Attachment 1: McLoughlin House Unit Management Plan Errata

(Attach this document to the Environmental Assessment to comprise a full and complete record of the environmental impact analysis.)

Introduction

This portion of the Errata indicates changes made after public and agency review of the McLoughlin House Unit Management Plan Environmental Assessment.

The following text should be added to the Plan/Environmental Assessment as noted below:

Page 12, 2nd paragraph, line 1: Replace "in 1909" with "between 1908 and 1909."

Page 21, 4th paragraph, lines 4-5: Replace last sentence with "In 1957, the state legislature officially bestowed the title 'Father of Oregon.'" [*Outpost*, Morrison, D.N., 2004:478]

Page 21, first bullet: Replace "original" with "second."

Page 21, last bullet: Replace "100" with "98" or "nearly 100."

Page 22, Primary Interpretive Themes, lines 34-35 (Theme A): Delete "encouraged" and replace with "diverted."

Page 22, last paragraph, (Theme A, second subtheme): Delete "and his wife Marguerite."

Pages 22-24, Primary Interpretive Themes: Reformat appearance of themes by indenting subthemes and adding "Subthemes" as a heading above.

Page 23, lines 6-7, 2nd Subtheme: Replace "Despite his adoption of American citizenship, civic involvement" with "Despite his attaining American citizenship, and his civic involvement"

Page 23, 9th paragraph: Replace subtheme with: "The McLoughlin House, with its large parlor, dining room, guest rooms, and detached kitchens, supported John and his wife Marguerite, daughter Eloisa's family, their servants, and their ability to offer hospitality to extended family, travelers, and business associates."

Page 23, line 24 (1st paragraph under Theme C): Replace "park land" with "public square." Earlier and later plats from 1840 designated Block 40 as a "Public square" not a park. (Morrison, D.N., 2004:478)

Page 23, last paragraph, line 2: Replace "boosterism" with "promotion."

Page 24, 1st paragraph: Replace subtheme text with "A public square since 1850, the grounds surrounding the McLoughlin and Barclay homes reflect more than 150 years of an evolving designed landscape."

Page 24, **4**th **paragraph**, **line 3**: Insert "river route through Fort Vancouver and" before "Barlow Road."

Page 24, 5th paragraph, line 1: Replace "incorporation" with "settlement" and insert "provisional and" before "territorial."

Page 24, 6th paragraph, line 1: Replace "in" with "on."

Page 34, McLoughlin House Existing Floor Plan: Add north arrow.

Page 35, Barclay House Existing Floor Plan: Add north arrow.

Page 37, lines 13 and 14 and Page 51, Action Plans, Column 2: Add "Parking Plan" and "Transportation Plan" to the list of future plans.

Page 37, 4th paragraph after bullets, line 4: Delete "and to provide a short-term loading zone for buses." The loading zone would be on Center Street as stated on page 43, lines 8-9.

Page 37, 2nd paragraph after bullets, lines 2-3: Replace sentence beginning with "Interior furnishings. . ." with "Interior furnishings and exhibits not related to the Dr. McLoughlin would be removed."

Page 38, Line 9: Replace "in" with "is"

Page 38, 3rd paragraph, line 6: Replace "not of the historic period" with "not related to Dr. McLoughlin or the historic period."

Page 39: Add labels to the graves, fountains and other site items on the map.

Page 39, Figure 3: Replace "Wilamette" with "Willamette" and indicate the distance from house to river.

Page 40, 5th paragraph, lines 1-2: Delete "or at the end of 8th Street (on the adjacent city property)."

Page 41, 5th paragraph line 1: Add "and volunteers" after "employees." Page 41, last paragraph, 3rd sentence: Insert "In the interim," prior to "the resource management."

Page 43, line 6: Replace "any" with "a."

Page 43, line 7: Delete "any."

Page 45, line 2: Insert "to" between "regard" and "health."

Page 59, 4th paragraph, line 6: Add to the sentence ending in "table" "(this last item also came from Tolmie's estate, but was donated by the Catholic Women's Association of Portland. It is also likely that the marble top was added later.)"

Page 61, 3rd paragraph, line 5: Replace "northwest" with "southwest."

Page 63, 3rd paragraph, line 2: Replace "Victory Faith" with "Victorious Faith Family"

Page 63, 3rd paragraph, line 4: Delete last sentence (reference to permitted parking). Although Oregon City formerly monitored parking at this location, they no longer do and there are now officially no "permit" parking spaces.

