

Fort Vancouver National Historical Site

FINDING OF NO SIGNIFICANT IMPACT McLoughlin House Unit Management Plan Clackamas County, Oregon

May 2007

The National Park Service (NPS) has completed the environmental analysis process for the McLoughlin House Unit Management Plan.

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 (located in Oregon City, Oregon) as part of Fort Vancouver National Historic Site and to provide the National Park Service, the McLoughlin Memorial Association (Association), and other stakeholders with long-term guidance for managing the McLoughlin House Unit. The actions undertaken pursuant to 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 2004 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 NPS. 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). Despite the fact that the Fort Vancouver National Historic Site GMP stated that if the McLoughlin House was added to the park, an amendment to the GMP would be done, it has since been determined unnecessary. This is because the addition was called for by the GMP and as a result it does not constitute a new action. All uses of the new area which will occur under the plan are appropriate and all proposed actions are consistent with the overall direction of the GMP. Therefore, this Environmental Assessment (EA) and the McLoughlin House Management Plan tier off the GMP.

Selected Alternative

Alternative B: Implementation of McLoughlin House Unit Management Plan

This alternative would use the best available 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. The actions encompassed in the selected Plan are the same as identified and analyzed as Alternative B in the EA, with the exception of minor modifications made as a result of information and comments derived from public review of the EA, as follows:

In response to public comments, the following actions would be removed from or incorporated into the selected alternative:

- Requesting that the city vacate the dead end portion of 8th Street (removed)
- Developing a parking plan and a transportation plan (added)
- Considering a shelter near 8th Street (removed)
- Interpretive subtheme related to McLoughlin housing people in need (removed)
- Possible designation of ADA parking on 8th Street (removed)

The selected Plan includes 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 Dr. McLoughlin 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 the No Action Alternative, 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 moved 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. As in the No Action Alternative, 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 Country/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 (because the setting has changed). In addition the former detached kitchen was not moved to the current location along with the house. Changes that have occurred to the exterior of the house, including to 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, would be examined through additional research for retention and/or modification as appropriate to enhance historical integrity. The Historic Structure Report (HSR) would 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 related to Dr. McLoughlin or 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 detached 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 the No Action Alternative, 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 would 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 the No Action Alternative, 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.

Museum Collections

In addition to the activities listed under the No Action Alternative, 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 and Museum Management 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

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

Natural resource management duties would continue to fall under 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 at Dr. and Mrs. 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 or threatened species, or species of concern.

VISITOR EXPERIENCE

In the short term, the visitor experience at the McLoughlin House Unit would be the same as in the No Action Alternative. 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.

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 would 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 how 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.

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 the No Action Alternative, ADA restrooms would be added as new compatible construction at the rear of the building either within or attached to the structure.

The proposed rearrangement of the Barclay House would be subject to confirmation in a space rehabilitation plan. To determine the configuration, NPS would undertake a planning process to find the best arrangement of uses within both houses pending the completion of Historic Structures Reports. Other changes would be made in consultation with existing staff.

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 described in the No Action Alternative, 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. In the interim, 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
Resource Management	1 Permanent	2 Seasonal 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

Consistent with the NPS Servicewide Fee Program, there would be no charge for visiting the McLoughlin House, Barclay House or the historic grounds, and the NPS would not charge for school visits.

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

Hours of Operation

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

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

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.

One or two ADA accessible parking spaces would be created. As in the No Action Alternative, 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, such as southwest of the existing parking lot or some other appropriate nearby parking area. 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 this 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 tied 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.

There would be appropriate opportunities for interested public to be engaged in the preliminary planning for these projects.

Summary of Other Alternatives Considered

Alternative A: No Action (Continue Current Management)

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 NPS. 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 NPS. Many of these changes, however, would be dependent upon available NPS funding.

Preliminary 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.

Locating 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 allows 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.

Environmentally Preferred Alternative

In accordance with Director's Order-12, *Conservation Planning, Environmental Impact Analysis, and Decision-making* and Council on Environmental Quality (CEQ) requirements, the NPS is required to identify the "environmentally preferred" alternative in all environmental documents released for public review. 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 CEQ. The CEQ (46 FR 18026 - 46 FR 18038) provides direction that the "environmentally preferable alternative is the alternative that would promote the national environmental policy as expressed in NEPA's Section 101," including to:

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

Generally, these criteria mean the environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances historic, cultural, and natural resources (46 FR 18026 – 46 FR 18038).

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 to 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.

