# MEMORANDUM OF AGREEMENT

#### BETWEEN THE US DEPARTMENT OF VETERANS AFFAIRS

#### AND THE

#### WASHINGTON DEPARTMENT OF ARCHAEOLOGY AND HISTORIC PRESERVATION

#### REGARDING THE JONATHAN M. WAINWRIGHT VA MEMORIAL MEDICAL CENTER DEMOLITION OF BUILDINGS 8, 97 AND 103 GARAGES PROJECT

WHEREAS, the US Department of Veterans Affairs (VA) proposes to demolish three garages within the Walla Walla Veterans Affairs Medical Center (VAMC) campus as described in Attachment A (Undertaking); and

WHEREAS, Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. 470f, and its implementing regulations at 36 CFR Part 800 (Section 106) requires Federal Agencies to take into account the effects of their undertakings on historic properties and provide the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on those undertakings; and

WHEREAS, the purpose of this Memorandum of Agreement (MOA) is to ensure compliance with Section 106 of the NHPA, pursuant to 36 CFR § 800.6 (c); and

WHEREAS, VA, in consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP), has established the Undertaking's Area of Potential Effect (APE) (Attachment A), as defined by 36 CFR § 800.16 (d), to be:

Built environment of the VAMC campus (parcel #360730130080) including approximately 2.5 acres of City of Walla Walla land located adjacent and to the south; and the archaeological APE as those buildings to undergo demolition (Attachment A); and,

WHEREAS, VA, in consultation with DAHP, has determined that the Undertaking may have an adverse effect on the historic Buildings 97 and 103 considered contributing resources to the Fort Walla Walla Historic District (Attachment A); and

WHEREAS, VA has initiated consultation with the DAHP pursuant to 36 C.F.R. part 800, regulations implementing Section 106 of NHPA; and

WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), VA has notified the ACHP of its adverse effect determination with specified documentation and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, VA identified the following tribes as having ancestral or traditional interests in the area:

- Colville Confederated Tribes
- Confederated Tribes of the Umatilla Indian Reservation .
- Confederated Tribes and Bands of the Yakama Indian Nation
- Nez Perce Tribe
- Wanapum Tribe; and

WHEREAS, VA has consulted with the affected tribes and invited the tribes to articulate their views on the Undertaking and resolution of Adverse Effects and invited them to be concurring parties to the MOA; and

WHEREAS, VA has consulted with the City and County of Walla Walla and the Fort Walla Walla Museum regarding the effects of the undertaking on historic properties and has invited them to be Consulting Parties; and

NOW, THEREFORE, VA and DAHP agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

## STIPULATIONS

VA shall ensure that the following measures and stipulations are carried out.

#### I. Professional Qualifications

VA will ensure that all historic preservation and archaeological resources work performed by or on behalf of the agency pursuant to this agreement, shall be accomplished by or under the direct supervision of persons who meet the pertinent qualifications standard for the relevant discipline set out in the Secretary of the Interior's *Professional Qualifications Standards* (48 FR 44738-44739).

#### II. Archaeological Resources

#### A. Archaeological Resource Monitoring Plan And Cultural Materials Discovery Protocol

VA has developed a Monitoring Plan consistent with the Secretary of the Interior's Standards for Archaeological Documentation (48 FR 44734-44737), the Council's Treatment of Archaeological Properties (ACHP, draft 1980), and applicable Washington regulations (Attachment B). In accordance with Attachment B, the VA will ensure that archaeological monitoring will be implemented for all ground disturbing activities associated with demolition activities. In the event of unanticipated discovery of significant cultural resources, the VA and its contractors will consider the resources as NRHP-eligible and shall follow the procedures outlined in Attachment B in order to recover data and minimize construction delays.

#### **B.** Communication and Coordination

VA will undertake the following measures to ensure adequate communication between the VA, DAHP, the Consulting Parties, and archaeological field crews.

1. VA will designate the VAMC Cultural Resource Management Officer as Primary Point of Contact for cultural resource issues to ensure the efficient flow of technical information between parties through the continued consultation and implementation of the MOA.

#### C. Curation and Reporting

VA will ensure that all records and material resulting from identification and data recovery efforts are curated with an institution that meets the criteria of 36 CFR Part 79, except those human remains and objects subject to Native American Graves Protection and Repatriation Act (NAGPRA). Any objects subject to NAGPRA shall be treated in accordance with Section D below.

