

APPENDIX A - LIST OF ENVIRONMENTAL PERMITS REQUIRED

LIST OF ENVIRONMENTAL PERMITS REQUIRED

A.1 REGULATORY FRAMEWORK

This PEA has been prepared under the provisions of, and in accordance with the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, and VA's regulations for implementing NEPA (38 CFR Part 26). In addition, the PEA has been prepared as prescribed in VA's *NEPA Interim Guidance for Projects* (VA 2010). Federal, state, and local laws and regulations specifically applicable to this Proposed Action are identified, where appropriate, within this PEA, and include:

- Coastal Zone Management Act of 1972.
- Endangered Species Act of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Energy Independence Security Act Section 438.
- Executive Order 11988, *Floodplain Management* (24 May 1977).
- Executive Order 11990, *Protection of Wetlands* (24 May 1977).
- Executive Order 12898, *Environmental Justice* (11 February 1994).
- Executive Order 13112, *Invasive Species* (8 February 1999).
- Executive Order 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability* (8 December 2021).
- Farmland Protection Policy Act (7 USC 4201, et seq.)
- Federal Clean Air Act of 1990 (42 USC 7401 et seq., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 et seq.); Sections 401 and 404.
- Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).
- Native American Graves Protection and Repatriation Act, as amended (25 USC 3001 et seq.).
- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- Noise Control Act of 1972, Noise Control.
- Douglas County Code, Chapter 9.25 (Noise Disturbances).
- Oregon Administrative Rules (OAR) Chapter 141 (Department of State Lands), Division 85 (Administrative Rules Governing the Issuance and Enforcement of Removal-Fill Authorizations within Waters of Oregon Including Wetlands).
- OAR Chapter 333 (Oregon Health Authority, Public Health Division), Division 68 (Lead-Based Paint and Demolitions).
- OAR Chapter 340 (Department of Environmental Quality), Division 35 (Noise Control Regulations).
- OAR Chapter 340 (Department of Environmental Quality), Division 45 (Regulations Pertaining to NPDES and WPCF Permits).
- OAR Chapter 340 (Department of Environmental Quality), Division 150 (Underground Storage Tank Rules).

- OAR Chapter 340 (Department of Environmental Quality), Division 248 (Asbestos Requirements).
- OAR Chapter 603 (Department of Agriculture), Division 73 (Plants: Wildflowers and Endangered, Threatened, and Candidate Species)
- ORS Volume 5 (State Government, Government Procedures, Land Use), Title Number 19 (Miscellaneous Matters Related to Government and Public Affairs), Chapter 196 (State Waters and Ocean Resources; Wetlands; Removal and Fill).
- ORS Volume 6 (Local Government, Public Employees, Elections), Title Number 21 (Cities), Chapter 227 (City Planning and Zoning), Section 350 (Wetland Development).
- ORS Volume 13 (Housing, Games, Environment), Title Number 36A (Housing, Lottery and Games, Environment), Chapter 467 (Noise Control).
- ORS Volume 13 (Housing, Games, Environment), Title Number 36A (Housing; Lottery and Games; Environment), Chapter 468A (Air Quality).
- ORS Volume 13 (Housing, Games, Environment), Title Number 36A (Housing; Lottery and Games; Environment), Chapter 468B (Water Quality).
- ORS Volume 15 (Water Resources, Agriculture and Food), Title Number 46 (Agriculture), Chapter 564 (Wildflowers; Threatened or Endangered Plants).
- Douglas County Land Use and Development Ordinance.
- Roseburg, Oregon Municipal Code (ROMC) Title 5 (Utilities), Chapter 6 (Storm Drainage Regulations).
- ROMC Title 7.02 (Offenses), Section 140 (Noise disturbances).
- ROMC Title 12 (Land Use and Development Regulations), Chapter 04 (Zoning Regulations – Districts and Overlays).
- ROMC Title 12 (Land Use and Development Regulations), Chapter 6 (Site Development), Section 30 (Site Improvement Requirements).
- Roseburg Urban Sanitary Authority (RUSA) Code of Ordinances Title 4 (Wastewater Discharge Prohibitions and Limitations), Chapter 20 (Administration), Section 30 (Industrial discharge permits).

A.2 ENVIRONMENTAL PERMITS REQUIRED

In addition to the regulatory framework of NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, VA's NEPA regulations (38 CFR Part 26), and VA's *NEPA Interim Guidance for Projects*, the following federal, state, and/or local environmental permits that may be required as part of this Proposed Action include:

- ODEQ Air Quality Bureau permit (stationary source permit) for air emissions from new emergency generators, boilers, and other equipment.
- ODEQ administered NPDES permit for construction activities.
- ODEQ Air Quality Bureau Asbestos/Demolition Notification.
- ODEQ registration for new emergency generator ASTs and USTs.

APPENDIX B – AGENCY CORRESPONDENCE

From: [VACO Environment](#)
Bcc: ["jim_thrailkill@fws.gov"](#); ["chu.rebecca@epa.gov"](#); ["darla.j.white@usace.army.mil"](#); ["david.ferguson@or.usda.gov"](#); ["hwhitman@blm.gov"](#); ["ali.mirzakhali@deq.oregon.gov"](#); ["julie.harvey@deq.oregon.gov"](#); ["jennifer.wigal@deq.oregon.gov"](#); ["lydia.emer@deq.oregon.gov"](#); ["bart.collinsworth@deq.oregon.gov"](#); ["camacho.ivan@deq.state.or.us"](#); ["navarro.jeffrey@deq.state.or.us"](#); ["samina.t.panwhar@dhsosha.state.or.us"](#); ["odfw.wildlifeinfo@odfw.oregon.gov"](#); ["frank.h.reading@odot.state.or.us"](#); ["vicki.walker@dsl.oregon.gov"](#); ["kelly.fitzpatrick@odva.oregon.gov"](#); ["swcddouglas@gmail.com"](#); ["jmshaklee@co.douglas.or.us"](#); ["publicworks@co.douglas.or.us"](#); ["adscott@co.douglas.or.us"](#); ["nmessenger@cityofroseburg.org"](#); ["cdd@cityofroseburg.org"](#); ["parks@cityofroseburg.org"](#); ["pwd@cityofroseburg.org"](#); ["tonym@ctsi.nsn.us"](#); ["ramona.quenelle@grandronde.org"](#); ["rain.circle@wstribe.org"](#); ["sampsino@ctuir.org"](#); ["richardson@cowcreek.com"](#); ["joseph.allen@klamathtribes.com"](#); ["Bill.Mixon"](#); ["Bill.Duncan"](#); ["Rick.Sciapiti"](#); ["Jim.Little"](#); ["Dodson"](#); ["Kelly.FITZPATRICK@odva.oregon.gov"](#); ["e106@achp.gov"](#); ["ORSHPO.Clearance@oregon.gov"](#); ["Charisse.soucie@burnspaiute-nsn.gov"](#); ["dpigsley@msn.com"](#); ["ckrossman@ctclusi.org"](#); ["David.harrelson@grandronde.org"](#); ["robert.brunoe@ctwsbnr.org"](#); ["careyMiller@ctuir.org"](#); ["KassandraRippee@coquilletribe.org"](#); ["jjohnson@cowcreek.com"](#); ["perry.chocktoot@klamathtribes.com"](#); ["planning@co.douglas.or.us"](#); ["dchs.oregon@gmail.com"](#); ["info@restoreoregon.org"](#); ["cstevens@cityofroseburg.org"](#); ["Vfw2468@hotmail.com"](#); ["am.legion.post16@gmail.com"](#); [Prescott, Kevin J. \(ROS\)](#); [Wilder, Troy \(ROS\)](#); [Tyson, Shawn D. \(ROS\)](#); [Gerritsen, Curt A. \(ROS\)](#); ["Kelly.Sellers.Wittie"](#); [Hull, Patrick A.](#); ["Kelly.Sellers.Wittie"](#)
Subject: National Environmental Policy Act Notice of Proposed Seismic and Functional Improvement Projects at the Roseburg VA Medical Center Roseburg, Oregon
Date: Thursday, June 15, 2023 1:47:00 PM
Attachments: [Roseburg VAMC Scoping Notice.pdf](#)

Dear Valued Stakeholder,

The U.S. Department of Veterans Affairs (VA) is proposing Seismic and Functional Improvement Projects at the Roseburg VA Medical Center (Roseburg VAMC) located at 913 NW Garden Valley Boulevard in Roseburg, Oregon. The proposed construction, seismic retrofitting, renovation, and demolition projects would correct seismic and functional deficiencies at the medical center and would improve the delivery of health care services to area Veterans. In addition, the proposed action includes the transfer of approximately 14 acres of land to the State of Oregon for the future development of a State Veterans Home.

As part of the decision-making process, VA is complying with the National Environmental Policy Act (NEPA) by preparing an Environmental Assessment (EA). As part of this process, VA is seeking input on issues to be addressed during the NEPA process, including environmental and cultural concerns. VA invites you to participate in the NEPA process.

VA has separately initiated a formal Section 106 consultation for the undertaking on June 6, 2023. The Section 106 consultation process and conclusions will, as noted, be conducted as a separate process, however the results of the Section 106 process will provide a major contribution to the EA's analysis of potential effects to historic and cultural resources.

Please see the attached NEPA Scoping Notice for information on the proposed projects including details on how to submit any comments or input on alternatives and/or issues that your or your organization feel the VA should analyze as part of the EA.

VA respectfully requests that you submit any comments/information via email by July 20, 2023 to **vacoenvironment@va.gov** with the subject line ***"Roseburg VAMC NEPA Scoping"***.

VA will solicit input from the public at large through publication of the Notice on June 18 and 20, 2023 in The News-Review newspaper.

In addition, VA will hold public meetings on June 28, 2023 at 7:00 pm and June 29, 2023 at 10:00 am. at the VAMC at the Roseburg VAMC Building 16 Auditorium to inform the public of the Proposed Action and receive public input regarding the proposed projects.

Thank you for your interest and participation.

Respectfully,
Bruce Mack
Department of Veterans Affairs
Environmental Engineer



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

June 13, 2023

Sent via email

SUBJECT: Scoping Notice for an Environmental Assessment for the Proposed Seismic and Functional Improvement Projects, Roseburg VA Medical Center, 913 NW Garden Valley Boulevard, Roseburg, Oregon

Dear Valued Stakeholder:

The U.S. Department of Veterans Affairs (VA) is preparing an Environmental Assessment (EA) to analyze the potential environmental impacts associated with the proposed Seismic and Functional Improvement Projects (Proposed Action) at the Roseburg VA Medical Center (Roseburg VAMC) located at 913 NW Garden Valley Boulevard in Roseburg, Oregon. The Roseburg VAMC currently offers primary and specialty health care services to approximately 49,865 Veterans living in central and southern Oregon and northern California. Approximately 28,242 Veterans are currently served by the Roseburg VAMC. The location of the Roseburg VAMC campus is shown on Figures 1 and 2. Figure 3 provides an aerial photograph of the campus.

Multiple buildings located at the Roseburg VAMC campus have functional and size deficiencies that do not meet VA's modern standards for the delivery of health care services to our nation's Veterans. Additionally, the campus is located within a seismically active area, classified as a "high" potential seismic zone and a seismic study of the campus found that five buildings, including the main hospital building (Building 1) and mental health building (Building 2), are at risk from seismic activity and do not meet current seismic building standards. Finally, VA seeks to bolster Veteran services to by partnering with the State of Oregon to support the future development of a State Veterans Home.

To address these challenges, VA is proposing a series of construction, renovation, seismic retrofitting, and demolition projects at locations across the campus. This includes the construction of a new Outpatient Specialty Care Clinic building (Building 100) to replace the functions currently in Building 1 and the transfer of approximately 14 acres of campus land to the State of Oregon for the future development of a State Veterans Home.

The primary components of the Proposed Action include:

New Construction

Constructing a 3 to 4-story, approximately 165,000 building gross square-foot (BgFt²) Outpatient Specialty Care Clinic (Building 100) east of the Ellipse Road. The building would be designed to improve patient care, meet modern health care delivery standards, consolidate clinical

departments, and improve workplace conditions. Existing clinical functions within the seismically deficient and undersized 126,335 BgFt² Building 1 would be relocated to Building 100. Additionally, clinics within Building 1AC would be relocated to Building 100 to improve health care delivery.

Constructing approximately 425 surface parking spaces north, east, and south of Building 100 to support the parking needs of the building.

Prior to Building 100 becoming fully operational, the determination of the future utilization of the vacated Building 1 will be carefully assessed by VA. The disposition process for the building will include potential adaptive reuse, transfer to another agency or private entity, or, if no viable use can be determined possible, demolition. However, any final decision will be determined at the appropriate time following the published process in the *VA Real Property Disposal Guide* that prioritizes reuse/adaptation/transfer before consideration of other options.

Seismic Retrofit and Renovation

Seismically retrofitting/renovating Building 2, the approximately 74,474 BgFt² mental health clinic building. Retrofitting would include the removal of the interior of the building and the installation of structural upgrades and new mechanical systems to the building interior. It is anticipated that little or no exterior modification would be required. Following the completion of the upgrades, the building interior would be redesigned and constructed to meet current health care delivery requirements. The existing mental health clinic and administrative functions would remain in retrofitted/renovated Building 2. In addition, some of the administrative and support spaces from Buildings 1, 17, and 57 would be relocated to Building 2.

Seismically retrofitting/renovating Buildings 11 (laundry), 13 (warehouse), and 16 (chapel/auditorium). These retrofits are anticipated to include the selective demolition of the interiors of the buildings, the installation of shear walls and other interior improvements, and interior renovation. Following the renovation, the buildings would be returned to their current uses.

Renovation/Additions

Renovating the vacated clinical space of the ambulatory care/outpatient clinic building (Building 1AC) for an approximately 30-bed Community Living Center (CLC) facility.

Remodeling the interior and adding a wing to a CLC building (Building 81). The addition would result in approximately 7 additional CLC beds.

Renovating the interior of Building 71 (patient food and nutrition, and campus canteen).

Demolition

Demolishing seven buildings, totaling approximately 25,000 BgFt², including Building 17 (offices), Building 57 (VA police station), Building 58 (environmental management and greenhouse), Building 63 (hazardous materials storage), Building T15 (storage), Building 54 (former golf shack) and Structure 56 (open-air picnic structure). This will remove poor condition, unusable structures and/or allow for improved site access and parking.

Removal or renovation of Building 60 (392 BgFt² electrical utility building) and Building 84 (1,121 BgFt² MRI building). These buildings are located adjacent to, and support, Building 1 and the final determination will depend on the disposition of Building 1.

Existing Parking Lot Modification

Rebalancing existing surface parking lots at the campus. Once Building 1 operations are transferred to Building 100, less parking will be needed in the western portion of the campus. Other proposed projects would also affect existing parking in the northern and western portions of the campus. It is anticipated that approximately 97 new parking spaces would be constructed, 165 parking spaces would be demolished, and 189 parking spaces would no longer be used. Existing parking lots would likely be used for construction contractor parking and material storage and/or temporary swing space for the Proposed Action construction.

Infrastructure and Utilities

Constructing/realigning campus roads to provide access to proposed Building 100, the proposed future State Veterans Home, and other campus buildings. Veterans Way may be extended (reconnected) from the northern campus entrance between Buildings 2 and 16 to the road circling the Ellipse, which would lead to new roads serving Building 100 and the State Veterans Home. Other campus road modifications may also be constructed to improve traffic flow and pedestrian safety.

Infrastructure upgrades to support the proposed development, including installing, relocating, and removing campus utilities, as necessary, based on the final design.

Land Transfer for State Veterans Home

Transferring approximately 14 acres of land located in the eastern portion of the campus to the State of Oregon for the future construction of a State Veterans Home. Based on preliminary information provided by Oregon Department of Veterans Affairs, it is anticipated that the State Veterans Home would include several connected, single-story buildings totaling approximately 130,000 BgFt² and would include approximately 150 beds.

All elements of this Proposed Action are located entirely within the Roseburg VAMC campus on land currently owned by the Federal Government. Figure 4 depicts the current campus configuration. Figure 5 illustrates the primary Proposed Action construction areas.

The Proposed Action construction activities would be conducted in phases over approximately 10 years to minimize campus disruption, support continued campus operations, and minimize the need for temporary swing space during construction. VA is currently in the pre-design phase for the Proposed Action projects. No project design details are available at this time.

VA will prepare the Draft EA according to the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code 4321-4370h), the Council on Environmental Quality Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and VA Implementing Regulations (38 CFR Part 26). The Draft EA will evaluate the potential direct and indirect impacts to the environment resulting from the Proposed Action, as well as cumulative impacts with other actions and projects.

VA recognizes and appreciates that you or your organization may have comments or input on this Proposed Action for consideration in the Draft EA. We request that you submit any comments or input via email by **July 20, 2023** to vacoenvironment@va.gov with the subject line “**Roseburg VAMC NEPA Scoping**”.