Page 66, 5th paragraph, line 6: Insert "and/or timekeeper" after "hall monitor."

Page 67, line 2: Replace "a" with "the" after "tour."

Page 67, first bullet: Delete. The self-guided leaflet referred to has not been in use since the NPS acquired the houses due to the desire to avoid visitors being upstairs by themselves.

Page 67, Special Events paragraph: Delete references to family festival and special discount days. Annual special events now include only a Founder's Day event in September, Spirits of Oregon City the last weekend in October (in cooperation with other historic venues); and a Candlelight Tour (also in cooperation with other historic venues) in December.

Page 68, 4th paragraph (Fencing), line 2: Replace "fencing" before "that separates the Barclay House from the adjacent church property" with "landscaping."

Page 68, 4th paragraph, line 4: Replace "three" with "two."

Page 68, first bullet: Delete "-link" before "barrier." Fence is a single chain, not a chain-link fence.

Page 68, third bullet: Delete. The fencing is not present.

Page 68, line 28: Delete "The only," capitalize "available" and insert "first and" before "second."

Page 79, line 8: Delete "to the rear of the Barclay House."

Page 79, 3rd paragraph, line 5: Add "to the Barclay House" following "integral" and replace "I" with "it."

Page 79, 3rd paragraph, line 7: Replace "are" with "is."

Page 83, last paragraph, line 3: Insert "and volunteers" after "employees."

Page 84, lines 4-5: Insert "and/or adverse" before "beneficial" to note that some proposed administrative changes to the Barclay House would not be entirely considered beneficial.

Page 84, lines 6-7: Delete sentence beginning with "While."

Page 115, 6th paragraph, line 4: Replace "1845" with "1830" and delete ", the first frame house built in Oregon City."

Attachment 2: McLoughlin House Unit Management Plan Public Comment Summary

(Attach this document to the Environmental Assessment to comprise a full and complete record of the environmental impact analysis.)

1) Comment: Is Oregon City "one of the oldest incorporated cities in the Pacific Northwest" as stated on page 11, line 25, or the "oldest incorporated city west of the Missouri River" as on page 15 (Old Home Forum sign in front of McLoughlin House)?

Response: The text on page 11, line 25 is correct, stating that "Oregon City is one of the oldest incorporated cities in the Pacific Northwest" (see reference for Comment 3 below). The other, which is a quote from the Old Home Forum sign, cannot be verified.

2) Comment: The McLoughlin House was moved in 1908, not 1911.

Response: As stated in the EA (page 53 *et seq.*)the McLoughlin House was moved in 1909 (*Outpost*, Morrison 2004:478, Barbaero 2003, and newspaper accounts all confirm the summer 1909 move of the house).

3) Comment: The original survey for Oregon City was in 1842, not 1845.

Response: As noted in *Outpost* (Morrison 2004:429), Dr. McLoughlin's first plat (and first survey) was in 1842.

In 1829, Dr. John McLoughlin established a claim for the Hudson's Bay Company at Willamette Falls. The first survey of this area was in 1842, and it was subsequently named Oregon City. The city was granted a charter on December 24, 1845 and became one of the oldest incorporated cities in the Pacific Northwest. In 1846, McLoughlin and his family moved into their newly-built home in the heart of Oregon City along the Willamette River.

4) Comment: McLoughlin House was McLoughlin's second residence, not first.

Response: Text on page 21 will be revised. As noted in *Outpost* (Morrison 2004:429f), McLoughlin House was John McLoughlin's second residence; the first was the small building used to establish his claim there which was used as a residence during construction of the second house.

5) Comment: The wall behind the houses along Singer Hill Road may be historic. Singer built the grist/flour mill where the road is now and it operated between 1850 and 1890.

Response: Comment noted. The NPS in cooperation with Oregon City will try to determine the provenance of the wall. Information about the rock wall behind the house will be determined as part of the research for the Cultural Landscape Report.

6) Comment: Was the McLoughlin House sold in 1868 or 1874?

Response: The McLoughlin House was sold by the family some time in the 1860s.

7) Comment: Please indicate the citation for McLoughlin's use of his house for "people in need."

Response: This subtheme has been revised because it could not be wholly verified.