> VA will assess any claims or curation requests made by any affected Tribal Government in accordance with applicable federal and state laws. VA will facilitate the involvement of affected Tribal Governments in the decisions related to final disposition of archaeological artifacts. If any party objects to any element of the disposition, they may object in accordance with the procedures outlined in Stipulation V, Dispute Resolution.

> VA will ensure that the cultural resource monitoring and investigations related to the Undertaking are documented in a report that meets state and federal standards, except that investigations and findings involving Native American human remains and cultural resources subject to NAGPRA shall additionally be in conformance with Tribal Government requirements for culturally appropriate documentation and handling to the greatest extent possible. The report shall summarize the methodologies, results, and conclusions drawn from the documentation and analysis of any sites and artifacts conducted in accordance with this Agreement. The report shall be distributed to the Consulting Parties, and non-confidential portions of the report may be made available to the public.

#### D. Treatment of Human Remains and Items of Religious and Cultural Importance

1. If human remains are encountered during any construction and ground-disturbing activities, the VA will comply with all applicable Federal and State provisions. The VA will treat all encountered remains as though they are Native American, and accordingly consult with affected tribes, unless and until proven otherwise.

#### IV. Resolution of Adverse Effects to Historic Resources

VA will ensure that the following mitigative actions will be undertaken to resolve adverse effects:

- 1. Historic Property Inventory Forms for Buildings 97 and 103 will be updated and submitted to DAHP. Interior and exterior photographs will document the existing conditions and archival material will be retrieved to provide historic conditions and setting.
- 2. VAMC commits to completing and finalizing its Historic Preservation Plan and revisions to its Historic District National Register Nomination.

#### V. Dispute Resolution

A. Unless otherwise specified in this Agreement, should any Signatory to this Agreement object in writing within 30 days to any plans, specifications, actions, or findings proposed pursuant to this Agreement, VA shall consult with the objecting party to resolve the objection. Upon receiving the written objection(s):

1. VA will notify any non-objecting Signatorics as to the nature of the dispute.

2. VA will attempt to informally resolve the objection.

3. In the event that informal attempts are unsuccessful, VA will invite the objecting party to a

reconciliation meeting for the purpose of discussing and resolving the objection. VA shall issue such invitation no later than ten (10) working days after receipt of the written objection and shall schedule a meeting to be held within fifteen (15) working days following receipt of the invitation unless the parties mutually agree to a later scheduling of the meeting. The time frames specified herein may be expedited by mutual written agreement.

B. Should the Colville Confederated Tribe, Confederated Tribes of the Umatilla Indian Reservation, Wanapum Tribe, Confederated Tribes and Bands of the Yakama, and/or Nez Perce Tribe object to any proposed plan, curation procedure, handling of Native American human remains, the resolution of adverse impacts or sufficiency of proposed mitigation measures, VA shall consult with the Tribal Governments to seek to resolve the objection under Stipulation V (A).

C. If VA determines that an objection cannot be resolved through Stipulation V (A), VA shall forward all documentation relevant to the dispute to the ACHP. Within 15 days of receipt of all documentation, the ACHP shall either:

1. Provide VA with recommendations, which VA shall take into consideration in reaching a final decision regarding the dispute, or

2. Notify VA that it will comment within 45 days in accordance with 36 CFR § 800.7(c)(2). Any Council comment provided in response to such a request will be taken into account by VA in accordance with 36 CFR § 800.7(c)(4) with reference to the subject of the dispute.

Any recommendation or comment provided by the ACHP will be understood to pertain only to the subject of the dispute; VA's responsibilities to carry out all actions under this Agreement that are not the subject of the dispute will remain unchanged.

#### VI. Amendment

Any Signatory to this Agreement may request that it be amended, whereupon the parties will consult to consider such amendment. Any request to amend this Agreement shall be mailed to each signatory and concurring party at least 60 days in advance of any proposed consultation date.

#### VII. Termination

Any Signatory to this Agreement may terminate it by providing 60 days written notice to the other parties, provided that the signatories will consult during this 60-day waiting period to seek agreement on amendments or other actions that would avoid termination. In the event of termination, VA must either: (a) execute an MOA pursuant to 36 CFR § 800.6; or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7.