Through this notice, VA is also providing the public with information about the undertaking and seeking public comment and input about the undertaking’s effects on historic properties pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, (54 USC § 306108), and its implementing regulations (36 CFR Part 800 – Protection of Historic Properties). This notice does not serve as an invitation to consult under Section 106; it is solely to seek and consider the views of the public. VA initiated its Section 106 review separately and send invitations to consulting parties on June 6, 2023.

VA will hold two public meetings at the Roseburg VAMC to inform the public of the Proposed Action and to receive public input regarding the proposed projects that will be considered in the Draft EA. These meetings will be held on June 28, 2023 at 7:00 pm and June 29, 2023 at 10:00 am within the Roseburg VAMC Building 16 auditorium. VA will announce the meetings through a notice published in *The News-Review* and on the Roseburg VAMC website.

VA anticipates publishing the Draft EA for a 30-day public review and comment period in the Fall of 2023. VA will announce the start of this review period by publishing a notice of availability (NOA) of the Draft EA in *The News-Review*. VA will concurrently notify stakeholders via email and include instructions on how to submit comments. The Draft EA will be available for review at the Roseburg Public Library and via the VA CFM Environmental Program Office website at <https://www.cfm.va.gov/environmental>.

For questions, please email vacoenvironment@va.gov with the subject line “Roseburg VAMC NEPA Scoping”.

Respectfully,

Patrick Read
Acting Director, Environmental Program Office
Office of Construction and Facilities Management

Figure 1: Roseburg VAMC Location Map

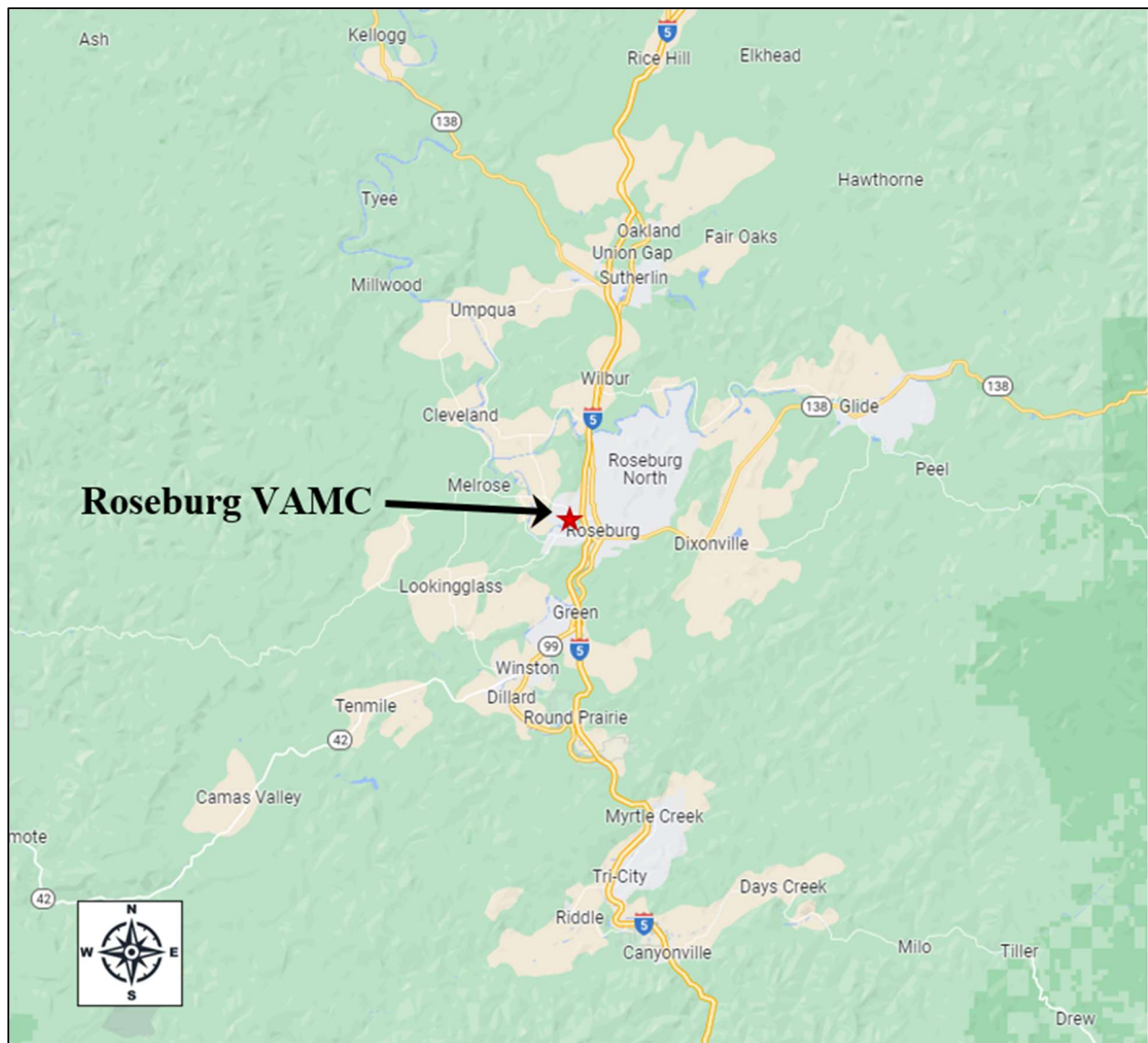


Figure 2: Topographic Location Map

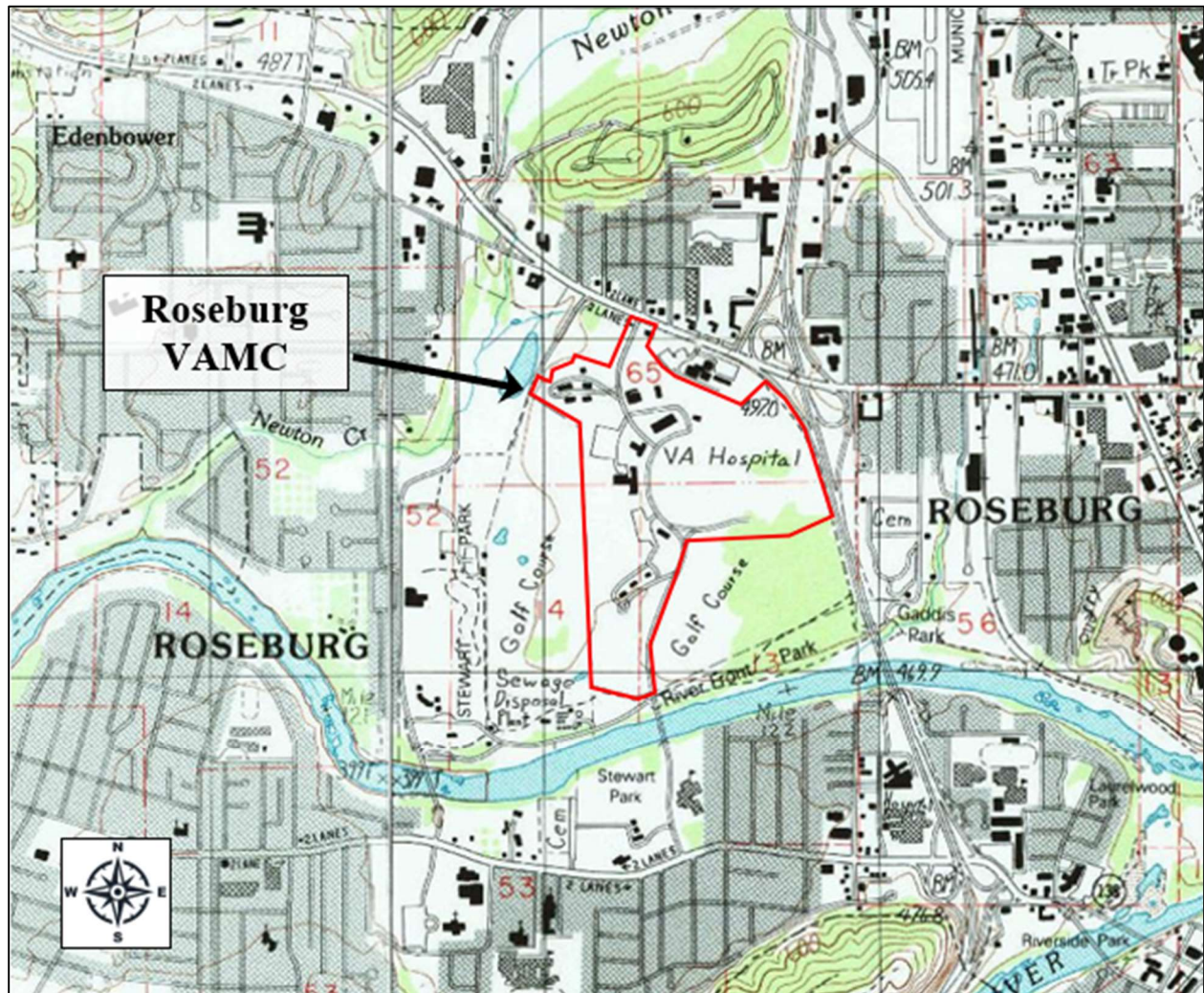


Figure 3: Aerial Photograph of Roseburg VAMC Campus

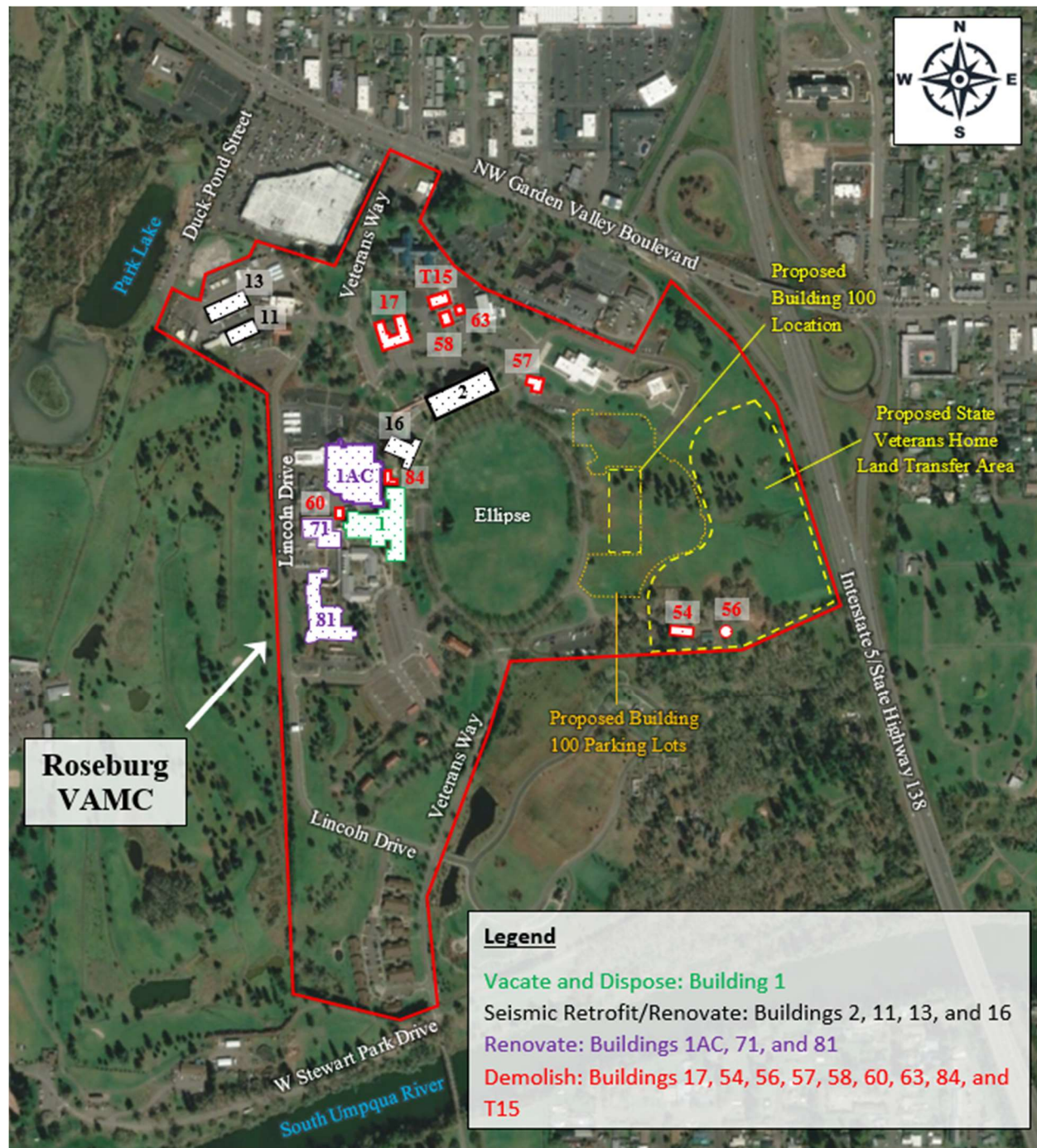


The map displays the VAMC Roseburg campus with a red outline indicating the property boundary. A red arrow points to the 'Historic District' label. The map includes various buildings, parking lots, and surrounding landmarks like Stewart Park Golf Course, Roseburg National Cemetery, and Interstate Highway 5. A legend in the bottom right corner defines symbols for property boundaries, buildings, identifiers, and parking lots.

LEGEND

- Property Boundary
- Building/Structure (VAMC Roseburg)
- Building/Structure (Others)
- Building Identifier
- Parking Lot Identifier

Figure 5: Proposed Action Project Locations



From: Rob Clark
Sent: Monday, April 22, 2024 10:11 AM
To: Rob Clark
Subject: RE: Telephone Discussions on 27 June - Roseburg VAMC NEPA Scoping

From: Widner, Jacob <Widner.Jacob@epa.gov>
Sent: Thursday, June 22, 2023 12:24 PM
To: Mack, Bruce G. (CFM) <Bruce.Mack@va.gov>
Cc: VACO Environment <VACOEnvironment@va.gov>; Sturges, Susan (she/her/hers) <Sturges.Susan@epa.gov>
Subject: [EXTERNAL] Roseburg VAMC NEPA Scoping

Bruce,

My name is Jacob Widner and I work in EPA's Region 10 office. We received the Scoping Notice for an Environmental Assessment for the Proposed Seismic and Functional Improvement Projects, Roseburg VA Medical Center and are determining our response to this notice. I would like to discuss some of the aspects of the project you plan to analyze. We were specifically concerned of the impact of the demolition debris on veterans who will be using the facility during the project. We would also like more information regarding staging areas for the construction equipment and sustainable designs or building materials that may be used in the renovations or new constructions.

Please let me know when a good time would be to discuss this project with you.

Thanks,

Jacob D. Widner
NEPA Compliance Division
Office of Federal Activities
United States Environmental Protection Agency
Washington, DC
Cell: 202-993-3272

From: Rob Clark
Sent: Monday, April 22, 2024 10:16 AM
To: Rob Clark
Subject: RE: Initiation of Consultation

From: Pippen, Vickie (ROS) <Vickie.Pippen@va.gov>
Sent: Thursday, June 8, 2023 9:20 AM
To: Rodgers, Mark W. <Mark.Rodgers@va.gov>
Subject: FW: Initiation of Consultation

For you to save if needed.

From: Planning Clerk1 <plnclerk1@co.douglas.or.us>
Sent: Thursday, June 8, 2023 9:18 AM
To: Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>
Cc: Pippen, Vickie (ROS) <Vickie.Pippen@va.gov>
Subject: [EXTERNAL] RE: Initiation of Consultation

Mr. Prescott and Ms. Pippen,

Thank you for the email and attachments related to your project.
Because your location is entirely within the Roseburg City Limits, the County has no jurisdiction.
Therefore, we will not be participating in your planning efforts.

Thank you for reaching out to us and good luck with your project.

Regards,
Kathy Wall



Kathy Wall | Senior Planner

Douglas County Courthouse | Room 106 | Justice Building | Roseburg, OR 97470
Phone: 541-440-4289 | Email: kzwall@co.douglas.or.us

From: Pippen, Vickie (ROS) <Vickie.Pippen@va.gov>
Sent: Tuesday, June 6, 2023 2:28 PM
To: PlanningWebEmail <planning@co.douglas.or.us>
Cc: Rodgers, Mark W. <Mark.Rodgers@va.gov>; Abreu, Hector M. <Hector.Abreu@va.gov>; Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>; Gerritsen, Curt A. (ROS) <Curt.Gerritsen@va.gov>
Subject: Initiation of Consultation

Dear, Judith Bacon

The U.S. Department of Veterans Affairs (VA) Health Care System at Roseburg, Oregon (Roseburg VAHCS), is initiating consultation under 54 U.S.C. § 306108 for functional and seismic improvements to the campus. Documentation is attached.

Roseburg VAHCS will host a consulting party meeting on June 28, 2023, to discuss the proposed Undertaking and the potential for adverse effects. Roseburg VAHCS will have in-person and webinar options for attendance.

Please RSVP to Kevin.Prescott@va.gov with your preferred method of attendance by June 20, 2023.