Singer Creek

8) Comment: A gully formerly existed between the houses where Singer Creek used to flow. The creek was diverted for use by the mill and flowed where the graves are now. Now it has been diverted to 7th Street. Sanford Maps would be helpful to show the early drainage patterns and other features, such as building footprints. They are from the 1860s and are on microfilm at the city library. Centered around 7th and Washington was a marsh. The area was drained in the 19th century and interruptions to the drainage have caused slides that took out part of the adjacent parking behind the church.

Response: Comments noted. Determination of drainage patterns, landscape features and contributing elements of the McLoughlin House site will be researched as part of the proposed Cultural Landscape Report.

Flour Mill

9) Comment: Report should mention existence of flour mill which led to the construction of the bluff wall.

Response: Determination of landscape features and contributing elements of the McLoughlin House site will be researched as part of the proposed Cultural Landscape Report.

Furnishings

10) Comment: What is the origin of the marble top table?

Response: The marble table top was purchased from the Tolmie estate by the Catholic Women's Association (Archdiocesan Catholic Women in Portland) in 1938 from the Tolmie Estate for donation to the McLoughlin House. Text on page 59 will be revised to state that it came from the Tolmie Estate but was donated by the Catholic Women's Association.

11) Comment: Is the wallpaper in the Barclay and McLoughlin houses historic?

Response: The wallpaper in the Barclay and McLoughlin houses needs further study. Additional information would be obtained from the Historic Resource Study and/or the Historic Structures Report for the Barclay House. (Note: The 2003 Historic Structures Report on the McLoughlin House includes some information on its wallpaper – see pages 185 and 222. An HSR has not been prepared for the Barclay House.)

<u>Signs</u>

12) Comment: Proposed new signage would need to meet the requirements of the McLoughlin Conservation District for residentially zoned properties.

Response: The NPS intends to work with representatives of the City of Oregon City and other interested parties while complying with Federal policies, guidelines and regulations.

13) Comment: Add better signage for public parking. Clearer directions/larger signs are also needed on site to identify where people should go.

Response: The NPS will work with the City of Oregon City regarding appropriate signage for city streets.

Neighborhood Changes

14) Comment: More information is needed about proposed changes to the McLoughlin neighborhood, including the road system, access and parking.

Response: A Parking Plan has been added to the list of recommended plans in the McLoughlin House Unit Plan/Environmental Assessment. The Parking Plan would include a public planning process to determine what changes should be made and would provide the information related to road systems, access and parking and will be done in cooperation with Oregon City.

15) Comment: Increased visitation may affect the balance that currently exists between residents and visitors.

Response: Same as that for Comment 14 above.

16) Comment: Does the NPS plan to fence the property to keep out unwanted/illegal nighttime uses?

Response: Further study of security issues for the property needs to be undertaken before any decisions are made regarding additional fencing.

New Structures/Additions

17) Comment: Additions to the Barclay House or grounds should be compatible with the architectural integrity of the house and meet Oregon City standards for additions to a designated resource.

Response: As noted under Comment 29 below, any proposed physical alterations to the Barclay or McLoughlin House or cultural landscape would undergo consultation with both Oregon City and the Oregon SHPO prior to implementation. Changes would not be made without more information from an Historic Structures Report or Cultural Landscape Report.

18) Comment: Reconstruction of the kitchen as a separate outbuilding should fit in with the other two buildings and could incorporate restrooms and a visitor waiting area. Centrally located between the houses, it would be a good shelter.

Response: Comment noted. As noted on page 38 of the Unit Plan/EA, "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." Additional planning would determine if restrooms were indeed feasible as well.

19) Comment: No additional structures should be located in McLoughlin Park.

Response: Any new structures proposed will be evaluated to determine their feasibility in consultation with appropriate organizations and agencies, including the State Historic Preservation Officer (SHPO). Any future development at the McLoughlin House site will be in accordance with laws and regulations and will serve to balance historic preservation, visitor needs and park operations.

20) Comment: Minimize exterior alterations to McLoughlin Park unless they restore the grounds.

Response: Changes made to McLoughlin Park would be intended to restore the grounds (see information about landscaping, pathways, and other improvements in the Unit Plan/EA).

21) Comment: A shelter would look out of place in McLoughlin Park, particularly at the end of 8th Street. 8th Street is necessary for fire lane access.