#### **VIII. Scope of Agreement**

This Agreement is limited in scope to the Undertaking and is entered into solely for that purpose. Nothing in this Agreement is intended or shall be construed to diminish or affect in any way the right of the Tribes to take any lawful action to protect Native American graves from disturbance or desceration, to protect archaeological sites from damage, or to protect the Tribes' rights under cemetery and Native American graves protection laws, or other applicable laws.

Additionally, this Agreement does not create any right or benefit, substantive or procedural, enforceable by law or equity, by persons who are not a party to this Agreement, against the DAHP, or VA, their officers, or employees, any Consulting Party, or any other person not a signatory to this Agreement.

#### IX. Effective End Date

This Agreement will continue in full force and effect until January 1, 2016. At any time in the 6month period prior to this date, VA may request in writing that the signatories review the Undertaking and consider an extension or modification of this Agreement. No extension or modification will be effective unless all signatories to the Agreement have agreed to it in writing.

#### X. Satisfaction of Section 106 Responsibilities

Execution of this Agreement by the signatories and implementation of its terms evidence that VA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORIES:

Date: 10 24 By: Brian Westfield Director, VA Medical Center Walla Walla Date: By: Allyson Brooks,

Washington State Historic Preservation Officer





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# **Historic Inventory Report**

Location							
Field Site No.					DAHP No.		
Historic Name: Eight-c	ar Garage						
Common Name: VAMO	Building 9	97					
Property Address: 77 V	Wainwrigh	nt Dr, Wall	la Walla	, WA 993	362		
Comments:							
Tax No./Parcel No. 360	73013008	0					
Plat/Block/Lot							
Acreage							
Supplemental Map(s)							
<b>Township/Range/EW</b> T07R36E	<b>Section</b> 30	1/4 Sec	1/4 1/	4 Sec	<b>County</b> Walla Walla		<b>adrangle</b> ALLA WALLA
Coordinate Reference							
Easting: 2185022							
Northing: 269677							
Projection: Washingtor	n State Pla	ne South					
Datum: HARN (feet)							
Identification							
Survey Name: Walla V	Valla VA 2	011			Date Recorded:	09/29/20	011
Field Recorder: P. Thon	npson						
Owner's Name: U.S. D	epartment	t of Veter	ans Affa	irs			
Owner Address: 77 W	ainwright/	Drive					
City: Walla Walla			State:	WA		Zip:	99362
Classification: Building							
Resource Status: Survey/Inventory			Comn	nents:			
Within a District? Yes							
Contributing?							
National Register:							
Local District:							
National Register Distri	ct/Themat	tic Nomin	ation N	ame:			
Eligibility Status: Not De	etermined	- SHPO					
Determination Date: 1/	1/0001						
Determination Commer	ıts:						



## Description

Historic Use: Tra	nsportation - Road-Related (vehic	cular) Current Use:	Current Use: Vacant/Not in Use			
Plan: Rectangle	an: Rectangle Stories: 1		Structural System: Clay Tile			
Changes to Plan:	Intact	Changes to Ir	nterior: Unknown			
Changes to Origin	al Cladding: Intact	Changes to V	Vindows: Not Applicable			
Changes to Other	:					
Other (specify):						
Style:	Cladding:	Roof Type:	Roof Material:			
Other - Utilitarian	Other	Shed	Asphalt / Composition - Shingle			
Foundation:	Form/Type:					
Concrete - Poured	d Other					
Narrative						
<b>Study Unit</b> Transportation		Other				
Date of Construct	ion: 1930 Built Date	Builder:				
		Engineer:				
		Architect:				
Property appears to meet criteria for the National Register of Historic Places:No						
Property is located	d in a potential historic district (I	National and/or local): Ye	5			
Property potentia	Ily contributes to a historic distri	ict (National and/or local	): Yes			
Statement of Significance:	Building 97 was constructed in 1930 as an eight-car garage, and it currently appears to be used for storage. It is oriented to the northwest and is located in the residential group of buildings, southeast of the Commander's Quarters (Building 1, 1877).					
Description of Physical Appearance:	The single-story, eight-bay building was constructed in a utilitarian manner. The building exhibits a hollow clay tile exterior, and a shed roof, and is supported by a concrete foundation. They bays exhibit original tri-fold, wood garage doors. One door appears to have been removed from its original hardware and re-installed on the exterior of the northwest (front) facade as a sliding door. The southeast (rear) facade exhibits eight windows with four-light fixed sashes. The eight-car garage (Building 97, 1930) probably served the nearby Nurses' Quarters (Building 46, the former fort-era hospital, since removed).					
Major Bibliographic Beforences						

