II. McLoughlin House Unit Management Plan

McLoughlin House NPS Photo





McLoughlin House Unit Management Plan

Introduction

of the Interior to acquire the McLoughlin House National Historic Site in Oregon City for inclusion in Fort Vancouver National Historic Site (Fort Vancouver NHS) in Vancouver, Washington. The McLoughlin House Unit, until recent acquisition by the National Park Service, was managed by the McLoughlin Memorial Association (Association), a non-profit organization established in 1909 to manage the McLoughlin House, which was designated by Congress in 1941 as an affiliated unit of the National Park System. As an affiliated unit, the McLoughlin House National Historic Site received technical and funding assistance from the National Park Service and was eligible to receive this assistance as available.

Because of the new legislation which authorized a change in ownership, the National Park Service needs to determine how the site will function as a unit of Fort Vancouver NHS. The McLoughlin House Unit Management Plan as detailed herein, when approved, will become the guiding management plan for the McLoughlin House Unit. As part of Fort Vancouver NHS, this plan tiers off (and is therefore subservient to) the Fort Vancouver National Historic Site Final General Management Plan Environmental Impact Statement (NPS 2003). The Record of Decision (ROD) for that General Management Plan (GMP) / Environmental Impact Statement (EIS) was signed June 2, 2004. The Final General Management Plan called for potential future management of the McLoughlin House National Historic Site (NPS 2003: p. 2-3).

This Environmental Assessment has been prepared to satisfy the requirements of the National Environmental Policy Act (NEPA) of 1969 as amended, including the Council on Environmental Quality (CEQ) regulations found at 40 CFR 1500 et seq. This Environmental Assessment also facilitates compliance with National Park Service policy and a variety of other federal laws, including Section 106 of the National Historic Preservation Act, Section 7 of the Endangered Species Act, and the Wilderness Act, and other laws enacted for the protection of the environment.

Project Description and Setting

The project site is a charter park known as McLoughlin Park of Oregon City and contains the historic houses of Drs. John McLoughlin and Forbes Barclay and the associated historic landscape. On March 28, 2004, the McLoughlin Memorial Association (Association) sold the houses to the National Park Service (NPS) to allow for direct NPS management and maintenance of the structures. Oregon City granted the NPS a scenic easement over the charter park but continues to retain ownership of the park land itself. The McLoughlin House Unit is located in Township 2 South, Range 2 East, Section 31, Willamette Meridian.

This management plan provides direction to the NPS concerning the future management, public use, and preservation of the McLoughlin and Barclay houses and the associated historic landscape. (For the

purposes of this document, the McLoughlin House site in Oregon City, Oregon will be referred to as the McLoughlin House Unit and the Fort Vancouver National Historic Site in Vancouver, Washington as the Fort Vancouver NHS Unit—both are units of Fort Vancouver National Historic Site.)

Purpose and Need

Purpose of the Plan

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

Need for the Plan

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

Relationship to Laws, Policies and Park Planning Documents

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

Laws and Executive Orders

National Park Service Organic Act

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

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

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

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

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

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

Endangered Species Act (16 USC 1531 et seq.)

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

National Historic Preservation Act (1966 as amended)

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

Native American Graves Protection and Repatriation Act (NAGPRA)

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

Fort Vancouver National Historic Site Legislation

Fort Vancouver National Monument was established on June 19, 1948 "to preserve as a national monument the site of the original Hudson's Bay stockade (of Fort Vancouver) and sufficient surrounding land to preserve the historical features of the area" for "the benefit of the people of the United States" (62)

Stat. 532 and the Senate Report on the legislation). The Department of the Interior report on the legislation further stated that the lands so dedicated should fulfill "two essential requirements—the preservation of the historic stockade…and the preservation of the historic parade ground of the later United States Army Post." In addition, the total area of the national monument was not to exceed 90 acres in Vancouver, Washington.

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

Executive Orders

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

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

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

McLoughlin House Unit Legislative History and Acquisition

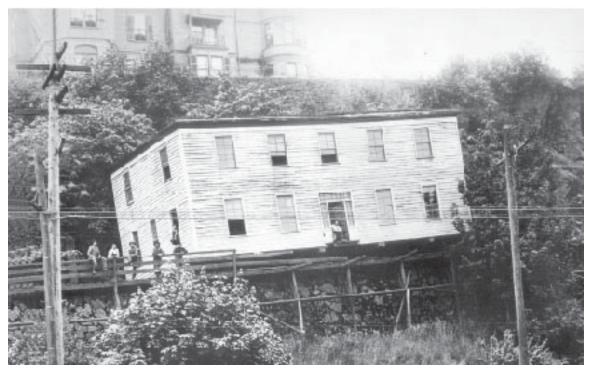
Dr. John McLoughlin served as Chief Factor at Fort Vancouver from 1825 to 1846 for the Hudson's Bay Company. Under McLoughlin's leadership, Fort Vancouver became the center of the political, cultural, and commercial activities in the Pacific Northwest. Dr. McLoughlin is known as the "Father of Oregon"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

In 1844, Dr. John McLoughlin established a claim for himself on land east of Willamette Falls and named it Oregon City. The city was granted a charter on December 24, 1844 and became one of the oldest incorporated cities in the Pacific Northwest. In 1846, McLoughlin and his family moved into their newly-built home in the heart of Oregon City along the Willamette River.

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

Dr. Forbes Barclay, a contemporary of Dr. McLoughlin, was a surgeon and clerk in charge of the Indian trade at the Hudson's Bay Company's (HBC) post of Fort Vancouver from 1840-1850. Barclay retired from the Company in 1850 and moved to Oregon City with his wife Maria and children. Barclay built his home in Oregon City from 1848-1849. He became a U.S. citizen and served in several elective municipal positions until his death in 1873. The Barclay family occupied the house through 1934.

When the McLoughlin House faced demolition between 1908 and 1909, the McLoughlin Memorial Association was established and money was raised to move the house to the top of the bluff where the



1909 Relocation of McLoughlin House

Courtesy of Clackamas County Historical Society photo library

house currently sits. In 1937, the Barclay House was moved from its site on Main Street to McLoughlin Park adjacent to the McLoughlin House.

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

Under a cooperative agreement between the Secretary, the Association, and Oregon City, the two houses were administered in non-federal ownership by the Association. The agreement required the Secretary to regulate the Association's maintenance of the historic character of the McLoughlin and Barclay houses and to provide planning and technical advisory assistance as requested and possible within existing appropriations limits. This assistance was initially provided by the NPS from the former Portland, Oregon office (now located in Seattle, Washington).

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

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



McLoughlin House



Barclay House

vice, Administrative History 1993).

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

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

On July 29, 2003, President George W. Bush signed Public Law 108-63 (known as H.R. 733) (Appendix A) authorizing the Secretary of the Interior to acquire the McLoughlin House National Historic Site for inclusion in Fort Vancouver National Historic Site. The legislation calls out certain requirements which have now been met. The name of the site changed from the "McLoughlin House National Historic Site" to "McLoughlin House." The legislation also changed the status of the site from an affiliated unit of the National Park System, not managed by the NPS, to a unit of Fort Vancouver NHS that would be managed by NPS staff from Fort Vancouver NHS. It further authorized the acquisition of the McLoughlin House, the Barclay House, and other associated real property, improvements, and personal property from the Association to the NPS by sale or donation. (See Appendix A: 2003 McLoughlin House Addition to Fort Vancouver National Historic Site Act.)

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

National Park Service Management Policies

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

Management Policies state that the NPS will conduct planning activities for the following: to evaluate possible additions to the National Park System; to identify how park resources will be preserved and

how parks will be used and developed to provide for public enjoyment; to facilitate coordination with other agencies and interests; and to involve the public in decision making about park resources, activities and facilities. NPS plans represent the agency's commitment to the public and to Congress regarding how parks will be managed.

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

Cooperating Organizations / Special Designations

McLoughlin Memorial Association

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

The objectives of the Association shall be Historical, Educational, Patriotic, and Supportive; to perpetuate the historic humanitarian services rendered Oregon pioneers by Dr. John McLoughlin; to encourage historical research relating to Dr. McLoughlin, his family, and his associates and to record and publish the same; to promote the "story" of Dr. McLoughlin in schools and public events through education outreach; to assist the National Park Service in maintaining the homes of Drs. John McLoughlin and Forbes Barclay as historical sites for the people; to assist the National Park Service in placing therein relics, documents, mementos, and furniture pertaining to the McLoughlin family; and to instill respect and appreciation for the memory and heroic spirit of the pioneer men and women of early Oregon.

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

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

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

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

- Fort Vancouver National Historic Site (formal cooperative relationship with NPS since 1941);
- Oregon City Women's Club (donated the fountain);
- National Society of the Colonial Dames of America in the State of Oregon;
- The Sons and Daughters of Oregon Pioneers;

- Daughters of the American Revolution;
- Old Home Forum:
- The Roake Family;
- Arch Council of Catholic Women;
- · Clackamas Heritage Partners; and
- Various business sponsors.
- Clackamas Heritage Partners

The Clackamas County Historical Society and the Oregon Trail Foundation merged into a single non-profit organization, called the Clackamas Heritage Partners on July 1, 2004. Clackamas Heritage Partners' mission is to preserve the heritage, educate the public, and interpret the history of the Oregon Territory, Clackamas County, and Oregon City, which was the western terminus of the Oregon Trail. Both organizations continue to maintain their existing nonprofit corporations. The new organization has the ability to raise public and private funds, implement state-of-the-art cultural heritage and preservation programs, and carry forward the respective missions of both organizations. A transition board, comprised of society and foundation members, has representatives from the McLoughlin Memorial Association, Oregon City Commission, and Clackamas County Commission. Consistent with NPS policies, the Superintendent of Fort Vancouver National Historic Site participates and attends meetings by invitation. The transition board is in the process of developing a strategic plan, designing an organizational structure, and overseeing incorporation of the new organization, and will retain a development director.

McLoughlin Conservation District

In 1982, the McLoughlin Conservation District was established by city ordinance to preserve cultural resources related to the early history of Oregon City. The conservation district's designated boundary includes a portion of Dr. John McLoughlin's original 1845 land plat, including the bluff where the McLoughlin and Barclay houses are located. A 2002 inventory lists 802 principal resources, primarily residential in nature, which range in dates of construction from 1845 to 2000. This includes 177 buildings or structures over 100 years of age. The district was found to be potentially eligible for the National Register of Historic Places, and the City of Oregon City is presently gauging support for nomination. The buildings are already designated as local landmarks within the McLoughlin Conservation District.

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

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

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

Oregon National Historic Trail

Designated in 1978, the Oregon National Historic Trail corridor is 2,130 miles in length and contains some 300 miles of discernible ruts and 125 historic sites, including the Oregon City Complex in Oregon City, Oregon (1999 Oregon National Historic Trail Management Plan, p. 35). Among other reasons, the

trail is significant because it strengthened the United States' claim to the Pacific Northwest. Administered by the National Park Service and partners, the national historic trail offers visitors the opportunity to travel an auto tour route and visit an array of interpretive and historic sites. The Oregon City Complex, including the McLoughlin House, is a high-potential site on the Oregon National Historic Trail (1999 Oregon National Historic Trail Management Plan, p. 312).

Park Planning Documents

Fort Vancouver NHS General Management Plan

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

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

This document also identifies additional actions and studies required to implement this plan.

State of Oregon and Oregon City Planning Documents

State of Oregon

Oregon Revised Statute 358

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

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

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

Oregon City

Oregon City Comprehensive Plan

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

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

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

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

Oregon City Municipal Code

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

Oregon City Draft Trails Plan

The draft trails plan, completed April 19, 2004, envisions a hierarchical system of trails from the re-

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

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

Oregon City Transportations System Plan

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

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

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

Major plan goals include:

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

Downtown Oregon City/ North End District Urban Renewal Plan

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

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

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

Clackamas County Documents

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

Agreements

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

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

McLoughlin House Unit Planning Issues

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

Cultural Resources

Documentation of subsurface cultural remains has been recently completed, indicating the presence of both historical and pre-contact American Indian artifacts (Cromwell 2005). A widespread, subsurface scatter of lithic debitage and localized but dense deposits of circa 1900 artifacts were encountered throughout the park.

Poor drainage in the vicinity of the gravesite possibly caused by Singer Creek being piped beneath the area has caused concerns related to the long-term preservation of subsurface cultural remains (archeological resources) and the graves of Dr. and Mrs. McLoughlin.

The McLoughlin and Barclay houses do not currently meet life safety or accessibility standards. They also are not in compliance with some building codes.

There is a large collection of significant museum objects associated with the McLoughlin and Barclay houses and site. Cataloguing, securing, and potentially storing some of these items is important to their preservation.

No cultural landscape analysis of the McLoughlin House site has occurred. Landscape elements have not been documented and cultural landscape treatments have not been prescribed.