Thank you;

Vickie Pippen

ASA for FMS

Vickie.Pippen@va.gov

541-440-1000 EXT 43034



City of Roseburg

Community Development Department

900 S.E. Douglas Avenue Roseburg, Oregon 97470 | www.cityofroseburg.org | Phone (541) 492-6745

July 20, 2023

**** Sent via e-mail to vacoenvironment@va.gov ****

Mr. Patrick Read
Acting Director, Environmental Program Office
U.S. Department of Veterans Affairs (VA)
Office of Construction & Facilities Management
Washington, DC 20420

SUBJECT: Roseburg VAMC NEPA Scoping

Thank you for the opportunity to provide feedback and comments on the proposed Seismic and Functional Improvement Projects at the Roseburg VAMC here in beautiful Roseburg, Oregon. The proposed improvements will greatly enhance the function and appearance of the campus, and the plans for a modern, up-to-date medical facility (Building 100), adaptive re-use of the old main hospital building, and the potential State of Oregon Veterans Home are exciting projects that the City of Roseburg welcomes and will be happy to support.

The dignified, classical revival buildings within the Roseburg VA Hospital Historic District are a critical and under-utilized community resource for the citizens of Roseburg, the surrounding rural areas, and veterans from across Southern Oregon and Northern California. The massive elliptical park with historic flagpole is the single largest *urban* public space in all of Douglas County, dwarfing the size of the next biggest such space (open lawn in front of the Douglas County Courthouse) by a factor of 17. The new hospital facility and repurposing the old main hospital building (#1) is potentially a game-changer not just for VAMC patients and family members, but also for residents and the tourism industry.

Based on ongoing planning and development review projects underway by the City of Roseburg in the vicinity, we would offer the following comments and suggestions:

1. We would request that the VAMC perform a **traffic impact study** to analyze the future impacts of the proposed changes, and present a plan to address those impacts in coordination with work we have planned for the Garden Valley Corridor Study.

2. We are working on an upcoming construction project for the Stewart Park Drive/Centennial Drive Bridge, which will have at least temporary traffic impacts during construction, and would like to be able to discuss and coordinate transportation-related issues with VAMC staff.
3. There needs to be a discussion around emergency services and how the proposal will impact the City's emergency services resources.
4. Given the historic district designation of much of the campus, if there are going to be major changes or potential demolition of contributing structures, the City of Roseburg Historic Resource Review Commission (HRRRC) should be consulted in a public setting at one or more of their regular meetings.
5. There may be some challenges providing water service to the State Veterans Home property, just based on City of Roseburg water service access regulations. The City will need to work through access and service issues for any new state-owned project or lands on the site, in addition to our regular planning, public works and historic resource standards.
6. The City's Transportation System Plan identifies a need for better bike and pedestrian connections to and through the VA campus, and we are currently working on planning projects with ODOT for both nearby interchanges (Exits 124 @ Harvard and 125 @ Garden Valley Boulevard). We welcome and encourage VA participation to participate with the City and ODOT on finding workable solutions for better access to and through the campus.
7. We would really appreciate the opportunity to comment as each project continues to develop, to ensure that our shared goals and concerns can be discussed and addressed early and often.

We are a ready and willing partner to the VA on these exciting changes coming to the historic VAMC campus. Please don't hesitate to reach out or contact us directly with any questions.

Respectfully,



Stuart Cowie, Director
City of Roseburg Community Development Department
900 SE Douglas Avenue
Roseburg, OR 97470
(541) 492-6750
SCowie@cityofroseburg.org

APPENDIX C - NHPA SECTION 106 CONSULTATION AND NATIVE AMERICAN TRIBE CORRESPONDENCE

OR SHPO SUBMITTAL FORM

RESPONSE REQUIRED IN ALL SECTIONS

WHY

This submittal is (Select One) ☒ the First Initiation of Consultation and no SHPO Case # exists
☐ a Response to SHPO Request for more information on existing SHPO Case # provided below
☐ New Information for review on existing SHPO Case # provided below
 Existing SHPO Case #

WHAT

Your Project Name
Your Project Number
Extremely Brief Project/Undertaking Description

WHERE

Project Location
County(s)
Street Address City
OR Legal Description T/R/S
OR Long/Lat (decimal degrees to 4 decimal places) Long Lat

WHO RECEIVES CORRESPONDENCE FROM THE SHPO

If not the Formal Contact, the Working Project Contact is who the SHPO communicates with for more information about the project and/or submittal package

Formal Contact		Working Project Contact (cc'd on all correspondence to Formal Contact)	
Name	<input type="text" value="Mr. Patrick A. Hull, Executive Director"/>	Name	<input type="text" value="Kevin Prescott, Projects Chief"/>
Org	<input type="text" value="Roseburg VA Health Care System"/>	Org	<input type="text" value="Roseburg VA Health Care System"/>
Address	<input type="text" value="913 NW Garden Valley Boulevard"/>	Address	<input type="text" value="913 NW Garden Valley Boulevard"/>
Address	<input type="text"/>	Address	<input type="text"/>
City/ST/Zip	<input type="text" value="Roseburg, OR 97471"/>	City/St/Zip	<input type="text" value="Roseburg, OR 97471"/>
Phone	<input type="text"/>	Phone	<input type="text" value="541-440-1371"/>
Email	<input type="text"/>	Email	<input type="text" value="Kevin.Prescott@va.gov"/>

HOW

Is there a federal nexus for the project (funding, permitting, licensing, etc.)? ☒ Yes ☐ No
Ownership of Project Land? ☐ Private ☒ Public ☐ Both

Additional Comments (Optional)

SUBMITTED TO SHPO FOR

- ☐ Built Environment Review
☐ Archaeology Review
☒ Both Built and Archaeology Review

SUBMITTAL EMAIL ACCOUNT

ORSHPO.Clearance@oregon.gov

ADDITIONAL ATTACHMENTS (Select All that Apply & Attach Individually)

- ☒ Cover Letter
☐ Map(s) (Required for Archaeology if not included in a Report)
☐ Oregon SHPO Clearance Form (Built Environment)
☐ 106 Documentation Form (Built Environment)
☐ Built Environment Only Report
☐ Archaeology Report INCLUDING State of Oregon Report Cover Sheet
☐ Combined Arch & Built Report INCLUDING State of Oregon Report Cover
☐ Sheet BLM or USFS Archaeology Site Record(s) # Individually Attached
☐ Spatial Data
☒ Other 1 (Name It)
☐ Other 2 (Name It)
☐ Other 3 (Name It)



**DEPARTMENT OF VETERANS AFFAIRS
ROSEBURG VA HEALTH CARE SYSTEM
913 NW Garden Valley Blvd.
Roseburg, Oregon 97471-6513**

In Reply Refer To: 653/138

DATE: June 2, 2023

Ms. Lisa Sumption
State Historic Preservation Officer
Oregon Parks & Recreation Department
725 Summer Street NE, Suite C
Salem, Oregon 97301
Via email: ORSHPO.Clearance@oregon.gov

Re: Initiation of Consultation for Proposed Seismic and Functional Improvements of the Roseburg VAMC Campus, 913 NW Garden Valley Boulevard, Roseburg, Douglas County, Oregon

Dear SHPO Sumption,

The U.S. Department of Veterans Affairs (VA) Roseburg VA Health Care System (HCS) has identified functional and seismic deficiencies at the VA Medical Center (VAMC) in Roseburg, Douglas County, Oregon (Figure 1). The functional issues have resulted in a loss of operational efficiencies that have the potential to affect the delivery of healthcare to Veterans. To correct these issues, Roseburg VAHCS has proposed a series of renovation, demolition, and construction projects affecting buildings, the Ellipse, utilities, and roadways across the campus. The projects generally fall into one of the six categories: seismic retrofits, functional corrections, renovations, parking, infrastructure & utilities, and preparation for a State Veterans Home. Schedules for these actions are tied to availability of funds, weather, and functional dependencies (i.e., renovation of a building cannot start until swing space is available in another campus building under construction). All schedule information is subject to change.

Implementation of the component projects of the proposed Undertaking is anticipated to take as much as ten years. Preliminary designs have been initiated for some projects but cannot be started for others pending availability of funds. Adverse effects of the proposed Undertaking therefore cannot be fully determined at this time. To meet its obligations under the National Historic Preservation Act (NHPA) and 36 CFR Part 800, Roseburg VAHCS proposes to consult to develop a programmatic agreement (PA) to establish a process for assessment of adverse effects and avoid, minimize, or mitigate adverse effects, when identified.

Roseburg VAHCS currently is consulting on the proposed rehabilitation of Building 3 to correct seismic issues and modify the interior for administrative use. The rehabilitation of Building 3 is an independent undertaking with a separate construction timeline and is not a subject of the proposed Undertaking for seismic and functional improvements across the Roseburg VAMC campus.

Definition of the Undertaking

The proposed undertaking is defined as seismic and functional improvements to the Roseburg VAMC campus (Figure 2). Anticipated projects of the Undertaking include, but are not limited to:

- Construction of an approximately 165,000 DSQFT medical building (Building 100) up to four stories in height east of the Ellipse. The building would consolidate clinical departments, improve patient care, and improve workplace conditions from the existing Building 1.
 - Construction of approximately 425 surface parking spaces north, east, and south of Building 100 to support the parking needs of the building.
 - Prior to Building 100 becoming fully operational, the determination of the future utilization of the vacated Building 1 will be carefully assessed by VA. The disposition process for the building will include potential adaptive reuse, transfer to another agency or private entity, or if no viable use can be determined possible demolition. However, any final decision will be determined at the appropriate time following the published process in the VA Real Property Disposal Guide that prioritizes reuse/adaptation/transfer before consideration of other options.

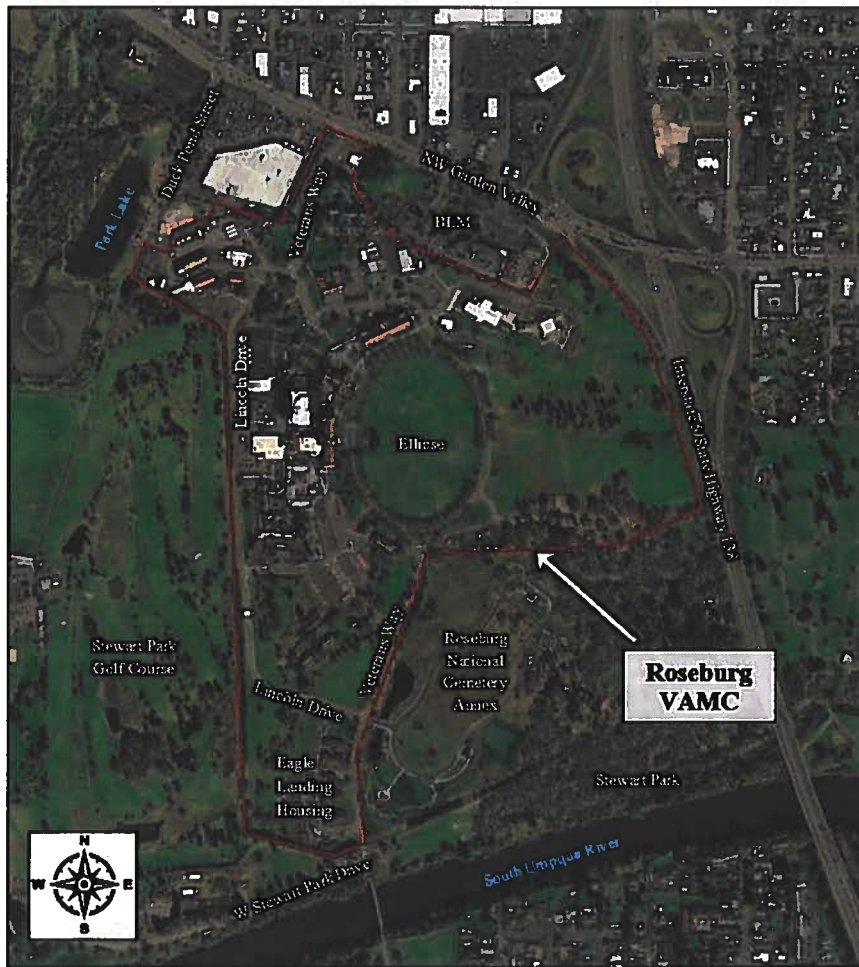


Figure 1 - Roseburg VAMC Campus

- Depending on the disposition of Building 1, demolition of Building 60 (392 BGSF electrical utility building) and Building 84 (1,121 BGSF MRI building). These buildings are located adjacent to and support Building 1.
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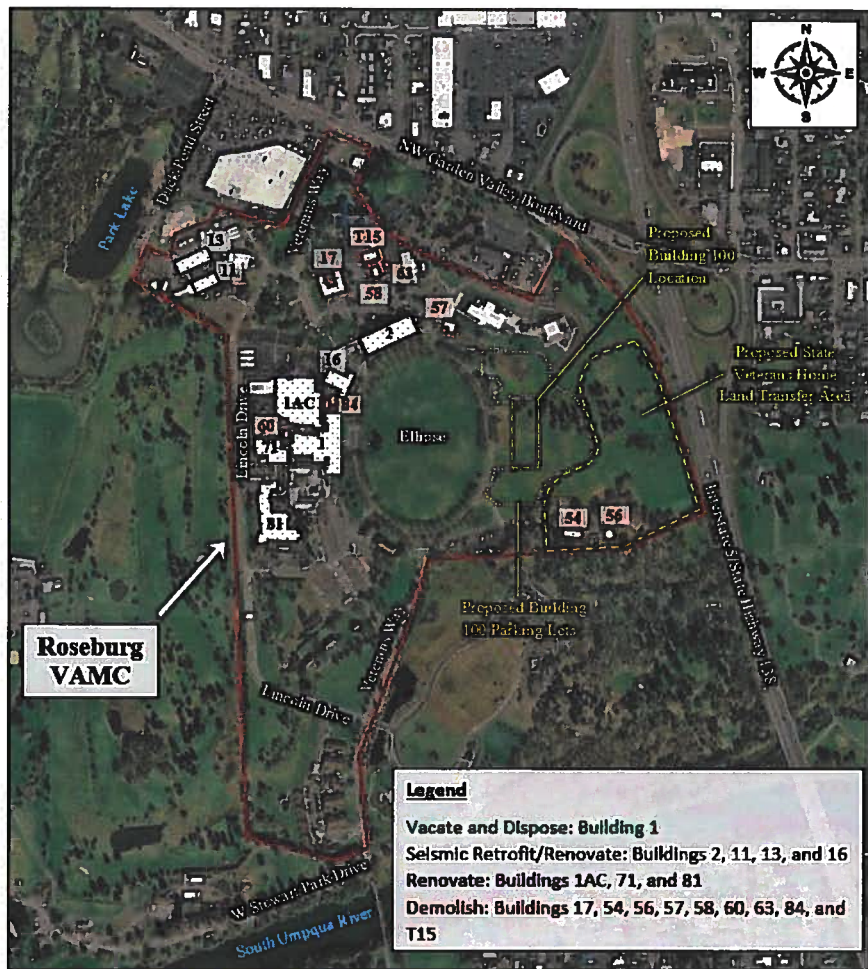


Figure 2 - Proposed Component Projects of the Undertaking

Delineation of the Area of Potential Effects

Roseburg VAHCS has delineated the campus boundaries plus the National Cemetery Annex as the Area of Potential Effects (APE) to accommodate potential utility and infrastructure projects and potential viewshed changes. The APE is indicated by shading in Figure 3. This APE is large enough to address construction up to five stories in height.

