

**PROGRAMMATIC AGREEMENT
AMONG
THE U.S. DEPARTMENT OF VETERANS AFFAIRS ROSEBURG HEALTH CARE SYSTEM,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
THE OREGON DEPARTMENT OF VETERANS AFFAIRS,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SEISMIC AND FUNCTIONAL IMPROVEMENT OF
THE ROSEBURG VA MEDICAL CENTER,
ROSEBURG, DOUGLAS COUNTY, OREGON**

WHEREAS, the President of the United States issued [Executive Order \(E.O.\) 13717¹](#), which requires Federal agencies to adhere to seismic design requirements of current national building codes and standards, and in response the U.S. Department of Veterans Affairs (VA) issued [Directive 7512: Seismic Safety of VA Buildings²](#) and [Handbook 18-8: Seismic Design Requirements³](#) setting seismic safety standards for existing buildings; and

WHEREAS, as part of required seismic risk reviews, VA determined the Roseburg VA Medical Center (VAMC) in Roseburg, Douglas County, Oregon was at High risk for seismicity and identified specific seismic deficiencies in Buildings 1, 2, 3, 11, 13, 16, and 17 and proposed to rectify seismic deficiencies in accordance with the seismic requirements and design standards including the construction of Building 100 in lieu of seismic and functional correction of Building 1; and

WHEREAS, VA conducted several assessments of the Roseburg VAMC campus and its capital assets between 2016 and 2023, and these assessments determined functional deficiencies that have the potential to affect the delivery of healthcare to Veterans, and VA supports the concept of a State Veterans Home in an identified area of the Roseburg VAMC campus as a way to provide care to Veterans as proposed in [State Law ORS 408.385⁴](#); and

WHEREAS, the preliminary list of seismic and functional improvements to the VAMC campus includes, subject to funding and campus operations, the projects listed in Attachment A, and this list may be updated based on the procedures outlined in this agreement; and

WHEREAS, VA determined that the compliance with seismic and functional requirements constitutes an undertaking, as defined in 36 CFR § 800.16(y), and therefore, is subject to 54 USC § 306108 of the National Historic Preservation Act of 1966 (NHPA) and its implementing regulations, 36 CFR Part 800, as amended (collectively referred to as “Section 106”); and

WHEREAS, VA consulted with the Oregon State Historic Preservation Officer (OR SHPO) (SHPO case No 23-0877), pursuant to 36 CFR § 800.2(c)(1); and

WHEREAS, VA invited the Burns Paiute Tribe; the Confederated Tribes of the Warm Springs Reservation of Oregon; the Confederated Tribes of Siletz Indians of Oregon; the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians; the Confederated Tribes of the Grand Ronde Community of Oregon; the Confederated Tribes of the Umatilla Indian Reservation; and Coquille Indian Tribe; and Cow Creek

¹ <https://www.govinfo.gov/app/details/DCPD-201600045>

² https://www.va.gov/vapubs/viewPublication.asp?Pub_ID=871&FType=2

³ www.cfm.va.gov/til/etc/seismic.pdf

⁴ https://oregon.public.law/statutes/ors_408.385

Band of Umpqua Tribe of Indians; and the Klamath Tribes to participate in consultation as federally recognized Indian tribes that attach religious and cultural significance to historic properties in Douglas County, pursuant to 36 CFR § 800.2(c)(2), and the Klamath Tribes responded that the Roseburg VAMC was outside its aboriginal territories but chose to participate in the consultation meeting held October 12, 2023, and no other Tribes responded with interest in participating in this consultation; and

WHEREAS, VA acknowledges its government-to-government relationship with Indian Tribes and its continued responsibility to engage in meaningful consultation with Indian Tribes pursuant to the National Historic Preservation Act and the Section 106 implementing regulations, and pursuant to Executive Orders and Presidential Memoranda. Nothing in this Agreement modifies, revokes, or otherwise changes those responsibilities, or alters, amends, repeals, or modifies Tribal sovereignty, any treaty rights, or any other rights of an Indian Tribe; and

WHEREAS, VA invited the Douglas County Historic Resource Review Committee; Douglas County Historical Society; Restore Oregon; the City of Roseburg Historic Resources Review Commission (HRRRC) as the Certified Local Government (CLG); the Patrick W. Kelly Post 2468 & Auxiliary of the Veterans of Foreign Wars; and the Earl B. Stewart Post 16 of the American Legion to participate in consultation, pursuant to 36 CFR § 800.2(c)(3) and (5), and the Douglas County Historic Review Resource Committee declined to participate on June 8, 2023, and the Roseburg Historic Resources Review Commission responded with interest in participating in this consultation, and no other consulting parties responded with interest in participating in this consultation; and

WHEREAS, VA invited the ODVA to participate in consultation as a partner in the effort to establish a State Veterans Home in the Roseburg area, pursuant to 36 CFR § 800.2(c)(4), and ODVA has chosen to participate in consultation; and

WHEREAS, VA, in consultation with the OR SHPO, determined that the Area of Potential Effects (APE) includes the Roseburg VAMC campus and the Roseburg National Cemetery Annex as depicted on the map in Attachment B, pursuant to 36 CFR § 800.4(a)(1); and

WHEREAS, VA identified historic properties through surveys of the campus in 2009, 2010, 2013, and 2022-23, and acknowledges the potential for as-yet unidentified archaeological sites to be present within the APE though archaeological inventories of the APE in 2009, 2010, and 2013 did not identify any sites meeting the criteria established in 36 CFR § 60.4; and

WHEREAS, VA identified the [Roseburg Veterans Administration Hospital Historic District \(RVAHHD\)](#)⁵, (National Register of Historic Places [NRHP] No. 12001247, listed in 2013) and the Roseburg National Cemetery Annex as historic properties within the APE (see summary of historic resources in Attachment C), pursuant to 36 CFR § 800.4(a)(1); and

WHEREAS, VA solicited information about historic properties and/or cultural resources potentially affected by the undertaking in the documentation initiating consultation (distributed June 6, 2023) and again via email on July 7, 2023, from the following groups at the recommendation of the OR SHPO: Women Veterans Alliance, Foundation for Women Warriors, Women Veterans Network, Modern Military Association of America, Oregon Department of Veterans Affairs LGBTQ+, National Association of Minority Veterans of America, Minority Veterans, Black Veterans Project, National Association for Black Veterans Inc, American Latino Veterans Association, Disabled American Veterans, Disabled Veterans National

⁵ https://www.cityofroseburg.org/storage/app/media/uploaded-files/CDD/NR_Noms_12001247_VA_Medical_Center.pdf

Foundation, Oregon Military Museum, Oregon Black Pioneers, Oregon Chinese Consolidated Benevolent Association, and received no responses as of February 22, 2024; and

WHEREAS, VA provided the public with information about the undertaking and its effects on historic properties and sought public comment and input, pursuant to 36 CFR § 800.2(d), through National Environmental Policy Act (NEPA) compliance efforts through a newspaper announcement on June 18, 2023, and June 20, 2023, in *The News-Review*; email notifications to campus stakeholders, including state and local regulatory agencies, elected officials, Veterans Service Organizations, and employees; posting on the VAMC website; and a public announcement on the VAMC speaker system on June 29, 2023; and hosted public meetings on June 28 and 29, 2023, in Building 16 of the VAMC, and VA received comments from the public regarding historic properties and took these into consideration in its NHPA and NEPA⁶ compliance processes; and

WHEREAS, VA, in consultation with the OR SHPO and other consulting parties, has determined that the seismic and functional improvements listed in Attachment A, if fully implemented, would adversely affect historic properties, but that VA cannot fully determine the effects until the design plans are complete; and

WHEREAS, VA expects the undertaking to be funded in several phases and these budgetary constraints, including Congressional allocations, limit the detailed design of the individual projects at this time such that VA cannot fully determine the effects of the alternatives on historic properties, or to evaluate ways to avoid, minimize, or mitigate those adverse effects, prior to completing the appropriate NEPA compliance; and

WHEREAS, VA plans a phased selection and design of construction alternatives and shall use a phased approach to complete assessment of the undertaking's effects on historic properties, pursuant to 36 CFR § 800.5(a)(3); and

WHEREAS, VA hosted a consultation meeting with the consulting parties on June 28, 2023, to discuss the definition of the undertaking, the delineation of the APE, the identification of historic properties within that APE, preliminary assessments of adverse effect, and the proposed development of this programmatic agreement (PA), and hosted a consultation meeting on October 12, 2023, to discuss the draft PA; and

WHEREAS, VA has determined it is appropriate to develop a PA in accordance with 36 CFR § 800.14(b), including § 800.14(b)(1)(ii), which recognizes that a PA may be used when effects on historic properties cannot be fully determined prior to approval of an undertaking; and

WHEREAS, VA invited to ODVA to sign this PA as an Invited Signatory, and ODVA accepted; and

WHEREAS, VA invited the City of Roseburg HRRC to be a Concurring Party to this PA, and the City of Roseburg accepted, and the City of Roseburg will utilize the expertise of the HRRC as necessary to fulfill its obligations under this PA; and

WHEREAS, pursuant to 36 CFR § 800.6(a)(1)(i)(C), VA invited the Advisory Council on Historic Preservation (ACHP) to participate in consultation and the ACHP chose to participate in consultation in accordance with 36 CFR § 800.14(b)(2)(i) on June 20, 2023; and

⁶ VA archives its NEPA documentation, including all comments, on its Environmental Program Office [webpage](https://www.cfm.va.gov/environmental/) (<https://www.cfm.va.gov/environmental/>).

NOW, THEREFORE, VA, OR SHPO, ODVA, and ACHP agree that the undertaking will be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking on historic properties.

STIPULATIONS

VA shall ensure that the following measures are carried out:

I. APPLICABILITY

- a. This PA applies only to those projects identified in Attachment A and any project related to the seismic and functional improvement of the Roseburg VAMC campus (Undertaking) where VA is the lead federal agency. VA may amend Attachment A as described in Stipulation XI.
- b. The Anti-Deficiency Act, 31 U.S.C. § 1341, prohibits federal agencies from incurring an obligation of funds in advance of or in excess of available appropriations. VA's obligations under this PA are subject to the availability of appropriated funds, and the stipulations of this PA are subject to the provisions of the Anti-Deficiency Act. VA shall make reasonable and good faith efforts to secure the necessary funds to implement this PA in its entirety. If compliance with the Anti-Deficiency Act alters or impairs VA's ability to implement the stipulations of this PA, VA shall consult in accordance with the amendment and termination procedures found at Stipulation IX of this PA.
- c. VA shall ensure that federal or contractor staff who meet the applicable Secretary of the Interior's *Professional Qualification Standards* for architectural history, history, archaeology, architecture, and and/or historic architecture (36 CFR Part 61; 48 FR 44738-9) participate as required by this PA.