Response: The proposed shelter location at the end of 8th Street has been dropped from consideration in the proposed action and is now being considered, as stated on page 38 of the Unit Plan/EA, in a reconstruction of the McLoughlin House kitchen.

22) Comment: The need for the proposed shelter is not justified by its expense. If built, it should be in a central location.

Response: See response to Comment 21, regarding the proposed reconstruction of the McLoughlin House kitchen, above.

23) Comment: Consider adding a path from the upper 8th Street parking to the proposed accessible bathroom at the rear of the Barclay House.

Response: As noted on page 76, "In addition, associated accessible walkways would be constructed to link this restroom to nearby parking. . ."

24) Comment: Consider adding a path from the sidewalk near the grave site to the proposed accessible bathroom. Prior to this, identify the source of the moisture.

Response: Such a path would be considered as part of the larger planning process associated with the return to historic circulation patterns proposed in the Unit Plan/EA.

8th Street

25) Comment: The NPS and Victorious Faith Family Church should continue to share 8th Street. Do not propose vacation of 8th Street.

Response: Vacating the public portion of 8th Street is no longer under consideration because the section of 8th Street that continues across the edge of the private church land and property also serves as an emergency vehicle access road and fire lane (see also response to Comment 26 below).

26) Comment: The proposed vacation of 8th Street would diminish Dr. McLoughlin's historic plat. It provides access to the bluff.

Response: 8th Street is a City of Oregon City publicly owned and maintained street. Vacating the public portion of 8th Street is no longer under consideration because the section of 8th Street that continues across the edge of the private church land and property also serves as an emergency vehicle access road and fire lane. Keeping this roadway open is also supported by the McLoughlin Neighborhood Association.

27) Comment: Requesting that Oregon City vacate the end of 8th Street could result in blocking access to the rear of the Victorious Faith Family Church.

Response: Vacating the public portion of 8th Street is no longer under consideration. NPS will continue to work with the Church and with Oregon City to ensure that adequate access to the rear of the Church and fire lane access remain.

28) Comment: More detail is needed about the effects of the NPS proposal to request that Oregon City vacate the end of 8th Street.

Response: NPS is no longer requesting that Oregon City vacate the public portion of 8th Street.

Accessibility

29) Comment: Balance the need for accessibility with the need for historic preservation.

Response: As stated in the plan, accessibility needs will be evaluated and provided in appropriate locations. As with other actions that would affect the site's historic structures or cultural landscape, concurrence from the Oregon SHPO would be sought for any changes that resulted in physical alterations or in new additions. Additional consultation would also occur with Oregon City for actions that affect the cultural landscape (the setting of the houses). The NPS would strive to ensure that no adverse effect occurred from future proposed actions.

30) Comment: Convene an accessibility study team to identify issues and to prepare an accessibility plan that addresses them. Include an NPS accessibility specialist, historic architect and landscape architect on the team.

Response: Comment noted. An *Accessibility Plan* has been added to the proposed list of needed plans and studies.

31) Comment: There were numerous concerns expressed regarding ADA parking, including:

- Designate ADA parking in the first space adjacent to the Church and Center Street in the 8th Street right-of-way;
- Locate ADA parking directly in front of the Barclay House on Center Street; and
- The staff parking area on 8th Street is unsuitable for accessible parking due to the grade and the fact that it is often slippery and wet and contains uneven pavement. There are also steps and a pebble walkway.

Response: NPS would work with Oregon City to designate appropriate accessible parking space(s). Accessible parking will most likely to be located in front of the Barclay House (see response below regarding the staff parking area). The NPS no longer proposes ADA parking on 8th Street. As noted in public comments, the area that is

currently used for staff parking on 8th Street has been determined to be unsuitable for accessible parking.

32) Comment: ADA improvements should involve citizen input and review.

Response: Public input and review are not required for ADA improvements; however, the NPS will make every effort to consult with the City and interested parties to make improvements that are deemed feasible and meet the legal requirements for design and implementation standards.

33) Comment: ADA access through the historic front door may conflict with historic character / would be a major adverse effect.

Response: See response to Comment 29 above.

34) Comment: Historic character is more important to retain than providing for accessibility.