Why the Selected Plan Will Not Have a Significant Effect

As documented in the EA, the park has determined that the selected alternative can be implemented with no significant adverse effects on soils, water quality, vegetation, wildlife, special status species, prehistoric and historical archeology, ethnographic resources, historic structures and cultural landscapes, visitor experience, or park operations. The National Environmental Policy Act requires that decision-making regarding the analysis of significance be based on analysis of the proposed action with respect to the following factors:

Beneficial and Adverse Effects - The selected alternative has a wide range of beneficial and adverse effects (see Impact Mitigation Matrix below). As shown below in the impact mitigation matrix, these short- and long-term negligible to moderate effects would not result in impairment.

Degree of effect on public health or safety - The selected alternative will not adversely affect public health or safety.

Unique characteristics of the geographic area, such as proximity to historic or cultural resources, park lands, wetlands, wild and scenic rivers, or ecologically critical areas - The selected alternative will not impact the unique characteristics of the area, including prime farmlands, wetlands, wild and scenic rivers or ecologically critical areas. The proposed actions call for changes in management conditions and will not result in the loss of these characteristics because these characteristics are either not present or not affected by the selected alternative.

Degree to which effects on the quality of the human environment are likely to be highly controversial - There were no controversial impacts or aspects of the proposed project that surfaced during the environmental analysis process. The effects on the quality of the human environment are known and have been fully described in the EA.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration - The selected alternative neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Degree to which the action may adversely affect districts, sites, highways, structures or objects listed on the National Register of Historic Places or may cause the loss or destruction of significant scientific, cultural or historic resources - The selected alternative will have no adverse effect on cultural resources. It will not result in the loss or destruction of significant scientific, cultural or historic resources.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat - The proposed project would have no effect on any listed species from the actions proposed in the selected alternative.

Whether the action is related to other actions with individually insignificant but cumulatively significant effects; Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks; and Whether the action threatens a violation of federal, state or local environmental protection law - No significant cumulative effects and no highly uncertain, unique or unknown risks were identified during preparation of the Environmental Assessment or during the public comment period. The selected alternative will not violate any federal, state or local environmental protection laws.

Measures to Minimize Environmental Harm

The following summary identifies the impacts and mitigation documented and evaluated in the EA. This summary assigns responsibility for ensuring that the measures, which minimize these impacts, are implemented as part of the preferred alternative. There were no highly controversial effects or highly uncertain, unique or unknown risks identified during either preparation of the environmental assessment/assessment of effect or the public review period. The preferred alternative does not violate federal, state, or local environmental protection laws.

All mitigation measures described in this section will be implemented. Further mitigation measures may be developed in response to ongoing informal consultation on this project and may also augment the measures described below. The measures identified below are designed to ensure that impacts to park natural and cultural resources, visitor use/experience and park operations are avoided, minimized or mitigated.

Resource	Impact	Measures to Avoid, Minimize or Mitigate Impact	Responsible Staff
Land Use	<p>Negligible to minor adverse impacts from construction of a compatible restroom and from changes to onsite and overflow parking.</p> <p>Long-term minor to moderate beneficial effects from comprehensive planning and acknowledgement of the site's historic zone.</p> <p>Long-term moderate beneficial effect from restoring exterior appearance of houses, interior of McLoughlin House and some interior spaces in Barclay House.</p> <p>Long-term minor beneficial effect from visitor understanding of how land use contributed to preservation of the site.</p>	<p>Actions would focus on maintaining and protecting historic resources, restoring the cultural landscape, recreating elements of the historic scene, maintaining visitor facilities and mitigating impacts from human use.</p>	Superintendent
Geology	<p>Minor to moderate short-term adverse impacts and long-term negligible beneficial impacts to geology from potential future actions to remediate landslide concerns regarding Singer Hill Road.</p>	<p>Future actions would undergo separate environmental analysis to determine the best solution for the cultural landscape and would conform to the scenic easement from Oregon City and retain the landscape buffer.</p>	PWRO Staff