II. ADMINISTRATION

- a. Time designations in this PA shall be in calendar days.
- b. For the purposes of this PA, the definitions provided in 36 CFR § 800.16(a) through (z) inclusive shall apply.
- c. For the purposes of this PA, the term "signatory" refers to all signatories and invited signatories. For purposes of this PA, the term "consulting parties" refers to all signatories, concurring parties, and federally recognized Indian Tribes that attach religious and cultural significance to historic properties in Douglas County, Oregon.
- d. VA shall complete the identification and evaluation of historic properties following receipt of funding, and no later than the close of Schematic Design (SD)⁷ to assist in the avoidance and minimization of adverse effects to historic properties in advance of construction.
- e. All parties shall send and accept official notices, comments, requests for additional information and/or documentation, draft materials, final deliverables, and all other communications required by this PA via email unless otherwise required. VA shall use applicable digital submission standards when providing information to OR SHPO.
 - i. To meet its construction schedule to provide healthcare to Veterans, the Consulting Parties to this PA agree to expedite and/or to conduct concurrent

⁷ A description of VA Design Review phases is available in the [Major Construction Design Review Procedure \(www.cfm.va.gov/til/ae/DesignReviewProcedure-MajorProject.pdf\)](http://www.cfm.va.gov/til/ae/DesignReviewProcedure-MajorProject.pdf) manual. Some phases may be consolidated or abbreviated in Minor or Non-recurring Maintenance (NRM) projects.

reviews to the extent feasible and, if determined more efficient by VA in consultation with OR SHPO, to participate in meetings/calls/webinars in lieu of formal consultation letters.

- f. Any written comments provided via email on draft documents, plans, and programs by the Consulting Parties within the time periods listed shall be considered in the revision of the document or deliverable. Failure of the Consulting Parties to respond within the established timeframes described in this PA of any document or deliverable shall not preclude VA from implementing this PA.
 - i. Consulting Parties may request extensions of up to ten (10) days via email.
 - ii. VA shall respond to any Consulting Party request for extension within three (3) days of receipt unless the request is received over a federal holiday, in which case VA shall respond by the next business day. VA shall not be required to grant extensions but shall consider all requests.
- g. VA shall afford Consulting Parties the opportunity to be added to its stakeholder list and notify those parties of upcoming campus meetings and events.
 - i. Consulting Parties interested in receiving VAMC campus notifications shall update email information as necessary. VA shall not be held responsible for “bounce backs” or “Junk Folder” filings.

III. TREATMENT OF BUILT RESOURCES

- a. VA shall follow Stipulation V for the treatment of Building 1 unless or until an alternative use for the building can be identified.
- b. VA shall utilize the Secretary of the Interior’s *Standards for Rehabilitation* (SOI Standards) (36 CFR Part 67) and National Park Service (NPS) [Preservation Bulletins](#), when relevant to the specific resource(s), to develop all design plans to rehabilitate or renovate an existing resource or to construct a building/structure/landscape feature.
 - i. Design plans for new construction shall take into account the setbacks, orientations, massing, size, scale, and materials of contributing resources to the RVAHHD.
 - ii. Design plans for additions and/or modifications to existing resources shall take into account the massing, size, scale, and materials of the resource being altered.
 - iii. VA shall not install a flagpole anywhere on campus taller than the flagpole in front of Building 1.
- c. Design Review to Avoid and/or Minimize Adverse Effects to Historic Properties
 - i. Through consultation, VA has developed a list of actions that require continuing consultation and those that have little to no potential to adversely affect historic properties (Attachment D).
 - ii. For those actions identified in Attachment D as requiring continuing consultation, VA shall notify the Consulting Parties of component projects at or around 35% design completion through submission of a Component Project Review Form (PRF) (Attachment E). VA shall include documentation consistent with 36 CFR § 800.11, including a determination of whether or not the project would adversely affect historic properties and an evaluation of cumulative effects taking into account the district as a whole and individual buildings.
 - 1. VA shall provide Consulting Parties thirty (30) days to review the documents.

- a. The Consulting Parties may provide comments on the proposed designs to minimize adverse effects to historic properties.
- b. OR SHPO must respond with concurrence, non-concurrence, or conditional concurrence (i.e., recommendations for altering the design to achieve a Finding of No Adverse Effect to Historic Properties) on the finding of effect within thirty (30) days of receipt of the PRF.
 - i. If OR SHPO requires additional information to concur or not concur, OR SHPO shall email VA. Once VA provides the necessary clarification or documentation, OR SHPO shall notify VA of its anticipated timeline for response.
2. Once the consultation period has concluded, VA shall review and consider all timely comments.
 - a. If VA determines the component project would not adversely affect historic properties and the OR SHPO concurs, and no other Consulting Party objects to the determination, documentation of the concurrence shall evidence completion of consultation for that project and VA shall proceed with construction activities.
 - b. If VA determines the component project would not adversely affect historic properties and the OR SHPO has provided conditional concurrence, or another Consulting Party has provided recommendations to avoid and/or minimize adverse effects to historic properties through alteration of the proposed design, VA shall review the recommendations and decide if the design can be revised.
 - i. If VA revises the design, VA shall send the revised design to the Consulting Parties for review and comment. Documentation of all revisions in accordance with recommendations shall evidence concurrence and VA shall proceed with construction.
 - ii. If VA determines that only some revisions are feasible and cannot meet all of the recommendations provided by participating Consulting Parties and still meet the goals of the undertaking, VA shall continue consultation with the Consulting Parties to reach concurrence or proceed in accordance with Stipulation III.d.
 - c. If VA determines revision of the design is not feasible, VA shall proceed in accordance with Stipulation III.d.
3. If VA determines the component project would adversely affect historic properties and cannot be revised to avoid or minimize adverse effects to historic properties, VA shall alert the Consulting Parties and proceed in accordance with Stipulation III.d.
- d. Determination of Adverse Effects to Built Resources
 - i. If VA determines the project would adversely affect historic properties either because the action is listed in Attachment C or through other means, VA shall notify Consulting Parties of this determination and consult in accordance with 36 CFR § 800.6 to resolve adverse effects.

1. In its documentation of a finding of adverse effect, VA may propose mitigation from the list contained in Attachment F or may develop other mitigation through consultation.

e. Cumulative Effects

- i. VA shall host a meeting in November every three (3) years following execution of this PA to discuss cumulative effects to historic properties, notably the Roseburg Veterans Administration Hospital Historic District.

1. When possible, VA shall coordinate this meeting with the Annual Meeting described in Stipulation IX.b.
2. VA shall invite all Consulting Parties to participate. The VA Federal Preservation Officer (FPO) or the FPO designee shall participate in the meeting.
3. VA shall host the meeting via webinar or in-person at its discretion.
4. At this meeting, VA shall summarize the effects of all component projects to date.
5. At this meeting and for fourteen (14) days following, VA shall accept comments from the Consulting Parties concerning the character-defining features of the historic district and methods to avoid and/or minimize adverse effects to historic properties. VA shall consider these recommendations in designing future component projects.

- ii. Following the activation of Building 100 or notification that Building 1 would not be retained, whichever is first, VA shall re-evaluate the Roseburg Veterans Administration Hospital Historic District for NRHP eligibility.

1. VA shall provide the Signatories and Tribes invited to participate in consultation thirty (30) days to review and comment on the evaluation and VA's determination that the RVAHHD NRHP nomination should be retained, revised, or removed from the NRHP.
 - a. VA shall consider all comments received and respond via email to all comments. VA may, at its discretion, host a meeting to discuss comments.
 - b. If the Signatories and participating Tribes do not concur with VA's determination, VA may choose to proceed in accordance with Stipulation X or seek a determination from the Keeper of the NRHP.
2. If determined necessary, VA shall submit the draft amended nomination to OR SHPO within one (1) year of the evaluation and not less than six (6) months prior to termination of this PA.
 - a. VA may consult in accordance with Stipulation XI to accommodate this amendment.

IV. TRANSFER OF LAND TO THE ODVA

- a. ODVA has requested that VA transfer up to fourteen (14) acres of land to the ODVA to facilitate the establishment of a State Veterans Home in the Roseburg VAMC campus.
 - i. VA may decline to transfer the acreage at its discretion. If VA declines to transfer, VA shall have no further obligations under this stipulation.

- 296 ii. ODVA may decline to complete a request for the acreage at its discretion. If ODVA
297 declines to request the acreage, ODVA shall have no further obligations under
298 this stipulation.
- 299 b. Prior to transfer, VA shall conduct an archaeological survey of the land to be transferred
300 to determine the presence or absence of archaeological deposits and to evaluate those
301 deposits for NRHP eligibility.
- 302 i. VA shall consult with OR SHPO and Tribes to determine appropriate testing
303 methods given past disturbance of the area and the potential damage to
304 archaeological properties caused by the deposition of soils.
- 305 ii. VA shall submit a draft report to OR SHPO and Tribes for a thirty (30) day review
306 and comment period.
- 307 iii. VA shall consider all timely comments to finalize the report. VA shall submit final
308 copies of the report to OR SHPO and Tribes prior to initiating ground disturbance
309 related to construction of a State Veterans Home.
- 310 c. VA shall consult in accordance with 36 CFR Part 800 regarding the proposed construction
311 of the State Veterans Home or, at its discretion, authorize ODVA to initiate consultation
312 on behalf of VA in accordance with the protocols of the VA State Home Construction Grant
313 Program.
- 314 i. VA shall ensure the Consulting Parties will be invited to participate in this
315 consultation.
- 316
- 317 V. DISPOSAL OF BUILDING 1
- 318 a. VA will determine whether Building 1 can be reutilized by the agency and notify the
319 Consulting Parties once this determination is complete.
- 320 i. If VA determines it can reutilize Building 1, VA shall follow Stipulation III.c for
321 treatment of Building 1.
- 322 b. If VA determines Building 1 cannot be reutilized by VA, VA shall work with the VA Office
323 of Real Property, the Office of Asset Enterprise Management, and/or other entities within
324 VA to dispose of Building 1 in accordance with [VA's 2019 Disposal Guidelines](https://www.cfm.va.gov/realProperty/RealPropertyDisposalGuide.pdf)⁸.
- 325 i. VA shall solicit input from the Consulting Parties about potential reuses by other
326 entities such as private developers, educational institutions, or non-profit
327 organizations. VA shall provide thirty (30) days for Consulting Parties to submit
328 ideas via email.
- 329 1. VA may combine this request for input with the notification described in
330 Stipulation V.a.i at its discretion.
- 331 2. Following the close of the comment period, VA shall issue a Sources
332 Sought Notice (SSN) for potential reuse alternatives. VA shall publish the
333 SSN for at least thirty (30) days.
- 334 a. VA shall notify the Consulting Parties when the SSN is published.
- 335 3. Following the close of the SSN response period, VA shall issue a Request
336 for Proposal (RFP) for reuse of Building 1.
- 337 a. VA shall notify the Consulting Parties when the RFP is published.
- 338 4. VA shall notify the Consulting Parties via email if a viable reuse has been
339 identified or if VA will report Building 1 to the General Services
340 Administration (GSA) as excess for disposal.

