

V. Alternatives

The *National Environmental Policy Act* of 1969 (NEPA) requires that alternative strategies are developed to fully explore a range of ideas, methods, and concepts as part of an Environmental Assessment (EA). All alternatives should be feasible for implementation. National Park Service policy requires that when the NPS can identify its preferred alternative that it be done so before the EA is released for public review. The preferred alternative is that alternative the National Park Service believes would best accomplish its goals, based on the analyses completed to date.

Development of these alternatives was based on information about the McLoughlin House Unit's resources and visitor use. The alternatives were developed by a comprehensive interdisciplinary planning team in March 2004 and have since been refined through internal NPS reviews.

Two alternatives are described in this draft plan. The alternatives are characterized as follows: Alternative A: No Action (Continue Current Management) would result in the continuation of current management practices, however, small changes would be made based on the change in ownership from the Association to the National Park Service. Alternative B: Implementation of McLoughlin House Unit Management Plan is the preferred alternative. Alternative B emphasizes additional cultural resources strategies that would ensure the long-term preservation of the houses, historic site, and collections; increased opportunities for visitor education and interpretation; and improved visitor and NPS facilities.

A. Alternative A: No Action (Continue Current Management)

This Alternative is required by the National Environmental Policy Act to provide a baseline to compare action alternatives; for this plan, it is also considered a feasible management option. Under the No Action Alternative, existing operations, maintenance of facilities, and appropriate stewardship of cultural and natural resources would continue. Included in Alternative A would be minor changes resulting from the transfer of McLoughlin House Unit from the McLoughlin Memorial Association to the National Park Service. Many of these changes, however, would be dependent upon available NPS funding.

MANAGEMENT ZONING

Management zones define the specific resource conditions and visitor experiences that would be achieved and maintained over time. Zones identify the kinds and levels of visitor use, management activities, and development that would be appropriate for maintaining the desired conditions. Because the McLoughlin House Unit was previously managed by a non-federal entity, no NPS management zoning currently exists at the McLoughlin House. As a result, no management zones would be applied under Alternative A.

CULTURAL RESOURCES

McLoughlin and Barclay Houses

As owner of the houses, the National Park Service would preserve the integrity and character of the historic McLoughlin and Barclay houses according to the Secretary of the Interior's Standards for preservation and rehabilitation. No major rehabilitation or restoration actions would be undertaken to return the homes to their historic appearance. Some improvements, however, would be necessary to meet current building codes, to prevent further deterioration of the structures and landscape, and to provide for emergency rehabilitation in the event of a fire or natural disaster. Routine maintenance and stabilization actions that could be undertaken would include such actions as replacing non-historic wallpaper, renovating the fire sprinkler system, replacing gutters and eaves and other minor features as they deteriorate, upgrading the security and heating systems, and making minor structural changes to provide access to persons with disabilities.

Cultural Landscape

In cooperation with Oregon City, the National Park Service would continue to preserve the historic grounds and landscape features to maintain the existing integrity and character of the cultural landscape. This work would require routine landscaping, such as lawn care, removing invasive plants and weeds, and thinning and pruning historic and non-historic vegetation in accordance with the Scenic Easement Deed conveyed by Oregon City to the National Park Service on December 18, 2003.

Preservation maintenance actions would also be necessary to preserve the graves of Dr. John and Marguerite McLoughlin, the cannon, fountain, signs, and commemorative plaques. Stewardship of the historic landscape would also include other treatments necessary to prevent deterioration of the site and its historic features.

Museum Collections

The museum collections (approximately 700 items) would be protected and maintained in their current locations in the McLoughlin House, Barclay House. This collection would continue to include both period and non-period items (outside of the 1846-87 time significance). The collections would receive basic documentation (inventory, accession and catalogue), preservation, security and storage according to NPS Standards. The National Park Service would complete a Scope of Collections Statement, a Museum Management Plan and a Conservation Survey to guide documentation, preservation, security and storage of the museum collections. Park staff would coordinate with the Association to facilitate these basic documentation and preservation efforts.

Historic furnishings studies and plans for the McLoughlin and Barclay houses would be completed to determine the appropriate disposition for non-period items (what would be exhibited, what would be used to furnish the houses, and what would continue to be stored, or be identified for other appropriate solutions). National Park Service curatorial staff would coordinate with the Association to assist with organization of the collection records.

Archaeology

Underground archaeological resources would be preserved in place or in collections according to additional study and findings. Archaeological testing completed in 2001 and 2004 confirms the presence of significant, intact sub-surface deposits of prehistoric and historic-period artifacts (Cromwell 2005). Archaeological testing, excavation, and monitoring could occur if ground altering infrastructure or landscape work was necessary. Archaeological work would be done in accordance with the Scenic Easement Deed in accordance with the National Historic Preservation Act and State law ORS 358.

NATURAL RESOURCES

Alternative A would continue existing natural resources management strategies. Natural resource management duties would therefore continue to fall under the jurisdiction of Fort Vancouver NHS.

Geology: The NPS, in cooperation with the city (because they retain ownership of the park setting) would analyze the potential for geologic instability (including landslides) at the site. Landslide prone areas along Singer Hill Road and along the northeastern portion of the site could require stabilization to control erosion and to prevent earth movement onto the roadway below.

Vegetation: The NPS would also work cooperatively with the city to assess existing vegetation conditions and the potential for removing invasive species along the bluff, as appropriate and feasible.

Water Resources / Wetlands: Further investigation of the poor drainage conditions associated with the former course of Singer Creek would be made. If necessary, actions to mediate standing water and poor drainage near areas such as the McLoughlin's gravesites would occur, pending appropriate analysis, to ensure long-term preservation of the gravesites and their associated features.

Special Status Species: Ongoing monitoring and analysis would occur to determine the presence of any endangered, threatened, or species of concern.

VISITOR EXPERIENCE

The visitor experience at the McLoughlin House Unit would not be noticeably different under new NPS management. Fort Vancouver and other NPS staff would work with the Association Board of Trustees and volunteer docents to provide tours and other interpretive and educational activities, and to sponsor special events at the site.

The NPS would provide technical and staffing assistance, as funding permits. All McLoughlin Memorial Association docents would be required to become part of the NPS Volunteers-In-Parks program, administered through Fort Vancouver NHS. NPS staff would work cooperatively with local organizations and institutions to continue mutually beneficial relationships. Cooperative activities and programs would continue, such as implementing cultural heritage and preservation programs, and community outreach. The NPS would continue to distribute brochures and encourage people to visit other historic and theme-related sites in the Oregon City area (Appendix D). Some interpretive materials, such as websites and brochures, would be updated to reflect new administration and contact information. Requests for special events, such as weddings, would be determined in accordance with *NPS Management Policies*.