Response: Both accessibility and the retention of historic features and characteristics are important and are not mutually exclusive. While the NPS does not intend to make the upstairs of either the Barclay or McLoughlin Houses accessible, it is possible for visitors who cannot access the upstairs of the McLoughlin House to understand what is there through interpretation. The intent is to make the first floor of both houses accessible. For the Barclay House, while the upstairs is currently intended to provide some additional office space, accessible office space would be provided downstairs at the ratio required by law and policy.

Loading/Parking/Increased Visitation

35) Comment: Buses can continue to use the west side of Center Street for loading and unloading. The 8th Street portion adjoining Center Street would not be a safe place for the students to unload, nor for the buses to back out of. Cones are currently used to designate bus parking on Center Street.

Response: As noted on page 43, "The NPS would request that the city provide as 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 . . . and long-term bus parking on 7th Street, southwest of the existing parking lot."

36) Comment: No drop-off zone is needed.

Response: A Parking Plan has been added to the list of recommended plans in the McLoughlin House Unit Plan/Environmental Assessment. The Parking Plan would include a public planning process to determine what changes should be made and would provide the information related to road systems, access and parking and will be done in cooperation with Oregon City.

37) Comment: Increased visitation could have a detrimental effect on adjacent uses (McLoughlin neighborhood) due to an increase in traffic (cars and buses).

Response: NPS intends to complete a parking plan and work with the community to alleviate issues and concerns regarding increased traffic and visitation.

38) Comment: Overflow parking can be accommodated using adjacent lots at Fial Tech or McLean Clinic for off-peak use.

Response: Page 37 identifies the need to work with Oregon City to seek overflow parking locations: "As in Alternative A, additional parking would be sought for overflow parking and special events." The proposed parking plan will evaluate these and other locations for overflow and special event parking.

39) Comment: Develop a parking plan in conjunction with the McLoughlin Neighborhood Association to minimize adverse effects from increased visitation on adjacent residents.

Response: The need for a parking plan has been added to the list of Implementation Plans identified on page 37, confirmed on page 43, and summarized on page 51.

40) Comment: The McLoughlin Memorial Association (MMA) has not set a carrying capacity for the number of people that are allowed to tour the house at any given time. In the Barclay House, up to 30 people have been held in the back room and up to 10 in the gift shop. In the McLoughlin House, larger (school) groups have been accommodated by assigning docents to smaller groups or by rotating the groups among stationary docents. Visiting schools currently accommodate more than 45 students on buses.

Response: Carrying capacity for a building is defined as the maximum number of persons who can be assembled within the entirely of the designated space at one point in time in accordance with building codes and regulations.

In 2006 the official carrying capacity of the Barclay House was established by the Deputy Fire Marshall of the Clackamas Fire District (#1) at 60 persons. (Permit on file at Barclay House offices.) NPS will be requesting a similar evaluation and official determination of the carrying capacity for the McLoughlin House.

Note that the Fire Marshall limit is for <u>maximum</u> capacity. The NPS may adjust this number (not to exceed the established numbers for either McLoughlin or Barclay Houses individually), to accommodate fewer people as determined by activity and age of visitors, the quality of visitor experience and protection of resources.

Page 33 of the Plan/EA acknowledges the need to develop a carrying capacity for the houses. On page 66, it is noted where the current maximum number comes from: "The NPS estimates that the house McLoughlin House can accommodate an approximate maximum of 45 people at a time. Large groups of visitors have been managed through splitting into smaller groups, which are accompanied by NPS staff or authorized docents." Safety and security concerns would be taken into consideration with regard to the maximum number of visitors at one time on site.

41) Comment: Define the carrying capacity of the McLoughlin neighborhood (a) and the McLoughlin and Barclay houses (b).

Response: (a) The carrying capacity of the McLoughlin Neighborhood would be determined by the City of Oregon City through traffic studies and parking plans. (b) Refer to Comment 40 above regarding the carrying capacity of the Barclay and

McLoughlin houses; the NPS acknowledges on page 33 the need to develop carrying capacity figures for both houses: "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."

42) Comment: On street parking at the site is adequate, even for special events.

Response: Comment noted. Special events will likely increase in the future and additional parking needs addressed.

Barclay House Proposed Floorplan

43) Comment: Retain the office space where it is. It provides a good overview of the site through the front and side windows, allows staff and volunteers to see visitors approach, contributes to site security, and contributes to safety for park visitors.