⁸ <https://www.cfm.va.gov/realProperty/RealPropertyDisposalGuide.pdf>

- ii. If VA chooses to report Building 1 to GSA as excess, VA shall follow GSA's policies for property actions.
 - 1. VA shall include contact information for all Consulting Parties to GSA and identify the parties as Consulting Parties to this consultation.
- iii. If VA has determined it necessary to demolish Building 1, VA shall convene a meeting of the Consulting Parties to discuss mitigation.
 - 1. This meeting may be held in-person or via webinar at the discretion of VA.
 - 2. Following this meeting, VA shall consider all mitigation ideas discussed and select mitigation commensurate with the adverse effect.
 - 3. VA shall distribute a draft Memorandum of Agreement (MOA) to memorialize the consultation and describe the mitigation.
 - a. VA shall provide all Consulting Parties thirty (30) days to review drafts of the MOA. Consulting Parties requiring additional time for review may request an extension in accordance with Stipulation II.f.
 - b. Between notification of the determination that Building 1 must be demolished and the close of the comment period on the final draft MOA, VA shall again provide Consulting Parties an opportunity to provide viable alternatives to demolition. VA shall consider all viable alternatives received.
 - i. If no comments are received, VA shall proceed with securing funds to demolish Building 1.
 - 4. VA shall incorporate comments and distribute the MOA for signature.
 - a. VA shall notify the Consulting Parties after funding for the demolition of Building 1 has been secured but before a contract for demolition has been awarded.
 - 5. VA shall not remove the flagpole from its current location in front of Building 1.

VI. TREATMENT OF POTENTIAL ARCHAEOLOGICAL RESOURCES

- a. Prior to beginning construction of a component project, VA shall conduct a cultural resources survey to identify archaeological resources in the footprint of ground disturbance for proposed building locations of buildings and additions of more than 1,000 gross square feet (GSF), proposed roadways, and proposed parking lots.
 - i. VA may elect to conduct larger-scale investigations of multiple areas at one time or conduct testing on a project-by-project basis.
 - ii. VA shall ensure that these surveys meet the requirements of the most recent *Guidelines for Conducting Field Archaeology in Oregon* (Guidelines) and be conducted by a qualified archaeologist.
 - 1. If no archaeological resources meeting the criteria for listing in the NRHP are identified, VA shall prepare a summary of methodologies and investigations and submit the summary to the OR SHPO and Tribes for their review.
 - a. VA shall provide OR SHPO and Tribes thirty (30) days to review the draft survey summary and Determination of Eligibility.

- b. VA shall consider all comments received. If OR SHPO and the Tribes concur with VA's determination or do not respond, VA shall draft and submit a final report.
 - c. If OR SHPO or a Tribe objects, VA shall host a meeting to discuss the objection. If the matter is resolved and VA determines no resources meeting the criteria for listing in the NRHP, VA shall proceed in accordance with Stipulation VI.a.ii.1. If the matter is not resolved or VA changes its determination, VA shall proceed in accordance with Stipulation VI.a.ii.2.
 - 2. If resources meeting the criteria for listing in the NRHP are identified, VA shall determine if the site can be avoided by the proposed construction either through establishment of a buffer specific to the size and shape of the identified resource, its location, and its sensitivity to nearby geographic considerations such as the water table.
 - a. If the site can be avoided, VA shall submit a report consistent with the Guidelines to the OR SHPO and Tribes. VA shall then avoid the site in future construction activities.
 - b. If the site cannot be avoided, VA shall submit a report consistent with the Guidelines and consult with the Consulting Parties as described in 36 CFR § 800.6 to develop a MOA.
 - i. VA shall initiate consultation via formal letter with an accompanying draft MOA but may, at its discretion, continue consultation via webinar, conference call, letters, or in-person meetings.
 - ii. Once the MOA is executed, VA shall proceed with implementation of the MOA and construction.
 - b. VA shall ensure that any ground disturbance in excess of nine (9) inches below grade associated with demolition or renovation of existing buildings, structures, roadways, landscape features, and parking lots that is located in previously undisturbed soils or soils that have not been previously evaluated is monitored by a SOI-qualified archaeologist. VA shall ensure that the monitor shall prepare a report on the work using the Guidelines and that copies of the report shall be submitted to the OR SHPO and Tribes.
 - i. VA shall authorize the archaeological monitor to halt construction in the immediate area to investigate sites that appear to meet the criteria for listing in the NRHP, if any are identified. VA shall permit construction to continue in other locations as long as they are monitored, as appropriate, and are at least thirty (30) meters away from the sites.
 - 1. If sites meeting the criteria for listing in the NRHP are identified("eligible sites"), VA shall proceed in accordance with Stipulation VI.a.ii.2.
 - c. VA shall monitor or test areas proposed for utility upgrades unless the proposed area has been determined disturbed in consultation or the area was previously investigated.
 - i. VA may seek the guidance of the OR SHPO and/or Tribes to determine previous testing or disturbance.
 - ii. VA shall ensure that the monitor shall prepare a report on the work using the Guidelines and that copies of the report shall be submitted to the OR SHPO and Tribes.

- iii. VA shall authorize the archaeological monitor to halt construction to investigate materials that appear to meet the criteria for listing in the NRHP, if any are identified. VA shall permit construction to continue in other locations as long as they are monitored, as appropriate, and are at least thirty (30) meters away from the materials.

1. If materials meeting the criteria for listing in the NRHP are identified, VA shall proceed in accordance with Stipulation VI.a.ii.2.

VII. TREATMENT OF HUMAN REMAINS AND ITEMS OF RELIGIOUS AND CULTURAL IMPORTANCE

- a. VA shall treat burial sites, human remains, and funerary objects with dignity and respect in all circumstances regardless of National Register eligibility or the circumstances of the action.

- b. If potential human remains and/or potential funerary objects are identified, VA shall stop construction work that may adversely affect historic deposits or that may disturb the remains at minimum fifty (50) feet from the discovery and:

- i. Contact Douglas County Sheriff's Office to determine whether the human remains may be involved in a legal investigation or not, consistent with local and state laws.

- ii. If local law enforcement determines the remains are human and not subject to legal investigation, VA shall:

1. Treat discoveries related to Native Americans and Native American lifeways with respect and in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA) (Public Law 101-601, 25 USC 3001 et seq., 104 Stat. 3048).

- a. Contact the [appropriate Native American Tribe\(s\)⁹ with the assistance of the Legislative Commission on Indian Services \(LCIS\), the State Police, and the OR SHPO.](https://www.oregonlegislature.gov/cis/Pages/archaeology.aspx)

- b. Consult with Tribal descendants or associated communities prior to disturbing or disinterring burial sites, human remains, or funerary objects, or required by applicable law or regulation, unless there are no other alternatives available and only after full consideration of avoidance and/or preservation in place.

2. Treat non-Native American remains and objects with respect and within the directions given by the County Sheriff's office, the State Archaeologist, and the OR SHPO.

3. VA shall work with the appropriate Tribes, agencies, and organizations to develop a culturally sensitive plan for treatment.

- c. If VA has questions or requires assistance, VA shall consult with the Tribes and the OR SHPO.

VIII. POST-REVIEW DISCOVERIES

- a. If qualified personnel, whether VA staff or appropriate contractor staff, determine resources meeting the criteria of 36 CFR § 60.4 have been discovered, or unanticipated effects on historic resources occur during execution of the undertaking and the discovery

⁹ <https://www.oregonlegislature.gov/cis/Pages/archaeology.aspx>

is not subject to Stipulation VII of this PA, VA shall notify the Tribes and Signatories and consult in accordance with 36 CFR § 800.6 to resolve adverse effects.

- b. If necessary to protect a historic resource or prevent costly construction delays, VA may request expedited consultation to resolve adverse effects within its construction schedule.
 - i. VA shall alert the Tribes and the Signatories of the discovery and request an expedited review via email with the subject line "POST-REVIEW DISCOVERY: EXPEDITED REVIEW REQUEST." In this email, VA shall describe the discovered resource or unanticipated effect with text and photos, assess any effects, and propose measures to avoid, minimize, and/or mitigate the effects to the historic property.
 - ii. For seven (7) days following distribution of the notification email, the VA Point of Contact identified in the email shall answer questions from the Consulting Parties about the discovery. Consulting Parties may submit questions via email or by phone.
 - iii. Consulting Parties shall respond to the expedited review within seven (7) days of receipt of the notification email either with their concurrence with VA's proposed assessment and actions or their nonconcurrence.
 - 1. If the Consulting Parties concur or do not respond, VA may proceed with implementation of the proposed measures to avoid, minimize, and/or mitigate the effects to the historic property.
 - 2. If a Consulting Party does not concur, VA shall host a webinar to discuss the discovery and proposed measures to avoid, minimize, and/or mitigate the effects. VA shall distribute a summary of the meeting, including all decisions made in consultation, via email within three (3) days.
- c. If VA and the OR SHPO cannot reach consensus on measures to avoid, minimize, and/or mitigate effects following this meeting, VA shall proceed in accordance with Stipulation X.