The NPS would encourage the Association to continue management of the gift shop located in the Barclay House. All profits would continue to support operations at the McLoughlin House Unit.

Though carrying capacity is presently a maximum of 45 visitors in the McLoughlin House, carrying capacity for both houses would need to be determined. Safety and security concerns would be taken into consideration with regard to the maximum number of visitors at one time.

PARK FACILITIES

Park facilities would be maintained and improved to meet required ADA accessibility standards. ADA access would need to be established on the site at any point of ingress or egress to the homes, as well as to any other areas with transitional elevations.

New signage with the new designation as a formal unit of Fort Vancouver NHS would be added to the site.

When applicable, the park staff would use sustainable products in the maintenance and repairs of the houses and other site features, including the use of latex based paints on the houses. As other new environmentally friendly products become available, they would be evaluated for their feasibility for use on the houses.

Maintenance machinery and tools for the McLoughlin House Unit would be provided by the park's maintenance facility. Maintenance machinery and tools would be stored at the park's maintenance facility in Vancouver, Washington.

McLoughlin House

The McLoughlin House would continue to be used for visitor use in the form of tours and special events. (See Figure 1: Existing Floor Plan of the McLoughlin House.) A Historic Structure Report would be done to provide analysis of the changes that occurred to the house in 1909 as well as the mid-1930s.

Barclay House

The Barclay House would continue to house visitor facilities, administrative offices, the gift shop, multi-purpose room, kitchen, lavatories, and general storage. A Historic Structure Report is needed in order to determine the original building floor plan, and what changes have been made to the floor plan and uses over time. The Barclay

House would also need routine maintenance to ensure that deterioration does not occur.

Because the existing restroom on the second floor of the Barclay House is inadequate for visitor use and is not accessible, ADA (American Disabilities Act) restrooms would be added as new compatible construction at the rear of the building in consultation with the city, state and Oregon State Historic Preservation Office as appropriate. (See Figure 2: Barclay House Existing Floor Plan with Historical Uses).

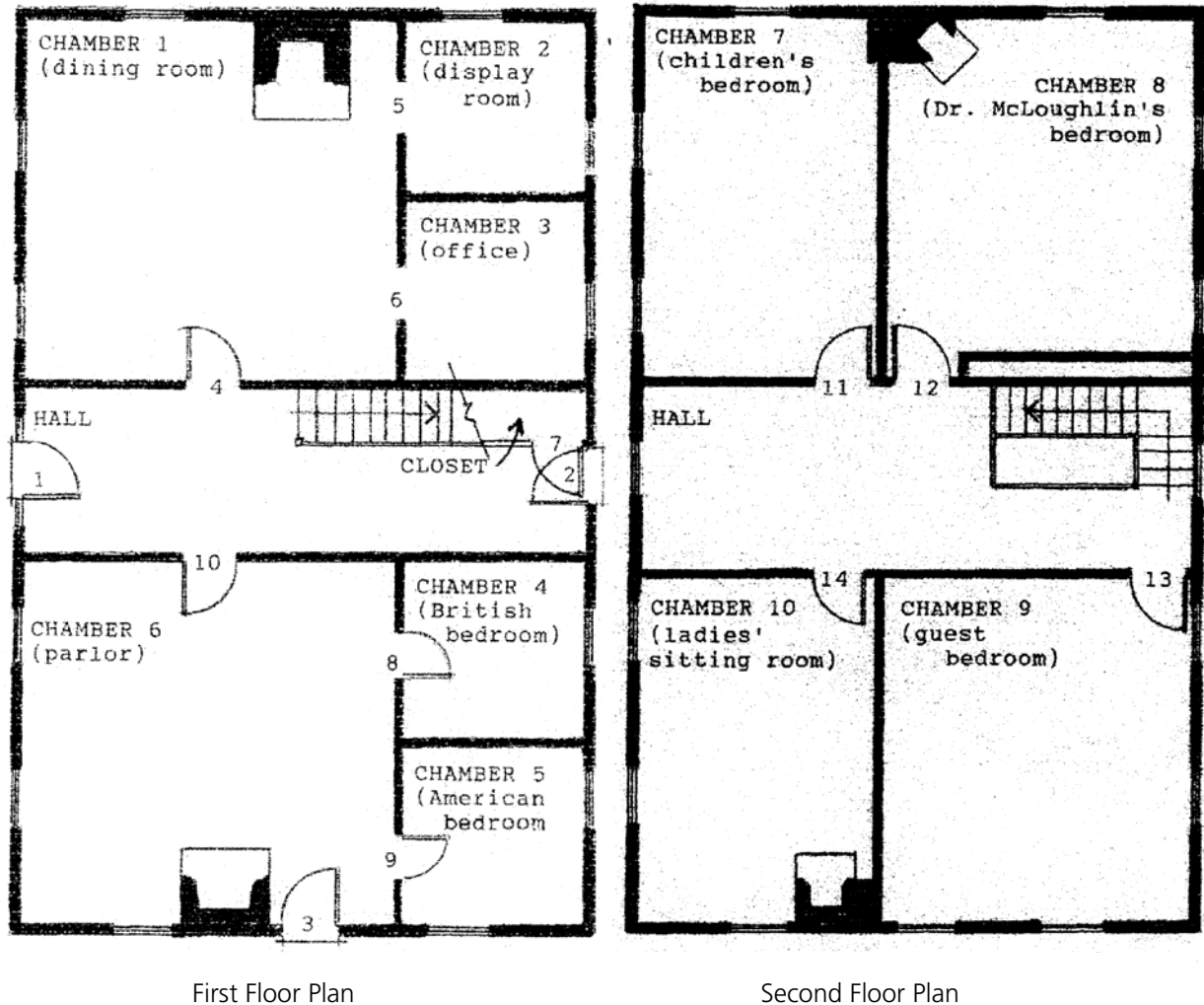
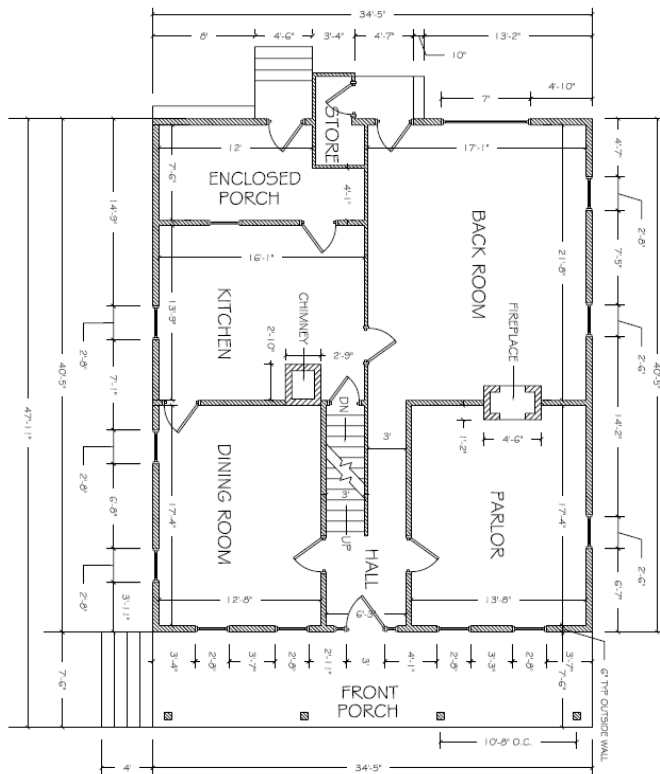
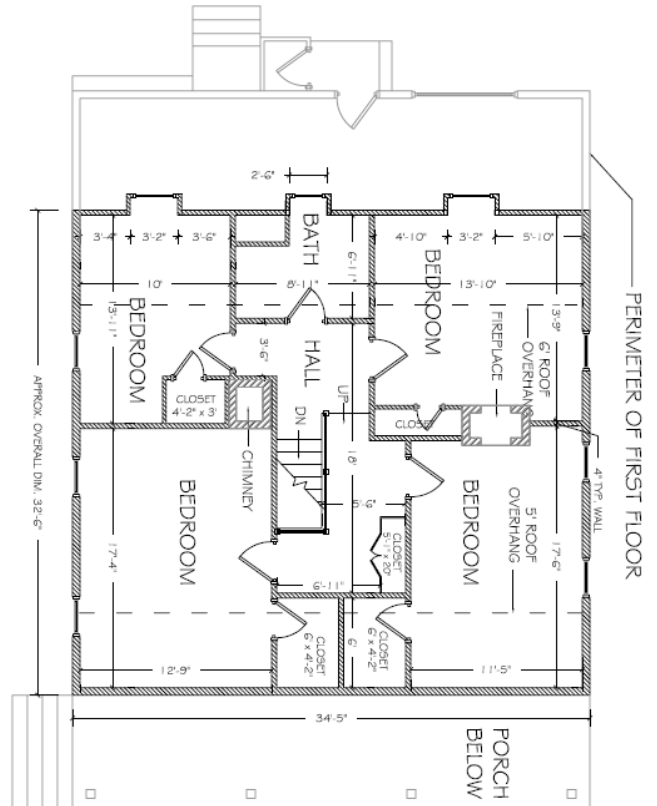