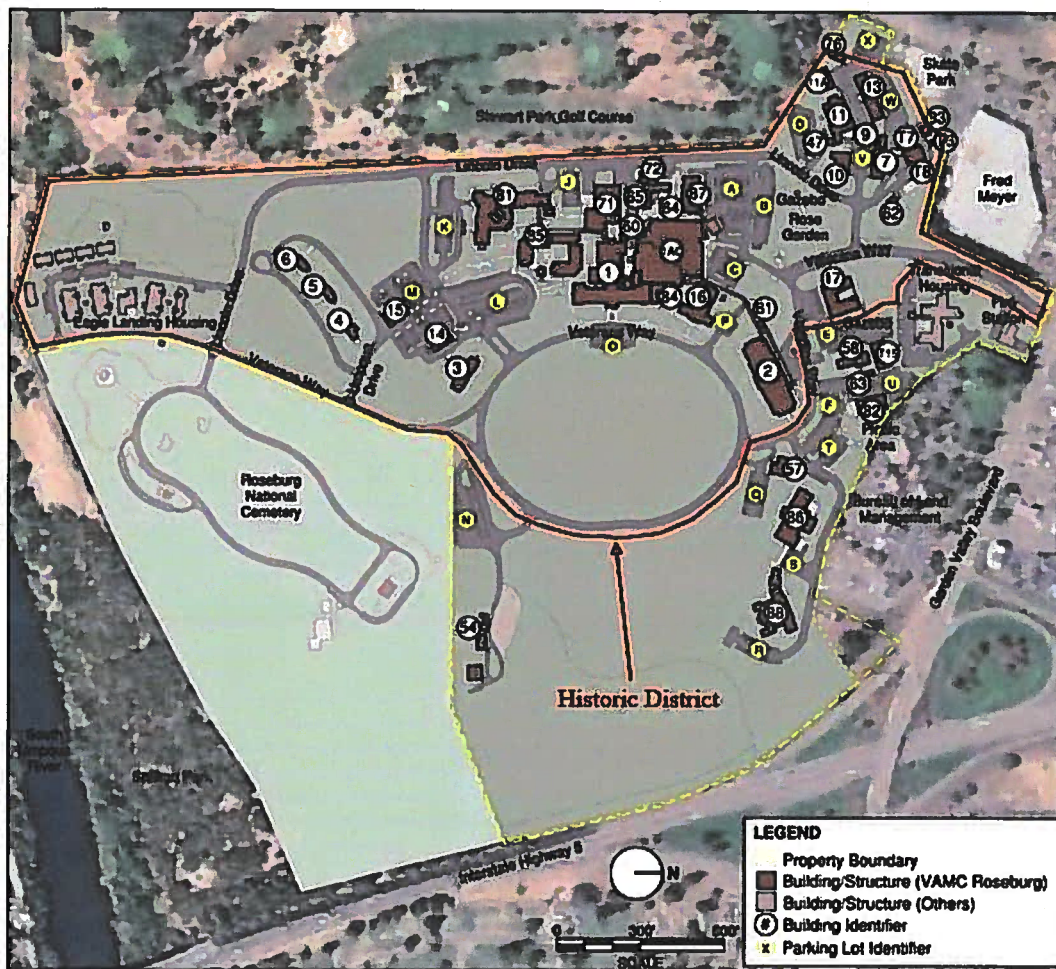


Figure 3 - Area of Potential Effects

Identification of Historic Properties

Two historic built resources are located within the APE: the Roseburg Veterans Administration Hospital Historic District and the Roseburg National Cemetery Annex. Photos are included as an attachment.

- Roseburg Veterans Administration Hospital Historic District:** The Roseburg Veterans Administration Hospital Historic District was added to the National Register of Historic Places in 2013. It was determined eligible under Criterion A: *Politics/Government* and *Health/Medicine* and under Criterion C: *Architecture*. Its Period of Significance extends from 1932, with initiation of construction of the campus, through 1950. The Historic District included 24 contributing resources and 19 non-contributing resources when nominated; it currently contains 23 contributing and 31 non-contributing resources. The boundaries of the Historic District are not contiguous and include most of the western portion of the campus, the Stewart Park Bridge, and the Roseburg National Cemetery. The list of contributing resources includes buildings, the Ellipse, landscaping efforts, and the Roseburg National Cemetery. The National Register nomination notes that most of the building interiors have lost integrity due to changing standards in medical care, but that the exterior of the buildings retain a high degree of integrity.
- Roseburg National Cemetery Annex:** All National Cemeteries, regardless of age, are eligible for inclusion in the National Register of Historic Places. The [Roseburg National Cemetery](#) is addressed 1770 West Harvard Avenue; this property is not part of the Roseburg VAMC campus and is not within the APE, however, the National Cemetery Administration expanded the existing Roseburg National Cemetery in 2011 adjacent to the Roseburg VAMC campus with construction of the Roseburg National Cemetery Annex. The Annex is located within the APE. The Annex, as part of

the contributing Roseburg National Cemetery, is therefore both a contributing resource to the RVAHHD and eligible for individual listing in the National Register as part of the Roseburg National Cemetery.

The Roseburg VAMC campus holds potential for identification of prehistoric and historic archaeological features that may meet the requirements of 36 CFR § 60.4. No Traditional Cultural Properties have been identified within the APE.

Determination of Adverse Effects

Although some component projects of the Undertaking are defined, most lack design plans and therefore cannot be fully analyzed at this time. The National Park Services defines rehabilitation as “the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.” Construction actions that meet the Secretary of the Interior’s *Standards for Rehabilitation* are not adverse. Until design plans are finalized, it is not known if rehabilitation is feasible.

- Roseburg Veterans Administration Hospital Historic District - Building 1, 2, 3, 13, 16, and 17 and the campus roadway system are contributing resources proposed for modification or demolition as part of the Undertaking. Other contributing resources may be needed as swing space. Additionally, the proposed construction has the potential to interrupt existing viewsheds.
 - Building 1 – The range of effects to Building 1 cannot be fully assessed until plans for disposition, including potential adaptive reuses, transfers, or demolition, are known. Plans for disposition would be in accordance with VA protocols. The lobby of Building 1 retains original details and design.
 - Building 2 – Plans for Building 2 are not yet complete. The interior of Building 2 lacks integrity. It is assumed the design plans will meet the definition of rehabilitation; however, effects cannot be fully analyzed at the time.
 - Building 16 – The entry lobby and auditorium of Building 16 retain original decorative details. Plans for Building 16 are not yet complete. The full range of effects cannot be fully assessed at this time.
 - Building 17 – The building is proposed for demolition. Demolition of a contributing resource is an adverse effect.
 - Campus Roadway System – Plans for changes to campus roadways are not yet complete. The full range of effects cannot be fully assessed at this time.
 - The full range of plans for swing space are not complete at this time and would be developed as construction progresses, subject to funding availability and campus operations. Existing buildings may be utilized, or temporary buildings and structures may be installed on any campus greenspace or parking lots. The full range of effects cannot be fully assessed at this time.
 - Existing viewsheds could be modified by the demolition or exterior renovation of contributing resources. The construction of Building 100 east of the historic district also could affect viewsheds within the APE. Full analysis of changes to the viewsheds cannot be completed until design plans are developed.
 - The demolition of non-contributing resources within the historic district or buildings outside the historic district boundaries would not adversely affect the Roseburg Veterans Administration Hospital Historic District. Interior renovation of non-contributing resources within the historic district or buildings outside the district boundaries also would not affect the Roseburg Veterans Administration Hospital Historic District.
- Roseburg National Cemetery Annex - No changes or modifications are anticipated to the Roseburg National Cemetery Annex.

- Potential Archaeological Deposits - The demolition of existing buildings; the removal, upgrade, and/or installation of utility corridors; and the construction of buildings and structures have the potential to adversely affect as-yet unidentified archaeological deposits.

Therefore, as the full range of effects cannot be determined at this time, Roseburg VAHCS proposes to develop a PA through consultation pursuant to 36 CFR § 800.14. Roseburg VAHCS requests your comments on the APE, list of identified historic properties, and determination of adverse effects to those properties within the APE, as well as our proposal to develop a PA.

Public Involvement

Pursuant to 36 CFR § 800.2(d), Roseburg VAHCS intends to provide information to the public and seek comments on the Undertaking, through social media posts, newspaper advertisements, and public meetings held in compliance with the National Environmental Policy Act (NEPA). Roseburg VAHCS also will provide the public opportunity to review the draft Environmental Assessment.

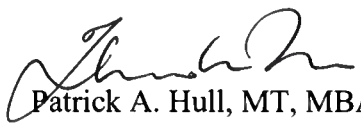
Potential Consulting Parties

Roseburg VAHCS has invited the following Tribes, agencies, and organizations to participate in consultation: Advisory Council on Historic Preservation; Burns Paiute Tribe; Confederated Tribes of Siletz Indians of Oregon; Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians; Confederated Tribes of the Grand Ronde Community of Oregon; Confederated Tribes of the Warm Springs Reservation of Oregon; Confederated Tribes of the Umatilla Indian Reservation; Coquille Indian Tribe; Cow Creek Band of Umpqua Tribe of Indians; Klamath Tribes; Oregon State Historic Preservation Office; Douglas County Historic Resource Review Committee; Douglas County Historical Society; Restore Oregon; Roseburg Certified Local Government; the State of Oregon Department of Veterans Affairs; and the Patrick W. Kelley (VFW) Post 2468 & Auxiliary. Roseburg VAHCS requests that you email Kevin Prescott, Projects Chief, at the address below by June 20, 2023, if you have additional suggestions for invited Consulting Parties so there is sufficient time for consideration and outreach.

Roseburg VAHCS will host a consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects on June 28, 2023. Please respond to Kevin.Prescott@va.gov with your availability by June 20, 2023. Roseburg VAHCS also intends to hold NEPA public meetings that week.

Thank you for your attention to this matter. Please contact Mr. Prescott if you have any questions or require any additional information.

Sincerely,

 (for)
Patrick A. Hull, MT, MBA
Executive Director, SES
Roseburg VA Health Care System

cc: Héctor M. Abreu-Cintrón, Acting VA Federal Preservation Officer
Mark Rodgers, Roseburg VAHCS



APPENDIX A

SUPPLEMENTAL PHOTOS WITH CONTRIBUTING STATUS TO THE ROSEBURG VA NATIONAL
REGISTER HISTORIC DISTRICT INDICATED

Roseburg VAMC
Roseburg, Douglas County, Oregon



Figure 1 - Building 1 (contributing resource), date unknown. Photo in the collection of the Roseburg VAMC.



Figure 3 - Building 1AC at rear of Building 1



Figure 2 - East elevation of Building 1



Figure 4 - Roof of Building 1

Roseburg VAMC
Roseburg, Douglas County, Oregon



Figure 5 - Lobby of Building 1



Figure 6 - Elevator bay at first floor of Building 1

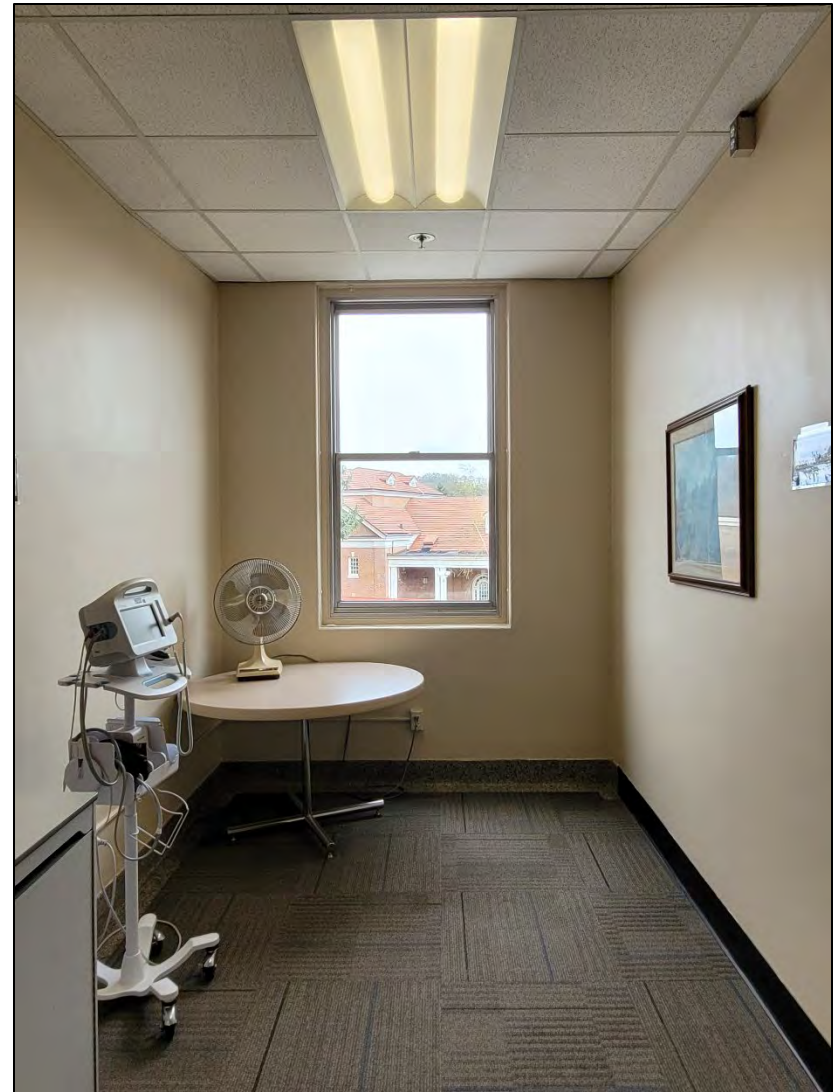


Figure 7 - Typical interior space of Building 1

Roseburg VAMC
Roseburg, Douglas County, Oregon



Figure 8 - Building 2 (contributing resource), 1933. Photo in the collection of the Roseburg VAMC.



Figure 9 – South elevation of Building 2



Figure 10 – North elevation Building 11 (non-contributing)



Figure 11 - South elevation of Building 13 (contributing resource)

Roseburg VAMC
Roseburg, Douglas County, Oregon



Figure 12 - Southwest elevation of Building 16 (contributing resource), date unknown. Photo in the collection of the Douglas County Museum.



Figure 13 - Southeast elevation of Building 16



Figure 14 - Stairwell in entry lobby of Building 16



Figure 15 - Auditorium in Building 16

Roseburg VAMC
Roseburg, Douglas County, Oregon



Figure 16 - Auditorium in Building 16



Figure 17 – Oblique of south and east elevations of Building 17 (contributing resource)



Figure 18 - Oblique of west and north elevations of Building 54 (outside NRHD)



Figure 19 - South elevation of Building 57 (outside NRHD)

Roseburg VAMC
Roseburg, Douglas County, Oregon



Figure 20 - South elevation of Building 58 (outside NRHD)



Figure 22 - East elevation of Building 85 (non-contributing resource)



Figure 21 - South elevation of Building 63 (outside NRHD)



Figure 23 - South elevation of Building T15 (outside NRHD)

Roseburg VAMC
Roseburg, Douglas County, Oregon



Figure 24 - Structure 56 (outside NRHD)



Figure 26 - Building 1 (right) at Ellipse (left) with flag pole (center) (all three contributing resources)



Figure 25 - Proposed location of Building 100 with proposed land transfer parcel in background (outside NRHD)



**Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form
*MS Word format***

Send to: *e106@achp.gov*

Please review the instructions at www.achp.gov/e106-email-form prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.

I. Basic information

1. Purpose of notification. Indicate whether this documentation is to:

- ☒ Notify the ACHP of a finding that an undertaking may adversely affect historic properties
- ☒ Invite the ACHP to participate in a Section 106 consultation
- ☒ Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
- ☐ Supply additional documentation for a case already entered into the ACHP record system
- ☐ File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
- ☐ Other, please describe

[Click here to enter text.](#)

2. ACHP Project Number (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): [Click here to enter text.](#)

3. Name of federal agency (If multiple agencies, list them all and indicate whether one is the lead agency):

U.S. Department of Veterans Affairs (VA) Roseburg VA Health Care System

4. Name of undertaking/project (Include project/permit/application number if applicable):

Seismic and Functional Improvements to the Roseburg VA Medical Center

5. Location of undertaking (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

913 NW Garden Valley Boulevard, Roseburg, Douglas County, Oregon

No Tribal lands

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 ☐ Washington, DC 20001-2637

Phone: 202-517-0200 ☐ Fax: 202-517-6381 ☐ achp@achp.gov ☐ www.achp.gov

6. Name and title of federal agency official and contact person for this undertaking, including email address and phone number:

Kevin Prescott, Projects Chief

Kevin.Prescott@va.gov / (541) 440-1371

II. Information on the Undertaking*

7. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

This Undertaking involves various component projects, including seismic retrofits, renovations/rehabilitations, demolitions, construction, a land transfer, and vacation and disposition of Building 1. See letter for details.

8. Describe the Area of Potential Effects (APE):

The whole of the Roseburg VAMC campus plus the adjacent Roseburg National Cemetery Annex.

9. Describe steps taken to identify historic properties:

The campus contains a NRHP-listed historic district. Most of the campus was surveyed archaeologically ca. 2010-2014.

10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

Roseburg Veterans Administration Hospital Historic District

Potential for archaeological resources

11. Describe the undertaking's effects on historic properties:

Full range of effects cannot be determined at this time.

12. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

See letter.

13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

This is the initiation of consultation, so no responses have yet been received.

III. Additional Information

14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation. Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

- Oregon SHPO
- Local American Legion post – Al.oregon.post16@gmail.com
- Burns Paiute Tribe – Charisse.soucic@burnspaiute-nsn.gov
- Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians – ckrossman@ctclusi.org
- Confederated Tribes of the Grand Ronde Community of Oregon – David.harrelson@grandronde.org
- Confederated Tribes of the Warm Springs Reservation of Oregon – robert.brunoe@ctwsbnr.org
- Confederated Tribes of Siletz Indians of Oregon – dpigsley@msn.com
- Confederated Tribes of the Umatilla Indian Reservation – careyMiller@ctuir.org
- Coquille Indian Tribe – KassandraRippee@coquilletribe.org
- Cow Creek Band of Umpqua Tribe of Indians – jjohnson@cowcreek.com
- Douglas County Historic Resource Review Committee – planning@co.douglas.or.us
- Douglas County Historical Society – dchs.oregon@gmail.com
- Klamath Tribes – perry.chocktoot@klamathtribes.com
- Oregon Department of Veterans Affairs – kelly.fitzpatrick@odva.oregon.gov
- Restore Oregon – info@restoreoregon.org
- Roseburg CLG – cstevens@cityofroseburg.org
- Local VFW post - Vfw2468@hotmail.com

15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

VAMC website - <https://www.va.gov/roseburg-health-care/>
 VAMC Facebook - <https://www.facebook.com/VARoseburg>

16. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:

No.