References:



### Photos



Photographer: Susan Johnson, Artifacts Consulting, Inc. northwest corner facing east 2011



Location				
Field Site No.		DAHP No.		
Historic Name: Single-car Garage				
Common Name: VAMC Building 1	03			
Property Address: 77 Wainwright	Dr, Walla Walla, WA 99	362		
Comments:				
Tax No./Parcel No. 360730130080	I			
Plat/Block/Lot				
Acreage				
Supplemental Map(s)				
Township/Range/EW Section 3 T07R36E 30	L/4 Sec 1/4 1/4 Sec	<b>County</b> Walla Walla		rangle A WALLA
Coordinate Reference				
Easting: 2185075				
Northing: 269893				
Projection: Washington State Plan	e South			
Datum: HARN (feet)				
Identification				
Survey Name: Walla Walla VA 20	11	Date Recorded:	09/29/2013	L
Field Recorder: P. Thompson				
Owner's Name: U.S. Department	of Veterans Affairs			
Owner Address: 77 Wainwright C	Prive			
City: Walla Walla	State: WA		Zip:	99362
Classification: Building				
Resource Status:	Comments:			
Survey/Inventory				
Within a District? Yes				
Contributing?				
National Register:				
Local District:				
National Register District/Themati	c Nomination Name:			
Eligibility Status: Not Determined -	SHPO			

Determination Date: 1/1/0001 Determination Comments:



#### Description

Historic Use: Transporta	ation - Road-Related (vehicul	lar) Current Use: Ot	Current Use: Other		
Plan: Rectangle	Stories: 1	Structural System	Structural System: Braced Frame		
Changes to Plan: Intact		Changes to Interio	or: Unknown		
Changes to Original Clad	lding: Intact	Changes to Windo	ws: Intact		
Changes to Other:					
Other (specify):					
Style:	Cladding:	Roof Type:	Roof Material:		
Other - Utilitarian	Wood - Shiplap	Gable - Front Gable	Asphalt / Composition - Shingle		
Foundation:	Form/Type:				
Concrete - Poured	Other				
Narrative					
<b>Study Unit</b> Transportation		Other			
Date of Construction:	1928 Built Date	Builder:			
		Engineer:			
		Architect:			
Property appears to meet criteria for the National Register of Historic Places:No					
Property is located in a potential historic district (National and/or local): Yes					

Property potentially contributes to a historic district (National and/or local): Yes

Statement ofBuilding 103 was constructed in 1928 as a one car garage, and it currently appears to be used for storage.Significance:It is oriented to the northeast and is located in the residential group of buildings, immediately east-<br/>northeast of the commander's quarters (Building 1, 1877).

Description ofThe single-story, single-bay building was constructed in a utilitarian manner. The building exhibits an<br/>exterior clad in wood ship lap siding, and a front-gable roof sheathed in composition shingles with<br/>exposed rafter tails. It is supported by a concrete foundation. The northeast (front) facade features a<br/>garage bay with an overhead door. The northwest (side) facade features a large window featuring a six-<br/>light fixed wood sash, and a single-leaf entry with a four-panel wood door, with a similar window on the<br/>southeast (side). The southwest (rear) facade has a window with a five-light fixed wood sash. A sheltered<br/>walkway from the rear entry of the commander's quarters (Building 1, 1877) extends for approximately<br/>25 feet long to the single-car garage (Building 103, 1928). The walkway has a gable roof sheathed in<br/>composition shingles, supported by wood columns.

Major Bibliographic References:



## Photos



Photographer: Susan Johnson, Artifacts Consulting, Inc. southwest corner facing northeast 2011



**Building 8 Garage** 



JONATHAN M. WAINWRIGHT MEMORIAL VA MEDICAL CENTER 77 Wainwright Drive Walla Walla, Washington 99362

In Reply Refer 10: 687-14-103

November 4, 2013

# Notice of Undertaking and Area of Potential Effect, Determination of Eligibility, and Finding of Adverse Effect

Report of future undertaking which may affect historic and cultural resources at Buildings 8, 97 and 103 at the Jonathan M. Wainwright VA Medical Center Campus, Walla Walla, Washington.