The McLoughlin House Unit is one of many historical sites within the area. The cultural and historical connections of the unit to related sites and cultural resources are important considerations.

Natural Resources

The hydrology of Singer Creek has not been documented or analyzed.

Steep slopes along Singer Hill Road could potentially result in landslides and soil erosion. Analysis of geological and seismic conditions associated with the site is needed.

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

Visitor Experience

Analysis of how to best maximize expertise, staff and volunteers to provide a quality visitor experience while providing adequate resource protection (based on funding and staffing) is needed.

An interpretive program that incorporates public outreach, including a theme-related curriculum meeting Oregon and Washington education standards, is needed.

A variety of interpretive methods could be used to broaden visitor experiences at the site.

There are currently a number of undesirable uses at the site, including unauthorized overnight sleeping and loitering.

Park Facilities

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

Park Operations

The appropriate level of funding, staffing and operational space requirements is unknown.

A plan that documents the integration and transition of the management of the property from the Association to the National Park Service is needed.

There are administrative, interpretive, museum, and maintenance storage needs associated with management of the site by the National Park Service and the Association.

Guidelines for appropriate special events that could occur in the houses and on the site are needed.

Analysis of the impact of visitation fees, especially for economically disadvantaged populations, is needed.

Visitor and Employee Safety

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

Access, Circulation, and Parking

Visitor circulation at the site is not clearly defined. Analysis of visitor circulation patterns is needed.

With National Park Service management, visitation and, therefore traffic, are likely to increase.

Planning for additional parking, including parking for people with disabilities, and special event parking is needed.

There are potential impacts on park neighbors, including property owners along Washington, Center, and 7th streets.

Oregon City and Portland metro area public transportation opportunities and improvements need to be considered at the site.

Coordinating visitor arrival and departure with other cultural sites in the city (such as the Museum of the Oregon Territory) should be addressed.

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

McLoughlin House Unit Management Plan

The McLoughlin House Unit Management Plan (Plan) emphasizes additional cultural resources strategies that will ensure the long-term preservation of the McLoughlin and Barclay houses, historic site, and collections; increased opportunities for visitor education and interpretation; and improved visitor and NPS facilities compared to current management practices. The Plan uses the best strategies to preserve the historic character of the buildings and the condition of collections, to provide for on-site administrative offices, and to allow for optimum visitor use and enjoyment of the site.

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

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

The visitor entry to the McLoughlin House could be changed to the front of the house (facing the bluff) to reflect the historic entry. This determination will be made pending recommendations from the Cultural Landscape Report. Additional parking will 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 will apply and will be amended to include

the McLoughlin House Unit. The McLoughlin House Unit will be zoned Historic. (See Appendix A: Fort Vancouver National Historic Site Management Zones.) The McLoughlin and Barclay Houses will be retained in their historic condition related to early settlement of the Oregon County/Oregon Territory and Oregon City and rehabilitated for public and administrative uses. The historic setting of the charter park will be maintained. The visitor experience will 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 will 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 will be used for interpreting Dr. John McLoughlin and his family life and significance as well as the subsequent history of the house as hotel, boarding house, and museum. Given the fact that the house was moved to its present location in 1909, long after its period of significance (1846-1867) when the family occupied the house, a true restoration of the exterior is not achievable. In addition the former detached kitchen was not moved. Changes that have occurred to the exterior, including foundations, porches, and walkways, or changes that may be necessary for its continued operation as a house museum such as the central heating system, vents, and ducts, will be examined through additional research for retention and/or modification as appropriate to enhance historical integrity. The Historic Structure Report (HSR) will provide direction for restoration treatment of exterior building envelope features where restoration is feasible.

Additional research to supplement information in the HSR will determine the potential for interior restoration. This research will include materials testing that will determine interior surface treatments. The research will also identify architectural elements and details that date to the historic period for restoration. The interior treatment will 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 will be removed from the house based on the development of an approved historic furnishings plan. All work will be done following the Secretary of the Interior's Standards for the Treatment of Historic Properties and will follow an approved restoration/rehabilitation plan developed specifically for the house. Interpretive exhibits that document the history of and changes to the house will complement the interpretive exhibits based on the primary interpretive themes.

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

Barclay House

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

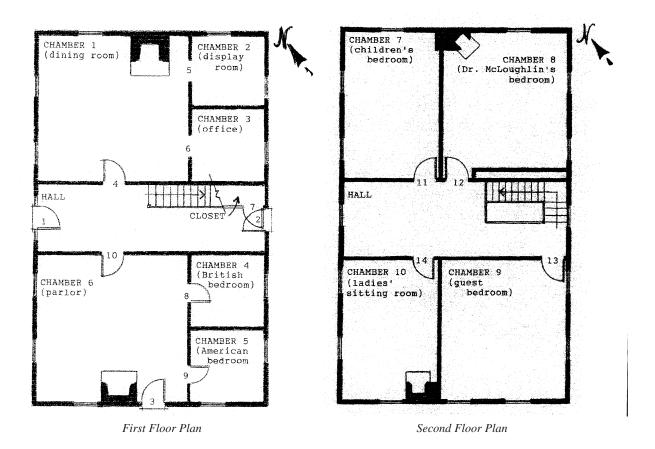


Figure 1: Existing Floor Plan of McLoughlin House

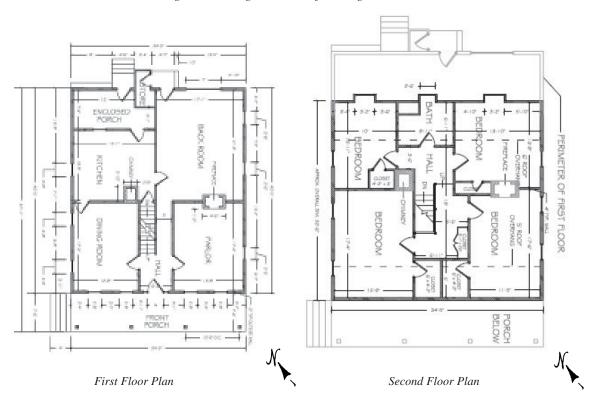


Figure 2: Barclay House Existing Floor Plan with Existing Uses

plan developed specifically for the house.

Cultural Landscape

Unlike many parks set in a certain historic period, the landscape of the McLoughlin House Unit will 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 will 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 will be further developed through an approved Cultural Landscape Report/Recommended Treatments Plan. (See Figure 3, McLoughlin House Unit Site Plan.)

Preservation maintenance will 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 will 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

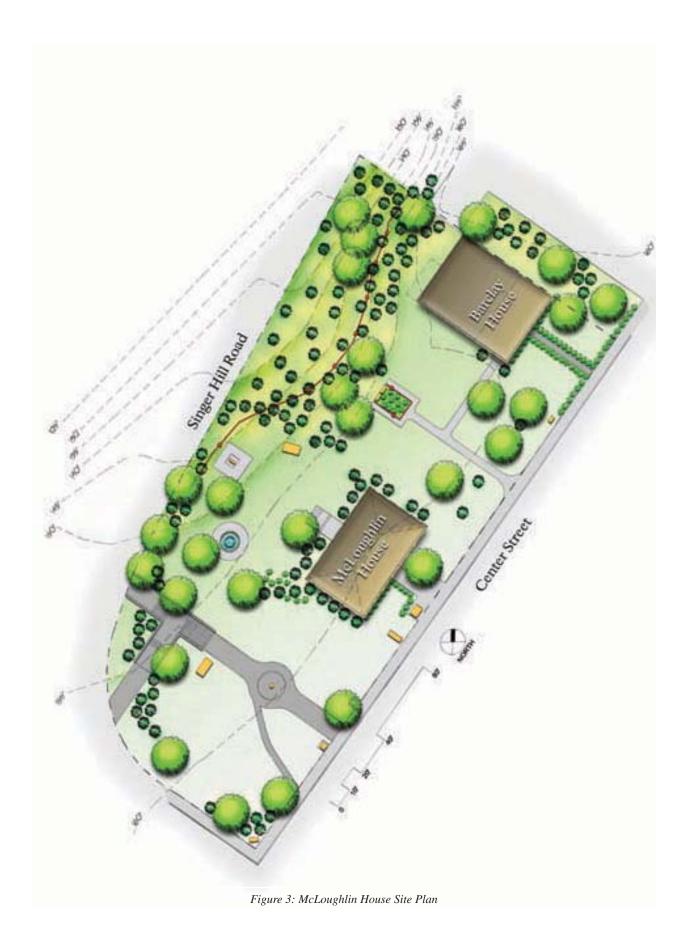
The museum collections (approximately 700 items) will be protected and maintained in their current locations in the McLoughlin House, and Barclay House. This collection will continue to include both period and non-period items (outside of the 1846-87 time significance). The collections will receive basic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

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

The NPS will actively manage the existing collections. All items in the collections will be well researched, and material outside of the determined "period of significance" (1846 – 1867), or otherwise considered extraneous to site needs will be considered for de-accessioning according to NPS guidelines and policy. A Historic Furnishing Study/Plan will 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 will 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 land-



scape work was necessary. Archaeological work will be done in accordance with the Scenic Easement Deed in accordance with the National Historic Preservation Act and State law ORS 358.

Natural Resources

Existing natural resources management strategies will be continued. Natural resource management duties will therefore continue to fall under the jurisdiction of Fort Vancouver NHS.

Geology: The NPS, in cooperation with the city (because they retain ownership of the park setting) will 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 will 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 will be made. If necessary, actions to mediate standing water and poor drainage near areas such as the McLoughlins' gravesites will occur, pending appropriate analysis, to ensure long-term preservation of the gravesites and their associated features.

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

Visitor Experience

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

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

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

Though carrying capacity is presently a maximum of 45 visitors in the McLoughlin House, carrying capacity for both houses will need to be determined. Safety and security concerns will be taken into con-

sideration with regard to the maximum number of visitors at one time.

Under NPS administration, visitors will continue to tour the site, and have opportunities to attend special events. Hours and dates of visitation will not increase, due to staffing and budget limitations.

The NPS will determine whether a shelter for visitors in inclement weather will be needed at the site. A study will be undertaken to assess the need and location and its potential effects on the historic land-scape.

In the long term, over the life of this plan, NPS-provided interpretive and educational programming and services at the site will be increased and broadened. All volunteers interacting with the visiting public will be offered interpretive training, as part of the Fort Vancouver NHS Volunteers-In-Parks program, to meet standards for interpretation. Education programs will be reviewed and adapted for consistency with curriculum standards. Teacher packets will 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, will be amended to address the McLoughlin House Unit. The plan will articulate the manner and ways in which the NPS will provide interpretation and education to the public at the site. Using the LRIP as a foundation, the NPS will 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 will also be expanded to include the McLoughlin House.

Park Facilities

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

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

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

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

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

The NPS will consider locating an additional outside shelter for visitors to use during inclement

weather near the proposed street end parking.

McLoughlin House

The McLoughlin House will continue to be used for visitor use in the form of tours and special events. (See Figure 1: Existing Floor Plan of the McLoughlin House.) A Historic Structure Report will be done to provide analysis of the changes that occurred to the house in 1909 as well as the mid-1930s. In addition, evaluation of the condition of the roof and roof drainage system of the house will be conducted to determine the extent of repairs necessary.

Barclay House

The configuration and treatment of the rooms in the Barclay House will 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. ADA restrooms will be added as new compatible construction at the rear of the building either within or attached to the structure.

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

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

Park Operations and Staffing

Operations

In the short term, the Association will 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 will be explored to connect both Fort Vancouver NHS and the McLouglin 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. Fundraising events and donations by partners will 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 will be implemented over time.

Staffing

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

Permanent

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

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

Seasonal

• Interpreters (2)

A written agreement will 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

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

The Association will 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 will 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 will 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 will evaluate and seek to eliminate potential safety hazards at the site.

Access, Circulation, and Parking

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

The parking area between the Barclay House and the Victorious Faith Family Church is located at the dead end portion of 8th Street (west of Center Street) and is publicly owned. The Association staff currently has five permitted parking spaces next to the church and an additional two spaces on the northwest corner of the site by the Barclay House. One or two ADA accessible parking spaces will be created. Accessibility will need to be established on the site at a point of ingress or egress to the homes, as well as other areas with transitional elevations.

The NPS will 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 will allow a safe drop-off and pick-up area at the site and an area for occasional service vehicles.

The NPS will also explore opportunities for a long-term arrangement or agreement with the city to utilize an existing parking lot for off-site parking for overflow, special events and long-term bus parking on 7th Street, southwest of the existing parking lot. This additional space will 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 will need to be conducted to implement this unit management plan. 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 will reference and be tiered to this unit management plan. The following studies and plans will 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;
- Carrying capacity study based upon recommendations from Historic Structure Reports for McLoughlin and Barclay houses;
- Parking Plan; and
- Transportation Plan.