The following are attached to this form (check all that apply):

- ☒ Section 106 consultation correspondence

- ☒ Maps, photographs, drawings, and/or plans
- ☐ Additional historic property information
- ☐ Consulting party list with known contact information
- ☐ Other: [Click here to enter text.](#)



**DEPARTMENT OF VETERANS AFFAIRS
ROSEBURG VA HEALTH CARE SYSTEM
913 NW Garden Valley Blvd.
Roseburg, Oregon 97471-6513**

In Reply Refer To: **653/138**

DATE: June 2, 2023

Mr. Reid Nelson
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, District of Columbia 20001
Via email: e106@achp.gov

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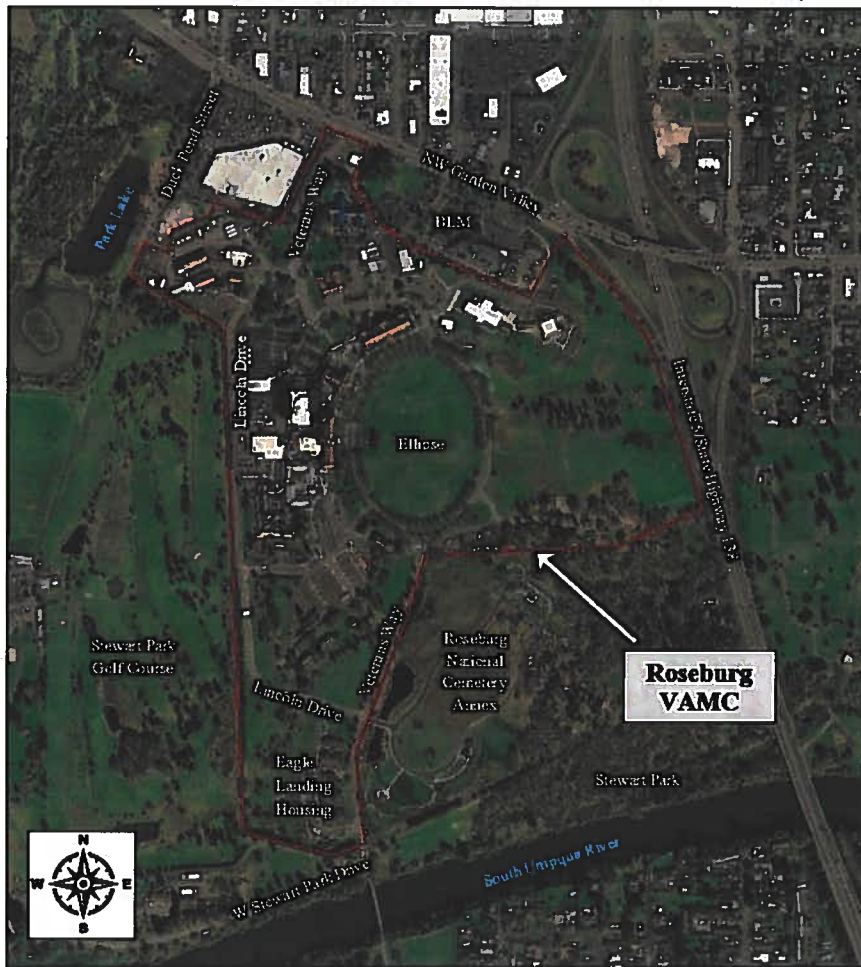


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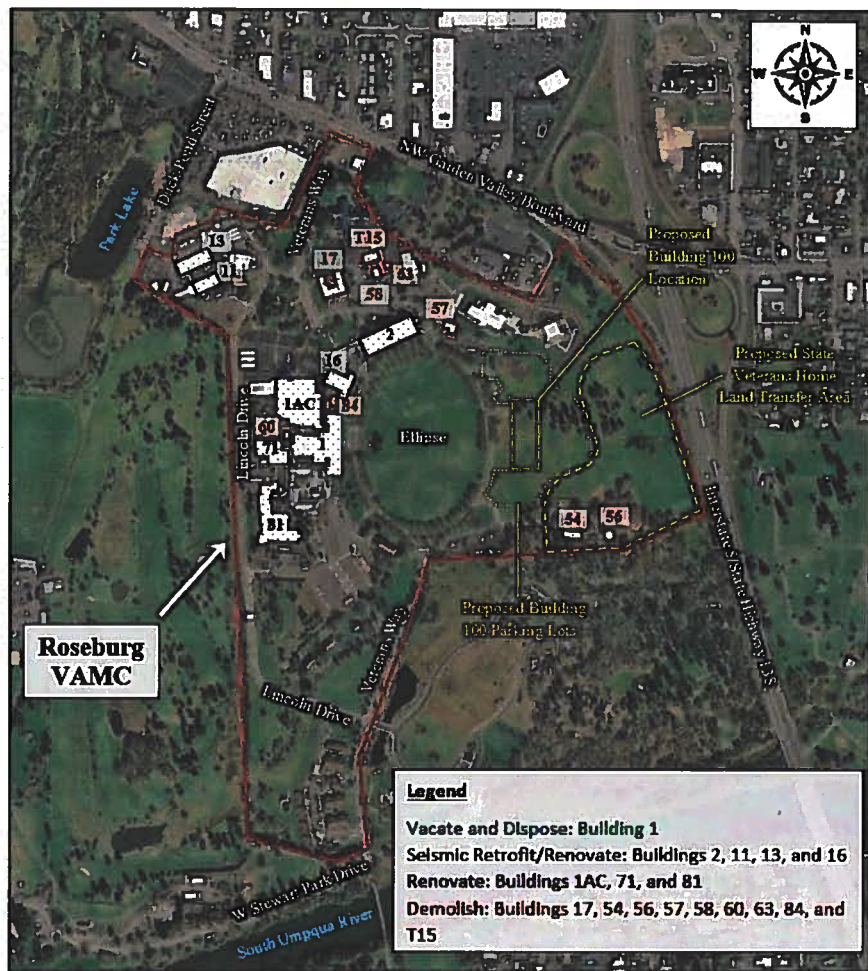


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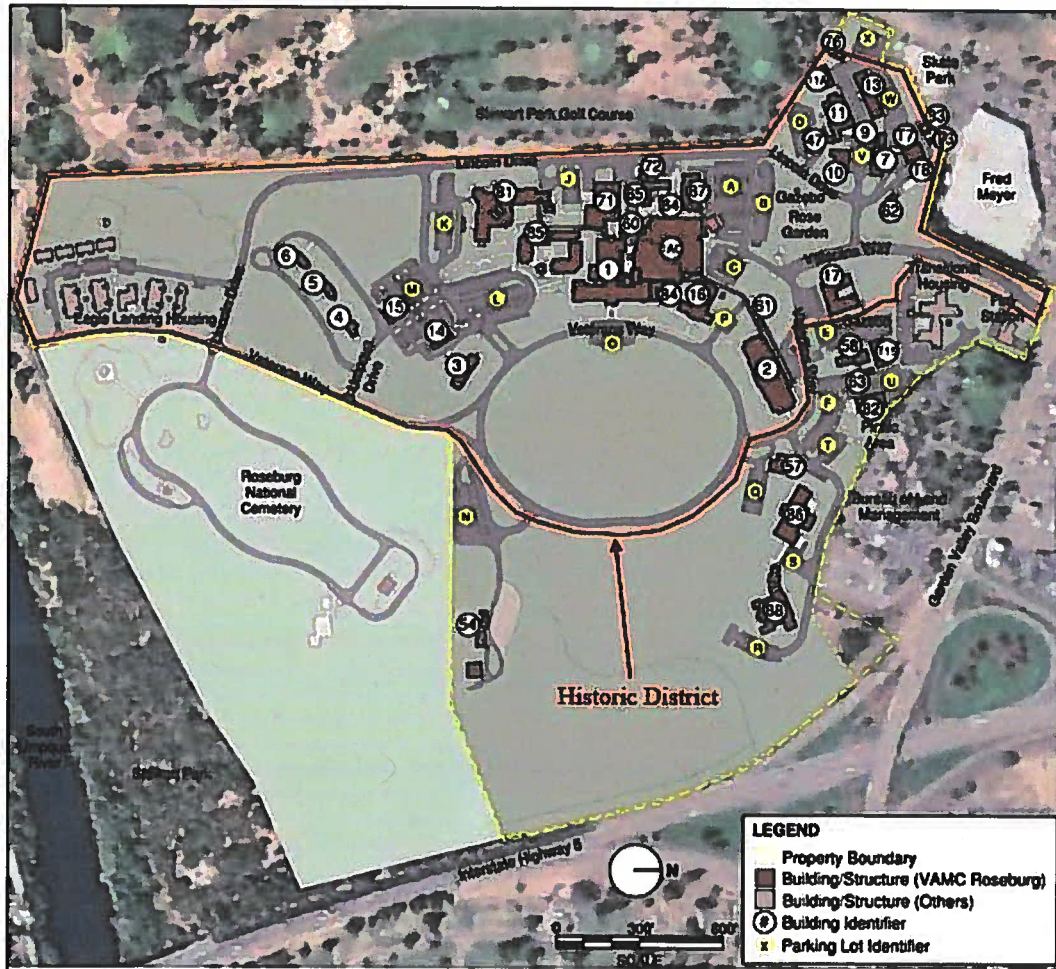


Figure 3 - Area of Potential Effects

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Determination of Adverse Effects

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- Roseburg Veterans Administration Hospital Historic District - Building 1, 2, 3, 13, 16, and 17 and the campus roadway system are contributing resources proposed for modification or demolition as part of the Undertaking. Other contributing resources may be needed as swing space. Additionally, the proposed construction has the potential to interrupt existing viewsheds.
 - Building 1 – The range of effects to Building 1 cannot be fully assessed until plans for disposition, including potential adaptive reuses, transfers, or demolition, are known. Plans for disposition would be in accordance with VA protocols. The lobby of Building 1 retains original details and design.
 - Building 2 – Plans for Building 2 are not yet complete. The interior of Building 2 lacks integrity. It is assumed the design plans will meet the definition of rehabilitation; however, effects cannot be fully analyzed at the time.
 - Building 16 – The entry lobby and auditorium of Building 16 retain original decorative details. Plans for Building 16 are not yet complete. The full range of effects cannot be fully assessed at this time.
 - Building 17 – The building is proposed for demolition. Demolition of a contributing resource is an adverse effect.
 - Campus Roadway System – Plans for changes to campus roadways are not yet complete. The full range of effects cannot be fully assessed at this time.
 - The full range of plans for swing space are not complete at this time and would be developed as construction progresses, subject to funding availability and campus operations. Existing buildings may be utilized, or temporary buildings and structures may be installed on any campus greenspace or parking lots. The full range of effects cannot be fully assessed at this time.
 - Existing viewsheds could be modified by the demolition or exterior renovation of contributing resources. The construction of Building 100 east of the historic district also could affect viewsheds within the APE. Full analysis of changes to the viewsheds cannot be completed until design plans are developed.
 - The demolition of non-contributing resources within the historic district or buildings outside the historic district boundaries would not adversely affect the Roseburg Veterans Administration Hospital Historic District. Interior renovation of non-contributing resources within the historic district or buildings outside the district boundaries also would not affect the Roseburg Veterans Administration Hospital Historic District.
- Roseburg National Cemetery Annex - No changes or modifications are anticipated to the Roseburg National Cemetery Annex.

- Potential Archaeological Deposits - The demolition of existing buildings; the removal, upgrade, and/or installation of utility corridors; and the construction of buildings and structures have the potential to adversely affect as-yet unidentified archaeological deposits.

Therefore, as the full range of effects cannot be determined at this time, Roseburg VAHCS proposes to develop a PA through consultation pursuant to 36 CFR § 800.14. Roseburg VAHCS requests your comments on the APE, list of identified historic properties, and determination of adverse effects to those properties within the APE, as well as our proposal to develop a PA.

Public Involvement

Pursuant to 36 CFR § 800.2(d), Roseburg VAHCS intends to provide information to the public and seek comments on the Undertaking, through social media posts, newspaper advertisements, and public meetings held in compliance with the National Environmental Policy Act (NEPA). Roseburg VAHCS also will provide the public opportunity to review the draft Environmental Assessment.

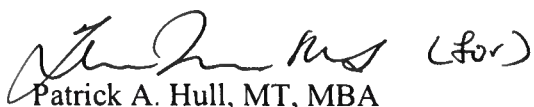
Potential Consulting Parties

Roseburg VAHCS has invited the following Tribes, agencies, and organizations to participate in consultation: Advisory Council on Historic Preservation; Burns Paiute Tribe; Confederated Tribes of Siletz Indians of Oregon; Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians; Confederated Tribes of the Grand Ronde Community of Oregon; Confederated Tribes of the Warm Springs Reservation of Oregon; Confederated Tribes of the Umatilla Indian Reservation; Coquille Indian Tribe; Cow Creek Band of Umpqua Tribe of Indians; Klamath Tribes; Oregon State Historic Preservation Office; Douglas County Historic Resource Review Committee; Douglas County Historical Society; Restore Oregon; Roseburg Certified Local Government; the State of Oregon Department of Veterans Affairs; and the Patrick W. Kelley (VFW) Post 2468 & Auxiliary. Roseburg VAHCS requests that you email Kevin Prescott, Projects Chief, at the address below by June 20, 2023, if you have additional suggestions for invited Consulting Parties so there is sufficient time for consideration and outreach.

Roseburg VAHCS will host a consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects on June 28, 2023. Please respond to Kevin.Prescott@va.gov with your availability by June 20, 2023. Roseburg VAHCS also intends to hold NEPA public meetings that week.

Thank you for your attention to this matter. Please contact Mr. Prescott if you have any questions or require any additional information.

Sincerely,



Patrick A. Hull, MT, MBA
Executive Director, SES
Roseburg VA Health Care System

cc: Héctor M. Abreu-Cintrón, Acting VA Federal Preservation Officer
Mark Rodgers, Roseburg VAHCS



**DEPARTMENT OF VETERANS AFFAIRS
ROSEBURG VA HEALTH CARE SYSTEM
913 NW Garden Valley Blvd.
Roseburg, Oregon 97471-6513**

In Reply Refer To: **653/138**

DATE: June 2, 2023

Jeremy Johnson
Tribal Historic Preservation Officer
Cow Creek Band of Umpqua Tribe of Indians
2371 NE Stephens Street, Suite 100
Roseburg, Oregon 97470
Via email: jjohnson@cowcreek.com

Re: Initiation of Consultation for Proposed Seismic and Functional Improvements of the Roseburg VAMC Campus, 913 NW Garden Valley Boulevard, Roseburg, Douglas County, Oregon

Dear THPO Johnson,

The U.S. Department of Veterans Affairs (VA) Roseburg VA Health Care System (HCS) has identified functional and seismic deficiencies at the VA Medical Center (VAMC) in Roseburg, Douglas County, Oregon (Figure 1). The functional issues have resulted in a loss of operational efficiencies that have the potential to affect the delivery of healthcare to Veterans. To correct these issues, Roseburg VAHCS has proposed a series of renovation, demolition, and construction projects affecting buildings, the Ellipse, utilities, and roadways across the campus. The projects generally fall into one of the six categories: seismic retrofits, functional corrections, renovations, parking, infrastructure & utilities, and preparation for a State Veterans Home. Schedules for these actions are tied to availability of funds, weather, and functional dependencies (i.e., renovation of a building cannot start until swing space is available in another campus building under construction). All schedule information is subject to change.

Implementation of the component projects of the proposed Undertaking is anticipated to take as much as ten years. Preliminary designs have been initiated for some projects but cannot be started for others pending availability of funds. Adverse effects of the proposed Undertaking therefore cannot be fully determined at this time. To meet its obligations under the National Historic Preservation Act (NHPA) and 36 CFR Part 800, Roseburg VAHCS proposes to consult to develop a programmatic agreement (PA) to establish a process for assessment of adverse effects and avoid, minimize, or mitigate adverse effects, when identified.

Roseburg VAHCS currently is consulting on the proposed rehabilitation of Building 3 to correct seismic issues and modify the interior for administrative use. The rehabilitation of Building 3 is an independent undertaking with a separate construction timeline and is not a subject of the proposed Undertaking for seismic and functional improvements across the Roseburg VAMC campus.

Definition of the Undertaking

The proposed undertaking is defined as seismic and functional improvements to the Roseburg VAMC campus (Figure 2). Anticipated projects of the Undertaking include, but are not limited to:

- Construction of an approximately 165,000 DSQFT medical building (Building 100) up to four stories in height east of the Ellipse. The building would consolidate clinical departments, improve patient care, and improve workplace conditions from the existing Building 1.
 - Construction of approximately 425 surface parking spaces north, east, and south of Building 100 to support the parking needs of the building.
 - Prior to Building 100 becoming fully operational, the determination of the future utilization of the vacated Building 1 will be carefully assessed by VA. The disposition process for the building will include potential adaptive reuse, transfer to another agency or private entity, or if no viable use can be determined possible demolition. However, any final decision will be determined at the appropriate time following the published process in the VA Real Property Disposal Guide that prioritizes reuse/adaptation/transfer before consideration of other options.