Dear Consulting Party Representatives:

By this letter, the Department of Veterans Affairs (VA) submits the Notice of Undertaking initiating consultation with the Washington State Historic Preservation Office in accordance with Section 106 of the National Historic Preservation Act of 1966, and implementing regulations 36 CFR Part 800. This Undertaking entails the proposed demolition of three garages, Buildings 8, 97 and 103.

Building 8 was constructed by the VA in 1974 as a single-car garage for the Medical Center Police Department who occupy adjacent Building 7. The single-story, front gabled, wood frame building was constructed in a utilitarian manner. It measures 24 feet (north-south) by 16 feet. The building exhibits horizontal wood cladding and a composition roof, constructed on a concrete slab on grade. A modern, vinyl overhead garage door has been constructed within the south gable end. The north and east elevations exhibit six - light fixed casement windows and the west gable end has a centered plywood door. Building 8 is the selected location for a smoke shelter for VA residents attending residential treatment programs. The smoking shelter is a Federal mandate and the location meets the minimum standoff requirements.

Building 97 was constructed by the VA in 1930 as an eight-car garage for medical staff that resided in nearby Quarters (see Bldg. 97 Historic Inventory Report). The singlestory, eight-bay building was constructed in a utilitarian manner. It measures 20 feet (north-south) by 80 feet and faces to the north. The building exhibits a painted hollow clay tile exterior and shed roof, constructed on a concrete slab. The bays exhibit original tri-fold, wood garage doors that hang from curving track that runs within the interior of each garage space. The doors are numbered with affixed modern numerals (2-9). One door appears to have been removed from its original hardware and reinstalled on the exterior of the northwest (front) facade as a sliding door. The south (rear) façade exhibits eight windows (one for each bay) with two-over-two light fixed sashes covered with hardware cloth. The interior demising walls are corrugated galvanized aluminum sheeting and two curb stops are situated on the floor of each bay. Numerous wall cracks evidence structural deficiencies. Building 97 is going to be bisected by the property line parcel selected by VA and State Department of Veterans Affairs for a future Skilled Nursing Home facility.

Building 103 was constructed by the VA in 1928 as a single-car garage for the Medical Center Director who resided in adjacent Quarters 1(constructed circa 1877). The singlestory, front gabled, wood frame building was constructed in a utilitarian manner (see Bldg. 103 Historic Inventory Report). It measures 23 feet (east-west) by 15 feet. The building exhibits wood tongue-and-groove cladding and a composition roof, constructed on a concrete slab on grade. The east gable end has been altered by the addition of a three foot wood frame extension of similar wood framing and cladding. A modern, vinyl overhead garage door has been constructed within the addition. The north and south elevations exhibit six - light fixed casement windows and the west gable end has a five light fixed casement window. The north elevation also exhibits a four – panel solid wood door with modern hardware. There is a 24-foot long gabled covered modern walkway that extends west from the southwest corner of Building 103 to the rear wing and door of Building 1. The walkway roof is eight feet high and six feet wide and supported by modern 4" by 4" wood posts. It shelters a concrete walk that is bordered along the north by a modern board fence and gate at the eastern terminus. Building 103 is in extremely poor condition and in the pathway of a future campus electrical re-route. The electrical route can not be altered to avoid the structure.

The three garages are proposed to be razed because they no longer serve their original purposes, do not support present campus functions, are incompatible with recent and proposed construction, and represent potential safety and security liabilities as future repurposing of nearby buildings and landscapes are realized. The garages are not candidates for adaptive reuse projects due to incompatibilities, their limited dimensions, locations within the campus, and poor condition.

There are three Areas of Potential Effect (APE) (see APE map) which is the footprint of each standing structure. The concrete foundations of the structures will likely remain in place; therefore there is no archaeological APE.

Building 8 is a modern building and is not considered eligible to the NRHP as a contributing resource to the Historic District (see Building 8 Garage photo). Therefore, demolition of the garage will have no adverse effect upon the characteristics that make the District eligible to the National Register. However, Buildings 97 and 103 have been evaluated as contributing resources to the District within the VA era Period of Significance (Hetzel et.al 2010, Draft Historic Preservation Plan for JMWMVAMC 2012).