IX. ANNUAL REPORTING AND MEETING

- a. Annually, within two (2) weeks of the anniversary of the execution of this PA, until it is concluded, expires, or is terminated, VA shall provide to all Consulting Parties a summary report detailing work undertaken pursuant to the terms of this PA including implementation of mitigation measures. The report shall include construction actions anticipated in the upcoming twelve (12) months, disposal actions related to Building 1, implementation of mitigation measures, any problems encountered in the past twelve (12) months, any disputes or objections received in VA's efforts to carry out the terms of this PA, and the resolutions thereof. VA shall include information concerning upcoming consultation efforts, construction scheduling, and project planning in each Annual Report. This report also shall contain an evaluation of the NRHP eligibility of the district taking into account all cumulative effects and consideration of all component projects undertaken since execution of this PA.
 - i. Roseburg VAMC shall coordinate with the VA Historic Preservation Office staff on this Annual Report. VA HPO staff shall approve the Annual Report prior to submission to the Consulting Parties.

- b. Annually, following submission of the Annual Report, VA shall host a meeting to discuss the implementation of the undertaking and this PA.
 - i. VA shall host the meeting via webinar or in-person, at its discretion.
 - ii. VA shall include notice of the meeting in the Annual Report described in Stipulation IX.a and again no less than one week prior to the meeting.

X. DISPUTE RESOLUTION

- a. Should any Signatory to this PA object via email to the manner in which any stipulation of this PA is implemented, VA shall consult with that party or parties to resolve the objection. If VA determines that such objection cannot be resolved, VA shall:
 - i. Forward all documentation relevant to the dispute, including VA's proposed resolution, to all Signatories for review and comment.
 - 1. Adequate documentation shall include reference to this PA, the written objection of the Signatory, VA's response to the objection, and any supporting documentation.
 - ii. The ACHP shall provide VA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. The other Signatories may comment at their discretion.
 - 1. If the ACHP does not respond within thirty (30) days, VA shall prepare a written response that takes into account timely comments from other Signatories regarding the dispute.
 - iii. VA shall take into account any timely advice or comments received from the Signatories in determining a final decision on the dispute.
 - iv. VA shall prepare a written decision and distribute the decision and the documentation relevant to the dispute to all Signatories within sixty (60) days of the ACHP's recommendation. VA shall then proceed in accordance with its final decision.
- b. VA's responsibility to carry out all other actions subject to the terms of this PA that are not the subject of the dispute remain unchanged.

XI. AMENDMENT

- a. VA may amend the list of proposed projects listed in Attachment A either through notice in the Annual Report described in Stipulation IX.a or by correspondence to the OR SHPO.
 - i. If the OR SHPO objects via email to the inclusion of a new project within thirty (30) days of receipt of notification, VA shall consult in accordance with Stipulation X to resolve the objection.
- b. Any Signatory to this PA may propose that it be amended, whereupon the Signatories shall consult for not less than thirty (30) days to consider such an amendment.
 - i. If consultation is proving productive, the Signatories may choose to extend this consultation period via email.
- c. Any amendment to this PA shall be agreed to in writing by all Signatories and shall be effective on the date a copy with all signatures is filed with the ACHP.

XII. TERMINATION

- a. This PA may be concluded by consultation on all components of the undertaking in accordance with Stipulations III-VI. Upon completion of construction of all component

projects and the associated mitigation, as appropriate, VA shall distribute notice of completion to all Consulting Parties.

- b. If VA determines that it cannot implement the terms of this PA, or if a Signatory determines that the PA is not being properly implemented, the Signatory may propose to the other Signatories that the PA be terminated.

i. The Signatory proposing termination shall notify the other Signatories to this PA explaining the reason(s) for termination and affording at least thirty (30) days to consult and seek an alternative to termination.

ii. Should such consultation fail, and the PA is terminated, VA shall either consult to develop a new agreement, in accordance with 36 CFR § 800.6, or request the comments of the ACHP, under 36 CFR § 800.7(a).

XIII. ADMINISTRATION AND DURATION

a. This PA shall be executed in counterparts with a separate page for each Signatory.

b. VA shall file a complete copy of the executed PA, including all signatory pages and attachments, with the ACHP.

i. This PA shall take effect once filed with the ACHP.

c. This PA shall expire if its stipulations are not carried out within ten (10) years from the date of execution, unless it is terminated prior to that date. No less than 180 days prior to the expiration date, VA may consult with the other Signatories to reconsider the terms of the PA and amend it in accordance with Stipulation XI.

EXECUTION AND IMPLEMENTATION of this PA 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.

ATTACHMENTS:

- A: List of Anticipated Component Projects
- B: Area of Potential Effects, Identified Historic Properties, and Visual Representation of Anticipated Component Projects
- C: Summary of Historic Resources Listed in 2012 Roseburg Veterans Administration Hospital Historic District National Register Nomination including 2023 Determinations of Contributing Interior Spaces
- D: List of Actions Likely to Cause Adverse Effects, Actions Unlikely to Adversely Affect Historic Properties, and Actions that Require No Additional Consultation
- E: Component Project Form
- F: List of Potential Mitigation Measures

**PROGRAMMATIC AGREEMENT
AMONG
THE U.S. DEPARTMENT OF VETERANS AFFAIRS ROSEBURG HEALTH CARE SYSTEM,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
THE OREGON DEPARTMENT OF VETERANS AFFAIRS,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
REGARDING THE SEISMIC AND FUNCTIONAL IMPROVEMENT OF
THE ROSEBURG VA MEDICAL CENTER,
ROSEBURG, DOUGLAS COUNTY, OREGON**

SIGNATORY:

U.S. Department of Veterans Affairs Roseburg Health Care System

PATRICK HULL



Digitally signed by PATRICK HULL
Date: 2024.05.26 09:30:55 -07'00'

Patrick Hull, MT, MBA
Executive Director / CEO

Date

**PROGRAMMATIC AGREEMENT
AMONG
THE U.S. DEPARTMENT OF VETERANS AFFAIRS ROSEBURG HEALTH CARE SYSTEM,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
THE OREGON DEPARTMENT OF VETERANS AFFAIRS,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
REGARDING THE SEISMIC AND FUNCTIONAL IMPROVEMENT OF
THE ROSEBURG VA MEDICAL CENTER,
ROSEBURG, DOUGLAS COUNTY, OREGON**

SIGNATORY:

Oregon State Historic Preservation Officer



Christine Curran
Deputy State Historic Preservation Officer
State Historic Preservation Office
Oregon Parks & Recreation Department

05/28/24

Date

**PROGRAMMATIC AGREEMENT
AMONG
THE U.S. DEPARTMENT OF VETERANS AFFAIRS ROSEBURG HEALTH CARE SYSTEM,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
THE OREGON DEPARTMENT OF VETERANS AFFAIRS,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
REGARDING THE SEISMIC AND FUNCTIONAL IMPROVEMENT OF
THE ROSEBURG VA MEDICAL CENTER,
ROSEBURG, DOUGLAS COUNTY, OREGON**

SIGNATORY:

Advisory Council on Historic Preservation



Reid J. Nelson
Executive Director

June 3, 2024

Date

**PROGRAMMATIC AGREEMENT
AMONG
THE U.S. DEPARTMENT OF VETERANS AFFAIRS ROSEBURG HEALTH CARE SYSTEM,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
THE OREGON DEPARTMENT OF VETERANS AFFAIRS,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
REGARDING THE SEISMIC AND FUNCTIONAL IMPROVEMENT OF
THE ROSEBURG VA MEDICAL CENTER,
ROSEBURG, DOUGLAS COUNTY, OREGON**

INVITED SIGNATORY:

Oregon Department of Veterans' Affairs



Dr. Nakeia Council Daniels
Director

05/31/24

Date

PROGRAMMATIC AGREEMENT

AMONG

**THE U.S. DEPARTMENT OF VETERANS AFFAIRS ROSEBURG HEALTH CARE SYSTEM,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
THE OREGON DEPARTMENT OF VETERANS AFFAIRS,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
REGARDING THE SEISMIC AND FUNCTIONAL IMPROVEMENT OF
THE ROSEBURG VA MEDICAL CENTER,
ROSEBURG, DOUGLAS COUNTY, OREGON**

CONCURRING PARTY:

City of Roseburg Historic Resources Review Committee


Nikki Messenger
City Manager

6-6-2024

Date

ATTACHMENT A – LIST OF ANTICIPATED COMPONENT PROJECTS

The preliminary list of seismic and functional improvements to the VAMC campus may include, subject to funding and campus operations, the following undertakings:

- Construction of a three- to four-story, approximately 165,000 square foot medical building (Building 100) on the eastern edge of the Ellipse.
- Construction of approximately 425 surface parking spaces to support the new hospital building,
- Vacation and disposition of Building 1 in accordance with VA protocols.
- Rebalance of campus parking including removal or closure of existing spaces or construction of others near buildings subject to renovation.
- Renovation of the first floor of Building 1AC.
- Seismic retrofit and renovation or rehabilitation of Building 2.
- Seismic retrofit and renovation of the interior of Building 11.
- Seismic retrofit and renovation of the interior of Building 13.
- Seismic retrofit and renovation or rehabilitation of Building 16.
- Demolition of Buildings 17, 57, 58, 63, and T-15.
- Potential demolition of Buildings 60 and 84, dependent on the disposition of Building 1.
- Renovation of the interior of Building 71.
- Renovation of Building 81 and construction of up to three additions.
- Utility upgrades and installations to support the component projects.
- Construction of new roadways to improve campus flow.
- Enhancement of campus greenspaces such as the installation of picnic tables, benches, pavilions, and exercise equipment.
- Expansion and improvement of campus signage including plaques, wayfinding tools, and maps.
- Improvement of existing campus flag poles and installation of new ones.
- Transfer of approximately 14 acres of land east of the Ellipse to the State of Oregon for construction of a State Veterans Home.
- Use of swing space consisting of space in existing buildings or temporary trailers, or modular buildings installed on existing parking lots or greenspaces.

This list may be updated and revised using the procedures outlined in Stipulation XI.a.

