Organic Act**

The key provision of the legislation establishing the National Park Service (the 1916 Organic Act) is:

The National Park Service shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified . . . by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations (16 USC 1).

# 1970 National Park Service General Authorities Act (as amended in 1978 – Redwood amendment)

This act prohibits the National Park Service from allowing any activities that would cause derogation of the values and purposes for which the parks have been established (except as directly and specifically provided by Congress in the enabling legislation for the parks). Therefore, all units are to be managed as national parks, based on their enabling legislation and without regard for their individual titles. Parks also adhere to other applicable federal laws and regulations, such as the Endangered Species Act, the National Historic Preservation Act, the Wilderness Act, and the Wild and Scenic Rivers Act. To articulate its responsibilities under these laws and regulations, the National Park Service has established management policies for all units under its

stewardship.

## National Environmental Policy Act (NEPA) (42USC 4341 et seq.)

NEPA requires the identification and documentation of the environmental consequences of federal actions. Regulations implementing NEPA are set for by the President's Council on Environmental Quality (CEQ) (40 CFR Parts 1500-1508). CEQ regulations establish the requirements and process for agencies to fulfill their obligations under NEPA.

## **Endangered Species Act (16 USC 1531 et seq.)**

The Endangered Species Act (ESA) requires federal agencies, in consultation with the Secretary of the Interior, to use their authorities in the furtherance of the purposes of the act and to carry out programs for the conservation of listed endangered and threatened species (16 USC 1535 Section 7(a)(1)). The ESA also directs federal agencies, in consultation with the Secretary of the Interior, to ensure that any action authorized, funded, or carried out by an agency is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of designated critical habitat (16 USC 1535 Section 7(a)(2)). Consultation with the United States Fish and Wildlife Service (USFWS) is required if there is likely to be an effect.

## **National Historic Preservation Act (1966 as amended)**

Section 106 of the National Historic Preservation Act (NHPA) directs federal agencies to take into account the effect of any undertaking [a federally funded or assisted project] on historic properties. "Historic property" is any district, building, structure, site, or object that is eligible for listing in the National Register of Historic Places because the property is significant at the national, state, or local level in American history, architecture, archeology, engineering, or culture. This section also provides the Advisory Council on Historic Preservation and the State Historic Preservation Officer (SHPO) an opportunity to comment on the undertaking. The 1992 amendments to the act have further defined the roles of American Indian Tribes and the affected public in the Section 106 process.

#### Native American Graves Protection and Repatriation Act (NAGPRA)

This law provides protection to Native American gravesites and resources on tribal and federal lands and in federal collections. NAGPRA provides for "a process whereby Indian tribes... have an opportunity to intervene in development activity on federal or tribal lands in order to safeguard Native American human remains, funerary objects, or objects of cultural patrimony..."

## **Fort Vancouver National Historic Site Legislation**

Fort Vancouver National Monument was established on June 19, 1948 "to preserve as a national monument the site of the original Hudson's Bay stockade (of Fort Vancouver) and sufficient surrounding land to preserve the historical features of the area" for "the benefit of the people of the United States" (62 Stat. 532 and the Senate Report on the legislation). The Department of the Interior report on the legislation further stated that the lands so dedicated should fulfill "two essential requirements—the preservation of the historic stockade...and the preservation of the historic parade ground of the later United States Army Post." In addition, the total area of the national monument was not to exceed 90 acres in Vancouver, Washington.

To improve the conditions for achieving the legislative requirements of the park, Congress passed an act June 30, 1961 (75 Stat. 196) enlarging the boundaries of Fort Vancouver and re-designating the national monument as a national historic site. Congress also allowed for a revision of the monument boundaries to include an additional 130 acres of land "adjacent to, contiguous to, or in the vicinity of the existing monument."

#### **Executive Orders**

Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands) require the avoidance, to the extent possible; of long- and short-term adverse impacts associated with the occupancy and modification of floodplains and wetlands (see *Impact Topics* for more information).