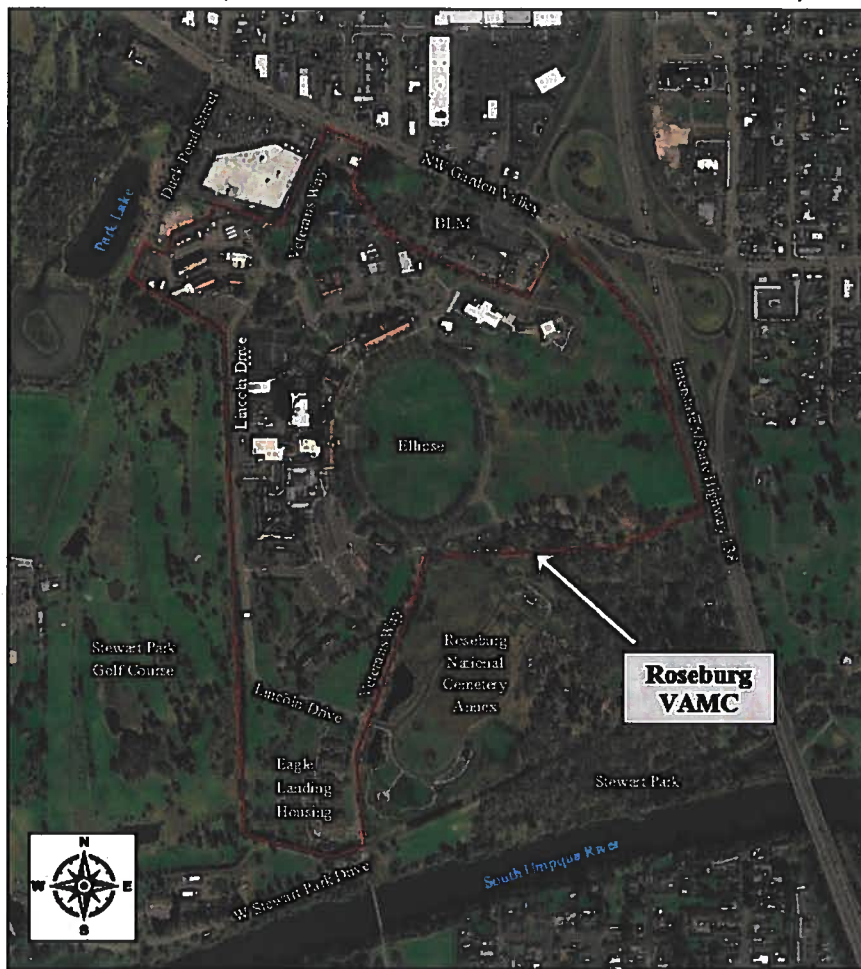


Figure 1 - Roseburg VAMC Campus

- Depending on the disposition of Building 1, demolition of Building 60 (392 BGSF electrical utility building) and Building 84 (1,121 BGSF MRI building). These buildings are located adjacent to and support Building 1.
- Seismic retrofit and renovation or rehabilitation of Building 2 (approximately 74,474 BGSF). Retrofitting would include the demolition of the interior of the building and the installation of the structural upgrades and new mechanical systems to the building interior. It is anticipated that little or no exterior modification would be required. Following the completion of the upgrades, the building interior would be renovated or rehabilitated to meet the operational needs of the building.
- Seismic retrofit and renovation or rehabilitation of Buildings 11 (laundry), 13 (warehouse), and 16 (chapel/auditorium). These retrofits are anticipated to include demolition of the interiors of the buildings, the installation of shear walls and other interior improvements, and interior renovation. Following renovation or rehabilitation, the buildings would be returned to their current uses.
- Renovation of the vacated clinical space of the ambulatory care/outpatient clinic building (Building 1AC) for an approximately 30-bed Community Living Center (CLC) facility.
- Renovation of the interior and addition of a wing to a CLC building (Building 81). The addition would result in approximately 7 additional CLC beds.
- Renovation of the interior of Building 71 (Patient Food & Nutrition/Canteen building)
- Demolition of Buildings 17, 57, 58, 63, and T15, totaling approximately 20,969 BGSF, to allow for improved site access and parking.
- Demolition of a golf shack (Building 54) and open-air structure (Structure 56).
- Rebalancing of existing surface parking lots at the campus. Existing parking lots would likely be used for construction contractor parking and material storage and/or temporary swing space for the Proposed Action construction.
- Construction and/or realignment of campus roads to provide access to proposed Building 100, the future State Veterans Home, and other campus buildings. Veterans Way would be extended (reconnected) from the northern campus entrance between Buildings 2 and 16 to the road circling the Ellipse, which would lead to new roads serving Building 100 and the State Veterans Home. Other campus road modifications may also be constructed to improve traffic flow and pedestrian safety.
- Infrastructure upgrades to support the proposed development, including installing, relocating, and removing campus utilities, as necessary, based on the final designs.
- Transfer of approximately 14 acres of land located in the eastern portion of the campus to the State of Oregon for the future construction of a State Veterans Home. Based on preliminary information provided by Oregon Department of Veterans Affairs, it is anticipated that the State Veterans Home would include several connected, single-story buildings totaling approximately 130,000 BGSF and would include approximately 150 beds.

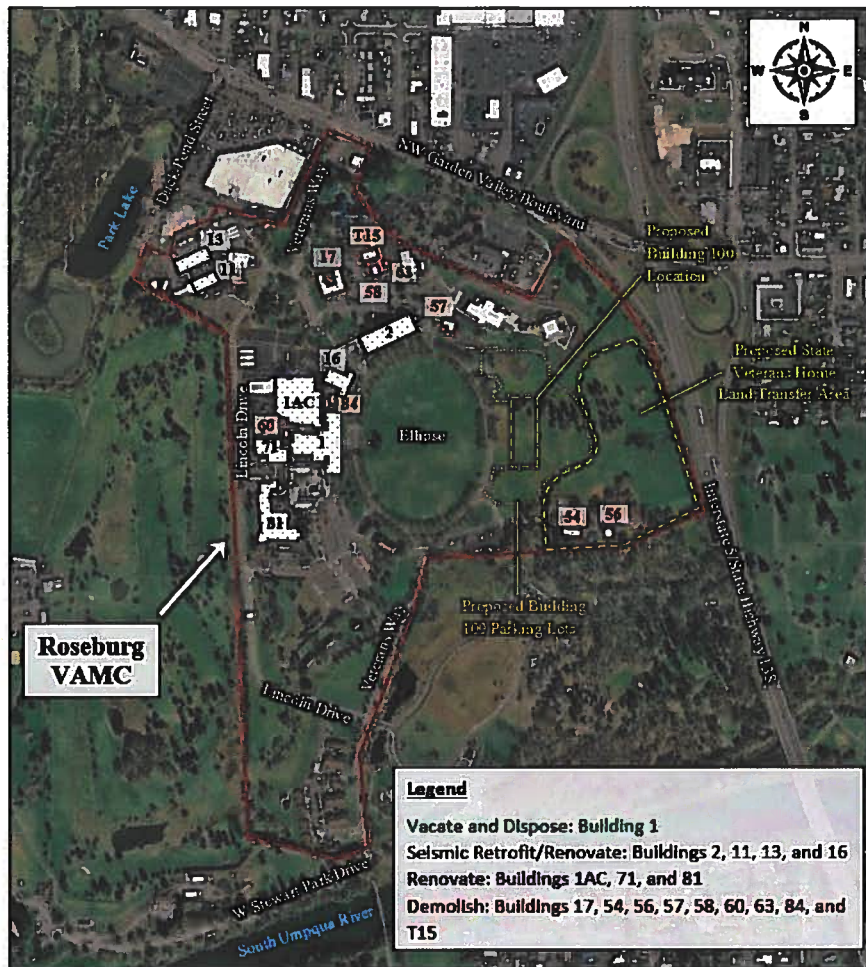


Figure 2 - Proposed Component Projects of the Undertaking

Delineation of the Area of Potential Effects

Roseburg VAHCS has delineated the campus boundaries plus the National Cemetery Annex as the Area of Potential Effects (APE) to accommodate potential utility and infrastructure projects and potential viewshed changes. The APE is indicated by shading in Figure 3. This APE is large enough to address construction up to five stories in height.

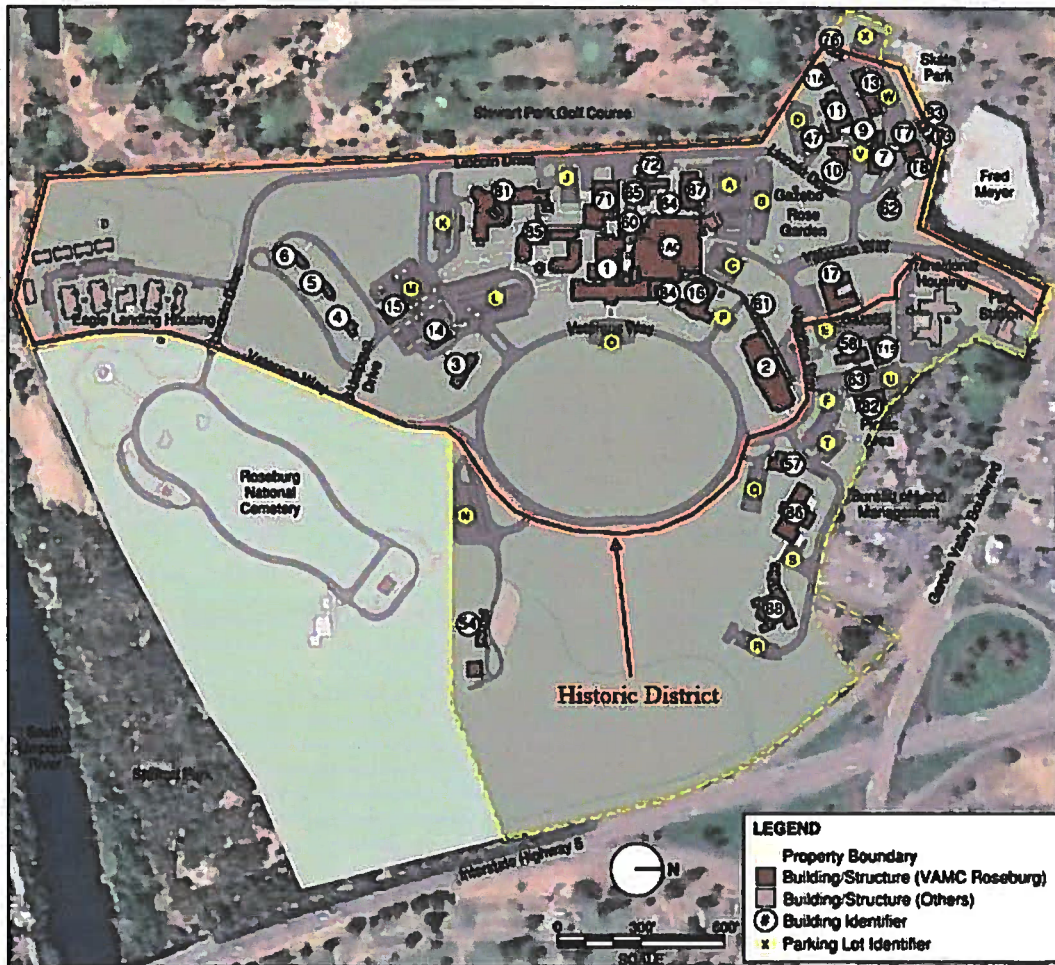


Figure 3 - Area of Potential Effects

Identification of Historic Properties

Two historic built resources are located within the APE: the Roseburg Veterans Administration Hospital Historic District and the Roseburg National Cemetery Annex. Photos are included as an attachment.

- Roseburg Veterans Administration Hospital Historic District:** The Roseburg Veterans Administration Hospital Historic District was added to the National Register of Historic Places in 2013. It was determined eligible under Criterion A: *Politics/Government* and *Health/Medicine* and under Criterion C: *Architecture*. Its Period of Significance extends from 1932, with initiation of construction of the campus, through 1950. The Historic District included 24 contributing resources and 19 non-contributing resources when nominated; it currently contains 23 contributing and 31 non-contributing resources. The boundaries of the Historic District are not contiguous and include most of the western portion of the campus, the Stewart Park Bridge, and the Roseburg National Cemetery. The list of contributing resources includes buildings, the Ellipse, landscaping efforts, and the Roseburg National Cemetery. The National Register nomination notes that most of the building interiors have lost integrity due to changing standards in medical care, but that the exterior of the buildings retain a high degree of integrity.
- Roseburg National Cemetery Annex:** All National Cemeteries, regardless of age, are eligible for inclusion in the National Register of Historic Places. The [Roseburg National Cemetery](#) is addressed 1770 West Harvard Avenue; this property is not part of the Roseburg VAMC campus and is not within the APE, however, the National Cemetery Administration expanded the existing Roseburg National Cemetery in 2011 adjacent to the Roseburg VAMC campus with construction of the Roseburg National Cemetery Annex. The Annex is located within the APE. The Annex, as part of

the contributing Roseburg National Cemetery, is therefore both a contributing resource to the RVAHHD and eligible for individual listing in the National Register as part of the Roseburg National Cemetery.

The Roseburg VAMC campus holds potential for identification of prehistoric and historic archaeological features that may meet the requirements of 36 CFR § 60.4. No Traditional Cultural Properties have been identified within the APE.

Determination of Adverse Effects

Although some component projects of the Undertaking are defined, most lack design plans and therefore cannot be fully analyzed at this time. The National Park Services defines rehabilitation as “the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.” Construction actions that meet the Secretary of the Interior’s *Standards for Rehabilitation* are not adverse. Until design plans are finalized, it is not known if rehabilitation is feasible.

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Pursuant to 36 CFR § 800.2(d), Roseburg VAHCS intends to provide information to the public and seek comments on the Undertaking, through social media posts, newspaper advertisements, and public meetings held in compliance with the National Environmental Policy Act (NEPA). Roseburg VAHCS also will provide the public opportunity to review the draft Environmental Assessment.


Potential Consulting Parties

Roseburg VAHCS has invited the following Tribes, agencies, and organizations to participate in consultation: Advisory Council on Historic Preservation; Burns Paiute Tribe; Confederated Tribes of Siletz Indians of Oregon; Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians; Confederated Tribes of the Grand Ronde Community of Oregon; Confederated Tribes of the Warm Springs Reservation of Oregon; Confederated Tribes of the Umatilla Indian Reservation; Coquille Indian Tribe; Cow Creek Band of Umpqua Tribe of Indians; Klamath Tribes; Oregon State Historic Preservation Office; Douglas County Historic Resource Review Committee; Douglas County Historical Society; Restore Oregon; Roseburg Certified Local Government; the State of Oregon Department of Veterans Affairs; and the Patrick W. Kelley (VFW) Post 2468 & Auxiliary. Roseburg VAHCS requests that you email Kevin Prescott, Projects Chief, at the address below by June 20, 2023, if you have additional suggestions for invited Consulting Parties so there is sufficient time for consideration and outreach.

Roseburg VAHCS will host a consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects on June 28, 2023. Please respond to Kevin.Prescott@va.gov with your availability by June 20, 2023. Roseburg VAHCS also intends to hold NEPA public meetings that week.

Thank you for your attention to this matter. Please contact Mr. Prescott if you have any questions or require any additional information.

Sincerely,



Patrick A. Hull, MT, MBA
Executive Director, SES
Roseburg VA Health Care System

cc: Héctor M. Abreu-Cintrón, Acting VA Federal Preservation Officer
Mark Rodgers, Roseburg VAHCS

Hon. Sara C. Bronin
Chair

Jordan Tannenbaum
Vice Chairman

Reid J. Nelson
Executive Director



June 20, 2023

The Honorable Denis R. McDonough
Secretary Department of Veterans Affairs
810 Vermont Avenue, NW, Room 1000
Washington, DC 20420

Ref: *Seismic and Functional Improvements to the Roseburg VA Medical Center*
Roseburg, Douglas County, Oregon
ACHP Project Number: 019658

Dear Secretary McDonough:

In response to the recent notification by the U.S. Department of Veterans Affairs (VA), the Advisory Council on Historic Preservation (ACHP) will participate in consultation to develop a programmatic agreement (Agreement) for Section 106 responsibilities at the VA Medical Center in Roseburg, Oregon, in accordance with 36 CFR § 800.14(b)(2)(i). We are notifying you, as the head of the agency, of our decision to participate in consultation. By copy of this letter, we are also notifying the Executive Director of the VA Roseburg Health Care System Patrick Hull of this decision.