Figure 1: Existing Floor Plan of McLoughlin House



First Floor Plan



Second Floor Plan

Figure 2: Barclay House Existing Floor Plan with Historical Uses

PARK OPERATIONS AND STAFFING

Operations

The NPS would continue to operate McLoughlin House without significant modification to the existing conditions as noted above. The Association would continue management of the gift shop located in the Barclay House.

In 2006 dollars, the National Park Service's operating budget would start at approximately \$150,000 for the McLoughlin House Unit. Fundraising events and accepting donations by partners could supplement NPS operating funds.

An agreement between the NPS and McLoughlin Memorial Association would be drafted to address the roles and responsibilities of each partner and how they will work together. The agreement would also outline the use of space in the Barclay House.

Staffing

The NPS would provide one part-time staff person on-site to serve as an NPS contact representative. In addition, Fort Vancouver staff would provide assistance to the site in curatorial, maintenance, interpretation, and education capacities. The NPS would hire one seasonal staff person to provide interpretive and educational functions, as funding permits. The Association would be encouraged to augment NPS staffing during operating hours and during peak visitation times.

Fees

In the No Action Alternative a determination would be made consistent with NPS policies and regulations regarding the viability of charging a fee to the general public for visiting the McLoughlin House. There would be no charge for visiting the Barclay House or the historic grounds, and the NPS would not charge for school visits. In addition, staff would accept and recognize all NPS fee passes such as the Golden Age and Golden Access passes.

The Association would discontinue fee collection as NPS takes over management of the unit.

Hours of Operation

Hours of operation would continue to be the same (10 a.m. to 4 p.m. on Wednesday through Saturday, and 1 p.m. to 4 p.m. on Sunday). Park operations would continue to be suspended during holidays and would continue existing closures in December and January.

VISITOR AND EMPLOYEE SAFETY

The NPS would design and install historically compatible new fencing along the top of the bluff to protect visitors and employees from the steep bluff edge above Singer Hill Road.

The NPS would replace or install a sprinkler fire suppression system, smoke detectors, electrical system, intrusion alarm system, and communications system in each house to meet current code requirements.

The NPS would evaluate and seek to eliminate potential safety hazards at the site.

ACCESS, CIRCULATION, AND PARKING

The No Action alternative would not make major changes to existing access, circulation and parking at the site. Because it is likely that there would be increased visitation from NPS designation of the site, pedestrian and vehicle circulation and parking would be evaluated and additional parking would be sought for overflow and special events.

IMPLEMENTATION PLANS

A number of additional studies and plans would need to be conducted to implement Alternative A. Some of these studies and plans could require additional special project funding or increases to the operating base funding. Some of these projects could require formal analysis of alternatives in compliance with National Environmental Policy Act and the National Historic Preservation Act. Such documents would reference and be tiered to this unit management plan. The following studies and plans would need to be developed to guide more detailed planning for the unit:

- (Complete) Historic Structures Report for the McLoughlin House;
- Historic Structures Report for Barclay House;
- Restoration/Rehabilitation Plans for both houses based on the Historic Structures Reports;
- Cultural Landscape Report;
- Assessment of security and life/safety code issues and mechanical systems (could be included

- in the Historic Structures Reports for the two houses);
- Scope of Collection Statement;
- Emergency Operations Plan (for site and collections);
- Museum Management Plan;
- Exhibit Plan;
- Archival survey and assessment;
- Conservation survey and treatment plan;
- Administrative History;
- Long-Range Interpretive Plan (amendment to Fort Vancouver NHS Long-Range Interpretive Plan);
- Oral histories (priority due to age of people with information to share);
- Museum Collection Preservation Maintenance Plan; and
- Carrying capacity study based upon recommendations from Historic Structure Reports for McLoughlin and Barclay houses.