Affected Environment

Land Use

Zoning and Land Use

The charter park in which the McLoughlin and Barclay Houses are located is zoned RC-4, "McLoughlin Conditional." The purpose of this residential zoning district is to allow a mix of residential building types, not to exceed medium density. It is based on the pattern of development prevalent in older areas of the city, where lot sizes and dwelling types vary greatly. Proposed changes, other than single-family homes, can be considered only upon conditional use review (Oregon City GIS, 2004). The Comprehensive Plan of Oregon City, though, designates the site as a park.

While most of the McLoughlin Conservation District (MCD) is zoned RC-4, "McLoughlin Conditional," there are some Office Conditional uses located across Center and along 7th streets. Generally, these sites tend to be the adaptive reuse of residential structures in the MCD. The site is part of Oregon City's Downtown Urban Renewal District. The section "Land Use Documents, Related Plans, and Programs" details the Oregon City Downtown Urban Renewal Plan.

Development Trends

Historically, development in Oregon City was concentrated in a narrow strip along the Willamette River's banks. By the late nineteenth century, Oregon City began expanding to the upper terraces of the city (Historic Preservation Northwest, 2003). Recent trends have included the development on the upper (third) terrace to the east. Clackamas County has made an effort to keep the downtown and older areas of Oregon City viable through the location of governmental offices in these areas. The county is the largest property owner in the city (Historic Preservation Northwest, 2003).

McLoughlin Conservation District

The MCD is primarily residential in nature with 177 structures in the neighborhood being over 100 years old (Historic Preservation Northwest, 2003). Zoning ordinances have been developed to maintain the medium-density residential nature of the neighborhood.

Cultural Resources

Historic Site Conditions

The current site of the McLoughlin House Unit is part of John McLoughlin's original land claim. He donated the grounds to Oregon City, which in turn, designated the site a charter park known as McLoughlin Park. When the house was relocated to its present site in 1909, the park was apparently covered with wild grasses and a cluster of mature pine trees. A cast iron fountain (a portion of which is still at the site) and a pond were installed on the grounds in 1911 by the Oregon City Women's Club. Access to the front door of



McLoughlin Park, 1913

McLoughlin House was from the northwest side of the property on a path that circled the fountain before landing at the home's front door.

Within the next decade, the grounds were transformed into a park-like landscape complete with an extensive lawn, footpaths, rose beds and other plantings of undetermined varieties. Young deciduous trees and small evergreens were planted among the older pines. Foundation plantings of shrubs and flowers surrounded the McLoughlin House. Members of Oregon City Women's Club did much of the planting. By 1920, the landscaping had matured. Within a few years the park grounds became more simplified. Trees still dotted the lawn, but only a few shrubs and plantings remained, generally around the house.

The grounds were transformed once again in the late 1930s and early 1940s as part of the second McLoughlin House restoration. At the direction of architect Glenn Stanton, the McLoughlin Memorial Association planned to have a caretaker's house built next to the McLoughlin House to serve as the caretaker's quarters. The plan changed when the owner of the historic Barclay House offered it to the Association in April 1937. The Barclay House was moved from its site on Main Street to McLoughlin Park and positioned between the 1890 Eastham-Caufield House and the McLoughlin House. The Eastham-Caufield House was demolished in 1950 to provide a site for an adjacent Methodist church.

About 1955, Oregon City removed trees and shrubs which were crowding the McLoughlin House. In addition, the Portland Garden Club did some landscaping in the park surrounding the house. This involved removing some of the large rhododendrons near the foundation of the house and replacing them with smaller native shrubs such as salal and huckleberry. The 1962 Columbus Day storm blew down several trees in the park including a large English elm at the southeast corner.

Graves of the McLoughlins

In 1970, the graves of Dr. McLoughlin and Marguerite McLoughlin were moved to the park and placed near the northwest corner of the McLoughlin House. The graves were surrounded by an iron fence.



Graves of the McLoughlins

Current Site Conditions

The park is located in the McLoughlin Neighborhood and is surrounded by residential development and commercial properties. The site mixes elements of a public park with a residential landscape design. Shrubs and flowerbeds are clustered around the house, while open areas are covered in lawn and large evergreen and deciduous trees. Paved walkways, the McLoughlin gravesites, commemorative markers, and landscape furniture add to the public park and historical ambiance.

The site currently reflects its early twentieth century appearance (when the houses were moved), however some modifications to the historic landscape over the past nearly 100 years have changed aspects of its historic character. The spatial organization, land use, topography, circulation, buildings and structures and constructed water features have remained largely unaltered since the early twentieth century. Modifications have included diverting a small creek Singer Creek in the west yard, reworking the historic plantings, and adding outdoor furniture, amenities, and commemorative markers to the site.

Trees and Other Plantings

The park is well maintained. Vegetative landscaping includes an extensive lawn, flower beds, hedges, and trees. In the early twentieth century, the landscape was more heavily planted in shrubs, rose bushes, and flowers. Today, the landscaping has been simplified by removing higher maintenance vegetation. A manicured lawn wraps around the McLoughlin House. Curvilinear beds surrounding the foundation of the houses are planted with shrubs, perennials, and bulbs. Mature deciduous and coniferous trees, including a large evergreen magnolia and several horse chestnuts, dot the lawn and provide a canopy of green foliage for the park.

Landscape Features

Beyond the houses, a focal point of the cultural landscape is the gravesites of Dr. and Mrs. McLoughlin. The graves are located between the McLoughlin and Barclay houses and are surrounded by a painted black iron fence. A plaque affixed to the backside of a rock slab recognizes those who were involved in the relocation of the graves. English ivy covers the tops of the graves.

The 1911 cast iron, round fountain stands near the center of the front lawn, facing the river. The fountain is missing the finial, which in early twentieth century photographs, shows a female figure or cherub holding an umbrella. The finial disappeared in 1960. Encircling the fountain is a 10-foot, 6-inch diameter pond.

West of the fountain is a cast iron eighteenth century cannon. Historically, according to oral tradition, the cannon came from a ship that sank in the Willamette River. The cannon was placed in McLoughlin Park in 1958.

The site also contains three rock monuments mounted on concrete slabs. One is at the corner of the park at 7th and Center streets. It includes a plaque honoring Dr. McLoughlin that was placed by the Oregon City Territorial Days Association on August 18, 1939. The second monument is near the entrance to the McLoughlin House. Mounted on the rock is a bronze plaque dated 1950 that designates the McLoughlin House as a national historic site. The third monument is located midway between the house and the intersection of 7th and Center streets. It consists of a bronze plaque dated September 10, 1989, affixed to a stone and is dedicated to Eva Emory Dye and others who helped save the McLoughlin House in 1909.

The northwestern section of the site is partially delineated by approximately 140 feet of modern metal chain link fencing along the top of a bluff.

A modern metal flagpole is located near the east entrance to the McLoughlin House.

Outdoor Furniture

The site contains two seven-foot long modern wooden and metal park benches located on the west and south lawns. There are also two modern rectangular concrete planters on the east terrace.



 $\ Vegetation \ Surrounding \ McLoughlin \ House$



Fountain and Cannon on McLoughlin House grounds



Drinking fountain and footpaths to underpass



Pedestrian Underpass to Singer Creek Falls

Public Amenities

The site includes a concrete and rock drinking fountain and trash receptacles located on the east lawn and on the edge along Center Street. A plaque on the drinking fountain pad dedicates the fountain to the memory of Vera Caufield, curator of the McLoughlin House from 1947 to 1962.

Walkways and Underpass

A straight sidewalk with grass parking strip parallels Center Street. A second sidewalk (not shown) runs perpendicular to the main sidewalk and leads to the terrace and steps at the east entrance to the McLoughlin House. This sidewalk was installed in 1948 to replace an earlier boardwalk. Another sidewalk bisects the north lawn and ends at the McLoughlin graves.

Two asphalt footpaths cut through the south lawn on diagonals from the main sidewalk. The paths eventually unite and encircle the drinking fountain and from there continue west ending at a pedestrian underpass. The underpass has cut stone piers and metal tubular railings. Oregon City received a variety of federal funding during the 1930s which resulted in many new improvements to the downtown area. The underpass was constructed in 1936-1937 with Public Works Administration (WPA) funds. The connection steps to the underpass along Singer Creek Falls and down the bluff were also constructed in 1936 using WPA funding.



Sign at McLoughlin House

Signs

Two painted wooden signs that formerly stood on the east lawn near the door to the McLoughlin House were removed in 2006. At both the McLoughlin and Barclay Houses, a sign displaying the construction date and style of the house is located above the front door.

McLoughlin House

The 1846 McLoughlin House has undergone extensive changes that have altered the exterior and interior fabric of the building during the nineteenth and early twentieth centuries. The house's period of significance is from 1846-1867 during which time Dr. McLoughlin and his family occupied the house. The property was sold in 1874 and passed out of ownership of the McLoughlin family. Between 1868 and 1908, the house was rented out to multiple tenants. During those years, the house received structural additions that substantially altered its original interior and exterior configurations.

In 1909, the house was moved to its present site from its original location on Main Street in response to its threatened demolition by the Hawley Pulp and Paper Company. At that time, the house was in poor condition and was reputed to have been used as a brothel. While some citizens felt it should be torn down, there were many who recognized its historical significance and rallied for its removal to a safe and secure location.

Today, the McLoughlin House is the centerpiece of McLoughlin Park. Architecturally, the McLoughlin House appears to have stylistic characteristics of earlier American buildings both Georgian and Colonial, which were drawn from English architectural traditions. In addition, it appears to have influences of French Canadian construction techniques. The house is rectangular in shape with a hipped roof and horizontal clapboard siding. It currently sits on a cut stone foundation. The house has vertical corner



McLoughlin House, view from grounds

boards, window and door trim, overhanging eaves, and a cornice. The house has two interior brick chimneys; one on the north side and one on the south. The east side of the house has five "12 over 12" double hung windows on the second floor and four "16 over 16" double hung windows on the first floor. The west side has the same window arrangement as the east. The north and south sides of the house each have five windows, three on the second floor and two on the first floor. The west side has a central paneled door with a transom and side lights, and the east side has a central paneled door with a transom. There is a paneled door on the south side of the house.

The interior of the house has a first and second floor central hallway running east and west. There is a stairway on the northeast side of the hallway leading to the second floor. The first floor has six rooms, a dining room, two small rooms to the right of the hall (the two small rooms are not accessed by the hall), a parlor, and two small rooms to the left of the hall (these two small rooms are also not accessed from the hall). There is a small utility closet and bath under the stairway. The second floor has four rooms, all accessed from the central hallway. Both the first and second floors have painted ceilings and wood floors. The interior woodwork is painted. Individual rooms are wallpapered with reproduction nineteenth century wallpaper. The exterior of the house is painted grey with white trim. The doors and windows are painted white.

The second period of significance for the house is 1909 to 1939. This period begins with the relocation of the house to McLoughlin Park and continues with restoration efforts through 1911. The period then continues with the second restoration effort which was begun in 1933 and completed in 1939.

Interior and Exterior Remodeling

At its original Main Street location and soon after the McLoughlin family left the house, various inte-

rior and exterior changes occurred. Among other alterations, window and door openings were removed and filled in. Some siding may have been replaced and/or removed to accommodate additions to the rear of the house. It is not known at this point what interior room configuration changes were made. By the early twentieth century, the McLoughlin House was in a deteriorated state, suffering from vandalism and neglect.

The 1909 move of the house resulted in a number of further exterior and interior changes to the structure. Soon after the relocation of the house, work was begun. This so-called "restoration" included the introduction of non-historic fabric, where liberties were taken that resulted in something less than a true restoration by today's standards.

A second phase of restoration began in 1933 under the direction of architect Glenn Stanton. By 1939, a number of Stanton's recommendations had been implemented including the installation of automatic fire suppression and heating systems, which necessitated replacing some interior walls and ceiling boards as well as lowering the ceilings on the first floor. The installation of stone porches, stone foundations, and piers was also part of this work, as well as the replacement of the 1909 mantels with ones based on the design of those in the Barclay house. The second floor bathroom was also removed. New roof shingles were installed as were metal hoods on the chimneys.

Typical of the times and similar to work executed on similar house museums, Stanton "updated" the house by providing structural and life safety improvements, as well as a central heating system. Although these changes may have made the house more comfortable, and certainly a safer place, some building fabric original to the McLoughlin period was likely sacrificed. Other changes by Stanton, particularly those to the exterior, contributed to reinforcing elements from the original house.