**ATTACHMENT B – MAPS OF AREA OF POTENTIAL EFFECTS, IDENTIFIED HISTORIC PROPERTIES, AND
VISUAL REPRESENTATION OF ANTICIPATED COMPONENT PROJECTS**

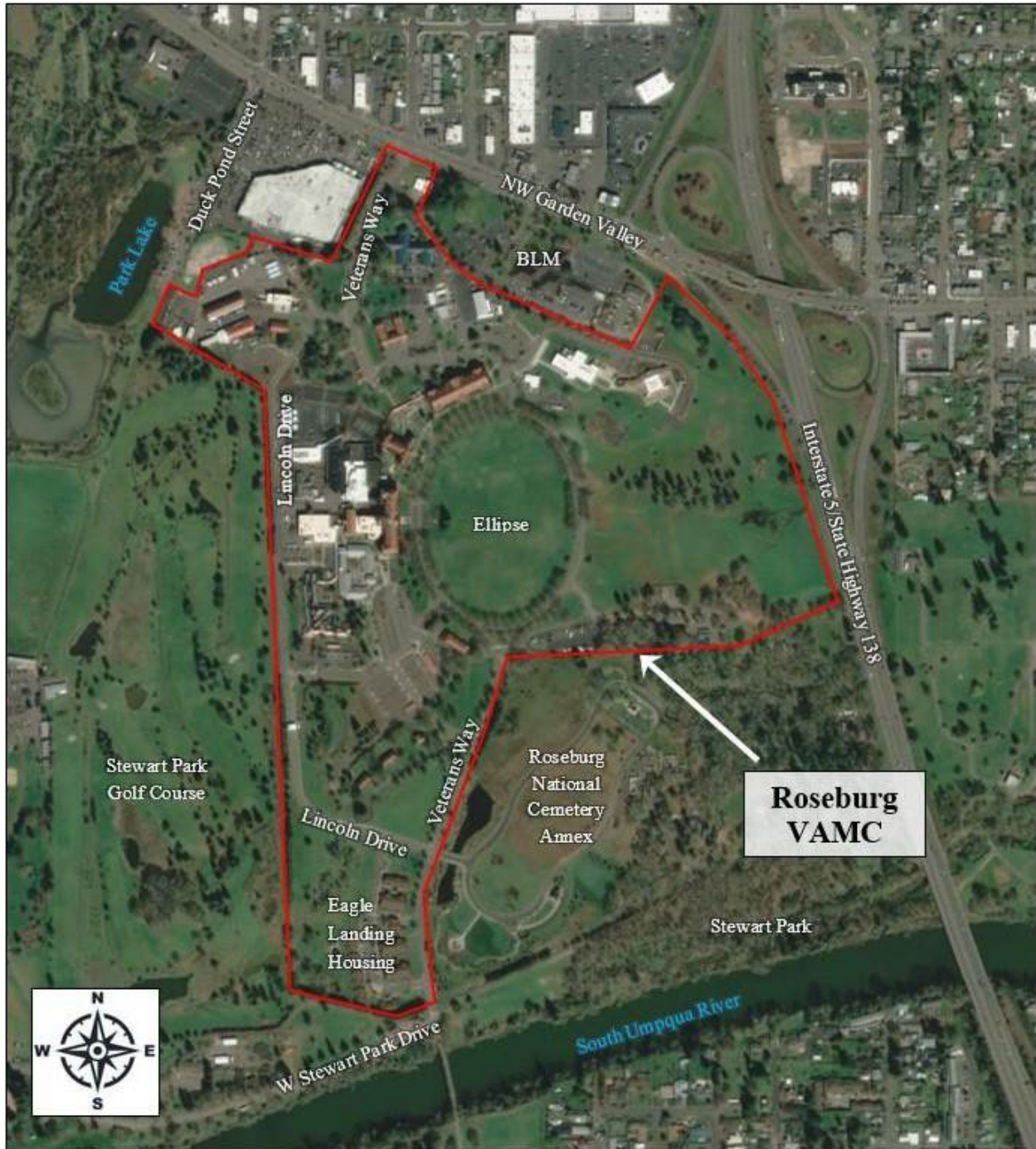


Figure 1 - Roseburg VAMC Campus

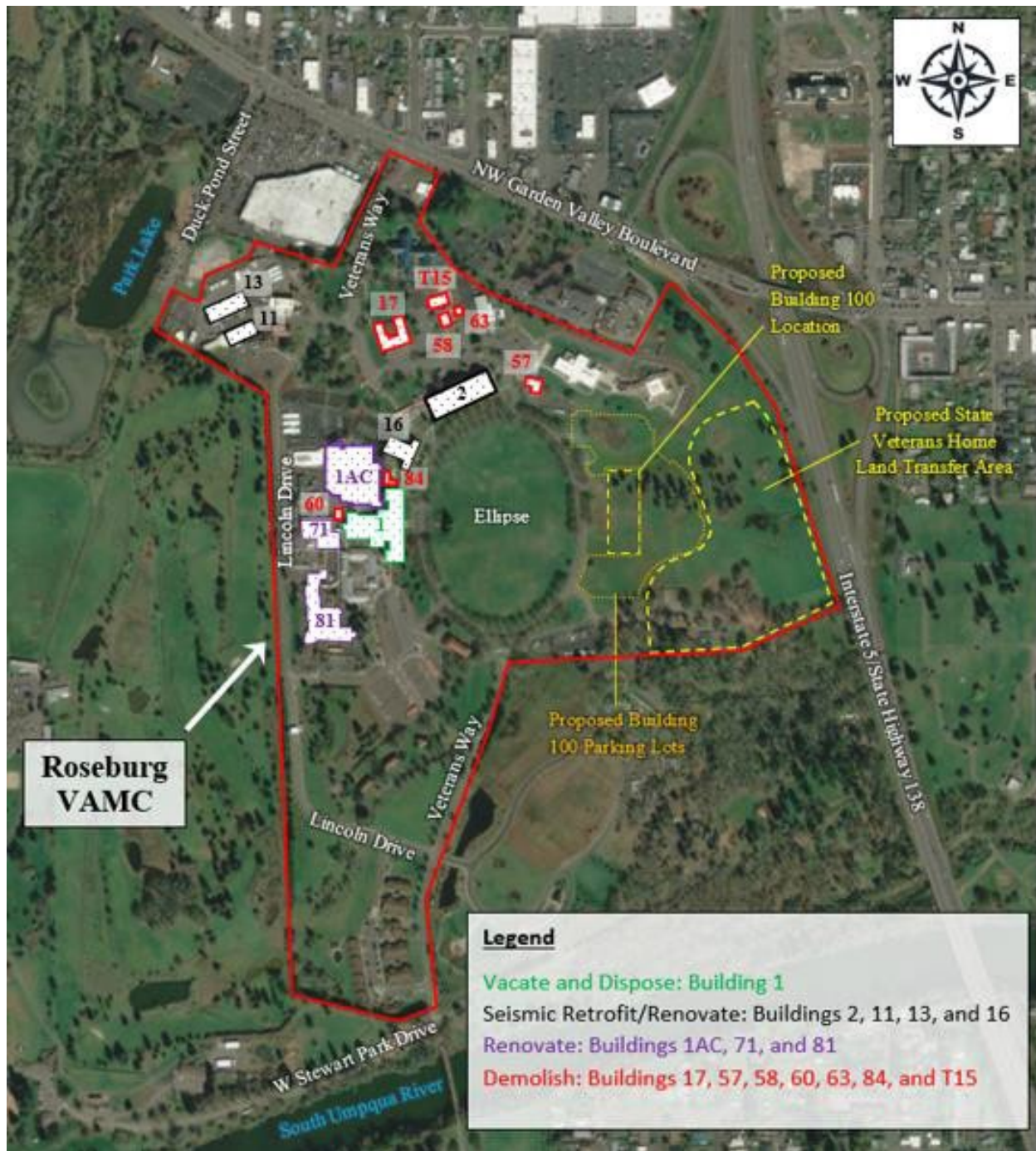


Figure 2 - Roseburg VAMC Campus with approximate locations of proposed component projects

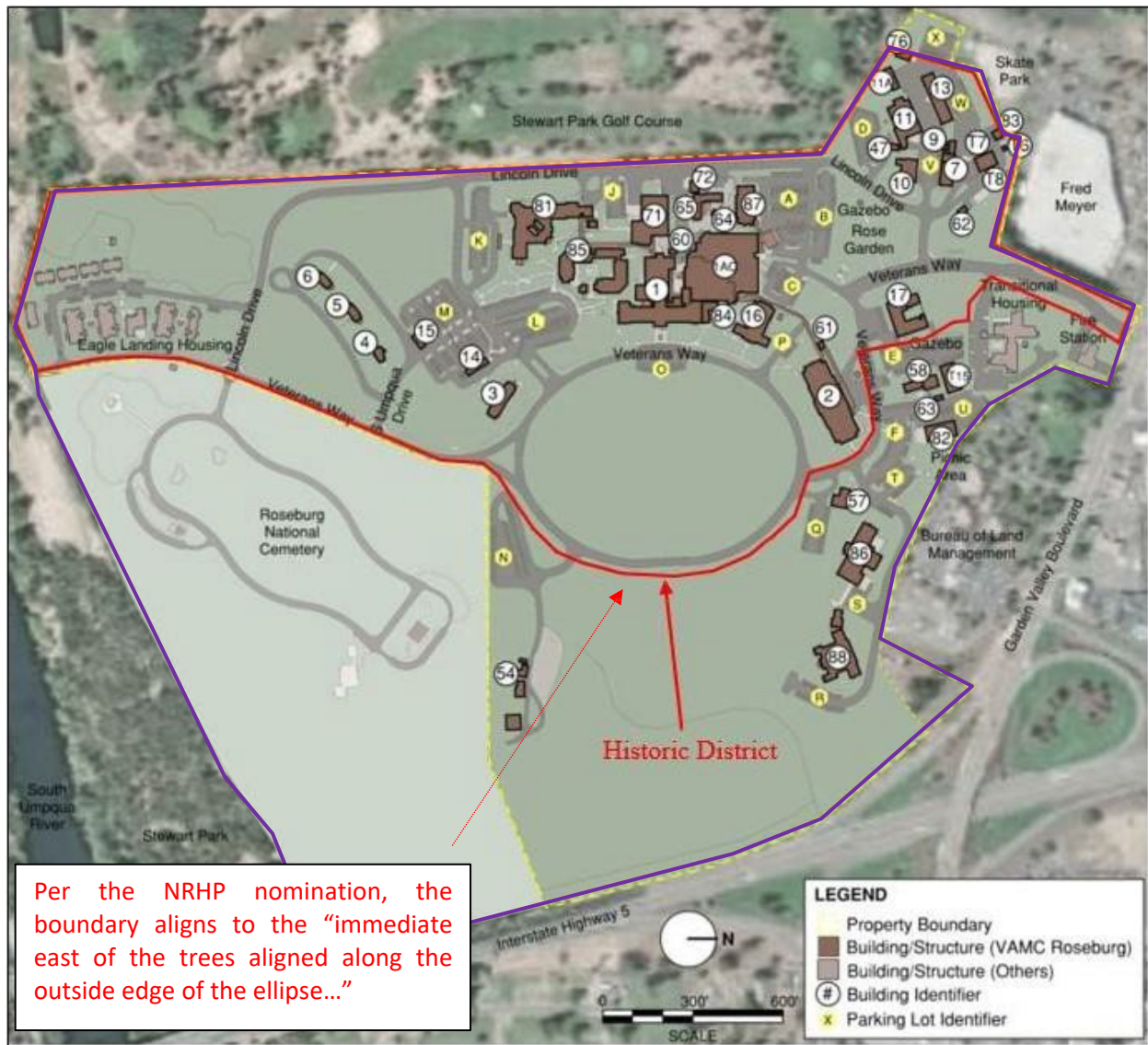


Figure 3 - Area of Potential Effects (APE) indicated in purple

Verbal Boundary Description (excerpt from the Roseburg Veterans Administration Hospital Historic District nomination):