B. Alternative B: Implementation of McLoughlin House Unit Management Plan (Preferred)

Alternative B is the National Park Service's Preferred Alternative. This alternative would use the best strategies to preserve the historic character of the buildings and the condition of collections, to provide for on-site administrative offices, and to allow for optimum visitor use and enjoyment of the site.

Some of these actions include partial restoration of the exterior of the McLoughlin House to the 1846-1867 period and partial removal of later modern additions. Interior furnishings and exhibits not related to the historic period (1846-1867) would be removed. The Barclay House would continue to be adaptively used for administrative offices, visitor contact, and other public uses; however, some of the uses in the various rooms would be changed to better reflect NPS needs. As in Alternative A, bathrooms accessible to persons with disabilities would be added at the back of the house and a Cultural Landscape Report would be prepared to guide site planning and restoration of cultural landscape elements.

Collections would be managed and documented in accordance with NPS museum collections standards. Appropriate interpretive media would be planned and designed to present the interpretive themes reflecting the site's significance.

The visitor entry to the McLoughlin House could be changed to the front of the house (facing the bluff) to reflect the historic entry. This determination would be made pending recommendations from the Cultural Landscape Report. The NPS would request that the city vacate the dead end portion of 8th Street adjacent to the Barclay House for visitor parking for the unit and to provide a short-term loading zone for buses. As in Alternative A, additional parking would be sought for overflow parking and special events.

MANAGEMENT ZONING

As a unit of Fort Vancouver National Historic Site, the management zones developed in the 2003 *Fort Vancouver National Historic Site General Management Plan* would apply and would be amended to include the McLoughlin House Unit. The McLoughlin House Unit would be zoned Historic. (See Appendix A: Fort Vancouver National Historic Site Management Zones.) The McLoughlin and Barclay Houses would be retained in their historic condition related to early settlement of the Oregon County/Oregon Territory and Oregon City and rehabilitated for public and administrative uses. The historic setting of the charter park would be maintained. The visitor experience would be enhanced through a range of approaches to 1) interpret the houses to more fully understand the contributions of McLoughlin and Barclay to the early history and pioneer settlement of Oregon and 2) use the historic district to provide a setting for the interpretation of the

development of Oregon City that will be respected in the future development of any enhancement of the site. Appropriate activities at the McLoughlin House Unit would include learning about the unit's natural and cultural resources, bird watching, photography, and walking along the bluff trail.

CULTURAL RESOURCES

McLoughlin House

The McLoughlin House would be used for interpreting Dr. John McLoughlin and his family life and significance as well as the subsequent history of the house as hotel, boarding house, and museum. Given the fact that the house was moved to its present location in 1909, long after its period of significance (1846-1867) when the family occupied the house, a true restoration of the exterior is not achievable. In addition the former detached kitchen was not moved. Changes that have occurred to the exterior, including foundations, porches, and walkways, or changes that may be necessary for its continued operation as a house museum such as the central heating system, vents, and ducts, will be examined through additional research for retention and/or modification as appropriate to enhance historical integrity. The Historic Structure Report (HSR) will provide direction for restoration treatment of exterior building envelope features where restoration is feasible.

Additional research to supplement information in the HSR will determine the potential for interior restoration. This research would include materials testing that would determine interior surface treatments. The research would also identify architectural elements and details that date to the historic period for restoration. The interior treatment would also include interpretive exhibits and historic furnishings of the McLoughlin family and related period furnishings. Furnishings and exhibits not of the historic period would be removed from the house based on the development of an approved historic furnishings plan. All work would be done following the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and would follow an approved restoration/rehabilitation plan developed specifically for the house. Interpretive exhibits that document the history of and changes to the house would complement the interpretive exhibits based on the primary interpretive themes.

Options would be explored for a potential restoration of the McLoughlin House kitchen. If feasible and appropriate, the kitchen could be used as a staging area for visitors, or a shelter in inclement weather.

Barclay House

As in Alternative A, the Barclay House would continue to be used for administrative offices, visitor contact, and other public uses. The interior and exterior of the house, however, would be rehabilitated for adaptive reuse to support additional public and administrative needs and one room of the house would be used to interpret Dr. Forbes Barclay's family and life in Oregon City. Treatment of this room would be based on an approved historic furnishings plan and would incorporate his furnishings or related period furnishings. All work would be done according to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, would meet Oregon City's historic review standards, and be in accordance with an approved rehabilitation plan developed specifically for the house.

Cultural Landscape

Unlike many parks set in a certain historic period, the landscape of the McLoughlin House Unit would be treated as a *living commemorative landscape* preserving the existing historic commemorative features and vegetation. Since the site has undergone many changes since the McLoughlin House was moved there in 1909, and it was not the original landscape for either the McLoughlin or Barclay houses, it is difficult to tie the landscape to one specific period. Site planning would complement the commemorative features of the site and the functions of each house. Specific landscape treatments and conditions are addressed in the Scenic Easement Deed and would be further developed through an approved Cultural Landscape Report/Recommended Treatments Plan. (See Figure 3, McLoughlin House Unit Site Plan.)

As in Alternative A, preservation maintenance would be necessary for the headstones and graves of Dr. John and Marguerite McLoughlin, the cannon, fountain, signs, and commemorative plaques. Proper stewardship of the historic landscape could necessitate additional treatments to prevent deterioration.

A Cultural Landscape Report would be required to document, analyze, and propose treatments for the cultural landscape, including the potential reconstruction of the historic circulation system on the site.