Executive Order 12898 (Environmental Justice) requires an analysis of impacts on low-income populations and communities, as appropriate (see *Impact Topics* for more information).

There are also numerous other Executive Orders which were analyzed for possible relationship to this Environmental Assessment.

## McLoughlin House Unit Legislative History and Acquisition

Dr. John McLoughlin served as Chief Factor at Fort Vancouver from 1825 to 1846 for the Hudson's Bay Company. Under McLoughlin's leadership, Fort Vancouver became the center of the political, cultural, and commercial activities in the Pacific Northwest. Dr. McLoughlin is known as the "Father of Oregon" for his role in Oregon's early history.

In 1844, Dr. John McLoughlin established a claim for himself on

newly-built home in the heart of Oregon City along the Willamette River.

land east of Willamette Falls and named it Oregon City. The city was granted a charter on December 24, 1844 and became one of the oldest incorporated cities in the Pacific Northwest. In 1846, McLoughlin and his family moved into their

Dr. McLoughlin donated the land on the bluff where the McLoughlin and Barclay houses are now situated to the citizens of Oregon City. The site eventually became a charter park and is one of the oldest public parks in the Pacific Northwest. As a charter park, the city must maintain title to the land.

Dr. Forbes Barclay, a contemporary of Dr. McLoughlin, was a surgeon and clerk in charge of the Indian trade at the Hudson's Bay Company's (HBC) post of Fort Vancouver from 1840-1850. Barclay retired from the Company in 1850 and moved to Oregon City with his





wife Maria and children. Barclay built his home in Oregon City from 1848-1849. He became a U.S. citizen and served in several elective municipal positions until his death in 1873. The Barclay family occupied the house through 1934.

When the McLoughlin House faced demolition in 1909, the McLoughlin Memorial Association was established and money was raised to move the house to the top of the bluff where the house currently sits. In 1937, the Barclay House was moved from its site on Main Street to McLoughlin Park adjacent to the McLoughlin House.

On February 19, 1941, the Secretary of the Interior, under the authority of the Historic Sites Act of 1935, designated the McLoughlin House National Historic Site as the first national historic site in the West. The site included the McLoughlin and Barclay houses and related historic landscape. (See Appendix B: 1941 McLoughlin House National Historic Site Congressional Authorization.)

Under a cooperative agreement between the Secretary, the Association, and Oregon City, the two houses were administered in non-federal ownership by the Association. The agreement required the Secretary to regulate the Association's maintenance of the historic character of the McLoughlin and Barclay houses and to provide planning and technical advisory assistance as requested and possible within existing



appropriations limits. This assistance was initially provided by the NPS from the former Portland, Oregon office (now located in Seattle, Washington).

Post dating the establishment of the McLoughlin House National Historic Site, Fort Vancouver National Monument (later National Historic Site) was established on June 19, 1948.

In January 1966, Fort Vancouver NHS staff officially took over responsibilities under the cooperative agreement for the McLoughlin House, which included an annual inspection. The amount of assistance provided by Fort Vancouver NHS staff to the Association has varied over the years (National Park Service, Administrative History 1993).

In August 1970, the remains of Dr. McLoughlin and his wife Marguerite were moved to the McLoughlin House site, and their graves placed between the two houses.

On May 15, 2001, the citizens of Oregon City voted to provide an easement on the land of the McLoughlin House National Historic Site to the NPS, if Congress authorized the addition of the site to the National Park System.

On July 29, 2003, President George W. Bush signed Public Law 108-63 (known as H.R. 733) (Appendix A) authorizing the Secretary of the Interior to acquire the McLoughlin House National Historic Site for inclusion in Fort Vancouver National Historic Site. The legislation calls out certain requirements which have now been

met. The name of the site changed from the "McLoughlin House National Historic Site" to "McLoughlin House." The legislation also changed the status of the site from an affiliated unit of the National Park System, not managed by the NPS, to a unit of Fort Vancouver NHS that would be managed by NPS staff from Fort Vancouver NHS. It further authorized the acquisition of the McLoughlin House, the Barclay House, and other associated real property, improvements, and personal property from the Association to the NPS by sale or donation. (See Appendix A: 2003 McLoughlin House Addition to Fort Vancouver National Historic Site Act.)