Response: As noted on page 41, the proposed rearrangement of the Barclay House would be "subject to confirmation in a rehabilitation plan." As a result, the NPS would undertake a planning process to determine the best arrangement of uses within both houses pending the completion of Historic Structure Reports. Other changes would be made with input from existing staff. In addition, for any changes that proposed physical alterations to the interior or exterior of the houses the NPS would consult with the Oregon State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (NHPA).

44) Comment: Maintain the kitchen in the Barclay House.

Response: Same as that for Comment 43.

Invasive Species

45) Comment: Control of invasive plants could not occur on adjacent private property.

Response: As noted on page 32, the NPS would work with Oregon City and others to improve landscaping and to control invasive species at McLoughlin Park; control of invasive species on other nearby property would not be undertaken by the NPS.

Connected Sites

46) Comment: There is a **n**eed to document existing buildings related to the Hudson Bay Company and/or McLoughlin House Unit (i.e. Ermatinger House and McLoughlin deed) and ensure histories are interpreted.

Response: Completion of an Historic Resources Study (HRS) and an Historic Structures Report (HSR) would provide further documentation of structures related to the McLoughlin House Unit.

Impacts

47) Comment: There would be an adverse effect on visitor experience from relocating the gift shop and converting the parlor in the Barclay House to a period finished room.

Response: See response to Comment 43 above. Although it is true that adverse effects could occur these would be weighed with the beneficial effects that could also

result. Language on page 84 of the plan has been modified to include the potential for these adverse effects.

48) Comment: In many cases, there is not enough detail to analyze the impacts of the proposals.

Response: As noted in the Environmental Assessment, many of the proposals require further study and documentation through the environmental analysis process. The EA summarizes the impacts insofar as they can be projected in a broad context and in comparison to existing conditions. Future environmental analysis would contain additional details regarding implementation decision making.

Fees

49) Comment: Fees are not charged at the site.

Response: The effective time for the description of the No Action Alternative was upon NPS assumption of the ownership of the McLoughlin and Barclay Houses. At that juncture, fees were still being charged by the McLoughlin Memorial Association for house tours. Because some time elapsed between the legislation that authorized the acquisition of the houses and the publication of the Unit Plan/Environmental Assessment, some changes to park operations have already taken place or are in process. See page 63, where the plan notes: "During transition of management to the National Park Service, no fees have been charged."

With the transfer of the McLoughlin site to the NPS in 2003 and due to shortages in staffing and limited visitation, and lacking capacity and structure for NPS fee collections, the site was designated by the Superintendent as a free site.

50) Comment: Please clarify the future role of the MMA given the intent of NPS to work with a non-profit organization for gift shop management (Page 41 and 50).

Response: The McLoughlin Memorial Association, (MMA) has managed the gift shop for many years. The NPS acknowledges the value of the gift shop and the MMA's desire to continue operations on site. The NPS will explore options with MMA and other non-profit organizations.

51) Comment: Please justify the need for six staff as well as volunteers.

Response: Additional NPS staff is required to supervise and manage the unit and to meet basic operational requirements and functions. Basic operations include ensuring site security and visitor safety which, in turn, contribute to a quality visitor experience. Other roles include coordination with partners including, but not limited to, the McLoughlin Memorial Association, Clackamas Heritage Partnership and City of Oregon City. In addition, this is a management unit plan for McLoughlin House which becomes part of the Fort Vancouver National Historic Site's General Management Plan, which is intended to last 15-20 years. Future staffing is based upon that time frame.

Interpretation

52) Comment: Consider retaining the current Junior Ranger program until the supply of brochures is exhausted and then incorporating the McLoughlin House program into the Fort Vancouver program.

Response: Good suggestion! Within a reasonable time frame, the NPS will work towards integrating the "Northwest Explorer Program" into the Junior Ranger Program at Fort Vancouver and implementing it across both units.

53) Comment: Increase interpretation about Native American presence/historical use of site.

Response: NPS intends to increase interpretation about the diversity of cultures and stories associated with this site.

54) Comment: Increase outreach to schools. It is getting harder for schools to come to the site.

Response: NPS recognizes the need for more outreach and plans to expand the website to support curricula for teachers and schools. The NPS will also look to the McLoughlin Memorial Association (MMA)to take a lead role in outreach, in accordance with their revised mission statement.

55) Comment: Consider creating video presentations for outreach (schools, retirement homes, and community organizations) and accessibility (to show visitors unable to climb stairs the upstairs of the McLoughlin House).