General Maintenance and Repairs

From 1947 through 2003, the National Park Service, as part of the 1941 formal agreement between the Department of the Interior and the Association, was to conduct annual inspections of the house and submit a yearly conditions and work report. During this period, a number of changes to the McLoughlin House occurred. For example, the wood terrace and steps on the east entrance were replaced with a two step stone terrace around 1956. The west steps and terrace may have been replaced at the same time. The "original front door" on the west entrance was repaired and repainted around 1953 and again in 1960. The "original" door was removed in 1966 and its replacement was believed to be "an exact replica of the old one" (Barbero 2003: p.83-84). Eaves and gutters were repaired after the 1962 Columbus Day storm and the roof was repaired following water damage in 1964. Floors were frequently refinished during the 1950s through the 1970s. An electric baseboard heating system, intended to be more efficient and economical, was installed in 1959, replacing the 1930's oil system, but the baseboard system was removed a year later. In 1968, a new heating system was installed. In 1976, several of the rooms in the house received new wallpaper. In 1977, two arson-caused fires damaged the interior and exterior of the southwest corner of the house. These fires necessitated repairs to the siding, windows and window trim. Window glass was also replaced. Between 1980 and 1981 a new roof was apparently installed on the house. Additional repairs and changes occurred in the 1980s and 1990s which included the installation of carpeting in public use areas, repair to the roof and chimneys, installation of ceiling insulation and indirect lighting, an updated security system and removal of the curator's office to the Barclay house in 1998. Additional roof repair and moss cleaning was done in the 1990s. In 1997-1998, the entire interior of the house was wallpapered. The security system was further updated.

Barclay House

The Barclay House is a companion and contemporary structure to the McLoughlin House. It was built in 1848-1849, at a cost of \$17,000 by Dr. Forbes Barclay. The period of significance for the Barclay House is 1850-1873 during which time Dr. Forbes Barclay occupied the house with his family. The house was occupied with Forbes Barclay's descendents until 1934.

The Barclay House was originally located on Main Street between Seventh and Eighth Streets. In 1937, the house was moved to McLoughlin Park adjacent to the McLoughlin House. Previously, the house had been moved in 1912 to a site on Water Street in Oregon City. The Barclay House is an early example of Pacific Northwest vernacular Classic Revival frame architecture.

The Barclay House has had a variety of uses since its relocation to the present site, including as an antique shop, a tea room, caretaker's quarters, offices for the Oregon City Chamber of Commerce, and most recently, administrative offices for the

McLoughlin House National Historic Site operations.

McLoughlin House Museum Collections

Immediately upon the relocation of the 1846 McLoughlin House to the new site, the McLoughlin Memorial Association began the acquisition of historic objects for the house, which officially opened to the public in 1911. Among the first objects to be acquired by the Association in 1909 were a whale oil lamp, a print of Queen Victoria, a rocking chair, an iron strong box, a leather shot pouch and powder horn, a deed executed by Dr. McLoughlin to a Peter Hatch, a picture of the Vancouver, Washington "witness" tree and a piece of the tree. Many of these early acquisitions were donations from public spirited citizens. Over the next 30 years, objects continued to be acquired for use as furnishings in the house.

In 1937-1938, Dr. Burt Brown Barker, noted twentieth century Oregon historian and one of the directors of the McLoughlin Memorial Association, purchased



Historic mahogany dining table

for the McLoughlin House a number of significant historic objects associated with McLoughlin and William Fraser Tolmie (former Fort Vancouver surgeon) from the Tolmie estate in Victoria, British Columbia. These objects included a mahogany dining table, a washbasin with the Hudson's Bay Company crest, a pair of bellows, a pair of brass andirons, books, a secretary bookcase desk and a marble top 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.) Many of these important historic items have helped interpret the story of Dr. McLoughlin's life.

From the 1940s through the 1990s, a number of important objects belonging to McLoughlin or family members and originally associated with their residence in the house were added to the collections. These objects included the following: a sofa table, a pair of card tables, personal items such as jewelry, McLoughlin's seal, watch and chain, Apostolic brief with relics, the Royal Horticultural Medal presented to McLoughlin in 1826 for his assistance to the botanist, David Douglas, a snuff box, McLoughlin's transfer printed dinner service, a melodeon, an 1886 oil portrait of McLoughlin, a "china" trunk, a Chinese lacquer cabinet that belonged to Marguerite McLoughlin and McLoughlin's silver cutlery (flatware).

Many of the objects in the McLoughlin House collection are in excellent physical condition; however none of the objects have received conservation treatment from a professional conservator. Exceptions include: in 2000, a paper conservator assessed the condition of some of the documents and books in the collection; and in 2002, a professionally certified appraiser provided an appraisal of the McLoughlin House collections.

The McLoughlin House collections have been managed since the 1930s by a number of curators. In the 1940s, Vera Caufield, Curator and Wilmer Gardner, a member of the Executive Board of the McLoughlin Memorial Association, drew up the first inventory of the collection.

Today, the collection consists of an estimated 800 objects which can be divided into several categories: objects that belonged to McLoughlin and his family, objects associated with other Hudson's Bay Company sites and individuals, and historic objects from the era that belonged to individuals not connected with McLoughlin or the McLoughlin House. The collection is housed in the McLoughlin and Barclay houses and at Fort Vancouver NHS. This collection helps to commemorate and interpret Dr. John McLoughlin and his family's significance in the history of the Pacific Northwest.

Archaeology

Archaeological surveys of the grounds of the McLoughlin House National Historic Site were conducted in 2001 and 2004 (Cromwell 2005). These surveys were done in response to a backed up and partially collapsed sewer line at the Barclay House, and in anticipation of the installation of updated sub-surface electrical and fire sprinkler lines. These surveys recovered approximately 5,000 late-nineteenth and early twentieth century historic artifacts, and an additional 240 prehistoric artifacts. These artifact deposits are substantial enough to warrant the recording of the park as an archaeological site with both historic and prehistoric components. An archaeological site form has been filed with the Oregon State Historic Preservation Office (SHPO), with a recommendation that the site be regarded as "Eligible" for the National Register of Historic Places. These findings will help to guide the management principles of the park, especially in regards to potential sub-surface excavations for future maintenance activities.

Physical Resources

Geology / Topography

The topography of Oregon City, located along the Willamette and Clackamas Rivers, divides the city into three natural terraces. These terraces range in elevation from 50 feet at the lowest terrace, to more than 250 feet above sea level on the upper terrace (Historic Preservation Northwest, 2003). The second terrace, on which the McLoughlin and Barclay Houses stand, ranges in elevation from 162 feet to 170 feet above sea level before it rises again to the third, and highest, terrace. The houses are located approximately 162 feet above sea level.

The site has areas along the northwest corner of the property line, which are classified in the city's map of the Unstable Soils and Hillside Constraint Overlay District (Oregon City, Code, 2004). The percentage of land area by slope category is detailed in Table 2. Figure 4 shows an aerial photo of the site detailing the locations of the steep slopes along Singer Hill Road.

Table 3: Slope Categories for McLoughlin House

Slope Category:	Percentage of Site:	General Location:
0% to 10% Slope	Approximately 50%	Most of southern and eastern areas of site along Center St. and 7th.
10% to 25% Slope	Approximately 20%	Northwest property edge along bluff
25% to 35% Slope	Approximately 20%	Northwest corner behind McLoughlin grave sites
35% or Greater Slope	Approximately 10%	Northwest corner behind Barclay House



Figure 4: Slope Categories in McLoughlin Park

Soils

According to the soil survey conducted by the Natural Resources Conservation Service, soils located within the property are Saum Silt Loam, with 3 to 8 percent slopes (Natural Resources Conservation Service, 2004). Oregon City's soil map of the property lists the soil type as a Category 1 Soil, which requires percolation tests for new development proposals (Oregon City, GIS, 2004).

The site is relatively well drained with some periods of standing water. The site may have clay-laden soils. No analysis of known poor drainage in the spring and winter has been undertaken by the NPS to evaluate percolation rates of the soil.

Water Resources

Surface Water Quality and Condition

While the park has not conducted a baseline inventory of surface water quality and condition, known surface water features are located outside of McLoughlin Park's boundary. The largest and most obvious surface water feature, the Willamette River, is located approximately 860 feet to the northwest of the property edge. Singer Creek, which is piped by the time it nears the property beneath 7th Street, daylights at Singer Creek Falls (southwest of the site) constructed in 1936 with funding from the Works Progress Administration (WPA) (Oregon City, General, 2004).

Ground Water Quality and Condition

The quality and condition of ground water on the site is unknown and the park has not conducted any monitoring to determine a baseline. The site does have a large (8" and 12") sanitary sewer line running from east to west, across the property and under the McLoughlin House (Oregon City, GIS, 2004).

Wetlands

Although no wetlands occur on the site, there is a nearby wetland and riparian area located to the west of Singer Hill across Singer Hill Road. As a result, Oregon City mandates water quality restrictions (essentially a vegetated buffer). According to the city's municipal code, because the site contains considerable slopes greater than 25%, "Vegetated corridors in excess of fifty feet apply on steep slopes only in the uphill direction from the protected water feature" (Oregon City Code 2004). Since the McLoughlin House Unit is within 50 feet of this wetland, proposed construction at the site will need to go through a city review process and to maintain vegetation on the hillside.

It is unknown whether a small wetland associated with Singer creek existed at the current site of McLoughlin Park. Historic records indicate a creek was diverted (see Current Site Conditions above) and there is regular seasonal ponding of water that occurs in the area of the McLoughlin gravesites.

Biological Resources

Vegetation

The site's vegetation is significantly altered from its natural state. It contains long established ornamental trees, plantings, and lawn and is associated with the McLoughlin Park cultural landscape. For more detail on the historic vegetation, refer to the Historic Site Conditions and Current Site Conditions sec-

tions under Cultural Resources above. Native, naturally occurring vegetation on the site is limited to the northwest area with slopes greater than 35%, however most of the vegetation occurring in this area is dominated by invasive species, particularly English Ivy and Himalayan Blackberry.

An assessment of trees in 2004 showed most of the trees in a healthy state. A small number of trees, however, were determined to be "hazard trees" by the National Park Service and were pruned in 2004 to alleviate concern over these trees falling on the McLoughlin and Barclay houses. Regular monitoring of these trees is important to ensure that they do not pose additional hazards to the historic homes. Monitoring and implementation actions associated with hazard trees will be undertaken based on the 1995 Hazard Tree Plan for Fort Vancouver National Historic Site.

A visit to the McLoughlin House Unit on August 25, 2004 found the site to be considerably altered from its natural state, with long established lawns and ornamental plant beds surrounding the buildings. Bigleaf maple was the only naturalized native plant seen, although sword fern, salal and Oregon grape are included in the ornamental plantings. The basalt cliff area along the site's northwest edge is engulfed in English ivy and Himalayan blackberry, so it is highly unlikely listed or rare plants have survived in this habitat. One small right-of-way, less than 100 square feet, between the cliff edge and a small parking area behind the Barclay House had been recently cut with a weed eater; therefore the vegetation was not identifiable.

Visitor Experience

Access and Circulation

Location

The McLoughlin House Unit is located on 713 Center Street on the second terrace of Oregon City, in Clackamas County, Oregon (Section 31, Township 2 South, Range 2 East, Willamette Meridian). The site is in the Fifth Congressional District of the 108th Congress, the 26th State House District, and the 12th State Senate District for Oregon. The site is located in U.S. Census Tract 224, Block 5043. The house is part of the McLoughlin Conservation District (MCD), a primarily residential, historic neighborhood located on the bluff above the Willamette River.

The primary access route to the site and Oregon City is via Oregon State Highway 99E, 43, and 213, and Interstate 205. The site is located approximately 13 miles southeast of downtown Portland, Oregon, and is part of the greater Portland/Vancouver Metropolitan area.

Visitor Access and Parking

Visitors driving to the McLoughlin House are signed off I-205 onto Highway 99E, then left on 10th Street and up Singer Hill to Center Street. There are also other directional signs located throughout downtown Oregon City. Limited street parking is available in front of the site.

Currently, the site only offers on-street parking along Center Street. According to the Association, there is little or no traffic congestion at the site, but during times of a scheduled group visit by bus, the Association has placed traffic cones in front of the house to facilitate bus parking. The major considerations for potential traffic and parking impacts will be with adjacent home and business owners along Center Street and the McLoughlin Conservation District in general.

The Association has two permitted parking spaces for staff along the north edge of the property, near the Victorious Faith Family Church (811 Center Street). The church currently uses the public right of way between the two properties as parking for members.

The Association coordinates bus traffic with the End of the Oregon Trail Interpretive Center (1726 Washington Street), about five minutes away, and the Museum of the Oregon Territory (211 Tumwater Drive) also about five minutes away in the opposite direction. Visitors move back and forth between the sites, generally spending one hour at each.

McLoughlin Park Grounds

Use of the grounds is similar to those of any city park. People use the park benches for their lunch or for sitting and relaxing. Others bring their pets for walks. Occasionally, newlyweds have wedding photos taken with the backdrop of green foliage during summer months. There are several commemorative and interpretive markers on the grounds for visitors to read.

Visitor Operations

Visitation

Informational signs at both the McLoughlin House and the Barclay House provide hours of operation, and indicate that visitors need to stop first at the Barclay House. Because the doors at the McLoughlin House are kept locked (except when tours are underway), visitors find their way to the Barclay House where they are greeted at the door.