Our participation in this consultation will be handled by Vanessa Hanvey, who can be reached at (202) 517-0224 or via email at vhanvey@achp.gov. We look forward to working with your agency and other consulting parties to develop a program alternative that tailors the Section 106 review process to meet historic preservation goals and program needs.

Sincerely,

Reid J. Nelson
Executive Director



Oregon

Tina Kotek, Governor

Parks and Recreation Department

Oregon Heritage/
State Historic Preservation Office
725 Summer St. NE, Suite C
Salem, OR 97301-1266
(503) 986-0690
Fax (503) 986-0793
oregonheritage.org



913 NW Garden Valley Blvd.
Roseburg, OR 97471

RE: SHPO Case No. 23-0877

VA Roseburg Seismic & Functional Improvements to the Roseburg VAMC Campus
Various seismic retrofits and renovations, rehabilitations, demolitions, and construction activities
913 NW Garden Valley Boulevard, Roseburg

Dear Kevin Prescott:

Thank you for consulting on the undertaking referenced above and meeting with some of our staff recently to discuss the undertaking. We agree that the undertaking has a high likelihood to adversely effect historic properties and negotiation of a Programmatic agreement or Memorandum of Agreement is the best way to proceed. Our office offers the following recommendations for the VA to consider.

- Our office recommends a full archaeological inventory of the APE, there are several archaeological sites within or adjacent to the project area.
- Our office recommends a complete a TCP or ethnographic study of the APE
- We recommend you consult with all federally recognized tribes whose members have ties to the facility
- Additional consulting parties: Oregon Military Museum, Oregon Black Pioneers, Oregon Chinese Consolidated Benevolent Association, American Latino Veterans Association, and other cultural, non-place based, non-profit heritage organizations (such as, Women's veterans, LGBTQ veterans, Native American veterans, disabled veterans, etc. [<https://veterans.oregonstate.edu/veterans-diversity-partnership>]).

For your consideration we have attached Oregon SHPO's template MOA which may be helpful in developing the WHEREAS clauses and standard agreement document language. We look forward to working with the VA in the future on this undertaking. Please include both Jessica Gabriel and Jamie French as contacts for this project. Additional consultation regarding this case must be sent through Go Digital. In order to help us track the undertaking accurately, reference the SHPO case number above in all correspondence.

Sincerely,

Jamie French, M.A.
Assistant State Archaeologist
(503) 979-7580
Jamie.French@oprds.oregon.gov

From: Rob Clark
Sent: Monday, April 22, 2024 10:16 AM
To: Rob Clark
Subject: RE: Initiation of Consultation

From: Pippen, Vickie (ROS) <Vickie.Pippen@va.gov>
Sent: Thursday, June 8, 2023 9:20 AM
To: Rodgers, Mark W. <Mark.Rodgers@va.gov>
Subject: FW: Initiation of Consultation

For you to save if needed.

From: Planning Clerk1 <plnclerk1@co.douglas.or.us>
Sent: Thursday, June 8, 2023 9:18 AM
To: Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>
Cc: Pippen, Vickie (ROS) <Vickie.Pippen@va.gov>
Subject: [EXTERNAL] RE: Initiation of Consultation

Mr. Prescott and Ms. Pippen,

Thank you for the email and attachments related to your project.
Because your location is entirely within the Roseburg City Limits, the County has no jurisdiction.
Therefore, we will not be participating in your planning efforts.

Thank you for reaching out to us and good luck with your project.

Regards,
Kathy Wall



Kathy Wall | Senior Planner

Douglas County Courthouse | Room 106 | Justice Building | Roseburg, OR 97470
Phone: 541-440-4289 | Email: kzwall@co.douglas.or.us

From: Pippen, Vickie (ROS) <Vickie.Pippen@va.gov>
Sent: Tuesday, June 6, 2023 2:28 PM
To: PlanningWebEmail <planning@co.douglas.or.us>
Cc: Rodgers, Mark W. <Mark.Rodgers@va.gov>; Abreu, Hector M. <Hector.Abreu@va.gov>; Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>; Gerritsen, Curt A. (ROS) <Curt.Gerritsen@va.gov>
Subject: Initiation of Consultation

Dear, Judith Bacon

The U.S. Department of Veterans Affairs (VA) Health Care System at Roseburg, Oregon (Roseburg VAHCS), is initiating consultation under 54 U.S.C. § 306108 for functional and seismic improvements to the campus. Documentation is attached.

Roseburg VAHCS will host a consulting party meeting on June 28, 2023, to discuss the proposed Undertaking and the potential for adverse effects. Roseburg VAHCS will have in-person and webinar options for attendance.

Please RSVP to Kevin.Prescott@va.gov with your preferred method of attendance by June 20, 2023.

Thank you;

Vickie Pippen

ASA for FMS

Vickie.Pippen@va.gov

541-440-1000 EXT 43034

From: Pippen, Vickie (ROS) <Vickie.Pippen@va.gov>
Sent: Wednesday, September 6, 2023 4:53 PM
To: ORSHPO.Clearance@oregon.gov
Cc: GABRIEL Jessica OPRD; JOHNSON Ian OPRD; Rodgers, Mark W.; Prescott, Kevin J. (ROS); Gerritsen, Curt A. (ROS); Abreu, Hector M.; am.legion.post.16@gmail.com; Charisse Soucie; Courtney Krossman; David.harrelson@grandronde.org; robert.brunoe@ctwsbnr.org; Delores Pigsley; Carey Miller; dchs.oregon@gmail.com; Perry Chocktoot; FITZPATRICK Kelly ODVA; Vfw2468@hotmail.com; les.anderson@klamathtribes.com; Vanessa Hanvey; scowie@cityofroseburg.org; info@restoreoregon.org; KassandraRippee@coquilletribe.org; jjohnson@cowcreek.com; jamie.french@opr.oregon.gov
Subject: Roseburg VAMC NHPA Consultant
Attachments: Roseburg VAMC_DRAFT PROGRAMMATIC AGREEMENT_2023.09.06.docx; 3_Component Project Form_Roseburg VAMC.docx; Distribution Information 8-31-2023 signed.pdf

CAUTION! This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear SHPO Sumpton,

Thank you for your continued participation in the consultation effort related to seismic and functional improvements at the Roseburg VAMC. Roseburg VAMC's response to your letter of July 2, 2023, is attached to this transmission.

Roseburg VAMC has produced a draft PA for Consulting Party review (attached). Please submit any suggested language or notes for the draft PA to Kevin Prescott at Kevin.Prescott@va.gov by September 29, 2023. Roseburg VAMC proposes hosting a Consulting Party meeting via webinar on October 12, 2023, to review comments and discuss proposed language. Please confirm attendance and preferred times and subsequently an invite with call-in information and time confirmation will be sent prior to said meeting. As stated in the June 28, 2023, meeting, Roseburg VAMC seeks to execute the PA this fall to meet its proposed construction schedule and improve services for Veterans.

Please contact Mr. Prescott if you have any questions or require any additional information.

Thank you.

Thank you;
Vickie Pippen
ASA for FMS
Vickie.Pippen@va.gov
541-440-1000 EXT 43034



**DEPARTMENT OF VETERANS AFFAIRS
ROSEBURG HEALTHCARE SYSTEM
913 NW Garden Valley Blvd.
Roseburg, Oregon 97471-6513**

In Reply Refer To: **653/138**

Date, August 30, 2023

Lisa Sumpton
State Historic Preservation Officer
Oregon Parks & Recreation Department
725 Summer Street NE, Suite C
Salem, Oregon 97301

RE: SHPO Case No. 23-0877

Seismic and Functional Improvements to the Roseburg VAMC Campus, 913 NW Garden Valley Boulevard, Roseburg, Douglas County, Oregon

Dear SHPO Sumpton,

Thank you for your office's letter dated July 3, 2023, regarding recommendations concerning the referenced undertaking at the Roseburg VAMC and your concurrence with the identification of historic built resources and the potential of the campus to contain intact archaeological deposits, the preliminary assessment of adverse effects, and the proposal to develop a programmatic agreement (PA). In addition, your letter made four recommendations: two about additional identification efforts and two about public outreach. The following is VA's response to these recommendations. This letter also includes a redefinition of the Undertaking and an update concerning the potential for adaptive reuse of Building 1, if VA determines the building is excess to its needs.

Identification Efforts

Your office recommended a "full archaeological inventory of the APE." Investigations of the Roseburg VAMC in 2009, 2010, and 2013¹ did not identify any sites meeting the requirements of 36 CFR § 60.4. Roseburg VAMC stated in its consultation initiation letter and in the subsequent Consulting Party meeting held on June 28, 2023, that VA does recognize the potential of the Roseburg VAMC to retain archaeological deposits. As a practical alternative, the Roseburg VAMC proposes to not conduct investigations of areas of the campus that will not be subject to ground disturbance as a result of the Undertaking. However, Roseburg VAMC does recommend archaeological monitoring of undisturbed soils and/or buried site testing in advance of ground disturbance in areas where construction activities associated with the Undertaking will occur. Roseburg VAMC welcomes your review of archaeological procedures included in the draft PA.

¹ OR SHPO Report Nos. 22621, 23626, and 26072

Your office also recommended an ethnographic and/or Traditional Cultural Property (TCP) study of the APE. As of today, the Roseburg VAMC has never received a request from any Tribal nor cultural group to conduct traditional nor spiritual practices on the campus, with the exception of use of the sweat lodge (2019), when the Roseburg VAMC asked for representatives of Native American tribes to collaborate with campus employees to form an “Elder Council” to construct a sweat lodge on the grounds. The sweat lodge is located between Buildings 3 and 4 and today is used as a location where people may contemplate, meditate, worship, or pray. Subsequently, no Tribes nor cultural groups have responded to Roseburg VAMC’s requests to participate in consultation nor have any provided information identifying TCPs within the APE. Therefore, until such requests are made, Roseburg VAMC feels that a TCP study would not be beneficial at this time.

Public Outreach Efforts

Your office recommended that Roseburg VAMC consult with all federally recognized Tribes whose members have ties to the facility. As was noted in our letter of June 6, 2023, Roseburg VAMC has invited all federally recognized Native American and Indian Tribes with cultural and/or geographic affiliation to Douglas County to participate in consultation (list provided in June 6, 2023, letter initiating consultation). To date, Roseburg VAMC has not received any responses from Tribes.

Your office also recommended that Roseburg VAMC contact additional Veterans Service Organizations (VSOs), the Oregon Chinese Consolidated Benevolent Association, the Oregon Military Museum, and Oregon Black Pioneers about the Undertaking. On July 7, 2023, Roseburg VAMC sent a request for information to twelve VSOs and the three organizations referenced above with a requested response date of July 21, 2023. Although VA felt that these organizations did not meet the definition of a “consulting party” as described in 36 CFR § 800.2(c)(5), as members of the public, Roseburg VAMC requested their input and/or recommendations and comments on the proposed Undertaking, in accordance with 36 CFR § 800.2(d). To date, Roseburg VAMC has not received responses from any of these organizations.

Public consultation through the NEPA Process

On June 16, 2023, Roseburg VAMC initiated scoping under the National Environmental Policy Act (NEPA) for the Proposed Action (Undertaking). In accordance with NEPA and standard VA environmental compliance practices, VA posted a notice in *The News-Review*; posted a message on the Roseburg VAMC website and on the VA Environmental Program Office website; and sent emails to elected officials, state and local regulatory agencies, federally recognized Tribes, Veteran representatives of federally recognized Tribes, and campus stakeholders, including local VSOs. Roseburg VAMC also included notice in the VAMC employee newsletter. All notices included information about the Proposed Action and an invitation to participate in NEPA Scoping Meetings on June 28 and 29, 2023. In addition to this outreach, Roseburg VAMC announced the invitation to the NEPA Scoping Meeting on the campus overhead public announcement system on June 29, 2023. Participants in the NEPA Scoping Meetings expressed a concern about the disposition of Building 1 and an interest in maintaining the campus aesthetic in lieu of a “modern” design. Following the meeting, Roseburg VAMC left hard copies of the notice in the Building 1 lobby for public review. Roseburg VAMC requested all Scoping comments by July 20, 2023. To date, Roseburg VAMC has received four comments from the public concerning cultural and historic properties. The comments expressed support for a reuse of Building 1. The comments will be included in the NEPA documentation.

Consulting Parties

Concurrent with the June 6, 2023, invitation to your office, Roseburg VAMC invited the Advisory Council on Historic Preservation (ACHP), federally recognized Indian Tribes, the Roseburg Certified Local Government (CLG), the Oregon Department of Veterans Affairs (ODVA), and local Veterans Services Organizations (VSOs) to participate in consultation. To date, ACHP, ODVA, and the Roseburg CLG have accepted. Given their proposed role as a partner to operating a State Veterans Home in Roseburg, Roseburg VAMC has invited ODVA to sign the PA as an Invited Signatory. Roseburg VAMC is open to other parties signing the PA as Concurring Parties depending on the responsibilities the party accepts in the final PA.

Disposition of Building 1

Following the Consulting Party meeting held June 28, 2023, Roseburg VAMC received an email from ODVA requesting additional information related to the option to utilize Building 1 as a State Veterans Home. Roseburg VAMC is working with ODVA to answer these questions and explore this option if VA determines Building 1 will be vacated.

Definition of the Undertaking

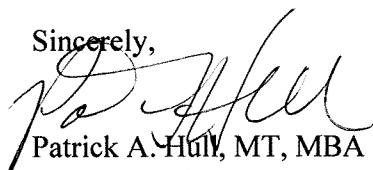
In August 2023, Roseburg VAMC was approved funding to demolish Building 54 and Structure 56 on an expedited track. These resources are located to the east of the Ellipse, outside the Roseburg Veterans Administration Hospital Historic District. VA has determined that neither meets the criteria for significance necessary for individual listing in the National Register of Historic Places. Therefore, VA has decided to eliminate these demolitions from the proposed Undertaking as defined in the draft PA and will initiate consultation separately with your office, Tribes, and other parties pursuant to 36 CFR Part 800. VA has determined that this reduction in the scope of the Undertaking will not alter the Area of Potential Effects (APE) nor the list of identified historic properties.

Next Steps

Roseburg VAMC has produced the attached draft PA for Consulting Party review. Please submit any suggested language or notes for the draft PA to Kevin Prescott at Kevin.Prescott@va.gov by September 29, 2023. Roseburg VAMC proposes hosting a Consulting Party meeting via webinar on October 12, 2023, to review comments and discuss proposed language. Please confirm attendance and preferred times and subsequently an invite with call-in information and time confirmation will be sent prior to said meeting. As stated in the June 28, 2023, meeting, Roseburg VAMC seeks to execute the PA this fall to meet its proposed construction schedule and improve services for Veterans.

Thank you for your attention to this matter. Please contact Mr. Prescott if you have any questions or require any additional information.

Sincerely,



Patrick A. Hull, MT, MBA
Executive Director, SES
Roseburg VA Health Care System

Cc: Héctor M. Abreu Cintrón, VA Historic Preservation Office
Kevin Prescott, Roseburg VAHCS

Vanessa Hanvey, ACHP
Jessica Gabriel, OR SHPO
Jamie French, OR SHPO



Oregon

Tina Kotek, Governor

Parks and Recreation Department

Oregon Heritage/
State Historic Preservation Office
725 Summer St. NE, Suite C
Salem, OR 97301-1266
(503) 986-0690
Fax (503) 986-0793
oregonheritage.org



913 NW Garden Valley Blvd.
Roseburg, OR 97471

RE: SHPO Case No. PA-207

VA Roseburg Seismic & Functional Improvements to the Roseburg VAMC Campus

PA for seismic work and improvements to the Roseburg campus

913 NW Garden Valley Boulevard, Roseburg, Douglas County

Dear Kevin Prescott:

Please find attached Oregon SHPO's comments on the Programmatic Agreement referenced above. If there are any questions our office will be happy to clarify either at the upcoming meeting or via email or phone.

Sincerely,

Jamie French, M.A.

Assistant State Archaeologist

(503) 979-7580

Jamie.French@oprds.oregon.gov

From: Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>
Sent: Friday, September 15, 2023 6:38 PM
To: Kelly Sellers Wittie; Abreu, Hector M.; Rob Clark
Subject: FW: Roseburg VAMC NHPA Consultation
Attachments: Roseburg VAMC NEPA Scoping 7.20.23.pdf

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Response from the City of Roseburg.

Kevin Prescott

Projects Chief, Facility Management Service
BSEET, FAC P/PM III, FAC-COR III, FE/C III
Office: (541) 440-1371
Cell: (541) 315-5483

From: Stuart I. Cowie <SCowie@cityofroseburg.org>
Sent: Friday, September 15, 2023 3:19 PM
To: Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>
Cc: VACO Environment <VACOEnvironment@va.gov>
Subject: [EXTERNAL] RE: Roseburg VAMC NHPA Consultation

Hi Kevin,

My name is Stuart Cowie. I am the Community Development Director for the City of Roseburg. We have been in contact with Bruce Mack, Environmental Program Coordinator with the Central Regional Office. We provided him with the attached letter concerning feedback and input involving the proposed VA projects. One of our primary concerns is a traffic impact study concerning the new development and how it will impact the surrounding area. We were pleased to receive an e-mail from Bruce indicating that an engineering firm was onboard and that a traffic study would be performed involving coordination with the City.