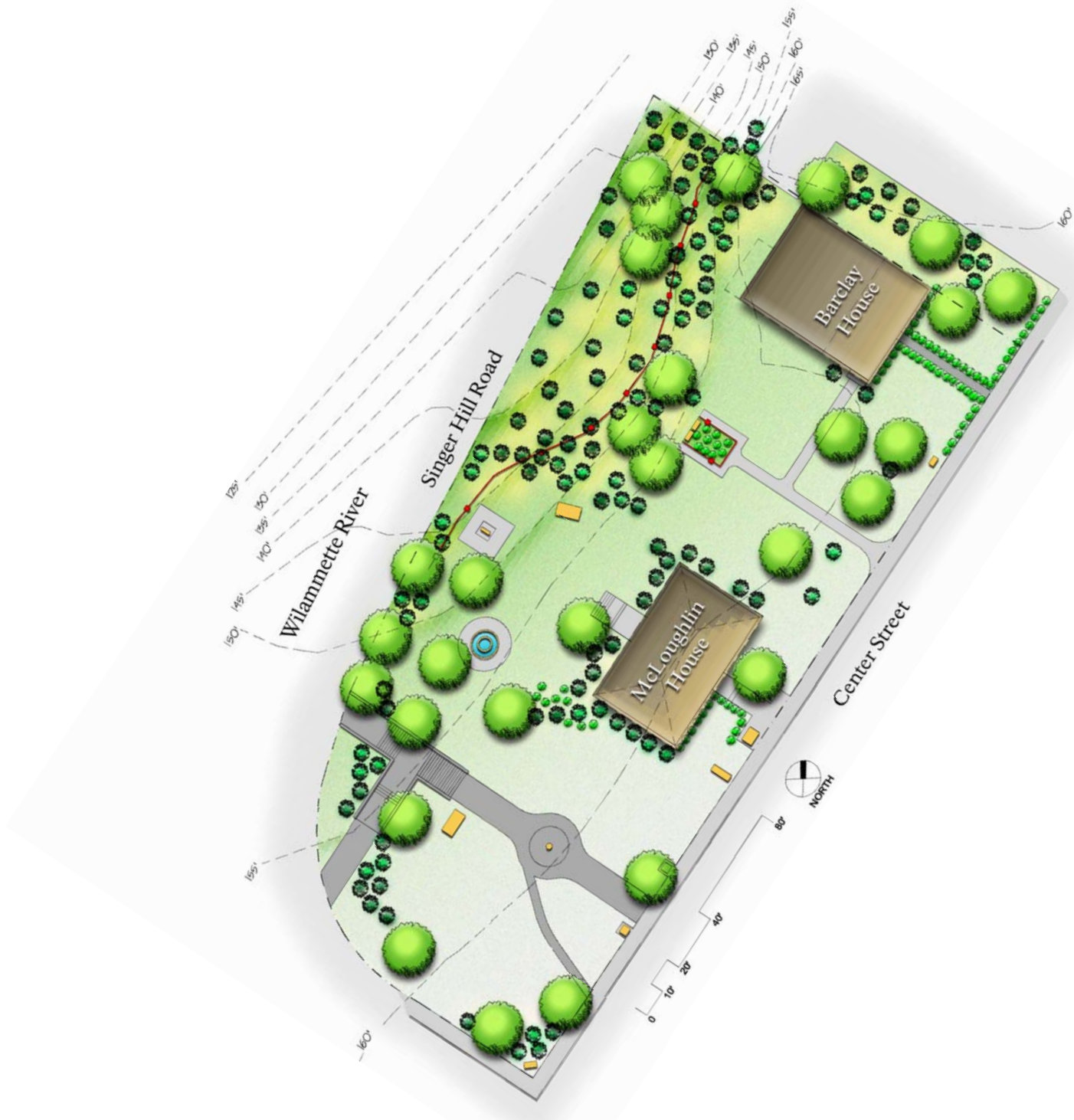


Figure 3: McLoughlin House Unit Site Plan

Museum Collections

In addition to the activities listed under Alternative A, the NPS would actively manage the existing collections. In this alternative, all items in the collections would be well researched, and material outside of the determined “period of significance” (1846 – 1867), or otherwise considered extraneous to site needs would be considered for de-accessioning according to NPS guidelines and policy. A Historic Furnishing Study/Plan would be prepared and used to support amending the Fort Vancouver National Historic Site Long Range Interpretive Plan to make specific recommendations regarding the McLoughlin House Unit associated exhibits and programs.

Archaeology

Treatment for archaeological resources would be the same as in Alternative A.

NATURAL RESOURCES

Treatment for natural resources would be the same as in Alternative A.

VISITOR EXPERIENCE

In the short term, the visitor experience at the McLoughlin House Unit would be the same as in Alternative A. Under NPS administration, visitors would continue to tour the site, and have opportunities to attend special events. Hours and dates of visitation would not increase, due to staffing and budget limitations.

The NPS would determine whether a shelter for visitors in inclement weather would be needed at the site or at the end of 8th Street (on the adjacent city property). A study would be undertaken to assess the need and location and its potential effects on the historic landscape.

In the long term, over the life of this plan, NPS-provided interpretive and educational programming and services at the site would be increased and broadened. All volunteers interacting with the visiting public would be offered interpretive training, as part of the Fort Vancouver NHS Volunteers-In-Parks program, to meet standards for interpretation. Education programs will be reviewed and adapted for consistency with curriculum standards. Teacher packets would be developed to send to schools and other groups ahead of their visits to optimize the learning experience.

The Fort Vancouver NHS Long-Range Interpretive Plan (LRIP), produced in April 2004, would be amended to address the McLoughlin House Unit. The plan would articulate the manner and ways in which the NPS would provide interpretation and education to the public at the site. Using the LRIP as a foundation, the NPS would develop appropriate interpretive and educational media (possibly including exhibits, wayside exhibits, publications, audiovisual products, historic furnishings, and expanded websites) to present interpretive themes reflecting the site’s significance. The Fort Vancouver NHS Junior Ranger program would also be expanded to include the McLoughlin House.

As in the No Action Alternative, carrying capacity for both houses would need to be determined.

Park Facilities

Maintenance and improvements of park facilities, including the addition of an accessible restroom, would be the same as in the No Action Alternative.

During renovation of the houses, the NPS would continue to allow public visitation as possible and provide limited interpretation of both the site and the renovation process.

The NPS would consider locating an additional outside shelter for visitors to use during inclement weather near the proposed street end parking.

McLoughlin House

The treatment of the McLoughlin House would be the same as in the No Action Alternative. In addition, evaluation of the condition of the roof and roof drainage system of the house would be conducted to determine the extent of repairs necessary.

Barclay House

The configuration and treatment of the rooms in the Barclay House would be changed to best reflect NPS and visitor use at the site in accordance with an approved rehabilitation plan that meets the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. As in Alternative A, ADA restrooms would be added as new compatible construction at the rear of the building either within or attached to the structure.

Subject to confirmation in a rehabilitation plan, the existing kitchen would be converted to an accessible office and could continue to include a small kitchenette. The gift shop would be moved across the hall. The former parlor space would be converted to a period furnished room to interpret the life of Dr. Barclay. The back multipurpose room would house exhibits that present the unit's interpretive themes. It would also include multi-purpose space for meetings and special events, including audio-visual presentations.