Resource	Impact	Measures to Avoid, Minimize or Mitigate Impact	Responsible Staff
Soils	<p>Negligible to moderate impacts from removal of existing soils and importation of fill materials from construction of historically compatible restroom and potential changes to surface materials surrounding graves. Beneficial impacts from the improvement of subsurface conditions.</p> <p>Additional impacts related to construction of walkways and additional impermeable and permeable surface treatments (landscaping and walkways).</p>	<p>Soil compaction and loss of vegetation would be remediated following construction by scarification and/or landscaping.</p>	PWRO Staff
Water Resources (including Hydrology and Wetlands):	<p>No additional impacts. Potential future improvement of drainage conditions near graves. Potential short-term adverse impacts coupled with long-term negligible to minor cumulative beneficial impacts.</p>	<p>Additional environmental analysis upon a proposed solution would occur.</p> <p>Best management practices would be used to retain natural processes to the degree possible, while improving protection for the gravesites.</p> <p>Additional investigation of potential historic changes to wetlands at the site would occur.</p>	PWRO Staff
Historic Buildings and Structures	<p>Short-term negligible to minor adverse effects and long-term beneficial effects from restoring the houses to their historic appearance.</p> <p>Short-term negligible to minor adverse effects (from testing) and long-term minor to moderate beneficial effects (from restoration) of the interior of the McLoughlin House and some or all of the parlor in the Barclay House.</p>	<p>Proposed actions would result in mitigating long-term adverse impacts that have occurred to the historic houses.</p> <p>Additional planning would be undertaken to determine the best arrangement of administrative facilities within the Barclay House.</p> <p>All work would be designed and performed to meet the Secretary of the Interior's Standards for the Treatment of Historic Properties.</p> <p>Additional consultation with the SHPO would occur for those actions falling outside of the 1995 NPS Programmatic Agreement.</p>	Archeologist
Cultural Landscapes	<p>Negligible to minor beneficial effects from potential re-establishment of the historic entrance to the McLoughlin House.</p> <p>Negligible to minor adverse effect on circulation patterns from possible reconstruction of kitchen.</p> <p>Negligible short-term adverse and negligible to minor beneficial effects from re-creation of historic circulation pathways or realignment of existing paths.</p> <p>Effects on historic buildings and structures noted above.</p>	<p>All work would be designed and performed to meet the Secretary of the Interior's Standards for the Treatment of Historic Properties.</p> <p>Additional consultation with the SHPO would occur for those actions falling outside of the 1995 NPS Programmatic Agreement.</p>	PWRO Historic Landscape Architect
Museum Collections	<p>Long-term minor to moderate beneficial effects from applying NPS museum standards to existing collections.</p> <p>Negligible to moderate long-term beneficial effects from completing collections and</p>	<p>Preparation of planning documents to guide museum collections management.</p>	Curator

Resource	Impact	Measures to Avoid, Minimize or Mitigate Impact	Responsible Staff
	<p>museum planning documents.</p> <p>Long-term moderate beneficial impact from managing the collections in support of an expanded interpretive program.</p> <p>Long-term minor beneficial effect from expansion of the collections to support historic furnishings study and use in the houses.</p> <p>Negligible to minor adverse impacts from deaccessioning of items long part of the collection, but determined inappropriate in accordance with NPS policy and guidelines.</p>		
Archeological Resources	Long-term negligible to moderate beneficial effects and short- and long-term localized minor adverse effects from <i>in situ</i> preservation of archeological resources or excavation preservation with the context preserved.	If National Register eligible subsurface deposits or other significant archeological resources are found, measures to avoid or mitigate the loss of these deposits will be developed in consultation with SHPO, Native American Tribes, and other interested parties under Section 106 of the National Historic Preservation Act and Oregon State Law.	Archeologist
Sacred Sites (Ethnography)	No or negligible effects as a result of the unlikely presence of ethnographic resource being affected by ongoing activities at the site.	Ongoing research and consultation with affected tribes regarding possible ethnographic connections.	Archeologist
Vegetation	<p>Long-term negligible to moderate beneficial effects and short-term negligible to moderate adverse effects from onsite ground disturbance during construction or modification to existing developed areas.</p> <p>Moderate beneficial impacts from removal of non-native species in selected locations.</p> <p>Negligible to minor beneficial effects from maintenance of landscaping.</p> <p>Short-term negligible to minor adverse effects from temporary removal of vegetation, followed by its replacement, during construction activities.</p> <p>Series of localized short- and long-term negligible to minor adverse impacts from improvements to pathways and additional actions to restore the historic appearance of the houses.</p>	<p>Rehabilitation of project sites following construction impacts.</p> <p>Revegetation or landscaping with suitable native or non-native (historic) species.</p>	Facility Manager
Visitor Experience: Visitor Use Opportunities	<p>Long-term moderate beneficial impacts from potential restoration of historic parlor in Barclay House.</p> <p>Negligible to minor long-term beneficial impact from potential reconstruction of kitchen (shelter).</p>	N/A	Chief Ranger
Visitor Experience: Visitor Interpretation and Education	<p>Negligible to minor beneficial impacts from greater NPS involvement in facilitating and giving house tours and from improvements to publications and exhibits.</p> <p>Minor to moderate beneficial effect on increasing visitor understanding of McLoughlin House unit through new exhibits and interpretive programming.</p>	N/A	Chief Ranger