Demolition of historic Buildings 97 and 103 will constitute an adverse effect to the extent that these garages were constructed during the VA era (1920-50) Period of Significance and were associated with the residential re-use of the nearby Fort-era Quarters to the west and razed VA-era staff residences to the east. At present, all those VA era constructed buildings to the east have been razed which essentially relegates all the garages located within the Fort era Officers Row (that defines the southern and eastern

perimeter of the Parade Ground) as spatially isolated, outlier resources of the VA era. Their contribution to the telling of the history of the District is limited to the re-purposing of significant nineteenth century, horse-era Officers Quarters and the twentieth century use of the automobile. Demolition of all three garages will not adversely affect the character-defining elements of the Fort era resources and will more likely contribute to the integrity and restoration of the Fort era assemblage of resources, landscape and viewsheds.

Therefore, mitigation of the effect will be realized by way of additional recordation and interior and exterior photographic documentation of Buildings 97 and 103 that will be submitted as part of updated DAHP Historic Inventory Reports. Additionally, demolition activities will be photographed and monitored for significant historic and archaeological resources.

If any questions, please call Steve Roberts, VA-Walla Walla Cultural Resource Management Officer, or Tim Anderson, Chief Engineer, Facilities Support Service at (509) 525-5200.

Sincerely,

Steph Roberts

Stephen Roberts VAMC Walla Walla Cultural Resource Management Officer

# ARCHAEOLOGICAL RESOURCE MONITORING PLAN and CULTURAL MATERIALS DISCOVERY PROTOCOL

This Monitoring Plan and Discovery Protocol for the unanticipated discovery of cultural materials is intended to assist the Department of Veterans Affairs (VA) to comply with a Memorandum of Agreement for historic preservation commitments for demolition of three garage Buildings 8, 97 and 103. The Project is a federally funded undertaking and is located within the Fort Walla Walla Historic District, listed in the National Register of Historic Places. Documented and undocumented archaeological sites and cultural material are known to exist in the vicinity of the Project's Area of Potential Effects (APE).

The Project includes the demolition of above-ground structures and likely removal of the underlying concrete pads. Archaeological monitoring will accompany all ground disturbing activities associated with the demolition. This document describes the procedures, protocols, and responsibilities of the archaeological monitoring crew and Project construction contractors. Any archaeological surface and subsurface investigations, site testing, construction, or other Project activities that involve surface or substrate disturbance will require the participation of archaeologists and/or qualified staff that meets the Secretary of the Interior's standards for a professional archaeologist as defined in 36 CFR 61.

The monitor shall be apprised daily by VA and/or construction contractor project manager of construction activities. All effort should be made to communicate construction schedules as early as possible (minimum 48 hours prior to excavation) to facilitate adequate staffing of archaeological monitoring crew. A representative of the archaeological monitoring crew will be designated daily to coordinate with a construction project manager in the morning prior to start of work and at the end of the work day.

## Thresholds and Protocols for Cultural Resource Site Identification and Data Recovery During Archaeological Monitoring of Construction Activities

The following is a guide for recognizing qualitative and quantitative characteristics that indicate the presence of significant historic and prehistoric cultural resources during the monitoring of construction activities within the Fort Walla Walla Historic District. The following is not an exhaustive list and discretion is given to the archaeological monitor to include additional characteristics for additional, intensive investigations. The protocols herein address treatments for various potential archaeological features that may be exposed through ground-disturbing activities.

Whenever an archaeological monitor observes the exposure of potential cultural material or features, the monitor will be permitted to access the location to allow for close visual examination. The monitor may undertake trowel and/or shovel excavation to determine horizontal and/or vertical extents of the deposit, integrity, presence of diagnostic artifacts, and potential for providing significant information regarding the history or prehistory of the region

and District. Excavation prior to consultation with DAHP and consulting parties will not exceed 0.5 cubic meters.

Ground-disturbing construction activity will be halted by the archaeological monitor if any of the following cultural resources are encountered:

- 1) Any prehistoric artifacts or feature (hearth or fire-cracked rock concentration, house pit, soil anomalies),
- 2) Any faunal artifacts or remains,
- 3) Intact historic building foundation elements (brick or stone piers, linear alignments, soil anomalies),
- 4) Shaft features (privies, wells),
- 5) Post molds,
- 6) Any other features, and
- 7) Cumulative artifact concentration in excess of 25% visible within the matrix of an exposed square meter. The estimation of the percentage of artifacts will make adjustments for architectural artifacts (bricks, mortar, window glass) that have been broken and smeared across an exposure.