ADA accessible office space for up to four employees would be provided in the Barclay House. Additional offices and general storage would be provided on the second floor. Details would be developed in a rehabilitation plan.

PARK OPERATIONS AND STAFFING

Operations

In the short term, the Association would continue to manage and run the gift shop. In the long term, the NPS recommends that the gift shop be continued by a nonprofit entity. Opportunities would be explored to connect both Fort Vancouver and the McLoughlin House sales areas and make available similar merchandise.

The projected NPS operating budget for the McLoughlin House site is \$285,000 in FY 2006 dollars. As in Alternative A, fundraising events and donations by partners would continue to supplement NPS operating funds. Implementation of proposed facility and program costs is contingent upon future funding. Based on the current situation, these funding needs are not expected to be realized in the near term. Instead, these projected costs should be viewed as an articulation of long-term needs. As additional funding becomes available, various operational, programmatic and capital development aspects of the plan would be implemented over time.

Staffing

Staffing at the McLoughlin House Unit would include six FTE (full time equivalent) positions on-site. Volunteer coordination would be part of the site manager's duties. The site manager would report to the superintendent of Fort Vancouver NHS. The resource management position could be filled by existing park staff. Positions would include:

Permanent

- Site manager
- Maintenance Worker(1 subject to furlough)
- Interpreter/education specialist (1 subject to furlough)
- Resource Management/Curator/ Museum Technician (1)

Seasonal

- Interpreters (2)

Table 1: Staffing Under Alternative B

NPS Staff	Interim (1-3 years)	Long-term (3-15 years)
Administration	1 Site Manager (possibly shared)	1 Site Manager (possibly shared)
Maintenance	1 Permanent - Subject to Furlough	1 Permanent - Subject to Furlough
Interpretation/Education	1 Permanent - Subject to Furlough	1 Permanent - Subject to Furlough
		2 Seasonal
Resource Management	1 Permanent	1 Permanent
Total Staff	4 Total	6 Total

A written agreement would be developed between the NPS and the Association with regard to the partnership. The Association could assist in providing short-term funding assistance for NPS staff positions.

Fees

Fee collection would be the same as in the Alternative A.

Hours of Operation

Park operations could be expanded to year-round if funding and staffing permit and visitation warrants.

VISITOR AND EMPLOYEE SAFETY

Actions associated with visitor and employee safety would be the same as Alternative A.

ACCESS, CIRCULATION, AND PARKING

A detailed circulation plan would be prepared as part of the Cultural Landscape Report. The NPS would explore restoring the historic entry to the McLoughlin House which faces the river and bluff as the visitor entrance into the house.

The parking area between the Barclay House and the Victorious Faith Family Church is located at the dead end portion of 8th Street (west of Center Street) and is publicly owned. The Association staff currently has five permitted parking spaces next to the church and an additional two spaces on the northwest corner of the site by the Barclay House. The NPS would request that the city vacate this dead end portion of 8th Street which would then be used for visitor and staff parking for the McLoughlin House Unit. One or two ADA accessible parking spaces would be created. As in Alternative A, accessibility would need to be established on the site at any point of ingress or egress to the homes, as well as any other areas with transitional elevations.

The NPS would request that the city provide a short-term (15 or 30 minutes) loading and unloading zone in front of the Barclay house with enough space to accommodate a large tour or school bus. This would allow a safe drop-off and pick-up area at the site and an area for occasional service vehicles.

The NPS would also explore opportunities for a long-term arrangement or agreement with the city to utilize an existing parking lot for off-site parking for overflow, special events and long-term bus parking on 7th Street, southwest of the existing parking lot. This additional space would accommodate any increase in traffic related to the transfer of the site into the National Park System.

Implementation Plans

A number of additional studies and plans would need to be conducted to implement Alternative B (Preferred Alternative). Some of these studies and plans could require additional special project funding or increases to the operating base funding. Some of these projects could require formal analysis of alternatives in compliance with National Environmental Policy Act and the National Historic Preservation Act. Such documents would reference and be tiered to this unit management plan. The same studies and plans listed under Alternative A would be developed to guide more detailed planning for the unit (See Alternative A).

C. Alternatives Considered but Rejected

Leasing Space in Barclay House

Since the Barclay House was moved to the site in 1937, the first floor has been leased out at times for a variety of purposes to non-Association entities. Initially, the planning team discussed the possibility of leasing space in the house as a way to generate revenue sources for the McLoughlin Unit. This idea was rejected, however, because it was determined that the McLoughlin Unit would require all the space in the Barclay House for administrative uses, the gift shop, and to provide ample space for quality interpretive and educational programming.

Situating Bathrooms at other Locations on Site

The McLoughlin House Unit site is small and constrained by natural features and topography; therefore there are few places to locate a bathroom facility. Unlike the McLoughlin House, the Barclay house has been significantly altered over time and provides an opportunity for upgrading the restrooms without significant new impacts on the cultural landscape or the eligibility of the Barclay House for listing on the National Register of Historic Places. The new restroom would meet ADA standards and replace a single non-compliant restroom.

Locating Administrative Operations in a Non-historic Facility Either On or Offsite

It is not possible to locate administrative operations in a non-historic building onsite since none exist. Keeping operations onsite allow for efficiency of operations and convenience to staff and volunteers and the ability to accommodate drop-in visitors. The Barclay House has been used in the past by the Association for administrative operations. Having staff present also helps maintain the building by providing day occupancy in the building. Providing for the administration function offsite would require additional funds to lease or buy a suitable space.

D. Environmentally Preferred Alternative

In accordance with NPS Director's Order-12, *Conservation Planning, Environmental Impact Analysis, and Decision-making*, the NPS is required to identify the "environmentally preferred alternative" in environmental documents. The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act (NEPA) of 1969, which is guided by the Council on Environmental Quality (CEQ). The CEQ (46 FR 18026 - 46 FR 18038) provides direction that "[t]he environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101 (b)", which considers:

- Fulfilling the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assuring for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
- Attaining the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserving important historic, cultural and natural aspects of our national heritage and maintaining, wherever possible, an environment that supports diversity and variety of individual choice;
- Achieving a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
- Enhancing the quality of renewable resources and approaching the maximum attainable recycling of depletable resources.

The Council on Environmental Quality states that the environmentally preferable alternative is "the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources (46 FR 18026 – 46 FR 18038)." According to NPS NEPA Handbook (DO-12), through identification of the environmentally preferred alternative, the NPS decision-makers and the public are faced with the relative merits of choices and must clearly state through the decision-making process the values and policies used in reaching final decisions.