Hours of Operation

Currently, the houses are open for visitation five days a week, Wednesday through Saturday (from 10:00 a.m. to 4:00 p.m.) and Sunday (from 1:00 p.m. to 4:00 p.m.). They are closed on major holidays, during January, and part of December. Nominal admission fees were being charged by the McLoughlin Memorial Association to the general public: \$4 for adults, \$3 for adults age 62 and over, \$2 for ages 6-17, and free admittance for children under 6 years of age. No admission was charged for the Barclay House or for visiting the grounds. During transition of management to the National Park Service, no fees have been charged.

Visitation Statistics

Operating on a five-day schedule with closures and several special events, the houses received 4,620 visitors during 2002, 4,099 visitors during 2003 and 4,205 visitors in 2004. These statistics are derived from paid tour admissions only and do not include visitors to McLoughlin Park or those that visited the Barclay House without going on a tour (See Table 3).

Starting in October 2004, the visitation statistics were derived from all visitors to both houses rather than from paid tours only (See Table 4).

Table 3: 2002-2004 Visitation for the McLoughlin House

Month/Year	2002	2003	2004
January	0	22	0
February	490	241	468
March	462	395	314
April	483	404	167
May	698	722	1059
June	405	524	535
July	424	366	445
August	478	435	406
September	358	256	224
October	373	353	215
November	211	191	222
December	238	190	150
TOTAL	4,620	4,099	4,205

Note: McLoughlin House is generally closed in January, except for special events. It was also closed during the first two weeks of February 2003 and the last two weeks of December 2003 and 2004.

Table 4: 2004-2006 Visitation for the McLoughlin and Barclay Houses

Month/Year	2004	2005	2006
January	N/A	N/A	N/A
February	N/A	M – 198B – 288	M – 178B – 287
March	N/A	M - 344B - 429	M – 266B – 441
April	N/A	M - 435B - 470	M - 697B - 461
May	N/A	M - 626B - 603	N/A
June	N/A	M – 842B – 544	N/A
July	N/A	M – 556B – 701	N/A
August	N/A	M – 448B – 569	N/A
September	N/A	M – 349B – 471	N/A
October	M – 453B – 368	M - 342B - 478	N/A
November	M – 228B – 287	M - 256B - 300	N/A
December	M – 129B – 214	M - 78B - 128	N/A
TOTAL	M - 810B -869	M – 4,474 B – 4,981	M - 1,141B -1,189

Note: M – McLoughlin House, B – Barclay House; McLoughlin House is generally closed in January, except for special events.

Type of Visitors

Visitors to the McLoughlin and Barclay houses generally arrive individually or in small groups (family or interest group). Individual visitors (one to two people in general) tend to be casual visitors off the street, coming specifically to see the houses, or are directed to the site from other Oregon City cultural sites or from Fort Vancouver National Historic Site. Seniors make up the largest type of general public group, followed by families and special interest groups.

School groups comprise a major component of visitation. School groups are encouraged to call prior to their visit to make a reservation. These groups can range from 10-20 to 50-80 people in size. There are no teacher's packets presently available (one was developed by the Association but it has not been re-

printed) to send to the groups prior to their visits, but brochures, driving directions, and maps are sent if requested.

There has been a drop in the number of school related visits, due to cuts in available bus transportation. Instead of more frequent visits with smaller groups of children, the Association staff has noticed fewer visits with combined, larger classes.

Public Tours

General public groups that are small in size and individual visitors have two options for touring the homes. They may choose to take a self-guided tour using a one-page handout and accompanied by an NPS staff member, authorized staff, or volunteer. Visitors can read interpretive information posted throughout the McLoughlin House and can interact with a member of the NPS staff or a docent, who is with each group or individual for security and safety reasons. Visitors are usually not left unaccompanied while touring the McLoughlin House; however, at times when there is limited staff, visitors have been allowed to independently tour the upstairs rooms which are gated.

Visitors are also offered the opportunity to take a fully-guided tour, generally lasting 45 minutes, with an NPS staff member or an Association docent providing interpretation.

The Association staff has not set a limit to the number of visitors that may tour the house at any given time. The NPS estimates that the 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. Visitors are not allowed to touch furnishings or other artifacts, and resources are inspected during normal maintenance for any cumulative damage.

The fully-guided tour consists of several stops. Visitors are greeted at the Barclay House. Docents then lead each group outside to the McLoughlin grave sites to begin the tour, weather permitting. In inclement weather, introductions are held in the McLoughlin House entry hall or in a larger room at the rear of the Barclay House.

At the McLoughlin House, large groups are divided into smaller groups for rotation through the house. Approximately 10-15 minutes are spent in different rooms with the NPS staff member or docent providing interpretation. At times, an additional docent may act as "hall monitor" and/or timekeeper to ensure that no one is left unsupervised.

Rooms are fully furnished with period pieces; some items and furniture are associated with the McLoughlin family or the Hudson's Bay Company. Visitors can step into the dining room, parlor, and the exhibit room off the dining room; the upstairs bedrooms have locked gates on the doorways so visitors can't actually



Historically furnished room, McLoughlin House

step into the rooms but can view them. Several displays of artifacts (out of reach, or under glass) are shown, and small interpretive/informational signs are located throughout the house.

To some extent, each tour is personalized depending on the NPS staff member's or docent's knowledge and skill, and on the visitor or group's knowledge and interest. Interpretation placing Drs. McLoughlin and Barclay and their families into the historical context of Pacific Northwest and Hudson's Bay Company and Oregon City history is offered for visitors lacking this background information. NPS staff or docents each start with a script emphasizing artifacts and room descriptions and functions, but experience and increasing subject matter knowledge lead to programs individualized to personal and visitor interests.

During the tour the first and second floors are visited. On the first floor the hall visitors are taken to the parlor, British and American bedrooms, dining room, display room, and office. On the second floor, visitors are shown the guest bedroom, ladies sitting room, hall, children's bedroom, and master bedroom.

At the conclusion, the tours return to the Barclay House moving into the large room at the rear of the house for a brief discussion of Dr. Forbes Barclay and family. Visitors end their tour in the gift shop in the Barclay House, where they may browse or shop before leaving the site. A section of wallpaper original to the Barclay family era can be seen in the sales area. Comprised of paper linings from Chinese tea boxes, the wallpaper is interpreted and protected with a see-through, glass covering.

Sales

The Association manages a retail sales operation (gift shop) inside the Barclay House. Visitors can visit the sales area both prior to and following their tours. Items for sale include McLoughlin, Hudson's Bay Company, and Oregon City theme-related books, maps, and publications, Oregon frontier theme-related toys, and various souvenirs. The sales operation, which is primarily managed by volunteers, is self-supporting with profits going to operation of the houses.

Publications

Several types of informational and interpretive publications are available to McLoughlin House visitors, including the following:

- Map and interpretive guide produced by NPS Harpers Ferry Center; and a
- Northwest Explorer (Junior Ranger) Program.

The house is also featured in a number of orientation materials such as brochures, maps and table tents, produced by the city, county, and state.

Websites

The McLoughlin Memorial Association maintains a website at http:\\www.mcloughlinhouse.org. This site provides basic visitation information (hours, admission costs, maps, directions, etc.) and brief narrative introductions to Drs. McLoughlin and Barclay.

A search engine request on the Internet will pull up a number of additional websites offering orientation and brief descriptions of the McLoughlin House.

Special Events

With the site transfer to the NPS, the NPS will be responsible for managing special events and activities throughout the year. Many of these activities will involve the Association. These serve to attract visitation to the site and to raise funds. Annual events include a candle light tour on the first Sunday of December, and occasional auctions and/or fundraisers. Mini-exhibits are held to encourage local, repeat visitation. Re-enactment and living history activities are held when staffing and scheduling allow. Other events are held occasionally in partnership with various Oregon City cultural institutions.

Outreach

The Association staff represents the McLoughlin House for marketing and promotion purposes through their participation in several local cultural organizations. The Historic Oregon City Heritage Coordinating Committee is an informal group meeting once a month to pursue common interests and to address issues facing cultural/heritage sites in Oregon City. The Clackamas Heritage Partners, of which NPS is a member, were recently formed in April 2004 to raise private funds, implement cultural heritage and preservation programs, and carry forward respective organizational and governmental missions.

Park Operations

Visitor and Employee Safety

A number of potential past and present issues, related to visitor and employee safety, had existed at the site but have recently been improved. These include recent remediation efforts associated with hazard trees, which were pruned and thinned; issues associated with mature landscaping which was recently thinned to decrease the site's attractiveness for loiterers and other undesirable activities; some issues associated with non-historic chain-link fencing and the site's location on a high bluff above Singer Hill Road; and concern over landscaping features, including flagstone walkways, which are slippery when wet.

Hazard Trees

The site's larger trees have experienced some deferred maintenance over the years. NPS maintenance staff has recently completed selective pruning and thinning of hazardous branches on the site. Pruning of some of the elm trees located on site will be completed next, to avoid any instability related to Dutch elm disease.

The recent selective pruning and thinning of vegetation behind the Barclay House has also made the site more visible and less desirable for loiterers and other undesirable activities. The staff has also begun routine site maintenance.

Fencing

Fencing near the rear of the site is intended to keep people away from the bluff that slopes down to Singer Hill Road. In addition, the gravesites are fenced and there is landscaping that separates the Barclay House from the adjacent church property. Other areas of the site—Center Street, 7th Street, and the end of 8th Street adjacent to the church—are not fenced and are open to the street. Generally, there are two types of fencing present at the site:

- Single chain barrier fence with posts at approximately 8' to 10' on center along bluff edge; and
- Decorative iron fence surrounding the gravesites.

Accessibility

Currently, there are no ADA accessible ramps to enter either the McLoughlin or Barclay houses. The McLoughlin House has a raised porch/ stoop at both entrances, and the Barclay House has a raised porch. In addition, there are no accessible restrooms at the site. Available restrooms are located on the first and second floors of the Barclay House.

There are only a few pedestrian paths on the site. A walkway doesn't exist between the gravesites and the fountain, necessitating visitors to walk across the grass lawn. Historic photos show a pathway in the area, but its configuration and location has not been fully investigated.

Indoor ADA accessibility for staff and visitors, including office space, at stairs, ingress and egress points, and other transition areas needs to be evaluated within the houses.

Utility Systems

Electrical

The current electrical systems in the houses are not code compliant and the park staff is in the process of replacing wiring and electrical panels. Electrical service delivery into the home from the street and service meters, located on the exteriors of the homes, will also be evaluated for code compliance, as well as visual impact.

Data and Phone Lines

There are two phones in the Barclay House, one for the MMA and one for the NPS. There are data lines for at least two computers. The telephone in the McLoughlin House is only for emergency use.

Sewer

The houses are hooked into the Oregon City sewer main which runs down Center Street.

Security and Monitoring Systems

Currently, the security system is not code compliant and the park staff will evaluate what changes need to be made to the system.

Fire Safety

The sprinkler system in the McLoughlin house is old (dated about 1935) and is in need of replacement. The park staff has evaluated the system and has immediate plans to replace the main valve and sprinkler heads after flushing the system.

Currently, the Barclay House has no sprinkler system. The park staff also plans to install a new sprinkler system in the Barclay House as well as replace/ repair the fire alarm systems in both houses.

List of Preparers

Planning Team

An interdisciplinary planning team comprised of National Park Service staff from Fort Vancouver National Historic Site, the Seattle Office of the Pacific West Region, the Intermountain Region, and board members from the McLoughlin Memorial Association was established in fall 2003. An orientation and planning workshop was conducted on March 29-30, 2004. A list of management issues were developed at this time for the future management, operation, and maintenance of the site.