Based on this legislation, the Association sold the McLoughlin and Barclay houses to the NPS, which now allows for direct NPS management and maintenance of the buildings. The Association also donated the museum collections to the NPS. Following the transfer, the NPS assumed responsibility for the management and staffing of the McLoughlin and Barclay Houses. NPS responsibilities would be augmented by volunteers from the Association. Additionally, the Association, through their nonprofit status, would continue to pursue private sector support for educational programming, site preservation, and other activities. It is intended that proceeds from the sale of the two historic properties to the NPS would be used to establish an endowment fund to benefit the site. This endowment would be administered by the Association's Board of Directors working cooperatively with the NPS. Resolution No. 03-44 was signed by the City Commission of Oregon City on December 17, 2003. The resolution authorized the city manager to execute a perpetual scenic easement with the NPS for the "preservation and maintenance of the McLoughlin and Barclay Houses." The Perpetual Scenic Easement Resolution No, 03-44 by the City Commission of Oregon City and Deed dated December 18, 2003 (Appendix A / see #6 below) granted an agreement between the Oregon City and the National Park Service whose intent is for the city to, in perpetuity, "preserve the scenic and historical quality" of the charter park via a scenic easement to the NPS, in the interest of providing public access to the McLoughlin and Barclay houses.

## 2. National Park Service Management Policies (NPS 2006)

NPS Management Policies and legislation require the development of a general management plan for units of the National Park System. In addition, Management Policies requires implementation planning that focuses how to implement the goals and actions called for in the general management plan. As noted above, the Fort Vancouver General Management Plan called for potential future management of the McLoughlin House National Historic Site (See #4 below).

Management Policies state that the NPS will conduct planning activities for the following: to evaluate possible additions to the National Park System; to identify how park resources will be preserved and how parks will be used and developed to provide for public enjoyment; to facilitate coordination with other agencies and interests; and to involve the public in decision making about park resources, activities and facilities. NPS plans represent the agency's commitment to the public and to Congress regarding how parks will be managed.

A variety of Director's Orders, including those for natural and cultural resources management provide guidance beyond what is stated in *Management Policies*.

# 3. Cooperating Organizations / Special Designations

### **McLoughlin Memorial Association**

The McLoughlin Memorial Association is a 501(c)(3) nonprofit organization established in 1909. The Association's objectives are stated in its later developed bylaws:

The objectives of the Association shall be Historical, Educational, Patriotic, and Supportive; to perpetuate the historic humanitarian services rendered Oregon pioneers by Dr. John McLoughlin; to encourage historical research relating to Dr. McLoughlin, his family, and his associates and to record and publish the same; to promote the "story" of Dr. McLoughlin in

schools and public events through education outreach; to assist the National Park Service in maintaining the homes of Drs. John McLoughlin and Forbes Barclay as historical sites for the people; to assist the National Park Service in placing therein relics, documents, mementos, and furniture pertaining to the McLoughlin family; and to instill respect and appreciation for the memory and heroic spirit of the pioneer men and women of early Oregon.

The Association has a Board of Trustees that meets four times a year. There is also an Executive Board comprised of the officers of the Association and an additional two to three Association members.

The Association currently works with other historic and heritage sites in the area, promoting public visitation in the Oregon City area and Clackamas County. The Association cooperates with other partners and individuals who have assisted them in providing financial support. These partners and individuals engage in activities at the McLoughlin House site, such as sponsoring special events. The Association has been instrumental in maintaining the McLoughlin House since 1909.

There are a total of 43 museums or historical sites in Clackamas County. The primary goal of the Association and its partners is to increase cooperation and public visitation for all museums and sites involved. The McLoughlin House, along with the End of the Oregon Trail Interpretive Center and the Museum of the Oregon Territory, are major interpretive attractions for visitors to Oregon City.