Resource	Impact	Measures to Avoid, Minimize or Mitigate Impact	Responsible Staff
	Long-term beneficial impacts from improvements in interpretation directed at children.		
Visitor Experience: Visitor Use Access and Transportation	<p>Minor adverse or minor beneficial effect on visitors from determination of carrying capacity.</p> <p>Short-term negligible to moderate adverse effects from existing limited parking with impacts decreasing to negligible as additional parking is secured for the site.</p> <p>Short- and long-term minor to major beneficial impacts from construction of accessible restroom.</p> <p>Additional minor to moderate beneficial impacts from potential reconfiguration of Barclay House.</p> <p>Long-term minor to moderate beneficial effect from proposed expansion of parking.</p>	Collaborative planning for interior modifications to the Barclay House.	Chief Ranger
Park Operations: Staffing and Facilities	<p>Long-term minor beneficial effect on staff and visitors from continuing most existing operations.</p> <p>Long-term minor to major beneficial effects on visitors needing accessible restrooms.</p> <p>Negligible to minor long-term beneficial effect from continued use of maintenance equipment and staffing from Fort Vancouver.</p> <p>Long-term negligible to minor beneficial effect from new signage.</p> <p>Long-term beneficial effect from preparation of NPS plans for continued management of the site.</p> <p>Additional long-term negligible adverse impact from need to maintain potential additional building (kitchen shelter).</p>	Collaborative development of a parking plan.	Chief Ranger
Park Operations: Visitor and Employee Health and Safety	<p>Series of minor to moderate long-term beneficial effects from adherence to NPS policies and implementation programs.</p> <p>Minor long-term beneficial effect on employee safety from NPS commitment to using green products.</p> <p>Long-term minor to moderate beneficial effect from installation of new, historically compatible fencing along Singer Hill bluff.</p>	N/A	Superintendent

Public Involvement

Fort Vancouver National Historic Site conducted both internal scoping with appropriate NPS staff and external scoping with the public and interested and affected groups, agencies, and tribes to determine the range of issues to be discussed in the Environmental Assessment.

A management plan newsletter was prepared in April 2004 and sent to approximately 700 people on the Fort Vancouver GMP mailing list. The original mailing list was also expanded to include

Oregon government agencies, organizations, tribes and businesses interested in or related to the McLoughlin House site. The newsletter announced the transfer of the McLoughlin House National Historic Site to the NPS, explained the planning process for the proposed management plan and how the public would be informed and involved. No comments were received as a result of this newsletter.

The EA was available for a sixty-day public review period from October 30, 2006 to December 30, 2006. Approximately 131 copies of the EA were distributed. During this time the EA was also available on the park's website <http://www.nps.gov/fova> and the Public, Environment and Public Comment website at <http://www.planning.nps.gov>. In response to a press release issued by the park, accounts of the proposed plan were published in *The Columbian*, and *The Oregonian*. Additionally, the press release was made available to several other newspapers including *The Columbian*, *The Oregonian*, *Portland Tribune*, *Seattle Times*, the *Vancouver Business Journal*, and other special emphasis news organizations as well as numerous radio and television stations. Printed copies of the EA were also available for review at several local area libraries (Fort Vancouver Regional Library). Two public meetings were also held on November 14, 2006 at the Barclay House.

Three comment letters were received from individuals; two from non-profit organizations: the McLoughlin Memorial Association and the McLoughlin Neighborhood Association; and one from another NPS office (National Trails System). Approximately eight people attended the afternoon public meeting, and approximately six people attended the evening public meeting. Public comments were primarily related to the specific actions associated with the proposed plan. Approximately 64 distinct comments were made on the plan. A public comment summary is included in an Errata prepared as an attachment to the EA which documents minor corrections. As noted above, in response to public comments, several plan elements were removed from or incorporated into the selected alternative. All corrections and modifications are minor in nature, and none resulted in any changes in the determinations of "significance" of potential impacts.

Agency Consultation

Native American Indian Tribes: Tribes in three states, including the Chinook, Cowlitz and Yakima Tribes in Washington, the Nez Perce Tribe in Idaho, and the Affiliated Tribes of Northwest Indians in Oregon, received information on the preparation of the plan. Tribes also received advance copies of the draft Alternatives from the plan and final copies of the EA. No responses from the tribes were received during either the public scoping or public review periods.

United States Fish and Wildlife Service (USFWS): There are no listed threatened or endangered species associated with the proposed management area. Because there would be *no effect* on any species listed or proposed for listing as a result of the implementation of this plan, no further consultation with the U.S. Fish and Wildlife Service is necessary.