If the initial investigation identifies the deposit as potentially significant and likely to yield information important to history, then work shall cease at the location of the find and a buffer of a 50 foot radius will be constructed with flagging tape and stakes/cones. A brief description of the find will be prepared on standard forms that include location, estimated areal extent, inventory of visible artifacts, and preliminary interpretation. Recordation will include at least 2 photos with north arrow, scale, and sign board with temporary number clearly visible. A plan view map will be prepared and the site location will be recorded by GPS. Each find proposed for Phase II investigation will be communicated within one day to the VA Project Manager, who will contact within one day signatory tribes and Washington Department of Archaeology and Historic Preservation (DAHP).

Based on historical documentation and the results of Phase I survey, few intact features are expected to be exposed through archaeological monitoring of demolition activities within the APE. In order to minimize delay within the construction phase of the Project, it is imperative that unanticipated discoveries be documented, recorded, and data recovered in an expedited manner. It is also critical that DAHP and affected tribes are provided the opportunity to participate in the consultation process regarding the evaluation, documentation and mitigation of significant resources that are found.

It is expected that nearly all unanticipated discoveries will be similar to historic artifact scatters that have been fully documented and investigated through previously accomplished Phase I archaeological excavations. As such, those historic artifacts are not expected to provide additional significant cultural information. Thus, investigations of those artifacts should be expedited to allow for construction activities to proceed without extensive delay. Minimal recordation should include photographs, plan view sketch, GPS location, descriptive documentation and association with previously recorded resources. No archaeological excavation is warranted beyond surface scraping to delineate horizontal extent and preparation for photographs. Diagnostic artifacts may be GPS'd, recovered and analyzed if they represent a unique and/or under-represented artifact class. Findings will be reported in a Monitoring Report prepared within 6 months of completion of archaeological monitoring of ground disturbing construction activity.

Significant, intact historic features that do not appear to be associated with previously investigated resources will be fenced off and reported to VA Construction and Project Managers with recommendations for site protection and/or Phase II/III archaeological investigation. In consultation with Consulting Parties, established procedures for archaeological investigations will be followed. A complete description of the feature, excavation, results, and interpretation will be provided in a technical report of findings within 6 months of the completion of archaeological monitoring of ground-disturbing construction activities. A Washington State Site Inventory form for new site(s) will be prepared and submitted to the signatory and consulting parties, as appropriate.

VA is sensitive to the cultural values that the tribes hold in regards to artifacts and features that may be exposed through the construction activities of the Project. VA will commit to immediate reporting and consultation with affected tribes upon the unanticipated discovery of pre-Contact and tribal cultural material and features. VA commits to ensuring the security of all artifacts and confidentiality of any information regarding finds. Consultation with the Consulting Parties will be undertaken to determine protocols regarding analysis and reporting of artifacts, and curation or re-burial of artifacts.

Upon encountering pre-Contact artifacts and cultural features, the immediate area will be fenced off and reported to VA Construction and Project Managers with recommendations for site protection and/or Phase II/III archaeological investigation. In consultation with Consulting Parties, established procedures for archaeological investigations will be followed. A complete description of the feature, excavation, results, and interpretation will be provided in a technical report of findings within 6 months of the completion of archaeological monitoring of ground-disturbing construction activities. A new site form will be prepared and submitted to the signatory and consulting parties, as appropriate.

A monthly progress report of all finds will be submitted to the signatory and consulting partics that details discovery of all cultural materials and features. Mapping and photographs will be available as requested. VA will initiate consultation with affected tribes regarding the disposition of any recovered Native American cultural material. A curation agreement between the VA and Fort Walla Walla Museum will be accomplished for all historical cultural materials collected during archaeological investigations.

If faunal remains are encountered and there is a possibility that they are human, all work will be halted within a 200 foot radius. The archaeological monitor will assume, and ensure in others, a respectful and calm demeanor. Remains will be treated as though they are Native American unless and until proven otherwise. NAGPRA regulations and guidance will be followed by the VA.

If at any time a qualified archaeologist is not present when a previously unknown cultural

Attachment B Garages 97, 103 and 8 Demo VAMC Walla Walla

resource is discovered in strata presumed to be non-culture-bearing, the contractor will immediately cease all ground-disturbing activities within 100 feet of the discovery and immediately notify the VA Construction and Cultural Resource Manager. The contractor will cease work within the 100 foot radius of the discovery and flag the radius for easily visible identification. The contractor shall protect the discovery site from vandalism, looting, photography, or further disturbance of any kind.