Alternative B (Preferred Alternative) was selected as the environmentally preferred alternative by determining how Alternatives A and B would meet the criteria set forth in the Section 101(b) and considering any inconsistencies between the alternatives analyzed and other environmental laws and policies.

Alternative B would best enhance the unit's ability to carry out its purpose of preserving the historic homes and landscape and interpreting the unit's historical significance. Alternative B provides management strategies that are environmentally responsible and historic preservation oriented, ensuring that future generations would be able to enjoy the unit's resources. Alternative B would assess and upgrade facilities to health and life safety standards. It would also fulfill requirements for ADA accessibility to the historic homes and landscape for both visitors and staff. Restoration and rehabilitation of interior and exterior elements of the historic homes and preservation maintenance of the historic landscape would ensure healthful, aesthetically and culturally pleasing surroundings, as well as preserve our national heritage. Documentation and improved management of collections would ensure that future generations could appreciate this aspect of our national heritage. Alternative B would enhance existing interpretive programs, with new exhibits, materials, and NPS staffing resources. Alternative B would allow for greater opportunities for partnering with like-minded institutions and individuals in the local and regional area. These partnership opportunities and working with the unit's neighbors would encourage education about the unit's resources and its preservation, thereby promoting "a wide sharing of life's amenities." The preferred alternative would satisfy national goals 1, 2, 3, 4 and 5 to a high degree. National goal 6 is not applicable to this project.

Alternative A, the no-action alternative, would continue existing courses of action. While Alternative A does fulfill the McLoughlin House Unit's purpose, it does so to a lesser degree than Alternative B. Under Alternative A, the NPS would limit resource preservation efforts to only what is mandated by law and to prevent further

deterioration. The NPS would provide educational and interpretive programs at their existing levels. Some of the actions with regard health and safety standards, ADA accessibility, partnerships, and use of environmentally responsible management strategies are the same as Alternative B. Therefore, in comparison with Alternative B, Alternative A would satisfy national goals 2 and 5 to a high degree and goals 1, 3, and 4 to a moderate degree. National goal 6 is not applicable to this project.

Table 2
Summary of Alternatives

Actions	Alternative A - No Action	Alternative B - Preferred
Management Zoning		
	No NPS management zones	Historic zone
Cultural Resources		
McLoughlin House	<p>Preserve integrity and character of the historic McLoughlin House.</p> <p>Undertake improvements over the next 10-15 years to meet building codes, to prevent deterioration, and to provide for emergency architectural work.</p> <p>Provide routine maintenance and stabilization; make structural changes to provide access to persons with disabilities without impacting the historic fabric of the house.</p>	<p>Same as Alternative A plus:</p> <p>Restore, to the extent possible, the exterior of the McLoughlin House to its 1846-67 period.</p> <p>Preserve architectural elements and details of the historic period.</p> <p>Furnish the interior of the houses with exhibits and historic furnishings of the McLoughlin family and related period.</p> <p>Remove furnishings and exhibits not of the historic period (1846-67).</p> <p>Explore options for potential restoration of kitchen.</p> <p>Provide interpretive exhibits that document the history of changes to the house and the process of its restoration.</p>
Barclay House	<p>Preserve the integrity and character of the historic Barclay House.</p> <p>Undertake improvements over the next 10-15 years to meet building codes, to prevent deterioration, and to provide for emergency architectural work.</p> <p>Provide routine maintenance and stabilization, and making structural changes to provide access to persons with disabilities.</p>	<p>Same as Alternative A plus:</p> <p>Restore, to the extent possible, the exterior of the Barclay House to its 1850-73 period. Address the possible removal of later additions, such as the back porch, as well as the addition of new elements, such as public restrooms.</p> <p>Preserve architectural elements and details of the historic period, while undertaking an adaptive rehabilitation to provide for the continued use for administrative offices, visitor contact, and other public uses.</p> <p>Furnish one or two rooms of the Barclay House with exhibits and historic furnishings of the Barclay family and related period.</p> <p>Interpret Dr. Forbes Barclay's family and</p>

		life in Oregon City.
Cultural Landscape	<p>Preserve the historic grounds and landscape features to maintain the existing integrity and character of the cultural landscape. Continue routine landscape work.</p> <p>Continue preservation maintenance for the graves of Dr. John and Marguerite McLoughlin, the cannon, fountain, signs, and commemorative plaques.</p> <p>Perform limited site planning to design ADA access to the houses and the new restroom facility at the rear of the Barclay House.</p> <p>Develop a Cultural Landscape Report and Recommended Treatments Plan.</p>	Same as Alternative A, plus some site planning, as necessary, to accommodate change to the site outlined in Alternative B.
Museum Collections	<p>Protect and maintain collections in their current locations in the McLoughlin House, Barclay House, and off-site safety deposit boxes.</p> <p>Coordinate with the Association to assist with organizing the collection records.</p> <p>Document collections in accordance with NPS museum collections standards.</p> <p>Manage the collection and provide on-site curatorial expertise and determine the extent of the collection management needs.</p> <p>Develop a Scope of Collection Statement and a Museum Management Plan.</p>	Same as Alternative A, plus consider deaccessioning or other actions for items not within the period of significance.
Archaeology	<p>Preserve underground archaeological resources.</p> <p>Testing, excavation, and monitoring could occur if ground altering infrastructure or landscape work was necessary.</p>	Same as Alternative A.
Natural Resources		
	<p>Continue existing natural resource management strategies.</p> <p>Address any potential landslide issues with consideration for impacts on archaeological and cultural landscape resources.</p> <p>Assess vegetation conditions and remove invasive species along the bluff as</p>	Same as Alternative A.