The boundary begins at UTM N 4786061 E 470273, located at the southwest corner of the intersection of Veterans Way (also known as Centennial Drive) and Northwest Garden Valley Boulevard, approximately 600 feet southeast of the intersection of Northwest Garden Valley Boulevard and Duck Pond Street. The boundary extends approximately 110 feet to the southeast across Veterans Way to UTM N 4786047 E 470305, and then it follows the southeast side of Veterans Way to the southwest approximately 570 feet to UTM N 4785916 E 470228. At this point, the boundary turns to the southeast, extending approximately 200 feet along a chain link fence south of the Orchard Knoll Transitional Housing Unit (located outside the historic district boundary) to the north edge of a parking lot to UTM N

772 4785895 E 470279. From here, the historic district boundary extends to the southeast for approximately
773 360 feet as it follows the west edge of a parking lot and continues across to the south side of Veterans
774 Way (aka Centennial Drive), to the north of Resource 2, to UTM N 4785775 E 470317. The historic
775 district boundary then turns to the northeast for approximately 270 feet along the south side of
776 Veterans Way to UTM N 4785786 E 470403. The boundary then extends to the southeast along the west
777 side of Veterans Way, to the east of Resource 2, to UTM N 4785732 E 470434. The boundary then turns
778 to the east, crossing Veterans Way, and continues to the immediate east of the trees aligned along the
779 outside edge of the ellipse (Resource L), curving to the southeast, south, then southwest for
780 approximately 1,300 feet, passing through UTM N 4785629 E 470536 and continuing to UTM N 4785391
781 E 470443, which is east of the "Y" intersection to the south of the ellipse. The historic district boundary
782 continues to the southwest, approximately 20 feet to the east of Veterans Way (aka Centennial Drive)
783 to include the trees aligning the drive, for approximately 1,060 feet to UTM N 4785130 E 470340. The
784 NRHP boundary continues to the southwest then curves to the south, crossing the South Umpqua River
785 to the east of the bridge (Resource G), for approximately 1,100 feet to UTM 4784783 E 470374. The
786 boundary turns to the west-southwest for approximately 60 feet to cross Veterans Way (aka Centennial
787 Drive) to UTM N 4784775 E 470346, then turns to the north-northwest for approximately 520 feet,
788 following the bridge back across the river to UTM N 4784932 E 470313. From this point the historic
789 district boundary follows the fence line approximately 130 feet to the west-southwest to UTM N
790 4784921 E 470275, then continues to follow the fence line/property line for approximately 450 feet to
791 the west-northwest to UTM N 4784954 E 470141. The historic district boundary and fence line turn to
792 the north, extending approximately 2,570 feet to UTM N 4785751 E 470103. The historic district
793 boundary continues to follow the fence line, extending approximately 560 feet to the northwest to UTM
794 N 4785816 E 469998, then approximately 280 feet northeast to UTM N 4785901 E 470026,
795 approximately 270 feet to the east-northeast to UTM N 4785949 E 470095, and approximately 365 feet
796 east-southeast to UTM N 4785923 E 470203. From this point, the historic district boundary follows the
797 property boundary along a fence line to the northwest of Veterans Way to the northeast for
798 approximately 480 feet to return to the beginning point of the historic district boundary at Northwest
799 Garden Valley Boulevard. The historic district boundary contains approximately 77 acres. In addition,
800 the district also includes a discontinuous section located on the south side of the South Umpqua River,
801 southwest of the parcel described above. This second parcel contains the Roseburg National Cemetery,
802 located between the river and West Harvard Avenue. The boundary of the roughly rectangular property
803 begins in the northwest corner at UTM N 4784629 E 469980. It extends in an eastward direction for
804 approximately 280 feet to UTM N 4784413 E 470066. From here, the boundary follows the fence line of
805 the cemetery to the south for approximately 650 feet to UTM N 4784642 E 470068. The historic district
806 boundary then turns to west-northwest to follow the right-of-way of West Harvard Avenue for
807 approximately 210 feet to UTM N 4784421 E 469999. The historic district boundary then extends to the
808 north along a fence for approximately 110 feet to UTM N 4784454 E 469999, then turns to the west
809 following the same fence for approximately 60 feet to UTM N 4784453 E 469979. The boundary then
810 extends approximately 500 feet to the north along a fence to return to the starting point, encompassing
811 approximately 5 acres.

**ATTACHMENT C – SUMMARY OF HISTORIC RESOURCES LISTED IN 2012 ROSEBURG VETERANS
ADMINISTRATION HOSPITAL HISTORIC DISTRICT NATIONAL REGISTER NOMINATION INCLUDING 2023
DETERMINATIONS OF CONTRIBUTING INTERIOR SPACES**

BUILT RESOURCES WITHIN THE ROSEBURG VETERANS ADMINISTRATION HOSPITAL HISTORIC DISTRICT BOUNDARIES			
Resource Number	Historic/Current Use	Date of Construction	Status
1	Main Hospital	1933	C
interior	Lobby	1933	C
	First Floor Elevator Bay adjacent to Lobby	1933	C
1AC	Ambulatory Care/Outpatient Clinic Addition	1994	NC Addition to B1
84	MRI Addition	2008	NC Addition to B1
2	Convalescent Building	1933	C
3	Nurses' Quarters	1933	C
4	Manager's Quarters	1933	C
5	Officers' Duplex Quarters	1933	C
6	Officers' Duplex Quarters	1933	C
7	Boiler House	1933	NC ¹⁰
9	Transformer House	1933	C
10	Garage/Animal House	1933	C
11	Laundry Building	1933	NC
11A	Laundry Addition	Ca. 1985-2000 [sic]	NC
13	Warehouse/Shops Building	1933	C
14	Personnel Garage	Ca. 1933-1938 [sic]	C
15	Personnel Garage	Ca. 1933-1938 [sic]	C

¹⁰ Building 7 is listed as a contributing resource in the Roseburg Veterans Administration Hospital Historic District National Register of Historic Places nomination. It was determined non-contributing following renovation in 2014-2015. The adverse effects of this Undertaking were addressed in *Memorandum of Agreement Between Veterans Affairs Roseburg Healthcare System and the Oregon Historic Preservation Officer Regarding the Seismically Upgrade Building 7 Boiler Plant (Project 653-13-100) and Buildings T6, T7, and T8 Removal (Project 653-10-523)* (MOA) executed in 2014.

Programmatic Agreement
Seismic & Functional Improvements
Roseburg VAMC

BUILT RESOURCES WITHIN THE ROSEBURG VETERANS ADMINISTRATION HOSPITAL HISTORIC DISTRICT BOUNDARIES			
Resource Number	Historic/Current Use	Date of Construction	Status
16	Recreation Building	1936	C
interior	Entry	1936	C
	Auditorium	1936	C
17	Occupational Therapy Shops	1938	C
47	Storage	1933	C
60	Generator Building	1978	NC
61	Generator Building	1978	NC
62	Main Switchgear Building	1984	NC
64	Emergency Electrical System	1990	NC
65	Mechanical Room Building	1996	NC
71	Canteen/Nutrition & Food Storage	1995	NC
72	Biological Waste Storage	1995	NC
76	Storage Building	1998	NC
81	Community Living Center	1999	NC
83	Storage Building	2008	NC
T-6	Plumbing Quonset Hut	1946	C
T-7	Grounds Quonset Hut	1946	C
T-8	Plumbing Quonset Hut	1946	C
A	Storage	Ca. 1970s [sic]	NC
B	Storage	Ca. 1990s-2000s [sic]	NC
C	Covered walkway between B71 & B81	Ca. 1999	NC
D	Covered walkway among B1AC, B2, & B16	1963-1964	NC
E	Rose Garden/Gazebo	Ca. 1985	NC
F	Roseburg National Cemetery	1894, 2010	C

BUILT RESOURCES WITHIN THE ROSEBURG VETERANS ADMINISTRATION HOSPITAL HISTORIC DISTRICT BOUNDARIES			
Resource Number	Historic/Current Use	Date of Construction	Status
G	Bridge	1933	C
H	Picnic/Smoking Shelter	Ca. 1980s-1990s [sic]	NC
I	Road system (southern)	Ca. 1933	C
J	Road system (northern)	Ca. 1933	C
K	Flag Pole	1933	C
L	Ellipse	1933	C
-	Eagle Landing (10 buildings)	2014	Not evaluated ¹¹ NC due to age

817

818

BUILT RESOURCES WITHIN THE APE BUT OUTSIDE THE ROSEBURG VETERANS ADMINISTRATION HOSPITAL HISTORIC DISTRICT			
Resources	Function / Service	Date of Construction	Eligibility Recommendation
57	Police Headquarters	1967	Lacks significance
58	Greenhouse	1970	Lacks significance
63	EMS Pest Control	1980	Under 50 Years of Age & Lacks significance
82	Cooling Towers/Maintenance Shops	2002	Under 50 Years of Age & Lacks significance
86	Acute Mental Health / Acute Psychiatric Unit	Ca. 2015	Under 50 Years of Age & Lacks significance
87	Dental	2013	Under 50 Years of Age & Lacks Significance

¹¹ Eagle Landing is a series of low-rise apartment buildings that opened in 2014 to serve Veterans. The development is located near the south gate of the Roseburg VAMC campus near the Stewart Park Drive bridge. The buildings are residential, rather than institutional in design, and clad in planks with gable rooflines. The development was constructed after the nomination of the historic district. The Oregon SHPO concurred with Roseburg VAMC's assertion that no historic properties would be adversely affected by construction of Eagle Landing. The buildings were constructed outside the Period of Significance for the historic district and do not contribute.