State Historic Preservation Office (SHPO): Consultation with the Oregon SHPO and the Advisory Council was done during initial scoping for the Management Plan. In August 2005, park staff sent a copy of the Archaeological Results report and met with Oregon SHPO staff. During this meeting, park staff reviewed the proposals for impending utility upgrades then being proposed for the houses as well as the proposed installation of a sign at the site by the NPS and the possible need for creating a Memorandum of Understanding for future management of the site. Because no specific actions are being proposed at this time that would affect cultural resources, no additional consultation with or concurrence from SHPO is needed. As site specific actions, however, are proposed that could potentially affect historic or archaeological resources at the site, ongoing consultation with Oregon SHPO will take place to determine their concurrence with the determinations of effect for proposed actions.

Impairment Disclosure

In addition to determining the environmental consequences of the preferred and no-action alternative, NPS *Management Policies* (NPS 2006) and Director's Order-12, *Conservation Planning, Environmental Impact Analysis, and Decision-making* require analysis of potential effects to determine if actions would impair park resources. The following sections from Management Policies define impairment and highlight the difference between an impact and impairment.

1.4.3 The NPS Obligation to Conserve and Provide for Enjoyment of Park Resources and Values

The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. This mandate is independent of the separate prohibition on impairment and applies all the time with respect to all park resources and values, even when there is no risk that any park resources or values may be impaired. NPS managers must always seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values. However, the laws do give the Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values.

The fundamental purpose of all parks also includes providing for the enjoyment of park resources and values by the people of the United States. The enjoyment that is contemplated by the statute is broad; it is the enjoyment of all the people of the United States and includes enjoyment both by people who visit parks and by those who appreciate them from afar. It also includes deriving benefit (including scientific knowledge) and inspiration from parks, as well as other forms of enjoyment and inspiration. Congress, recognizing that the enjoyment by future generations of the national parks can be ensured only if the superb quality of park resources and values is left unimpaired, has provided that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant. This is how courts have consistently interpreted the Organic Act.

1.4.4 The Prohibition on Impairment of Park Resources and Values

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

The impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the Service from having the authority to manage the activity so as to avoid the impairment.

1.4.5 What Constitutes Impairment of Park Resources and Values

The impairment that is prohibited by the Organic Act and the General Authorities Act is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Whether an impact meets this definition depends on the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts.

An impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. An impact that may, but would not necessarily, lead to impairment may result from visitor activities; NPS administrative activities; or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park. . .

1.4.6 What Constitutes Park Resources and Values

The "park resources and values" that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

1.4.7 Decision-making Requirements to Identify and Avoid Impairments

Before approving a proposed action that could lead to an impairment of park resources and values, an NPS decision-maker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources and values. If there would be an impairment, the action must not be approved.

The EA identified and evaluated impacts to a host of park resources and values, an analysis that considered the severity, duration, and timing of direct and indirect impacts. The impacts disclosed herein occur in areas that have long been cornerstones of visitor use. The analysis concluded that there will be no major adverse impacts to a resource or value whose conservation is 1) necessary to fulfill the specific purposes identified in the park's enabling legislation; 2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or 3) identified as a goal in the park's General Management Plan or other relevant planning documents. Consequently, the selected alternative will not result in impairment of park resources or values. The selected alternative was chosen because it best accomplishes the legislated purposes of the park and the statutory mission of the NPS and the purpose and need for the plan.

Conclusion

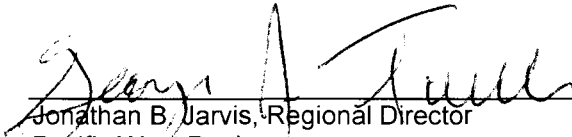
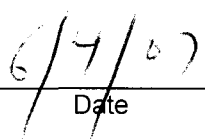
On the basis of the environmental analysis contained in the EA as summarized above, it is the determination of the NPS that the selected plan is not a major federal action significantly affecting the quality of the human environment. Nor is it an action without precedent or similar to an action that normally requires an Environmental Impact Statement. The conclusions of non-significance are supported by the conservation planning and environmental impact analysis completed and the capability of listed mitigation measures to reduce or eliminate impacts. No adverse effects to cultural or historical resources will occur; there are no unacceptable impacts, nor will any impairment of cultural or natural resources or park values occur. This determination also included due consideration of the minor nature of public comments. Therefore, in compliance with the National Environmental Policy Act, an Environmental Impact Statement will not be prepared, and portions of the selected plan will be implemented immediately, while others will be implemented as soon as practicable, pending other requirements, funding and staffing.

Recommended:

Tracy Fortmann, Superintendent Date
Fort Vancouver National Historic Site

Approved:

Jonathan B. Jarvis, Regional Director Date
Pacific West Region