Response: Video presentations to support outreach and education programs would likely be incorporated as part of a long-term goal. NPS will continue to partner with MMA and others to produce appropriate materials and information. Consistent with federal policies, guidelines and regulations, the NPS will look to the MMA to provide a role in outreach.

56) Comment: Why did the park discontinue the self-guided tours?

Response: Although the NPS supports the self-guided tours concept, currently the McLoughlin Site is not designed for this use from a security, safety or interpretive perspective.

Change in Management

57) Comment: Why is the NPS assuming responsibility not only for the houses and their contents, but also for other McLoughlin Park features and area facilities?

Response: The NPS purchased the Barclay and McLoughlin houses in 2003; they are now incorporated, administered and managed as a unit of Fort Vancouver National Historic Site. Oregon City granted the NPS a scenic easement over the charter park. Even though the city continues to own the land, the NPS is responsible for landscaping and maintenance services for the grounds.

58) Comment: Increase publicity about the site to improve visitation; increase lead time for events; increase media coverage; and to increase knowledge about the site over a wider geographic area.

Response: The NPS supports an increase in publicity about the site in partnership and will assume a lead role, working with other organizations including the Clackamas

Heritage Partners; McLoughlin Memorial Association, the City of Oregon City and the Vancouver National Historic Reserve.

59) Comment: Increase communication between the MMA and NPS. Opportunities to cooperate with and support each other would result in mutually beneficial projects and resource protection.

Response: Communication between partners is a critical aspect of the operation of any site and the NPS will actively seek opportunities to support and collaborate with MMA and other partner organizations and stakeholders, including Clackamas Heritage Partners and the City of Oregon City.

Need for/Purpose of Additional Reports

60) Comment: What is the purpose of Historic Structures Reports? There is already a Historic Resource Study for the McLoughlin House. Can this information be used to prepare the other?

Response: Historic Structures Reports (HSR) provide baseline documentation about the structure and describe the architectural features, history of the architecture and time period, and other topics. Funding to complete a final HSR that meets NPS standards will be sought in the future to provide this guidance. HSRs provide the necessary historical documentation for materials used on the structure.

A Historic Resource Study (HRS) provides an historical overview and identifies and evaluates cultural resources within their historic contexts. A Historic Resource Study identifies all available cultural resource information from all disciplines and includes preparation of National Register nominations for all qualifying resources. Any park HRS dating from 1985 or later is considered current according to Government Performance and Results Act (GPRA) goals; parks with an HRS prepared prior to 1985 should consider updating their documents. Special history studies provide historical research and evaluation of a specified resource or group of related resources.

An M.S. thesis through the University of Oregon was prepared in 1993 by K. Barbaero and provided a preliminary analysis of the McLoughlin House and background history. In addition, an historic structures report for Barclay House will need to be prepared.

61) Comment: What is the purpose of the transportation plan, including linkages to Portland and other Oregon City sites?

Response: A Proposed Parking Plan is now recommended within the McLoughlin House Unit Plan/Environmental Assessment. This would include a public planning process to determine what changes might be made (if any) and might include information about site access and parking.

Cultural Landscape

62) Comment: Returning the site to pre-settlement vegetation is a questionable need.

Response: The NPS has never advocated returning the site to pre-settlement vegetation. The garden is a 19th century Victorian era garden. NPS will request a Cultural Landscape Report to help determine the optimal landscaping and vegetation management strategies for the site as a living commemorative landscape. The NPS

currently maintains the existing landscaping, and may consider replanting with some historic species if cultural landscape research shows this to be appropriate and feasible.

63) Comment: Clarify roles of NPS/MMA with respect to fundraising.

Response: The park is working with the McLoughlin Memorial Association to address general roles and responsibilities and will also address minor fundraising and grant writing responsibilities. Consistent with the NPS policies on fundraising, if and at which time the Association and the NPS are interested in the Association undertaking a capital campaign, a fundraising agreement will be developed.

Neighborhood/Socioeconomic Impacts

64) Comment: The rehabilitation of the McLoughlin and Barclay houses is a laudable goal. These houses add value to the neighboring properties and historic value to the neighborhood.

Response: Analysis of the acknowledged value of these properties contributes negligibly to the socioeconomic context. As a result, this topic was excluded from further environmental analysis.