*Programmatic Agreement Seismic
& Functional Improvements
Roseburg VAMC*

88	CLC / Hospice	Ca. 2015	Under 50 Years of Age & Lacks significance
T-15	Storage	Ca. 1975	Lacks Significance
Orchard Knoll	Residential Treatment Facility	Ca. 2002	Under 50 Years of Age & Lacks significance

819

820

821

**ATTACHMENT D – LIST OF ACTIONS LIKELY TO CAUSE ADVERSE EFFECTS, ACTIONS UNLIKELY TO
ADVERSELY AFFECT HISTORIC PROPERTIES, AND ACTIONS THAT REQUIRE NO ADDITIONAL
CONSULTATION**

If a specific action or component project is not described below, Roseburg VAMC shall seek the recommendation of the VA Federal Preservation Officer and/or the OR SHPO.

Identified historic properties include the RVAHHD but determinations of effect must also include archaeological properties and other properties determined historic under 36 CFR § 60.4.

Actions Determined Likely to Meet the Requirements of 36 CFR 800.5(b)

Likely a finding of no adverse effect

VA shall submit documentation to Consulting Parties for review and comment either for concurrence or additional recommendations

- Excluding Buildings 1 and 16, interior renovations requiring demolition and construction that are limited to the interior of buildings that are contributing resources to the Roseburg Veterans Administration Hospital Historic District (RVAHHD) because these resources do not retain integrity of materials, workmanship, and design of the building interior. Select areas of Buildings 1 and 16, such as the lobbies, have been determined to retain integrity.
- Demolition of buildings/structures that are not historic either because the building/structures is not a contributing resource of the RVAHHD or is located outside the boundaries of the RVAHHD.
- Rehabilitation of historic buildings/structures/landscape features compatible with the Secretary of the Interior's *Standards for Rehabilitation (Standards)*.
- Installation of campus signage and/or landscape furniture that is permanent such as pavilions, exercise equipment, light poles, wayfinding signs, and flag poles.
- Modification of existing utility corridors within a disturbed context.
 - Does not include installation of new utility corridors.
- Construction of new parking lots or roadways.
- Removal of coniferous trees from the Ellipse.

Actions Determined to Adversely Affect Historic Properties

Finding of adverse effect

VA shall submit consultation documentation to Consulting Parties and resolve adverse effects

- Construction of buildings/structures/landscape features/new utility corridors if plans are determined incompatible with the *Standards*.
- Demolition of historic buildings/structures/landscape features/utility corridors.
- Exterior modification of historic and non-historic buildings/structures/landscape features including construction of additions if plans are determined incompatible with the *Standards*.
- Interior modification of buildings that retain interior integrity (Buildings 1 and 16) if plans are determined incompatible with the *Standards*.
- Transfer of historic properties out of federal authority.
- Transfer of property to another federal agency if that transfer adversely affects historic properties.
- Removal of deciduous trees from around the Ellipse.
- Installation of flag poles taller than the pole reserved for the American flag on the Ellipse.

Actions Excluded from Further Review

No Further Consultation Required

- Renovations limited to the interiors of buildings that are not historic or outside the boundaries of the RVAHHD.
- Repairs to non-historic windows or historic windows using in-kind materials, but not including window replacement.
- Cleaning and repair of roofs using in-kind materials.
- Routine maintenance and cleaning that does not involve demolition and/or construction.
 - Includes painting and/or repainting surfaces with in-kind materials.
 - Includes patching and resurfacing with in-kind materials.
 - Includes replacement of all fixed furniture such as cabinetry, counters, and built-in desks.
 - Does not include abrasive cleaning methods such as sand- or water-blasting.
- Heating, ventilation and air conditioning, mechanical, plumbing, energy management, electrical, fire life safety, security, telecommunications systems and equipment repairs or replacement inside or located on non-primary elevations of any campus building(s) excluding Buildings 1 and 16.
- Minor security and communication improvements that are reversible and/or not visible to the general public in Buildings 1 and 16.
- Installation, maintenance, and replacement of all fire safety (alarm, detection, and suppression) equipment in Building 1 and 16.
- Removal of asbestos-containing items; removal of items containing polychlorinated biphenyls (PCBs); removal of lead-based paint except in Buildings 1 and 16.
- Resurfacing of existing paved surfaces, including in-kind paving repair or replacement.
- Installation of landscape furniture that is moveable and/or temporary such as picnic tables, pavilions, exercise equipment, light poles, wayfinding signs, accessibility ramps, and flag poles.
- Maintenance, repair, or replacement of existing curbs, gutters, sidewalks, fencing.
- Maintenance of existing landscapes through seeding, watering, grubbing, pruning, and replacement of lawns, shrubs, bushes, flower beds, trees, and in-ground irrigation systems.

895

ATTACHMENT E: COMPONENT PROJECT FORM

896

897

COMPONENT PROJECT REVIEW FORM

**Undertaking: Seismic and Functional Improvement of the Roseburg VA Medical Center,
Roseburg, Douglas County, Oregon
OR SHPO Reference No. 23-0877**

This form is for use only for projects related to implementation of the *Programmatic Agreement Among U.S. Department of Veterans Affairs Roseburg Health Care System, the Oregon State Historic Preservation Office, the Oregon Department of Veterans Affairs, and the Advisory Council on Historic Preservation Regarding the Seismic and Functional Improvement of the Roseburg VA Medical Center, Roseburg, Douglas County, Oregon*. Roseburg VAMC shall consult on projects not related to the Seismic and Functional Improvements Undertaking in accordance with 54 USC § 306108 of the National Historic Preservation Act of 1966 (NHPA) and its implementing regulations, 36 CFR Part 800, as amended (collectively referred to as "Section 106").

1. COMPONENT PROJECT DESCRIPTION

1.1. Building(s) and/or Landscapes Affected: _____

1.2. Action(s): CHECK ALL THAT APPLY

Building/Structure:

- ☐ Rehabilitation: [Click or tap here to enter text.](#)
- ☐ Renovation: [Click or tap here to enter text.](#)
- ☐ Relocation: [Click or tap here to enter text.](#)
- ☐ Demolition: [Click or tap here to enter text.](#)
- ☐ Construction/Addition: [Click or tap here to enter text.](#)

Utilities:

- ☐ Upgrade Existing: [Click or tap here to enter text.](#)
- ☐ Installation: [Click or tap here to enter text.](#)

Roadways:

- ☐ Upgrade Existing: [Click or tap here to enter text.](#)
- ☐ Installation: [Click or tap here to enter text.](#)

Parking

- ☐ Upgrade Existing: [Click or tap here to enter text.](#)
- ☐ Installation: [Click or tap here to enter text.](#)

☐ Other: [Click or tap here to enter text.](#)

2. AREA OF POTENTIAL EFFECT (APE) AND IDENTIFICATION OF HISTORIC PROPERTIES

The APE for the Undertaking is the Roseburg VAMC plus the Roseburg National Cemetery Annex. A map of the specific area(s) affected by this component project and a list of those component projects underway are included as Attachment A. Photos of buildings or landscape features affected by the component project are included in Attachment B. Preliminary architectural plans, drawings, and renderings of the component project are included as Attachment C.

2.1. Are any of the buildings or structures affected by the proposed Component Project within the boundaries of the Roseburg Veterans Administration Hospital Historic District?

- ☐ Yes (list contributing): [Click or tap here to enter text.](#)
- ☐ No
- ☐ Partially (list contributing): [Click or tap here to enter text.](#)

COMPONENT PROJECT REVIEW FORM

**Undertaking: Seismic and Functional Improvement of the Roseburg VA Medical Center,
Roseburg, Douglas County, Oregon
OR SHPO Reference No. 23-0877**

2.2. Are any of the landscape features affected by the proposed Component Project within the boundaries of the Roseburg Veterans Administration Hospital Historic District?

- ☐ Yes (list contributing): [Click or tap here to enter text.](#)
- ☐ No
- ☐ Partially (list contributing): [Click or tap here to enter text.](#)

2.3. How will Roseburg VAMC identify potential archaeological deposits?

- ☐ Buried Site Testing in advance of ground disturbance (report attached)
- ☐ Archaeological monitoring during ground disturbance
- ☐ No ground disturbance anticipated
- ☐ Other: [Click or tap here to enter text.](#)

3. POTENTIAL FOR CUMULATIVE EFFECT

[Click or tap here to enter text.](#)