Partners of the McLoughlin Memorial Association include, but are not limited to the following groups:

- Fort Vancouver National Historic Site (formal cooperative relationship with NPS since 1941);
- Oregon City Women's Club (donated the fountain);
- National Society of the Colonial Dames of America in the State of Oregon;
- The Sons and Daughters of Oregon Pioneers;
- Daughters of the American Revolution;
- Old Home Forum;
- The Roake Family;
- Arch Council of Catholic Women;
- Clackamas Heritage Partners; and
- Various business sponsors.

## **Clackamas Heritage Partners**

The Clackamas County Historical Society and the Oregon Trail Foundation merged into a single non-profit organization, called the Clackamas Heritage Partners on July I, 2004. Clackamas Heritage Partners' mission is to preserve the heritage, educate the public, and interpret the history of the Oregon Territory, Clackamas County, and Oregon City, which was the western terminus of the Oregon Trail. Both organizations continue to maintain their existing nonprofit corporations. The new organization has the ability to raise public and private funds, implement state-of-the-art cultural heritage and preservation programs, and carry forward the respective missions of both organizations. A transition board, comprised of society and foundation members, has representatives from the McLoughlin Memorial Association, Oregon City Commission, and Clackamas County Commission. Consistent with NPS policies, the Superintendent of Fort Vancouver National Historic Site participates and attends meetings by invitation. The transition board is in the process of developing a strategic plan, designing an organizational structure, and overseeing incorporation of the new organization, and will retain a development director.

#### **McLoughlin Conservation District**

In 1982, the McLoughlin Conservation District was established by city ordinance to preserve cultural resources related to the early history of Oregon City. The conservation district's designated boundary includes a portion of Dr. John McLoughlin's original 1845 land plat, including the bluff where the McLoughlin and Barclay houses

are located. A 2002 inventory lists 802 principal resources, primarily residential in nature, which range in dates of construction from 1845 to 2000. This includes 177 buildings or structures over 100 years of age. The district was found to be potentially eligible for the National Register of Historic Places, and the City of Oregon City is presently gauging support for nomination. The buildings are already designated as local landmarks within the McLoughlin Conservation District.

An information sign, created by the Old Home Forum and posted by the city at the McLoughlin House, gives information about the McLoughlin Conservation District. It reads:

In 1844, Dr. John McLoughlin established a claim for himself on land east of Willamette Falls and named it Oregon City. The city was granted a charter on December 24, and became the oldest incorporated city west of the Missouri River.

This district, created in 1982, encompasses all the original 121 blocks of the plat. Many of the homes of these pioneers and civic leaders still stand in the neighborhood.

## **Oregon National Historic Trail**

Designated in 1978, the Oregon National Historic Trail corridor is 2,130 miles in length and contains some 300 miles of discernible ruts and 125 historic sites, including the Oregon City Complex in Oregon City, Oregon (1999 *Oregon National Historic Trail Management Plan*, p. 35). Among other reasons, the trail is significant because it strengthened the United States' claim to the Pacific Northwest. Administered by the National Park Service and partners, the national historic trail offers visitors the opportunity to travel an auto tour route and visit an array of interpretive and historic sites. The Oregon City Complex, including the McLoughlin House, is a high-potential site on the Oregon National Historic Trail (1999 *Oregon National Historic Trail Management Plan*, p. 312).

## 4. Park Planning Documents

## Fort Vancouver General Management Plan

The 2003 Fort Vancouver National Historic Site General Management Plan, indicated that if the McLoughlin House National Historic Site is included as part of Fort Vancouver National Historic Site, NPS staff would address the following actions in a GMP amendment. It has since been determined that a GMP amendment is not needed since adding the McLoughlin House to the NHS was an action already called for in the GMP and does not, therefore, constitute a new action. As a result, the following actions called for in the GMP (NPS 2003) are addressed in this Plan/Environmental Assessment.