The names and titles of participating team members are provided below:

Fort Vancouver National Historic Site

Tracy Fortmann, Superintendent

Gary Bickford, Chief of Maintenance

David Hansen, Former Park Curator/Historian

Elaine Huff, Administrative Officer

Theresa Langford, Park Curator

John Salisbury, McLoughlin House Unit Park Guide

Greg Shine, Chief Ranger

Intermountain Region

Sharon A. Brown, Outdoor Recreation Planner, National Trails System, Salt Lake City, UT

Pacific West Region - Seattle Office

Kent Bush, Staff Curator

Theo K. Chargualaf, former Landscape Architect (now at War in the Pacific National Historical Park in Guam)

Keith Dunbar, Chief of Planning and Environmental Compliance

Hank Florence, Historical Architect

Amanda Schramm, Planning Intern (Preparer)

Anna Tamura, Landscape Architect

Cheryl Teague, Landscape Architect (Preparer)
Stephanie Toothman, Chief of Cultural Resources
Doug Wilson, Vancouver National Historic Reserve Archeologist
Arlene Yamada, former Administrative Support Technician
McLoughlin Memorial Association
Patty Farrell, Treasurer
Rolla Harding, First Vice President
Denyse McGriff, President
Lorien Petersen, Secretary
John Salisbury, Past President
Ed Turpin, Second Vice President
Trustees
Wade Byers
Nelda Davis
Nelda Davis Wilmer Gardner
Wilmer Gardner
Wilmer Gardner Phyllis Gehring
Wilmer Gardner Phyllis Gehring Jr, Harriet Jorgensen
Wilmer Gardner Phyllis Gehring Jr, Harriet Jorgensen Denise McGee
Wilmer Gardner Phyllis Gehring Jr, Harriet Jorgensen Denise McGee Doug Neeley
Wilmer Gardner Phyllis Gehring Jr, Harriet Jorgensen Denise McGee Doug Neeley Janine Offut

Linda Spillum		
Ruth Van Arnam		
John Williams		
Joan Williams		
Earl Zak		

Consultants

Lewis and Clark National Historical Park

Scott Stonum, Chief of Resources

Nancy Eid, Biological Science Technician

Pacific West Region - Seattle Office

Rose Rumball-Petre, Environmental Protection Specialist (Preparer)

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Appendices

Appendix A: 1941 McLoughlin House Unit Agreements and Legislation

Appendix B: Fort Vancouver National Historic Site Management Zones

Appendix C: 2003 McLoughlin House Unit Special Status Species

Appendix D: 2003 Theme-related Sites and Programs

Appendix E: Socioeconomic Profile

Appendix F: McLoughlin House Unit Management Plan Finding of No Significant Impact

Appendix A: McLoughlin House Unit Agreements and Legislation

The following agreement is an existing legal agreement that influences both planning and operations for the McLoughlin House Unit at Fort Vancouver National Historic Site:

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

Fort Vancouver National Historic Site Legislation (1948, 1961)

McLoughlin House National Historic Site Legislation (1941)

117 STAT. 872

PUBLIC LAW 108-63—JULY 29, 2003

Public Law 108–63 108th Congress

An Act

July 29, 2003 [H.R. 733]

McLoughlin House Addition to Fort

Vancouver National Historic Site Act. 16 USC 450ff note.

To authorize the Secretary of the Interior to acquire the McLoughlin House in Oregon City, Oregon, for inclusion in Fort Vancouver National Historic Site, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE; DEFINITIONS.

(a) SHORT TITLE.—This Act may be cited as the "McLoughlin House Addition to Fort Vancouver National Historic Site Act".

(b) DEFINITIONS.—For the purposes of this Act, the following definitions apply:

(1) CITY.—The term "City" means Oregon City, Oregon.
(2) McLoughlin House.—The term "McLoughlin House" means the McLoughlin House National Historic Site which is described in the Acting Assistant Secretary of the Interior's Order of June 27, 1941, and generally depicted on the map entitled "McLoughlin House, Fort Vancouver National Historic Site", numbered 389/92,002, and dated 5/01/03, and includes the McLoughlin House, the Barclay House, and other associated real property, improvements, and personal property.
(3) Secretary.—The term "Secretary" means the Secretary

of the Interior.

SEC. 2. MCLOUGHLIN HOUSE ADDITION TO FORT VANCOUVER.

(a) ACQUISITION.—The Secretary is authorized to acquire the McLoughlin House, from willing sellers only, by donation, purchase with donated or appropriated funds, or exchange, except that lands or interests in lands owned by the City may be acquired by donation

(b) MAP AVAILABILITY.—The map identifying the McLoughlin House referred to in section 1(b)(2) shall be on file and available for inspection in the appropriate offices of the National Park Service,

Department of the Interior.

(c) BOUNDARIES; ADMINISTRATION.—Upon acquisition of the McLoughlin House, the acquired property shall be included within the boundaries of, and be administered as part of, the Fort Vancouver National Historic Site in accordance with all applicable laws and regulations.

(d) NAME CHANGE.—Upon acquisition of the McLoughlin House, the Secretary shall change the name of the site from the "McLoughlin House National Historic Site" to the "McLoughlin

House'

(e) FEDERAL LAWS.—After the McLoughlin House is acquired and added to Fort Vancouver National Historic Site, any reference

PUBLIC LAW 108-63—JULY 29, 2003

117 STAT. 873

in a law, map, regulation, document, paper, or other record of the United States to the "McLoughlin House National Historic Site" (other than this Act) shall be deemed a reference to the "McLoughlin House", a unit of Fort Vancouver National Historic

Approved July 29, 2003.

LEGISLATIVE HISTORY—H.R. 733:

SENATE REPORTS: No. 108–66 (Comm. on Energy and Natural Resources). CONGRESSIONAL RECORD, Vol. 149 (2003):

Apr. 8, considered and passed House.

June 16, considered and passed Senate, amended.

July 16, House concurred in Senate amendments.

10. Fort Vancouver National Historic Site

Page Establishment as national monument; transfer of lands by War Assets Administration and Secretary of the Army to Secretary of the Interior __Act of June 19, 1948 355 Boundaries revised and monument redesignated "Fort Vancouver National Historic Site"_____Act of June 30, 1961 356

An Act To provide for the establishment of the Fort Vancouver National Monument, in the State of Washington, to include the site of the old Hudson's Bay Company stockade, and for other purposes, approved June 19, 1948 (62 Stat. 532)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That, for the purpose of establishing a Fed- Ft. Vancouver National Monueral area of national historical importance for the benefit ment, Wash. of the people of the United States, to be known as the "Fort Vancouver National Monument", the Administrator of the War Assets Administration and the Secretary of the Army are authorized to transfer to the Secretary of the Interior, without exchange of funds, administrative jurisdiction over such federally owned lands and other property, real or personal, under their jurisdiction, including the site of the old Hudson's Bay Company stockade in the State of Washington, as they shall find to be surplus to the needs of their respective agencies, such properties to be selected, with their approval by the Secretary of the Interior for inclusion within the national monument. (16 U.S.C. 8 45011.)

SEC. 2. The total area of the national monument as Total area. established or as enlarged by transfers pursuant to this Act shall not exceed ninety acres. Establishment of the monument shall be effective, upon publication in the Federal Register of notice of such establishment, following the transfer to the Secretary of the Interior of administrative jurisdiction over such lands as the Secretary of the Interior shall deem to be sufficient for purposes of establishing the national monument. Addi- Additional tional lands may be added to the monument in accordance with the procedure prescribed in section 1 hereof, governing surplus properties, or by donation, subject to the maximum acreage limitation prescribed by this Act, upon publication of notice thereof in the Federal Register. (16 U.S.C. § 450ff-1.)

SEC. 3. The administration, protection, and development of the aforesaid national monument shall be exercised under the direction of the Secretary of the Interior by the National Park Service, subject to the provisions of the Act of August 25, 1916 (39 Stat. 535), entitled 10 U.S.C. "An Act to establish a National Park Service, and for other purposes", as amended. (16 U.S.C. § 450ff-2.)

356 IX. NATIONAL HISTORIC SITES—FORT VANCOUVER

An Act To revise the boundaries and to change the name of Fort Vancouver National Monument, in the State of Washington, and for other purposes, approved June 30, 1961 (75 Stat. 196)

Fort Vancouver National Monument, Wash. Be it enacted by the Senate and House of Pepresentatives of the United States of America in Congress assembled, That, for the purpose of preserving certain historic properties associated with the Fort Vancouver National Monument, established pursuant to the Act of June 19, 1948, chapter 546 (62 Stat. 532; 16 U.S.C. 450ff-450ff-2), the Secretary of the Interior may revise the boundaries of the monument to include therein not more than one hundred and thirty additional acres of land adjacent to, contiguous to, or in the vicinity of the existing monument. (16 U.S.C. § 450ff-3.)

Land acquisition.

Src. 2. The Secretary of the Interior may acquire in such manner as he may consider to be in the public interest the non-Federal lands and interests in lands within the revised boundaries. (16 U.S.C. & 450ff-4.)

Transfer authority.

the revised boundaries. (16 U.S.C. § 450ff-4.)
Sec. 3. The heads of executive departments may transfer to the Secretary of the Interior, without exchange of funds, administrative jurisdiction over such federally owned lands and other property under their administrative jurisdictions within the revised boundary as may become excess to the needs of their respective agencies for inclusion in the Fort Vancouver National Monument. (16 U.S.C. § 450ff-5.)

Redesignation.

(16 U.S.C. § 450ff-5.)
SEC. 4. Fort Vancouver National Monument is redesignated Fort Vancouver National Historic Site. (16 U.S.C. § 450ff-6.)

8. McLoughlin Home National Historic Site

Page

Designation of certain lands to comprise the site: Order of June 27, 1941.....

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Order Designating the McLoughlin Home National Historic Site, 1
Oregon City, Oreg.

[June 27, 1941—6 F. R. 3299, 3357]

WHEREAS, the Congress of the United States has declared it to be a national policy to preserve for the public use historic sites, buildings, and objects of national significance for the inspiration and benefit of the people of the United States; and

WHEREAS, the McLoughlin Home, located in the public park known as "McLoughlin Park" in the municipality of Oregon City, State of Oregon, is recognized as possessing national significance as the home of Dr. John McLoughlin, a distinguished, influential, and humanitarian leader in the settlement of the Oregon Territory; and

WHEREAS, a cooperative agreement has been made between the McLoughlin Memorial Association, the Municipality of Oregon City, and the United States of America, providing for the preservation and use of the McLoughlin Home as a national historic site:

Now, THEREFORE, I, W. C. Mendenhall, Acting Assistant Secretary of the Interior, under and by virtue of the authority conferred upon the Secretary of the Interior by Section 2 of the Act of Congress approved August 21, 1935 (49 Stat. 666), do hereby designate the following described lands, together with all historic structures thereon and all appurtenances connected therewith, to be a national historic site, having the name "McLoughlin Home National Historic Site":

All that tract of land in Block Forty (40) of Oregon City, in Clackamas County, Oregon as shown on the Town Plats, Clackamas County, Volume 1, Page 2, dated December 8, 1850, bounded by Center Street, Seventh Street, Singer Hill Road, and Eighth Street, containing .8394 acres, and known as "McLoughlin Park."

The administration, protection, and development of this national historic site shall be exercised in accordance with the provisions of the abovementioned cooperative agreement and the act of August 21, 1935, supra.

Warning is expressly given to all unauthorized persons not to appropriate, injure, destroy, deface, or remove any feature of this historic site.

In WITNESS WHEREOF, I have hereunto set my hand and caused the official seal of the Department of the Interior to be affixed, in the city of Washington, this 27th day of June 1941.

[SEAL]

W. C. MENDENHALL,

Appendix B: Fort Vancouver National Historic Site Management Zones

The following management zones are excerpts from the 2002 Fort Vancouver National Historic Site Draft General Management Plan. The underlined text below shows additions to those management zones that relate directly to the McLoughlin House Unit. These management zones give direction to how parts of the national historic site will be managed. (For more information, refer to the 2003 Fort Vancouver National Historic Site Final General Management Plan / Environmental Assessment.)

HISTORIC ZONE

Resource Condition or Character

The management focus in this zone is maintaining and protecting historic resources, restoring the cultural landscaping, recreating elements of the historic scene, maintaining visitor facilities, and mitigating impacts from human use while providing for quality visitor experiences. At the Fort Vancouver Unit, additional historic buildings and associated structures will be reconstructed, delineated (defining the silhouettes of buildings and rooflines), or defined by marking the corners of foundations to allow for increased understanding and interpretation of the HBC and early U.S. Army period. Evidence of educational activity, research, and resource preservation will be visible to visitors.

McLoughlin House Unit—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 setting within this zone is predominantly historic, keeping a high integrity of historic resources. At Fort Vancouver, the historic scene and the recreated landscape will be managed to protect the archaeological resources of the NHS and to restore the cultural landscape of the HBC and early Army period whenever possible. This landscape will also be managed to support visitor use and enjoyment of park resources to the extent that park resources will remain protected. This zone includes the Fort, the Village, Parade Ground, and portions of the Fort Vancouver Waterfront where the HBC interpretive area will be located. If the U.S. Army transfers all or a portion of the south and east Barracks area to the National Park Service, this area will be incorporated into this zone. Some aspects of the natural and cultural landscape will be modified to accommodate visitor use such as trail construction and providing for landscaping and new exhibits.

Visitor Experience

McLoughlin House Unit—At the McLoughlin House Unit, the historic setting of the charter park will be maintained.

At the Fort Vancouver Unit, though surrounded by an urban setting, visitors are immersed in an outdoor, recreated historic environment that is rich in architectural and cultural history. Interpretive and education opportunities are great in this zone and opportunities exist for visitors to experience both natural and cultural resources. The visitor experience is further enhanced through a range of approaches to interpret historic HBC structures within the Fort, Village, and at the Waterfront. This could include additional reconstruction of structures, delineation of the silhouettes of buildings, or defining the corners of foundations. Visitor activities occur in both structured (such as interpretive walks and "living history"

presentations) and unstructured ways (self-guided tours and waysides). The possibility of encountering other people and NPS staff is high, but at certain times of the day or season, opportunities could exist to experience relative solitude.

