

## IV. Impact Topics

### A. Impact Topics Analyzed

Actions in this plan would impact the following topics: physical resources (including land use, soils and water resources), cultural resources (including historic buildings and structures, cultural landscapes, museum collections and archeological resources); biological resources (including vegetation); recreational and social resources (including visitor experience and park operations).

#### PHYSICAL RESOURCES

##### Land Use

Land use at the McLoughlin House unit is under the management of Oregon City (the property owner) and the National Park Service (under a scenic easement). Proposed actions are subject to the ordinances of Oregon City and the State of Oregon. Under the plan, changes in land use, including some additional parking are proposed.

##### Soils

*Management Policies* (NPS 2006) require the NPS to understand and preserve and to prevent, to the extent possible the unnatural erosion, physical removal, or contamination of the soil. The alternatives involve ground-disturbing activities with the potential for erosion or sedimentation impacts to occur. Therefore, soils are addressed as an impact topic.

##### Water Resources

The 1972 Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977, is a national policy to restore and maintain the chemical, physical, and biological integrity of the nation's waters, to enhance the quality of water resources, and to prevent, and control, and abate water pollution. *NPS Management Policies* provide direction for the preservation, use, and quality of water in national parks.

The Clean Water Act is a national policy aimed at restoring, maintaining, and enhancing the chemical, physical, and biological integrity of the nation's waters and to prevent, control, and abate water pollution. Construction will result in earth disturbing activities, which increases the potential for erosion and sedimentation to occur. Section 401 of the *Clean Water Act* as well as NPS policy requires analysis of impacts on water quality.

##### Wetlands

Executive Order 11990 requires that impacts to wetlands be addressed. Although portions of the ground are seasonally wet, there are no wetlands at the site. There is, however, anecdotal evidence that Singer Creek has been filled.

#### BIOLOGICAL RESOURCES

##### Vegetation

The *National Environmental Policy Act* (NEPA) calls for examination of the impacts on the components of affected ecosystems. NPS policy is to protect the natural abundance and diversity of park native species and communities, including avoiding, minimizing or mitigating potential impacts from proposed projects. The alternatives described in this Environmental Assessment are likely to result in some vegetation removal.

## CULTURAL RESOURCES

### Prehistoric and Historical Archeological Resources

Compliance with the *Archeological Resources Protection Act* in protecting known or undiscovered archeological resources is necessary for lands directly under the houses, since the charter park is City-owned and falls under State law ORS 358 and ORS 97, and ARPA does not apply.

### Sacred Sites (Ethnography)

The National Park Service defines ethnographic resources as any “site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it” (DO-28, *Cultural Resource Management Guideline*, p. 181). Sites that are sacred to contemporary individuals and communities, including members of federally recognized American Indian tribes and other Native Americans, may be documented through a variety of methods. These include consultations with the people for whom certain places are sacred, through the collection of oral history data, through archaeological and anthropological research, and through the review of media such as published and unpublished written materials. An archaeological survey of the McLoughlin House Unit conducted in September 2004 discovered prehistoric artifacts relating to native occupation and use of the property (Cromwell 2005). Together with the results of the survey, the history of the McLoughlin House and its setting suggests that the possibility of the site’s importance to Native Americans.

### Historic Structures/Cultural Landscapes

Consideration of the impacts to cultural resources is required under provisions of Section 106 of the *National Historic Preservation Act of 1966*, as amended, and the 1995 *Programmatic Agreement among the National Park Service, the National Conference of State Historic Preservation Officers, and the Advisory Council on Historic Preservation*. It is also required under *Management Policies* (2006). Federal land managing agencies are required to consider the effects proposed actions have on properties listed in, or eligible for inclusion in, the National Register of Historic Places (i.e., Historic Properties), and allow the Advisory Council on Historic Preservation a reasonable opportunity to comment. Agencies are required to consult with federal, state, local, and tribal governments /organizations, identify historic properties, assess adverse effects to historic properties, and negate, minimize, or mitigate adverse effects to historic properties while engaged in any federal or federally assisted undertaking (36 CFR Part 800).