- Obtain and catalog the entire McLoughlin House collections;
- Write and implement a Scope of Collections Statement;
- Determine collection management needs;
- Determine the maintenance, accessibility, and infrastructure needs of the McLoughlin and Barclay houses;
- Determine the preservation needs of the McLoughlin and Barclay houses to ensure their historic integrity;
- Plan, design, and develop any necessary interpretive media;
- Develop a volunteer program;
- Provide for year-round site interpretation for the public; and
- Maintain the grounds surrounding the historic buildings.

This document also identifies additional actions and studies required to implement this plan (See *Implementation Plans* under *Alternatives*).

# 5. State of Oregon and Oregon City Planning Documents

## **State of Oregon**

#### Oregon Revised Statute 358

The state's revised statute has several elements relating to this project. Several parts (358.045, 358.050, 353.055 and 358.057) state the importance of the Oregon Trail as a major historical state attraction and notes which state agencies will be responsible for development and coordination of a comprehensive program for the Trail. It also points to the value and significance of state historic trails.

Statute 358.905 through 358.961 deals with Archaeological Objects and Sites. The statute identifies the importance of archaeological sites and that those on public land are under the stewardship of the people of Oregon and are to be protected and managed in perpetuity by the state as a public trust. This statute deals with prohibited conduct and collections,

Statute 97.772 establishes an Oregon Commission on Historic Cemeteries and defines as historic any burial place that contains the remains of one or more persons who died before February 14, 1909.

## **Oregon City**

#### Oregon City Comprehensive Plan

The city's revised comprehensive plan went into effect on May 5, 2004. Originally drafted in 1983, the comprehensive plan was initially developed in response to the 1973 Oregon state law dictating the nineteen statewide planning goals detailed by the Land Conservation and Development Commission (LCDC). State law requires each city and county to have a comprehensive plan and the zoning and land-division ordinances needed to put the plan into effect. Additionally, these comprehensive plans must be found consistent with the statewide goals to be "acknowledged" by the LCDC. The plan also maps the Urban Growth boundary of Oregon City. The McLoughlin House Site is within the Oregon City Urban Growth Boundary.

The plan includes detailed plan principles, goals and policies, and action items; chapters on Citizen Involvement, Land Use; Open Space, Scenic and Historic Areas, and Natural Resources; Air, Water, and Land Resources Quality; Natural Hazards and Natural Disasters; Parks and Recreation; Economic Development; Housing; Public Facilities; Transportation; Energy Conservation; Urbanization; and the Willamette River Greenway.

As of the plan's revision in May of 2004, the McLoughlin and Barclay houses are designated as a part of the McLoughlin Conservation District, covered in the Open Space, Scenic and Historic Areas chapter. A Conservation District, as defined by the plan, is designed to protect the buildings within the District through an ordinance requiring review of new construction and exterior alterations to designated structures and demolitions. While not as encompassing as a Historic District, a Conservation District can ensure that a neighborhood's significance does not further erode. Based on a 2002 survey of the McLoughlin Conservation District, the city is considering placing a part of the district on the National Register of Historic Places.

The plan also recognizes the recent ownership transfer of the McLoughlin and Barclay houses to the National Park Service.

#### Oregon City Municipal Code

Oregon City provides land use regulations through Chapter 17, the city's zoning code. The purpose of the zoning code is "to promote public health, safety and general welfare through standards and regulations designed to provide adequate light and air; to secure safety from fire and other dangers; to lessen congestion in the streets; to prevent the overcrowding of land; to assure opportunities for effective utilization of land; to provide for desired population densities; and to facilitate adequate provision for transportation, public utilities, parks and other

provisions set forth in the city comprehensive plan and the Oregon Land Conservation and Development Commission Statewide Planning Goals."