McLoughlin House Unit—At the McLoughlin House Unit, the visitor experience is also enhanced through a range of approaches to interpret the houses of Dr. McLoughlin and Dr. Barclay in Oregon City to more fully understand the contributions of these individuals to the early history and pioneer settlement of Oregon. The historic district that surrounds the McLoughlin and Barclay houses provides a setting for the interpretation of the development of Oregon City that will be respected in the future development of any enhancements of the site.

At all times, visitors would be encouraged to act in a manner that respects other visitors' use and enjoyment of the site. Certain areas will be established for on-going research with limited access to the general public. Visitors should expect moderate to severe intrusions to the natural soundscape and viewshed by cars, trains, airplanes, other visitors, and modern structures.

Appropriate Types of Activities or Facilities

Appropriate visitor activities could include learning about the park's natural and cultural resources and its ecological and historical relevance, bird watching, photography, jogging and bicycling (along the City of Vancouver's Discovery Historic Loop Trail), walking, and picnicking.

McLoughlin House Unit—At the McLoughlin House Unit, appropriate activities would include learning about the unit's natural and cultural resources, bird watching, photography, and walking along the bluff trail.

A range of interpretive, educational and orientation programs will be provided, with orientation and interpretation of resources taking place onsite. Additional educational and recreational opportunities will be available to visitors in other venues within the Vancouver National Historic Reserve.

Appendix C: McLoughlin House Unit Special Status Species

The U.S. Fish and Wildlife Service lists the following plant species that may occur on the site:

Table 5: USFWS Federally Listed Plant Species

Common Name:	Scientific Name:	Status:
Golden Indian paintbrush	Castilleja levisecta	Threatened
Willamette daisy	Erigeron decumbens var. decumbens	Endangered
Howellia	Howellia aquatilis	Threatened
Bradshaw's lomatium	Lomatium bradshawii	Endangered
Kincaid's lupine	Lupinus sulphureus var. kincaidii	Threatened
Nelson's checker-mallow	Sidalcea nelsoniana	Threatened

Table 6: USFWS Federally Listed Plant Species of Concern

Common Name:	Scientific Name:	Status:
White top aster	Aster curtus	n/a
Pale larkspur	Delphinium leucophaeum	n/a
Willamette Valley larkspur	Delphinium oreganum	n/a
Peacock larkspur	Delphinium pavonaceum	n/a
Thinileaved peavine	Lathyrus holochlorus	n/a
Oregon sullvantia	Sullivantia oregana	n/a

Threatened, Endangered, Rare Species, and Species of Concern

The U.S. Fish and Wildlife Service lists the following animal species (excluding fish species) that may occur on the site:

Table 7: USFWS Federally Listed Wildlife Species

Common Name:	Scientific Name:	Type:	Status:
Bald eagle	Haliaeetus leucocephalus	Bird	Threatened

Table 8: USFWS Candidate Species

Common Name:	Scientific Name:	Type:	Status:
Yellow-Billed cuckoo	Coccyzus americanus	Bird	n/a
Streaked hornded lark	Eremophila alpestris strigata	Bird	n/a
Oregon spotted frog	Rana pretiosa	Amphibian/ Reptile	n/a

Table 9: USFWS Federal Wildlife Species of Concern

Common Name:	Scientific Name:	Type:	Status:
Pacific western big-eared bat n/a	Corynorhinus townsendii towns	sendii	Mammal
Silver-haired bat	Lasionycteris noctivagans	Mammal	n/a
Long-eared myotis (bat)	Myotis evotis	Mammal	n/a
Fringed myotis (bat)	Myotis thysanodes	Mammal	n/a
Long-legged myotis (bat)	Myotis volans	Mammal	n/a
Yuma myotis (bat)	Myotis yumanensis	Mammal	n/a
Camas pocket gopher	Thomomys bulbivorus	Mammal	n/a

Band-tailed pigeon	Columba fasciata	Bird	n/a
Olive-sided flycatcher	Contopus cooperi borealis	Bird	n/a
Yellow-breasted chat	Icteria virens	Bird	n/a
Oregon vesper sparrow	Pooecetes gramineus affinis	Bird	n/a
Purple martin	Progne subis	Bird	n/a
Northwestern pond turtle	Emys marmorata marmorata	Amphibians/ Reptiles	n/a
Northern red-legged frog	Rana aurora aurora	Amphibians/ Reptiles	n/a

Listed Plant Species:

Golden Indian paintbrush

Castilleja levisecta

Habitat: Willamette Valley lowlands

<u>Documentation</u>: Not documented for Clackamas County in Oregon Natural Heritage Information System

database; may be extirpated in Oregon

Site Occurrence: Highly unlikely due to lack of habitat and site alterations.

Effect: No effect.

Willamette daisy

Erigeron decumbens var. decumbens

Habitat: Willamette Valley prairie and grasslands on heavy soils

<u>Documentation:</u> Documented in Clackamas Co. in Oregon Natural Heritage Information System data-

base

Site Occurrence: Potential habitat on property limited to cliff-top areas. There is currently no proposed

action in this area.

Effect: No effect

Howellia

Howellia aquitilis

<u>Habitat:</u> aquatic in western Oregon ponds and lakes

Documentation: Documented in Clackamas Co. in Oregon Natural Heritage Information System data-

base

Site Occurrence: No occurrence due to lack of aquatic habitat at site.

Effect: No effect

Bradshaw's lomatium

Lomatium bradshawii

Habitat: open, low, moist areas in Willamette Valley

<u>Documentation</u>: Not documented for Clackamas County in Oregon Natural Heritage Information System

database

Site Occurrence: No habitat on site.

Effect: No effect

Kincaid's lupine

Lupinus sulphureus var. kincaidii

Habitat: Willamette Valley Prairie

Not documented in Clackamas County in Oregon Natural Heritage Information System database Site Occurrence: Occurrence at site highly unlikely due to lack of habitat and site alterations.

Effect: No effect

Nelson's checkermallow Sidalcea nelsoniana

<u>Habitat</u>: Willamette Valley prairie and grassland, gravelly well-drained soils

<u>Documentation</u>: Documented in Clackamas Co. in Oregon Natural Heritage Information System data-

base

Site Occurrence: Occurrence at site unlikely due to lack of habitat and site alterations.

Effect: No effect

Species of Concern:

White top aster

Aster curtus

<u>Habitat</u>: Willamette Valley prairie

<u>Documentation</u>: Not documented in Clackamas County in Oregon Natural Heritage Information System

database

Site Occurrence: Occurrence at site unlikely due to lack of habitat and site alterations

Effect: No effect

Pale larkspur

Delphinium leucophaeum

Habitat: rocky cliffs and grassland slopes, lower Willamette and Columbia Rivers

<u>Documentation</u>: Documented in the Oregon City vicinity of Clackamas County in Oregon Natural Heri-

tage Information System database

Site Occurrence: Occurrence at site can't be ruled out; a May-June survey of the site's clifftop habitat is

recommended Effect: No effect

Willamette Valley larkspur

Delphinium oreganum

Habitat: Willamette Valley prairie and basalt cliffs

<u>Documentation</u>: Not documented in Clackamas County in Oregon Natural Heritage Information System

database

Site Occurrence: Occurrence at site is unlikely; however, a May-June survey of the site's clifftop habitat

is recommended. Effect: No effect

Peacock larkspur

Delphinium pavonaceum

Habitat: open fields, dry roadsides, central Willamette Valley

Documentation: Documented in Clackamas Co. in Oregon Natural Heritage Information System data-

base; Oregon Plant Atlas database records occurrence several miles south of Oregon City

Site Occurrence: Occurrence at site can't be ruled out; a May-June survey of the site's clifftop habitat is

recommended.

<u>Effect</u>: No effect

Thin-leaved peavine

Lathyrus holochlorus

Habitat: unknown

<u>Documentation</u>: Documented in Clackamas Co. in Oregon Natural Heritage Information System data-

base; Oregon Plant Atlas database records occurrence southeast of Oregon City

Site Occurrence: Occurrence at site can't be ruled out; a May-June survey of the site's clifftop habitat is

recommended.
Effect: No effect

Oregon sullivantia

Sullivantia oregana

Habitat: wet rocks, moist cliffs usually within waterfall spray zones

<u>Documentation</u>: Oregon Plant Atlas database registers one record north of Oregon City on the

Clackamas/Multnomah County line.

Site Occurrence: No occurrence due to lack of habitat at site.

Effect: No effect

Appendix D: Theme-related Sites and Programs

There are several local and regional cultural attractions and resources that complement the McLoughlin House interpretive themes. The Association staff actively encourages visitors to see related sites; in some instances, the staff works with other site staffs to promote visitation and resource awareness. Additional related resources are protected through program-based designations (trails, conservation district, and historic district).

Canemah National Historic District

In the 1850s, Canemah was an important boat-building center located just above the Willamette Falls. Changes in transportation led to construction of the locks and railroads to handle river traffic, and Canemah took on a more residential character. In 1928 the town was annexed to Oregon City. Roughly bounded by the Willamette River, 5th Avenue, and Marshall and Paquet streets, the district was listed to the National Register of Historic Places on October 11, 1978.

Clackamas County Historical Society/Museum of the Oregon Territory

This museum is located at 211 Tumwater Drive, Oregon City, Oregon. The Clackamas County Historical Society is a non-profit organization operating the Museum of the Oregon Territory. Sited to overlook the historic Willamette Falls, the museum features exhibits relating to Oregon history, a research library, and a sales area.

End of the Oregon Trail Interpretive Center

This interpretive center sits on historic Abernethy Green which is the end of the Oregon Trail in Oregon City, Oregon at 1726 Washington Street. The center is comprised of three buildings with the appearance of overland wagons. It offers regularly scheduled programs for a fee about overland travel on the Oregon Trail. The program is one hour in length, docent-led with multi-media presentations in two theaters and an exhibit gallery. A hologram "Dr. McLoughlin" speaks to visitors. A sales area and temporary exhibits are offered, as is a trades and craft workshop with hands-on activities. Special events are hosted during spring and summer each year. The non-profit Oregon Trail Foundation operates the facility.

Fort Vancouver National Historic Site

There is a strong historical connection between the McLoughlin and Barclay houses and Fort Vancouver, which served as the administrative headquarters and main supply depot for the Hudson's Bay Company's fur trading operations in the vast Columbia Department. Under the leadership of Chief Factor Dr. John McLoughlin from 1825 to 1846, the fort became the center of political, cultural, and commercial activities in the Pacific Northwest. When American emigrants arrived in the Oregon Country during the 1830s and 1840s on the Oregon Trail, Dr. McLoughlin provided essential supplies to save lives and to foster settlement. When Dr. McLoughlin left the company in 1846 he lived the rest of his life at his home in Oregon City. Dr. Forbes Barclay served as physician to the Hudson's Bay Company at Fort Vancouver before moving to Oregon City, where he spent the rest of his life. The site is administered by the National Park Service and is located at 612 East Reserve Street, Vancouver, Washington

Historic Ermatinger House and Living History Museum

Francis Ermatinger came to Oregon in 1825 as an employee of the Hudson's Bay Company. Dr. John McLoughlin placed him in charge of the company store in Oregon City in 1844. Married to Marguerite McLoughlin's granddaughter Catherine, Francis Ermatinger had a Federal-style house built for his family in 1830. Like the McLoughlin and Barclay houses, the Ermatinger House was saved from encroaching development around Willamette Falls by being moved to the upper level of town. The house has been moved twice—the McLoughlin Memorial Association moved it in 1910 to 11th and Center streets, and in 1986 it was moved to its present location at 6th and John Adams streets (619 6th Street). The house is owned by the City of Oregon City, and according to their websites, volunteers offer tours on weekends for nominal fees.

McLoughlin Conservation District

Established in 1982, the McLoughlin Conservation District is on a portion of Dr. John McLoughlin's 1845 land plat and includes the bluff, or "second level," with streets running roughly to Van Buren, and from Fourteenth to Clinton streets. A 1982-86 inventory identified 306 resources. The district was re-inventoried in 2002, and contains 802 principal resources, primarily residential in nature, and ranging in dates of construction from 1845 to 2000. There are 177 structures over 100 years of age. The district was found to be potentially eligible for nomination to the National Register of Historic Places, and the City of Oregon City is presently gauging support for such a nomination.

Oregon Historic Trails Program

The Oregon Historic Trails Program seeks to establish Oregon State as "the nation's leader in developing historic trails for the education, recreational, and economic values." Building on the work of the 1984 Oregon Trail Advisory Council and activities associated with the Oregon Trail sesquicentennial celebrations of 1993, the governor of Oregon established the Oregon Historic Trails Advisory Council in 1998 to advise the governor and to locate, preserve, and encourage the use of 16 designated historic trails in the state. Four of the 16 trails for which the council is responsible are national historic trails administered by the National Park Service (including the Oregon National Historic Trail), the USDA Forest Service, and their partners.