### Museum Collections

Requirements for proper management of museum objects are defined in 36 CFR 79. *Management Policies* and other cultural resources laws identify the need to evaluate effects on National Park Service Collections as applicable. Museum collections had been under the management of the Association and now would be managed by the National Park Service.

## RECREATIONAL / SOCIAL RESOURCES

### Visitor Experience

Based on *Management Policies* (2006), impacts to visitors are considered with respect to park undertakings. Analysis of visitor experience includes impacts on visitor and neighborhood access and circulation, transportation, safety and accessibility.

### Park Operations

Impacts to park operations and visitor services are considered in environmental analysis to disclose the degree to which proposed actions would change park management strategies and methods.

## B. Impact Topics Dismissed From Further Consideration

The topics listed below either would not be affected or would be affected only negligibly by the alternatives evaluated in this Environmental Assessment. Therefore, these topics have been dismissed from further analysis. Negligible effects are effects that would not be detectable over existing conditions.

### PHYSICAL RESOURCES

#### Air Quality

There is no airshed class designation for Fort Vancouver National Historic Site under the Clean Air Act. Only negligible, temporary (during construction) air quality impacts would occur from the implementation of the alternatives described in this document.

#### Water Resources

**Water Quantity:** There is no proposed increased or decreased use of water. As a result, there would be no impact to water quantity.

**Floodplains:** Executive Order 11988 (Floodplain Management) requires an examination of impacts to floodplains and potential risk involved in placing facilities within floodplains. NPS Management Policies, DO-2 (Planning Guidelines), and DO-12 (Conservation Planning, Environmental Impact Analysis, and Decision Making) provide guidelines for proposals in floodplains. Executive Order 11988 requires that impacts to floodplains be addressed. The site of the McLoughlin and Barclay houses is situated on a bluff approximately 50 feet above Singer Hill Road and about 860 feet (one-sixth of a mile) from the Willamette River. The site is not within the floodplain.

### BIOLOGICAL RESOURCES

#### Wildlife

The *National Environmental Policy Act* (NEPA) calls for examination of the impacts on the components of affected ecosystems. National Park Service policy is to protect the components and processes of naturally occurring biotic communities, including the natural abundance, diversity, and ecological integrity of plants and animals, including avoiding, minimizing or mitigating potential impacts from proposed projects (NPS 2006). Because the project is located in a highly developed residential setting, the area does not support suitable native wildlife habitat and minimal wildlife activity is expected, although no formal inventory has been undertaken by the park or Association. Some small rodents and insects may be present and birds nest in or visit the area. Impacts to wildlife from the construction, maintenance, or other activities associated with the preferred alternative are expected to be short term and negligible.

#### Threatened and Endangered (Special Status) Species

The *Endangered Species Act* requires an examination of impacts to all federally listed threatened or endangered species. NPS policy also requires an analysis of impacts to state-listed threatened or endangered species and federal candidate species. Under the Endangered Species Act, the NPS is mandated to promote the conservation of all federal threatened and endangered species and their critical habitats within the park boundary. Management Policies include the additional stipulation to conserve and manage species proposed for listing. The National Park Service consulted with the U.S. Fish and Wildlife Service (USFWS) to determine what threatened, endangered, rare species, and species of concern may occur at the site. The full lists of potential species are available in Appendix C. Consultation with the USFWS indicates that no threatened or endangered species will be impacted by the actions proposed in the plan; therefore, this impact topic is dismissed from further analysis.

The site's landlocked location precludes the listed, candidate and fish species of concern and the possible occurrence of the northwestern pond turtle. The high disturbance levels from the adjacent main road and the

lack of large trees on the site make it unlikely bald eagle habitat. No listed threatened or endangered plant species were found to be present at the time of the survey. Marginal and limited habitat for the Willamette daisy exists along a portion of the cliff edge, but it is outside of any area that has been or would be disturbed under the current plan. Future modifications, which may be needed to prevent earth movement along Singer Hill Road, would include site specific analysis related to the possibility that this species could be present.