	<p>necessary and feasible.</p> <p>Mediate standing water and poor drainage on site with consideration for impacts on archaeological and cultural landscape resources.</p>	
Visitor Experience		
Interpretive Programs and Outreach	<p>Continue interpretive programs similar to current levels incorporating basic information about the National Park Service.</p> <p>As appropriate, work with the Association, volunteers, and others to provide tours, organize educational activities and special events, and sponsor holiday events at the site.</p> <p>Provide technical and staffing assistance, as funding permits.</p> <p>Manage the McLoughlin House Unit website as part of the Fort Vancouver NHS website.</p> <p>Continue to greet visitors at the Barclay House before conducting tours of the site. Continue to end tours at the Barclay House gift shop. Discontinue the self-guided tours for the upstairs of the McLoughlin House.</p>	<p>Same as Alternative A, plus plan and design appropriate interpretive exhibits and media to tell the stories of the lives of Drs. McLoughlin and Barclay, as well as the history of the site and buildings.</p> <p>Develop teacher packets to send to schools and other groups ahead of their visits to optimize the learning experience.</p>
Partnerships	<p>Work cooperatively with local organizations and institutions to continue mutually beneficial relationships.</p> <p>Continue to distribute brochures and encourage people to visit other related historic sites in the Oregon City area.</p> <p>Develop cooperative activities and programs at the McLoughlin House consistent with NPS policies and regulations, such as implementing cultural heritage and preservation programs, and outreaching to the community.</p>	Same as Alternative A.
Carrying Capacity	Maintain current carrying capacity at 45 visitors maximum in the McLoughlin or Barclay Houses at one time. Continue to divide larger groups into smaller groups, touring different areas of the site with authorized guides.	Same as Alternative A, plus conduct a study of carrying capacity based on the Restoration/Rehabilitation Plans for both houses.
Park Facilities		
General/	Provide routine maintenance for the	Same as Alternative A, plus during

Maintenance	<p>landscape and for the two houses for visitor use and administrative functions.</p> <p>Improve facilities to required ADA accessibility standards.</p> <p>Add new signage with the new NPS designation.</p> <p>Store maintenance machinery and tools for the McLoughlin House Unit at the park's maintenance facility at the Fort Vancouver Unit.</p>	<p>renovation of the houses, continue to allow public visitation as possible and provide limited interpretation of both the site and the renovation process.</p> <p>Determine whether an outside inclement weather shelter for visitors would be needed.</p>
Restroom Facilities	Construct new ADA restroom at the back of the Barclay House as part of a restoration/rehabilitation/adaptive use plan.	Same as Alternative A.
McLoughlin House	<p>Continue the use of the house for tours and special events.</p> <p>Evaluate condition of roof and repair as necessary.</p>	Same as Alternative A.
Barclay House	The house would continue to accommodate visitor facilities, administrative offices, gift shop, multi-purpose room, kitchen, lavatories, and general storage.	<p>Change the configuration and use of the house to best reflect NPS and visitor use needs at the site. The following changes would need to be in accordance with the <i>Secretary of the Interior's Standard for Rehabilitation</i>.</p> <p>Convert the existing kitchen to a park office that is ADA accessible, possibly with a small kitchenette.</p> <p>The gift shop would be moved across the hall.</p> <p>Convert the former parlor space to a period furnished room about the life of Dr. Barclay.</p> <p>The back multi-purpose room would house exhibits that present the unit's interpretive themes, meetings, and audio-visual programs.</p> <p>Locate additional storage and office space on the second floor.</p>
Park Operations and Staffing		
Operations	<p>Continue to operate McLoughlin House without significant modification to the existing conditions.</p> <p>Develop a cooperative agreement between the NPS and the MMA to state the responsibilities of each partner.</p>	<p>Same as Alternative A plus:</p> <p>In the short-term, the Association would continue to manage and run the gift shop.</p> <p>In the long-term, the NPS recommends</p>

	The cooperative agreement would include management of the gift shop. Proceeds from the gift shop would continue to support the operation and maintenance of the McLoughlin house Unit.	that the gift shop be continued by a nonprofit entity. Opportunities should be explored to connect both Fort Vancouver and the McLoughlin House sales areas.
Staffing	<p>The Association would support the NPS by providing two staff members on-site during operating hours and additional staff during peak visitation times.</p> <p>Convert Association docents to NPS Volunteers-in-Parks.</p> <p>Provide one full-time staff.</p> <p>Hire seasonal staff to provide interpretive and educational functions, as funding permits.</p>	<p>The NPS would provide six FTE (full time equivalent) positions at the McLoughlin House Unit.</p> <p>Explore the possibility of some curatorial cost-sharing of services with other area museums.</p> <p>Convert Association docents to NPS Volunteers-in-Parks.</p> <p>Permanent staff positions would include a site manager, interpreter/ education specialist, resource manager, curator/ museum technician, and maintenance worker.</p> <p>Seasonal staff would likely include two Interpreters.</p>
Fees	Discontinue fee collection as NPS takes over management of the unit. In the future, determine whether to charge a fee, consistent with NPS policies and regulations, at such time as it becomes feasible.	Same as Alternative A.
Hours of Operation	Continue the hours of operation from 10 a.m. to 4 p.m. on Wednesday through Saturday, and 1 p.m. to 4 p.m. on Sunday. Closed on holidays and 2 months of the year.	Short-term: Same as Alternative A. Long-term: Explore need / feasibility of year-round operations.
Visitor and Employee Safety		
	<p>Evaluate and upgrade fire suppression systems and utilities to meet fire codes.</p> <p>Replace fencing along the steep bluff with code compliant fencing material.</p> <p>Evaluate the safety needs of the site by continuing to upgrade lighting and security system to prevent loitering and other undesirable uses of the site.</p>	Same as Alternative A.
Access, Circulation, and Parking		
	Seek off-site parking for overflow and special events. Work with the neighborhood, Oregon City, the Association, and others to address this	<p>Same as Alternative A plus:</p> <p>Explore restoring the historic entry to McLoughlin House which faces the river</p>

	<p>issue.</p> <p>Prepare a detailed circulation plan as part of the Cultural Landscape Report.</p>	<p>and bluff as the visitor entrance into the house.</p> <p>Request vacation of the dead end portion of 8th Street (west of Center Street) for visitor and staff parking adjacent to the church. This would include one or two ADA spaces.</p> <p>Request that the city provide a short-term (15 or 30 minutes) loading and unloading zone in front of the Barclay house with enough space to accommodate a large tour or school bus.</p>
Implementation Plans		
	<p>Action Plans Needed:</p> <ul style="list-style-type: none"> • Agreement between the NPS and MMA • Historic Structures Report for the Barclay House • Rehabilitations Plans for both houses • Cultural Landscape Report • Evaluation and assessment of security and life/safety code issues and mechanical systems • Scope of Collection Statement, • Emergency Operations Plan • Museum Management Plan • Archival Survey and Assessment • Conservation Survey and Treatment Plan • Historic Furnishings Study and Plan • Administrative History • Amendment to Fort Vancouver NHS Long Range Interpretive Plan • Oral Histories • Museum Collection Preservation • Maintenance Plan 	<p>Action Plans Needed:</p> <p>Same as Alternative A.</p>