#### Oregon City Draft Trails Plan

The draft trails plan, completed April 19, 2004, envisions a hierarchical system of trails from the regional to local level. As part of the development of the plan, the city analyzed the existing trail system and street network. The plan states that it will "recommend improvements to the existing system where needed, fill in the missing gaps, and connect to significant environmental features, schools, public facilities, local neighborhoods, and business districts in Oregon City and throughout the region." The plan's overarching goals are to create a sense of community and encourage environmental stewardship in Oregon City and the region through the creation of a trail system.

History, as stated by the draft plan, will be a major interpretive focus, recognizing not only the significance of Oregon City, Dr. John McLoughlin, American Pioneers, and the End of the Oregon Trail, but also the history associated with native groups, commercial and industrial development, and the environment.

#### Oregon City Transportations System Plan

The Oregon City Transportation Systems Plan (TSP), adopted in April 2001 was part of a planning process between the city, Clackamas County, Metro, and the Oregon Department of Transportation to analyze and manage the city's proposed transportation related projects over the next 20 years, through 2020. The plan, which must be based on the city's current comprehensive plan land use map, is intended to balance land use and future development with the efficient delivery of services. Additional consistency must be maintained with Metro's Regional Transportation Plan.

The state Land Conservation and Development Commission dictates that each TSP contains the following elements:

- A Road Plan For A Network Of Arterial And Collector Streets
- A Public Transit Plan
- A Bicycle And Pedestrian Plan
- An Air, Rail, Water, and Pipeline Plan
- A Transportation Finance Plan
- Policies and ordinances for implementing the transportation system plan

#### Major plan goals include:

- The development of multi-modal transportation options
- The maintenance of safety for all transportation users
- The maintenance of adequate transportation service capacity
- The efficient implementation of TSP goals and objectives

### <u>Downtown Oregon City/ North End District Urban Renewal Plan</u>

The purpose of the Downtown Oregon City/ North End District Urban Renewal Plan is to eliminate blighting influences found in the Renewal Area and to implement goals and objectives of Oregon City's Comprehensive Plan. The overall goals of the renewal plan are to improve:

• Traffic capacity and safety, pedestrian facilities, park and recreation facilities, and other public facilities within the area in order to serve existing residents, businesses, workers and visitors.

• The Renewal Area as a commercial and employment center, and stimulate private development within the area which is consistent with the comprehensive plan.

## **Clackamas County Documents**

There are no Clackamas County Documents that specifically relate to the McLoughlin House Unit.

## 6. Agreements

The only existing legal agreement on record is a Scenic Easement Deed between Oregon City and the NPS. This agreement influences both planning and operations for the McLoughlin House Unit at Fort Vancouver National Historic Site.

Scenic Easement Deed, December 18, 2003. The deed is an agreement between the city of Oregon City and the National Park Service whose intent is for the city to, in perpetuity, "preserve the scenic and historical quality" of the charter park via a scenic easement to the NPS, in the interest of providing public access to the McLoughlin and Barclay houses.

# C. McLoughlin House Unit Planning Issues

The following issues, derived from public and agency input are addressed in this Plan/Environmental Assessment.

#### **Cultural Resources**

- Documentation of subsurface cultural remains has been recently completed, indicating the
  presence of both historical and pre-contact American Indian artifacts (Cromwell 2005). A
  widespread, subsurface scatter of lithic debitage and localized but dense deposits of circa 1900
  artifacts were encountered throughout the park.
- Poor drainage in the vicinity of the gravesite possibly caused by Singer Creek being piped beneath the area has caused a concerns related to the long-term preservation of subsurface cultural remains (archeological resources) and the graves of Dr. and Mrs. McLoughlin.
- The McLoughlin and Barclay houses do not currently meet life safety or accessibility standards. They also are not in compliance with some building codes.
- There is a large collection of significant museum objects associated with the McLoughlin and Barclay houses and site. Cataloguing, securing, and potentially storing some of these items is important to their preservation.
- No cultural landscape analysis of the McLoughlin House site has occurred. Landscape elements have not been documented and cultural landscape treatments have not been prescribed.
- The McLoughlin House Unit is one of many historical sites within the area. The cultural and historical connections of the unit to related sites and cultural resources are important considerations.