## **RECREATIONAL / SOCIAL RESOURCES**

### **Wilderness**

NPS wilderness management policies are based on provisions of the 1916 NPS Organic Act, the 1964 Wilderness Act, and legislation establishing individual units of the national park system. There is no wilderness at Fort Vancouver National Historic Site or the McLoughlin House Unit.

### **Socioeconomics**

Socioeconomic impact analysis is required, as appropriate, under NEPA and NPS Management Policies pertaining to gateway communities. The local and regional economy and most business of the communities surrounding the park are based on tourism and resource use. Agriculture, manufacturing, professional services, and education also contribute to regional economies. There would be no measurable effects to regional or gateway community economies, or changes in visitor attendance or visitor spending patterns as a result of the implementation of the actions described herein. Nonetheless, a socioeconomic profile of the area is included as Appendix E.

### **Lightscape**

In accordance with NPS Management Policies (2006), the National Park Service strives to preserve natural ambient lightscapes, which are natural resources and values that exist in the absence of human-caused light. Due to its highly urbanized setting, the preservation of natural ambient lightscapes is not an objective of the McLoughlin House or Fort Vancouver NHS. The park would strive, however, to limit the use of artificial outdoor lighting that which is necessary for basic safety requirements, and to ensure that all outdoor lighting is shielded to the maximum extent possible, to focus light on the intended work area and away from the night sky, so as to minimally contribute to surrounding light sources. Due to recent upgrading of the outdoor lighting fixtures, the site now has sufficient lighting. The dark setting in the past has attracted loiterers who often drank, slept and at times engaged in illegal and unsanitary practices on the property. Outdoor lights effectively light the back of both houses and along both sides of the Barclay House. These lights are motion sensitive and have shields to focus light downwards, providing energy efficient and cost-effective lighting and preventing additional light pollution.

The National Park Service recently retrofitted both the McLoughlin and Barclay houses with outdoor shielded lights that focus the light downward and prevents light pollution. These were placed at the sides and back of the houses. Street lighting is available at the front. These lights are also motion detection sensitive, which prevents unnecessary lighting at night. There are three lights (approximately 12"x16") facing the property from the City utility/light poles that are along Center Street, and one light mounted on a fir tree near the fountain on the property. The NPS staff is trying to determine who owns the lights on the utility poles and whether these fixtures are operable. An evaluation of other site lighting was conducted in 2005, and with the above improvements, is now considered adequate. Thus, lightscape management was dismissed from further analysis in this environmental assessment.

### **Hazardous Materials**

Before the NPS can receive property through acquisition or donation, a site assessment has to be conducted which includes a hazardous materials component. The McLoughlin House National Historic Site had an underground storage tank that the NPS required to be removed prior to acquisition. The site has been remediated and currently there are no significant findings of hazardous or contaminated materials on site.

**Prime and Unique Farmlands**

In August 1980, the Council on Environmental Quality directed federal agencies to assess the effects of their actions on farmland soils classified by the U.S. Department of Agriculture's Natural Resource Conservation Service as prime or unique. This site is located in an established residential neighborhood. There are no prime farmlands associated with the project area.

**Ecologically Critical Areas, Wild and Scenic Rivers or Other Unique Natural Resources**

The site is not an ecologically critical area, and this part of the Willamette River is not designated a Wild and Scenic River. There are no other unique natural resources at the site.

**Indian Trust Resources**

The McLoughlin House site is not within the boundaries of federal land that is held in trust for any federally recognized tribe. There are no trust resources that would be impacted by the proposed action.

**Environmental Justice**

Presidential Executive Order 12898, General Actions to Address Environmental Justice in Minority Populations and Low-income Populations, requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. According to the U.S. Environmental Protection Agency (EPA), environmental justice is the

“...fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.”

The goal of “fair treatment” is not to shift risks among populations, but to identify potentially disproportionately high and adverse effects and identify alternatives that may mitigate these impacts.

The transfer of management of the site to the NPS and Fort Vancouver NHS staff would not have impacts on economically disadvantaged populations in Oregon City or the region. The currently proposed actions include discontinuing current fees charged to the general public once the NPS assumes management of the unit. Therefore, environmental justice was dismissed from further analysis in this environmental assessment.