Oregon National Historic Trail

Designated in 1987, the Oregon National Historic Trail corridor is 2,130 miles in length and contains some 300 miles of discernible ruts and 125 historic sites, including the Oregon City Complex in Oregon City, Oregon (1999 Oregon National Historic Trail Management Plan, p. 35). Among other reasons, the trail is significant because it strengthened the United States' claim to the Pacific Northwest. Administered by the National Park Service and partners, the national historic trail offers visitors the opportunity to travel an auto tour route and visit an array of interpretive and historic sites. The Oregon City Complex, including the McLoughlin House, is a high-potential site on the Oregon National Historic Trail (1999 Oregon National Historic Trail Management Plan, p. 312).

Philip Foster Farm

The Philip Foster Farm is located at 29912 SE Highway 211, near Eagle Creek, Oregon. Philip Foster and his family arrived in Oregon in 1843 via Cape Horn and the Sandwich Islands. Foster served as the

first treasurer of the Oregon Territory provisional government in 1844-45, and as an entrepreneur he funded construction of the Barlow Road, operated a store in Oregon City, and founded a flour mill and cattle company with Dr. John McLoughlin. Foster claimed 640 acres in Eagle Creek in the late 1840s to establish this farm, which hosted thousands of Oregon Trail emigrants near the end of their journeys. Since 1993 the Zion-Horseheaven Historical Society has operated the farm as a historic site, which is open to the public.

Rose Farm

William and Louisa Holmes and their children arrived in Oregon in 1843, having come overland from Missouri. Completed in 1847, the home on the Holmes land grant was built with hand hewn timbers. Dr. John McLoughlin was entertained here, and it is believed that both the provisional and territorial Oregon legislatures met in the house. The McLoughlin Memorial Association operates the home and offers tours (on the first Sunday of the month, May-September) for a nominal fee. It is located at 914 Holmes Lane, Oregon City.

Stevens-Crawford Heritage House

This home commemorates the families of early settlers Harley Stevens and Medorem Crawford, a wagon master who led emigrants across the Oregon Trail. Built in 1907-08, the house is of a classical foursquare style house, and contains the majority of its original period furnishings. The Clackamas County Historical Society administers the house, which is open for public tours at 603 6th Street, Oregon City, Oregon.

Appendix E: Socioeconomic Profile

Community Profile

Setting

Oregon City, the county seat for Clackamas County, is located in northwest Oregon, along the confluence of the Clackamas and Willamette rivers. The city currently has 9.2 square miles within its city limits. Established in 1829, Oregon City incorporated in 1844, and became the capital of the Oregon Territory in 1849. The unique geography of the city includes three "terraces" which range in elevations from 50 feet above sea level at the river's edge to more than 250 feet above sea level on the upper terrace. McLoughlin House, which was moved to its current location on top of Singer Hill in 1909, overlooks the older, industrial areas of Oregon City and the Willamette River and falls.

Population, Growth and Demographics

Population and Growth Trends in Oregon City

As of 2002, the reported population of Oregon City was 26,692 people (Oregon City, General, 2004). The city experienced the highest rate of growth between 1990 and 2000, with a 75 percent net increase in population over that period. The table below details population growth in Oregon City and Clackamas County over the past 25 years.

Table 10: Population Growth from 1980-2002

Year	Oregon City	Clackamas County
1980	14,673	241,919
1990	14,698	278,850
2000	25,754	338,391
2001	26,680	345,150
2002	26,692	

Demographic Profile

As of 2000, Oregon City's residents were predominately White, with Hispanic or Latino populations representing the largest minority group. The following table details the 2000 Census breakdown of race and ethnicity in the city and state.

Table 11: Demographic Profile of Oregon City and Oregon State

Race/ Ethnicity:	Population:	Oregon City Percentage:	Oregon Percentage:
White	23,807	92.4%	87%
Black or African American	150	0.6%	2%
American Indian and Alaska native	277	1.1%	1%
Asian	288	1.1%	3%
Native Hawaiian and other Pacific	Islander 28	0.1%	0%
Some other race	553	2.1%	4%
Two or more races	651	2.5%	3%
Hispanic or Latino	1,283	5.0%	8%

As of 2000, 86.2 percent of the city had earned a high school diploma, and 18.4 percent a bachelor's degree or higher. The median age of Oregon City in 2000 was 32.7 years old (U.S. Census, 2004).

Economic Profile

Major employers in Oregon City are the Clackamas County Government, Clackamas Community College, Willamette Falls Hospital, Smurfit Newsprint Corp, and PED Manufacturing. A recent land use application has been submitted to the city for a proposed Wal-Mart to be constructed. The median income per household, as reported in 1999, was \$46,205, slightly below the county's median income of \$53,321 (Clackamas County, 2004). As of 2000, 12.4% of the population was below the poverty level (U.S. Census, 2004).

Economically Disadvantaged Populations

No survey or interview data exists for the percentage of McLoughlin House visitors whose income is below the poverty line.

Appendix F: McLoughlin House Unit Management Plan Finding of No Significant Impact

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

- Interpretive subtheme related to McLoughlin housing people in need (removed)
- Possible designation of ADA parking on 8th Street (removed)

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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	1 Permanent - Subject to
	Furlough	Furlough
Interpretation/Education	1 Permanent - Subject to	1 Permanent - Subject to
	Furlough	Furlough
		2 Seasonal
Resource Management	1 Permanent	1 Permanent
Total Staff	4 Total	6 Total

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

Fees

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 tiered to this unit management plan. The following studies and plans would need to be developed to guide more detailed planning for the unit:

- (Complete) Historic Structures Report for the McLoughlin House;
- Historic Structures Report for Barclay House;
- Restoration/Rehabilitation Plans for both houses based on the Historic Structures Reports;
- Cultural Landscape Report;
- Assessment of security and life/safety code issues and mechanical systems (could be included in the Historic Structures Reports for the two houses);
- Scope of Collection Statement;
- Emergency Operations Plan (for site and collections);
- Museum Management Plan;
- Exhibit Plan;
- Archival survey and assessment;
- Conservation survey and treatment plan;
- Administrative History;
- Long-Range Interpretive Plan (amendment to Fort Vancouver NHS Long-Range Interpretive Plan);
- Oral histories (priority due to age of people with information to share);
- Museum Collection Preservation Maintenance Plan; and
- Carrying capacity study based upon recommendations from Historic Structure Reports for McLoughlin and Barclay houses.

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 Alterative 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:

<u>Beneficial and Adverse Effects</u> - 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.

<u>Degree of effect on public health or safety</u> - 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.

<u>Degree to which effects on the quality of the human environment are likely to be highly controversial</u> - 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.

<u>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</u> - 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.

<u>Degree to which the action may adversely affect an endangered or threatened species or its critical habitat</u> - 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,	Responsible Staff
		Minimize or Mitigate Impact	
Land Use	Negligible to minor adverse impacts from construction of a compatible restroom and from changes to onsite and overflow parking. Long-term minor to moderate beneficial effects from comprehensive planning and acknowledgement of the site's historic zone. Long-term moderate beneficial effect from restoring exterior appearance of houses, interior of McLoughlin House and some	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.	Superintendent
	interior spaces in Barclay House. Long-term minor beneficial effect from visitor understanding of how land use contributed to preservation of the site.		
Geology	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.	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.	PWRO Staff
Soils	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. Additional impacts related to construction of walkways and additional impermeable and permeable surface treatments (landscaping and walkways).	Soil compaction and loss of vegetation would be remediated following construction by scarification and/or landscaping.	PWRO Staff
Water Resources (including Hydrology and Wetlands):	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.	Additional environmental analysis upon a proposed solution would occur. Best management practices would be used to retain natural processes to the degree possible, while improving protection for the gravesites. Additional investigation of potential historic changes to wetlands at the site would occur.	PWRO Staff
Historic Buildings and Structures	Short-term negligible to minor adverse effects and long-term beneficial effects from restoring the houses to their historic appearance. 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.	Proposed actions would result in mitigating long-term adverse impacts that have occurred to the historic houses. Additional planning would be undertaken to determine the best arrangement of administrative facilities within the Barclay House. All work would be designed and performed to meet the Secretary of the Interior's Standards for the Treatment of Historic Properties. Additional consultation with the	Archeologist

Resource	Impact	Measures to Avoid, Minimize or Mitigate	Responsible Staff
		Impact	
		SHPO would occur for those actions falling outside of the 1995 NPS Programmatic Agreement.	
Cultural Landscapes	Negligible to minor beneficial effects from potential re-establishment of the historic entrance to the McLoughlin House. Negligible to minor adverse effect on circulation patterns from possible reconstruction of kitchen. Negligible short-term adverse and negligible to minor beneficial effects from re-creation of historic circulation pathways or realignment of existing paths. Effects on historic buildings and structures	All work would be designed and performed to meet the Secretary of the Interior's Standards for the Treatment of Historic Properties. Additional consultation with the SHPO would occur for those actions falling outside of the 1995 NPS Programmatic Agreement.	PWRO Historic Landscape Architect
Musaum	noted above. Long-term minor to moderate beneficial	Preparation of planning	Curator
Archeological Resources	effects from applying NPS museum standards to existing collections. Negligible to moderate long-term beneficial effects from completing collections and museum planning documents. Long-term moderate beneficial impact from managing the collections in support of an expanded interpretive program. Long-term minor beneficial effect from expansion of the collections to support historic furnishings study and use in the houses. Negligible to minor adverse impacts from deaccessioning of items long part of the collection, but determined inappropriate in accordance with NPS policy and guidelines. Long-term negligible to moderate beneficial effects and short- and long-term localized minor adverse effects from in situ 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	Archeologist
		other interested parties under Section 106 of the National Historic Preservation Act and Oregon State Law.	
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	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. Moderate beneficial impacts from removal of non-native species in selected locations. Negligible to minor beneficial effects from	Rehabilitation of project sites following construction impacts. Revegetation or landscaping with suitable native or non-native (historic) species.	Facility Manager
	maintenance of landscaping.		

Resource	Impact	Measures to Avoid, Minimize or Mitigate Impact	Responsible Staff
	Short-term negligible to minor adverse effects from temporary removal of vegetation, followed by its replacement, during construction activities.	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.		
Visitor Experience: Visitor Use Opportunities	Long-term moderate beneficial impacts from potential restoration of historic parlor in Barclay House.	N/A	Chief Ranger
	Negligible to minor long-term beneficial impact from potential reconstruction of kitchen (shelter).		
Visitor Experience: Visitor Interpretation and Education	Negligible to minor beneficial impacts from greater NPS involvement in facilitating and giving house tours and from improvements to publications and exhibits.	N/A	Chief Ranger
	Minor to moderate beneficial effect on increasing visitor understanding of McLoughlin House unit through new exhibits and interpretive programming.		
	Long-term beneficial impacts from improvements in interpretation directed at children.		
Visitor Experience: Visitor Use Access and Transportation	Minor adverse or minor beneficial effect on visitors from determination of carrying capacity.	Collaborative planning for interior modifications to the Barclay House.	Chief Ranger
	Short-term negligible to moderate adverse effects from existing limited parking with impacts decreasing to negligible as additional parking is secured for the site.		
	Short- and long-term minor to major beneficial impacts from construction of accessible restroom.		
	Additional minor to moderate beneficial impacts from potential reconfiguration of Barclay House.		
	Long-term minor to moderate beneficial effect from proposed expansion of parking.		
Park Operations: Staffing and Facilities	Long-term minor beneficial effect on staff and visitors from continuing most existing operations.	Collaborative development of a parking plan.	Chief Ranger
	Long-term minor to major beneficial effects on visitors needing accessible restrooms.		
	Negligible to minor long-term beneficial effect from continued use of maintenance equipment and staffing from Fort Vancouver.		
	Long-term negligible to minor beneficial effect from new signage.		
	Long-term beneficial effect from preparation of NPS plans for continued management of the site.		
	Additional long-term negligible adverse		

Resource	Impact	Measures to Avoid, Minimize or Mitigate Impact	Responsible Staff
	impact from need to maintain potential additional building (kitchen shelter).		
Park Operations: Visitor and Employee Health and Safety	Series of minor to moderate long-term beneficial effects from adherence to NPS policies and implementation programs. Minor long-term beneficial effect on employee safety from NPS commitment to using green products. Long-term minor to moderate beneficial effect from installation of new, historically compatible fencing along Singer Hill bluff.	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://parkplanning.nps.gov/fova. 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.

<u>United States Fish and Wildlife Service (USFWS)</u>: 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.

Recommen	nded
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Tracy Fortmann, Superintendent Fort Vancouver National Historic Site

May 29, 2007

Date

Approved:

Jonathan B Jarvis, Regional Director

Pacific West Region

Appendices

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