#### **Natural Resources**

- The hydrology of Singer Creek has not been documented or analyzed.
- Steep slopes along Singer Hill Road could potentially result in landslides and soil erosion. Analysis of geological and seismic conditions associated with the site is needed.

• Invasive plants in the former mill/landslide area below the bluff are affecting the site and should be removed in coordination with Oregon City.

#### **Visitor Experience**

- Analysis of how to best maximize expertise, staff and volunteers to provide a quality visitor
  experience while providing adequate resource protection (based on funding and staffing) is
  needed.
- An interpretive program that incorporates public outreach, including a theme-related curriculum meeting Oregon and Washington education standards, is needed.
- A variety of interpretive methods could be used to broaden visitor experiences at the site.
- There are currently a number of undesirable uses at the site, including unauthorized overnight sleeping and loitering.

#### **Park Facilities**

• Accessibility, including compliance with ADA (Americans with Disabilities Act) for visitor services and facilities, including restrooms and water fountains, is inadequate.

#### **Park Operations**

- The appropriate level of funding, staffing and operational space requirements is unknown.
- A plan that documents the integration and transition of the management of the property from the Association to the National Park Service is needed.
- There are administrative, interpretive, museum, and maintenance storage needs associated with management of the site by the National Park Service and the Association.
- Guidelines for appropriate special events that could occur in the houses and on the site are needed.
- Analysis of the impact of visitation fees, especially for economically disadvantaged populations, is needed.

#### **Visitor and Employee Safety**

• The steep bluff along Singer Hill Road could present hazardous conditions for visitors.

## **Access, Circulation, and Parking**

- Visitor circulation at the site is not clearly defined. Analysis of visitor circulation patterns is needed.
- With National Park Service management, visitation and, therefore traffic, are likely to increase.
- Planning for additional parking, including parking for people with disabilities, and special event parking is needed.
- There are potential impacts on park neighbors, including property owners along Washington, Center, and 7th streets.
- Oregon City and Portland metro area public transportation opportunities and improvements need to be considered at the site.
- Coordinating visitor arrival and departure with other cultural sites in the city (such as the Museum of the Oregon Territory) should be addressed.

• Staging areas for visitors awaiting tours and public and private transportation drop off zones need to be more clearly defined.

# **D. Public Scoping Issues**

During the public comment period for the Fort Vancouver National Historic Site General Management Plan the NPS received comments regarding the McLoughlin House National Historic Site. At the time of the Fort Vancouver General Management Plan scoping meetings in January 2000, however, the McLoughlin House was an "affiliated" National Park System unit. Affiliated units are not federally owned or directly administered by the NPS, but may utilize National Park Service technical or financial assistance when available.

The following issues represent the comments received by the public in January 2000:

- Some people mentioned the desire for adding the McLoughlin House National Historic Site in Oregon as a unit of Fort Vancouver National Historic Site.
- One comment mentioned the desire to coordinate planning at the McLoughlin House with Fort Vancouver National Historic Site with help from the NPS support office in Seattle, yet to allow the site to maintain its own identity.
- Some participants stressed the importance of finding alternative funding sources for staff, interpretive program development (including use of the Internet), and new activities to enhance tourism and raise public awareness of the site.
- There was an expression of support for NPS technical assistance in the area of building preservation and the proper care and display of site artifacts.
- There were some concerns about the existing NPS fee policy and national passes and what
  implications that would have on income at McLoughlin House site if the site were to become
  part of Fort Vancouver.
- One suggestion included developing interpretive exhibits emphasizing Dr. John McLoughlin's role in representing U.S. interests against the British.
- Development suggestions included the need to study parking, access, and traffic at the site; to
  provide better signage; and to develop an interpretive and educational link between the site
  and Fort Vancouver.
- There were questions about temporary closures related to renovation and staffing of the site.