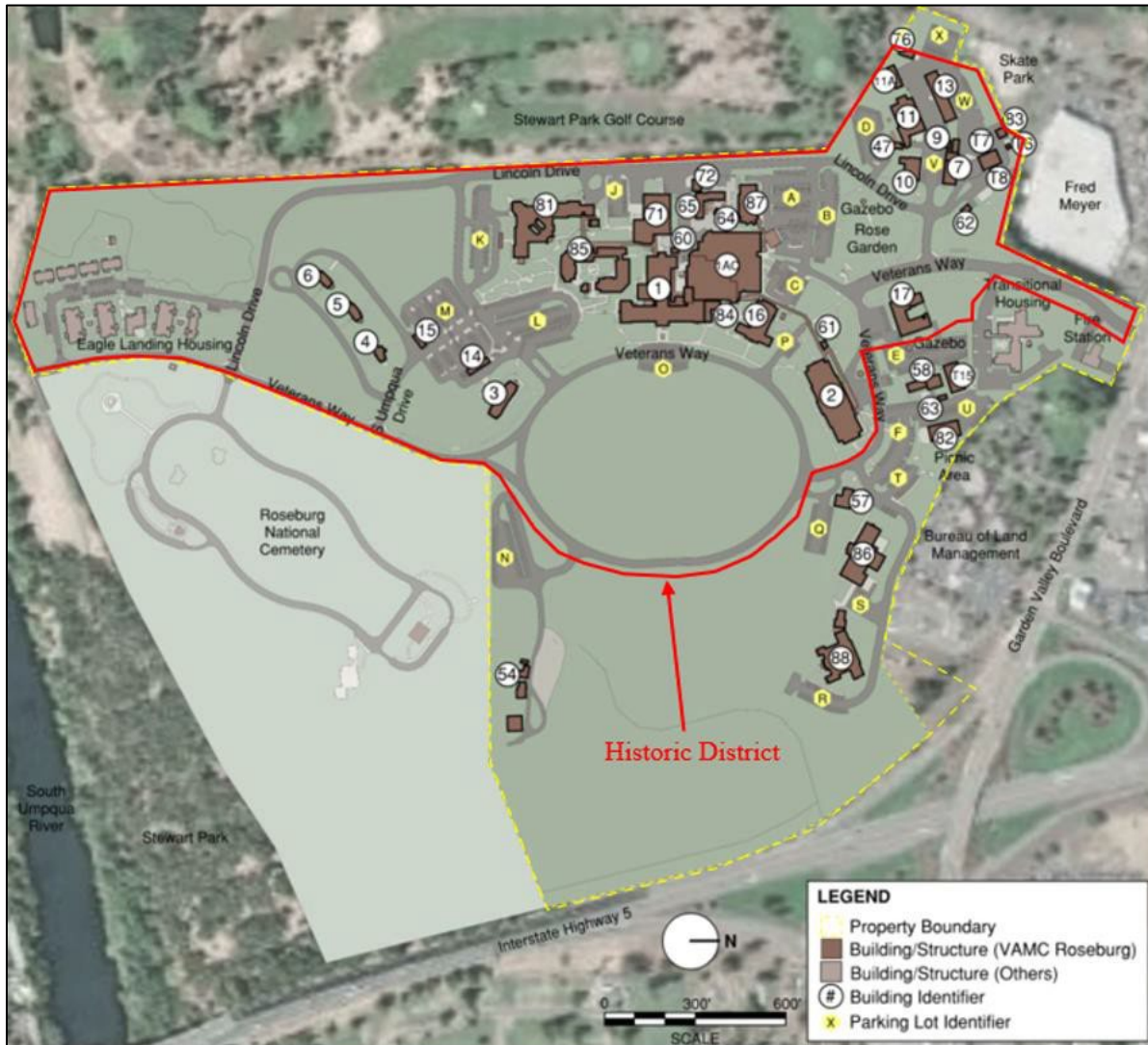
4. FINDING OF EFFECT

- ☐ VA has determined the Component Project will result in Adverse Effects to Historic Properties per 36 CFR § 800.5(d)(2) [Click or tap here to enter text.](#)
- ☐ VA has determined the Component Project will result in No Adverse Effect to Historic Properties per 36 CFR § 800.5(b) [Click or tap here to enter text.](#)
- ☐ VA has determined No Historic Properties will be Affected by the Component Project per 36 CFR § 800.4(d)(1) [Click or tap here to enter text.](#)
 - ☐ Proposed mitigation: [Click or tap here to enter text.](#)

COMPONENT PROJECT REVIEW FORM

Undertaking: Seismic and Functional Improvement of the Roseburg VA Medical Center,
Roseburg, Douglas County, Oregon
OR SHPO Reference No. 23-0877

Attachment A:



COMPONENT PROJECT REVIEW FORM

Undertaking: Seismic and Functional Improvement of the Roseburg VA Medical Center,
Roseburg, Douglas County, Oregon
OR SHPO Reference No. 23-0877

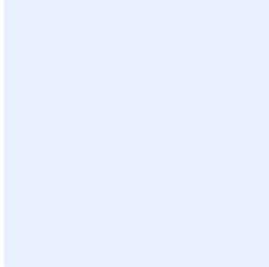
Component Projects to Date:

Component Project	Determination of Effect with Dates	Status

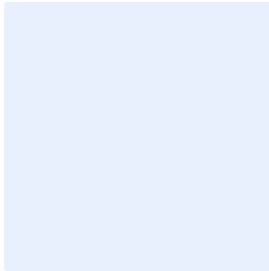
COMPONENT PROJECT REVIEW FORM

Undertaking: Seismic and Functional Improvement of the Roseburg VA Medical Center,
Roseburg, Douglas County, Oregon
OR SHPO Reference No. 23-0877

Attachment B:



Façade or overview



Affected area (include additional as necessary)

COMPONENT PROJECT REVIEW FORM

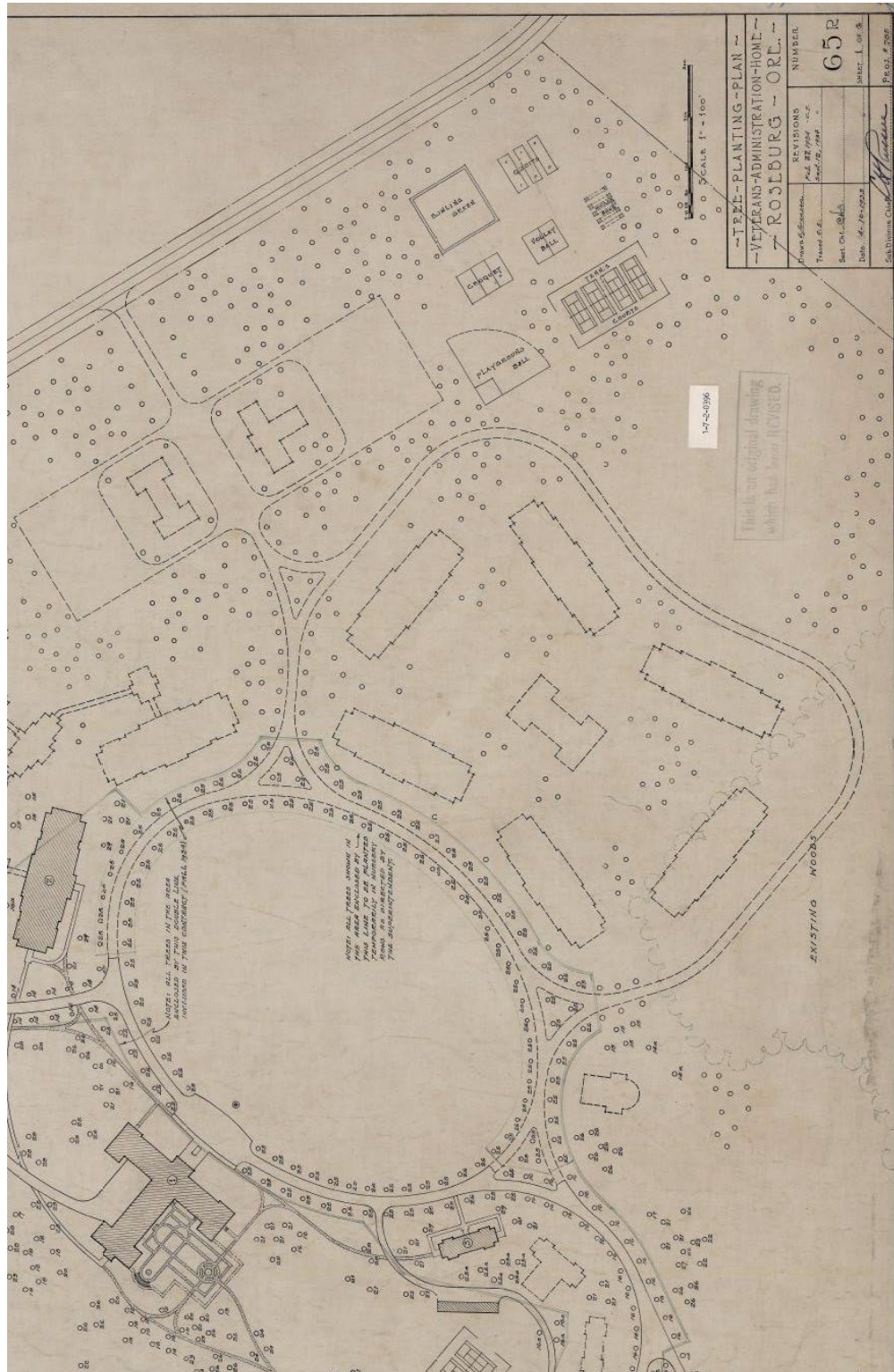
**Undertaking: Seismic and Functional Improvement of the Roseburg VA Medical Center,
Roseburg, Douglas County, Oregon
OR SHPO Reference No. 23-0877**

Attachment C:

ATTACHMENT F: LIST OF POTENTIAL MITIGATION MEASURES

- Provide text, photos, and maps to the City of Roseburg to expand the “Historic Resources in the City of Roseburg, OR” Story Map (<https://storymaps.arcgis.com/stories/05b70792949749eb93df71b7532b88af>).
 - Resources shall include the Roseburg VAMC, the Roseburg National Cemetery and National Cemetery Annex, and the Oregon State Soldiers Home.
- Submit digital one-page coloring sheets of the historic resources of the RVAHHD, including the roadways and landscapes, to the City of Roseburg to inform local children of historic resources in their area.
 - Pages shall include context suitable for children in grades K-3.
 - Pages shall be suitable for distribution through the City of Roseburg Parks & Recreation Department website (<https://www.cityofroseburg.org/departments/parks-and-recreation>).
- Install historic photos of the Building 1 lobby in the lobby of Building 100.
- Historic American Buildings Survey (HABS) documentation of a historic medical and/or former Quarters building.
- Historic American Landscapes Survey (HALS) documentation of the Ellipse.
- Supply digital scans of building plans, as-builts, and historic photos to the OR SHPO, the University of Oregon Special Collections, the City of Roseburg, and the VA History Office.
- Supply high-resolution digital photography of a built resource to the OR SHPO, the University of Oregon Special Collections, the City of Roseburg, and the VA History Office.
- Develop interpretive signage about the history and significance of the Roseburg VAMC and install the signage at the entrance to the campus near the intersection of Veterans Way and Stewart Park Drive.
- With the guidance of a [registered](#) Landscape Architect, update the 1933 Tree Planting Plan (Figure 4) with species suitable to the Roseburg, Oregon, climate and implement revised plan.
- Nominate the Roseburg National Cemetery, including the National Cemetery Annex, to the National Register of Historic Places.
- Submit data to the Oregon Encyclopedia to create entries for the RVAHHD, the Roseburg National Cemetery, and the Oregon State Soldiers Home.
- Secure the services of an experienced oral historian to conduct oral history interviews with Veterans who are served by the Roseburg VAMC and submit the oral histories to the [Veterans History Project](#), archived in the Veterans Collection at the Library of Congress.

932



933

934

Figure 4 - Tree Planting Plan of 1933