Thank you for identifying us as the Roseburg CLG on lines 85 and 86 with interest in participating in the consultation. The Roseburg CLG or Roseburg Historic Resource Review Commission, as they are more commonly referred to, meets monthly in order to review development proposals for structures located within one of the city's four historical areas for conformance with local historical requirements located with the Roseburg Municipal Code. The VA grounds one of these locations. In order to eliminate confusion could you refer to this group as the City of Roseburg Historic Resource Review Commission, rather than Roseburg CLG.

In addition, the City of Roseburg would respectfully request that we be added as a signatory to the PA. This would help to ensure the City's coordination in regard to the development. Nikki Messenger, City Manager could be listed as the individual who would sign on behalf of the City. Please let me know if this would be acceptable.

Thank you for allowing us to comment.

Sincerely,

Stuart Cowie | Community Development Director
900 SE Douglas Ave., Roseburg, OR 97470
541-492-6750
www.cityofroseburg.org

From: Pippen, Vickie (ROS) <Vickie.Pippen@va.gov>
Sent: Wednesday, September 6, 2023 2:04 PM
To: Stuart I. Cowie <SCowie@cityofroseburg.org>
Cc: Rodgers, Mark W. <Mark.Rodgers@va.gov>; Gerritsen, Curt A. (ROS) <Curt.Gerritsen@va.gov>; Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>; Abreu, Hector M. <Hector.Abreu@va.gov>
Subject: Roseburg VAMC NHPA Consultation

Dear Mr. Cowie,

Thank you for your continued participation in the consultation effort related to seismic and functional improvements at the Roseburg VAMC. Roseburg VAMC has produced a draft PA for Consulting Party review (attached). Please submit any suggested language or notes for the draft PA to Kevin Prescott at Kevin.Prescott@va.gov by September 29, 2023. Roseburg VAMC proposes hosting a Consulting Party meeting via webinar on October 12, 2023, to review comments and discuss proposed language. Please confirm attendance and preferred times and subsequently an invite with call-in information and time confirmation will be sent prior to said meeting. As stated in the June 28, 2023, meeting, Roseburg VAMC seeks to execute the PA this fall to meet its proposed construction schedule and improve services for Veterans.

Please contact Mr. Prescott if you have any questions or require any additional information.

Thank you.

Thank you;
Vickie Pippen
ASA for FMS
Vickie.Pippen@va.gov
541-440-1000 EXT 43034

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From: Kelly Sellers Wittie <kelly@row10hps.com>
Sent: Wednesday, September 27, 2023 2:19 PM
To: Rob Clark
Subject: FW: [External] Roseburg VAMC NHPA Consultation
Attachments: Roseburg VAMC_DRAFT PROGRAMMATIC AGREEMENT_2023.09.27_vh.docx

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KSW
Row 10 Historic Preservation Solutions, LLC

From: Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>
Sent: Wednesday, September 27, 2023 1:18 PM
To: Vanessa Hanvey <vhanvey@achp.gov>
Cc: Gerritsen, Curt A. (ROS) <Curt.Gerritsen@va.gov>; Rodgers, Mark W. <Mark.Rodgers@va.gov>; Abreu, Hector M. <hector.abreu@va.gov>; Kelly Sellers Wittie <kelly@row10hps.com>
Subject: RE: [External] Roseburg VAMC NHPA Consultation

Vanessa,

Thank you for your reply. We have received and will review your Draft PA edits.

Kevin Prescott

Projects Chief, Facility Management Service
BSEET, FAC P/PM III, FAC-COR III, FE/C III
Office: (541) 440-1371
Cell: (541) 315-5483

From: Vanessa Hanvey <vhanvey@achp.gov>
Sent: Wednesday, September 27, 2023 11:10 AM
To: Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>
Cc: Gerritsen, Curt A. (ROS) <Curt.Gerritsen@va.gov>; Rodgers, Mark W. <Mark.Rodgers@va.gov>; Abreu, Hector M. <Hector.Abreu@va.gov>
Subject: [EXTERNAL] Re: [External] Roseburg VAMC NHPA Consultation

Hello Mr. Prescott,

I have attached an edited version of the draft PA, which includes my suggestions and comments. In addition, I confirmed my attendance to the consulting parties meeting on October 12, 2023.

For your awareness, the ACHP's General Counsel will need to review a revised version of the PA before the ACHP agrees to sign. Given the breadth of this agreement document, they may suggest minor edits. With our current project load, I would expect their review to take approximately two weeks.

Please let me know if there is anything else you need prior to the consulting parties meeting!

Have a good day,
Vanessa N. Hanvey

Program Analyst and VA Liaison
Advisory Council on Historic Preservation
401 F Street NW, Suite 308, Washington, DC 20001
vhanvey@achp.gov
(202) 517-0224
Pronouns: she/her(s)



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@usachp – Twitter and Instagram

<https://www.youtube.com/channel/UChReeJ63BktsEqSidL396Ng>

From: Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>
Sent: Wednesday, September 6, 2023 3:51 PM
To: Vanessa Hanvey <vhanvey@achp.gov>
Cc: Gerritsen, Curt A. (ROS) <Curt.Gerritsen@va.gov>; Rodgers, Mark W. <Mark.Rodgers@va.gov>; Héctor M. Abreu-Cintrón, AIC PA <hector.abreu@va.gov>
Subject: [External] Roseburg VAMC NHPA Consultation

Dear Ms. Hanvey,

Thank you for your continued participation in the consultation effort related to seismic and functional improvements at the Roseburg VAMC. Roseburg VAMC's response to your letter of July 2, 2023, is attached to this transmission. Roseburg VAMC has produced a draft PA for Consulting Party review (attached). Please submit any suggested language or notes for the draft PA to Kevin Prescott at Kevin.Prescott@va.gov by September 29, 2023. Roseburg VAMC proposes hosting a Consulting Party meeting via webinar on October 12, 2023, to review comments and discuss proposed language. Please confirm attendance and preferred times and subsequently an invite with call-in information and time confirmation will be sent prior to said meeting. As stated in the June 28, 2023, meeting, Roseburg VAMC seeks to execute the PA this fall to meet its proposed construction schedule and improve services for Veterans.

Please contact Mr. Prescott if you have any questions or require any additional information.

Kevin Prescott

Projects Chief, Facility Management Service
BSEET, FAC P/PM III, FAC-COR III, FE/C III
Office: (541) 440-1371
Cell: (541) 315-5483

From: Pippen, Vickie (ROS) <Vickie.Pippen@va.gov>
Sent: Tuesday, November 28, 2023 6:02 PM
To: ORSHPO.Clearance@oregon.gov
Cc: jamie.french@opr.d.oregon.gov; GABRIEL Jessica OPRD; JOHNSON Ian OPRD; Rodgers, Mark W.; Prescott, Kevin J. (ROS); Gerritsen, Curt A. (ROS); Abreu, Hector M.; Davis, Robert F. (ROS); Mack, Bruce G. (CFM)
Subject: Roseburg Revised Draft PA 11-28-2023
Attachments: Component Project Form rev_Roseburg VAMC.docx; Roseburg VAMC_Programmatic Agreement_REV DRAFT_track changes_2023.11.27.pdf; Roseburg VAMC_Programmatic Agreement_REV DRAFT_clean_2023.11.27.docx

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Dear Mrs. Sumption,

VA is continuing consultation on the proposed seismic and functional improvements the Roseburg VAMC. VA distributed a draft programmatic agreement (PA) on September 6, 2023, for Consulting Party review and requested comments by September 29, 2023. Four parties – the Advisory Council on Historic Preservation (ACHP), the Oregon State Historic Preservation Office (OR SHPO), the Oregon Department of Veterans Affairs (ODVA), and the City of Roseburg Historic Resources Review Committee (HRRC) – submitted comments. VA hosted a meeting for all Consulting Parties on October 12, 2023. During the “live edit” of the draft during this meeting, VA recorded comments from the ACHP, the Klamath Tribes, the OR SHPO, and ODVA. VA re-opened the draft PA for additional comments for a week following the October 12th webinar but did not receive additional comments. VA spoke with the OR SHPO on November 1, 2023, to clarify their previous comments and recommendations.

Following consideration of all input, VA has produced a revised draft PA for Consulting Party review and requests comments on the revised draft PA by January 5, 2024. A copy of all comments received to date is attached for your convenience.

Thank you for your attention to this matter. Please contact Mr. Kevin Prescott at Kevin.Prescott@va.gov if you have any questions or require any additional information.

Thank you;
Vickie Pippen
ASA for FMS
Vickie.Pippen@va.gov
541-440-1000 EXT 43034



Oregon

Tina Kotek, Governor

Parks and Recreation Department

Oregon Heritage/
State Historic Preservation Office
725 Summer St. NE, Suite C
Salem, OR 97301-1266
(503) 986-0690
Fax (503) 986-0793
oregonheritage.org



913 NW Garden Valley Blvd.
Roseburg, OR 97471

RE: SHPO Case No. PA-207

VA Roseburg Seismic & Functional Improvements to the Roseburg VAMC Campus
PA for seismic work and improvements to the Roseburg campus
913 NW Garden Valley Boulevard, Roseburg, Douglas County

Dear Kevin Prescott:

Thank you for the opportunity to comment on the draft Programmatic Agreement (PA) regarding the seismic and functional improvements for the Roseburg VA Medical Center, Roseburg, Douglas Co., OR. The Oregon SHPO finds that the stipulations included in the PA provide appropriate mechanisms to address potential adverse effects on the Roseburg Veteran's Administration Hospital District.

The challenge of an undertaking such as what the VA proposes is that the agency is still determining what projects will be completed, when, and how they will be carried out. The Oregon SHPO believes including clear, specific administrative processes in the document can mitigate this uncertainty. We intend our comments here to address this need.

The following is a summary of the topics we believe are most important to address in the next draft of this document. Please see the marked draft for more information.

- The Oregon SHPO believes that the VA must re-evaluate the Roseburg Veteran's Administration Hospital District, update the National Register of Historic Places form, and submit it to the National Park Service as part of the proposed project. Our office included suggested language in Section III(e)(ii). The scope and scale of the project will have many physical impacts on the property, even those that are determined not to be adverse, and the nomination document itself will be 20 years old by the time the PA terminates. It is in the interest of all parties to have an accurate record for future undertakings.
- Please review the comments on the attached draft and edit the identified passages for specificity and clarity. We believe it is wise to remove as many potential questions as possible, considering the complex nature of the proposed undertaking.
- Please revise the document to address mitigating, monitoring, and documenting cumulative effects. Please include specific language addressing the appropriate alteration of existing buildings and the location, setback, massing, and materials for new construction.
- Consider including a whereas clause addressing continuing consultation with Native American Tribes. See the recommendation in the attached draft.

- In Section I, please define the PA's applicability more clearly.

- Consider providing Signatories and Consulting Parties an opportunity to request extensions in writing for VA's consideration for all processes. VA could add a provision to Section II, Administration, or another appropriate section that would apply to the entire document and eliminate the need to address this topic throughout, as would setting a standard 30-day review period for all documents. Allowing for flexibility in response times will ensure maximum participation and potentially limit conflicts. The VA would still be able to decline a request for an extension.

- Section III(c)(2)(b)(i), please provide the OR SHPO and consulting parties the opportunity to comment on the agency's redesign of proposed projects.

• The OR SHPO strongly recommends that the administrative clauses beginning with Section X be specific and include timelines for all processes to mitigate future conflicts as the VA carries out the undertaking. Attached is our template MOA developed from the ACHP's model document. Please consider using this language and modifying it as necessary.

- Please include a mechanism to add or remove projects from Appendix A without requiring a complete amendment, as Section XI describes.

- In Appendix D, please remove the demolition of non-contributing buildings from the list of "finding of no adverse effect." Demolishing non-contributing buildings constructed during the period of significance may still adversely affect the historic district when they are essential to understanding the original intent of the campus plan. Please see other comments throughout this section concerning questions regarding clarity and meaning.

- Appendix E, please add a blank to list projects to date and include an evaluation of cumulative effects to the Component Project Form. To identify for adverse effects, cumulative effects must be consistently monitored when an undertaking is not well-defined and takes place over a long period.

- The Oregon SHPO asks that the VA expand the list of potential mitigation measures in Attachment F to include more ambitious projects that address the total potential impact of the anticipated undertaking. Should all the proposed projects be carried out, the campus will lose the single most significant building, and the historic design of the campus will be severely diminished.

In our October 9th comments on the draft PA, our office noted an interest in discussing Sections 3 through 6 with the VA. However, with recent staff changes and absences, it is unclear if these discussions occurred. Comments throughout this section assume that VA would like to continue with the approach described in the prior draft. However, the SHPO sees great potential in more specifically addressing historic properties and including a list of best practices to guide future projects. SHPO is still open to further conversations about achieving the agency's goals through this approach if there is a desire to do so.

We hope that the U.S. Department of Veterans Affairs (VA) will find the following comments helpful, and we hope to bring consultation on this PA to a close soon.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ian P. Johnson", with a long horizontal flourish extending to the right.

Ian P. Johnson, M.A.

Associate Deputy SHPO

(971) 718-1137

ian.johnson@opr.d.oregon.gov

From: Prescott, Kevin J. (ROS) <Kevin.Prescott@va.gov>
Sent: Tuesday, February 27, 2024 3:56 PM
To: orshpo.clearance@oregon.gov; JOHNSON Ian * OPRD
Cc: Gerritsen, Curt A. (ROS); Rodgers, Mark W.; Mack, Bruce G. (CFM); Abreu, Hector M.
Subject: VA Roseburg - distribution of the final draft of the PA
Attachments: Component Project Form rev_Roseburg VAMC.docx; Roseburg VAMC_Programmatic Agreement_FINAL DRAFT_2024.02.26_clean.docx; Roseburg VAMC_Programmatic Agreement_REV DRAFT_2024.02.26_TC.docx

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The assigned SHPO Case Number is [PA-207](#)

SHPO Sumption,

VA has incorporated the edits into the attached final draft of the PA for the proposed undertaking to correct seismic and functional deficiencies at the Roseburg VAMC. There is a track changes version as well as a Clean version. Please make comments or edits on Clean version for ease of processing. VA would like to request that any final comments on the draft be submitted to Kevin.Prescott@va.gov by March 14th, 2024. VA will then review and respond to any final comments received and begin processing the PA for final execution.

Thank you for your assistance in achieving this important step, on this vital project for our Veterans. Please contact Mr. Kevin Prescott at Kevin.Prescott@va.gov if you have any questions or require any additional informaon.

Kevin Prescott

Projects Chief, Facility Management Service
BSEET, FAC P/PM III, FAC-COR III, FE/C III
Office: (541) 440-1371
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Oregon

Tina Kotek, Governor

Parks and Recreation Department

Oregon Heritage/
State Historic Preservation Office
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(503) 986-0690
Fax (503) 986-0793
oregonheritage.org



913 NW Garden Valley Blvd.
Roseburg, OR 97471

RE: SHPO Case No. PA-207

VA Roseburg Seismic & Functional Improvements to the Roseburg VAMC Campus
PA for seismic work and improvements to the Roseburg campus
913 NW Garden Valley Boulevard, Roseburg, Douglas County

Dear Kevin Prescott:

Thank you for your submission regarding the Programmatic Agreement referenced above. Attached please find our office comments on the proposed agreement.

Please address the above issues with a letter or new documentation and resubmit to our office via Go Digital. If you have not already done so, be sure to consult with all appropriate Native American tribes regarding the proposed undertaking. In order to help us track the undertaking accurately, reference the SHPO case number above in all correspondence.

Please contact our office if you have any questions, comments or need additional assistance.

Sincerely,

Jamie French, M.A.
Assistant State Archaeologist
(503) 979-7580
Jamie.French@oprds.oregon.gov

APPENDIX D - NHPA PROGRAMMATIC AGREEMENT

**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\(s\) with the assistance of the Legislative Commission on Indian Services \(LCIS\), the State Police, and the OR SHPO.](#)

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



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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

Date

**PROGRAMMATIC AGREEMENT
AMONG
THE U.S. DEPARTMENT OF VETERANS AFFAIRS ROSEBURG HEALTH CARE SYSTEM,
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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

696 **PROGRAMMATIC AGREEMENT**
697 **AMONG**
698 **THE U.S. DEPARTMENT OF VETERANS AFFAIRS ROSEBURG HEALTH CARE SYSTEM,**
699 **THE OREGON STATE HISTORIC PRESERVATION OFFICE,**
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701 **AND**
702 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,**
703 **REGARDING THE SEISMIC AND FUNCTIONAL IMPROVEMENT OF**
704 **THE ROSEBURG VA MEDICAL CENTER,**
705 **ROSEBURG, DOUGLAS COUNTY, OREGON**
706

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709 **CONCURRING PARTY:**

710 City of Roseburg Historic Resources Review Committee

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716 6-6-2024

717 Date

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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**

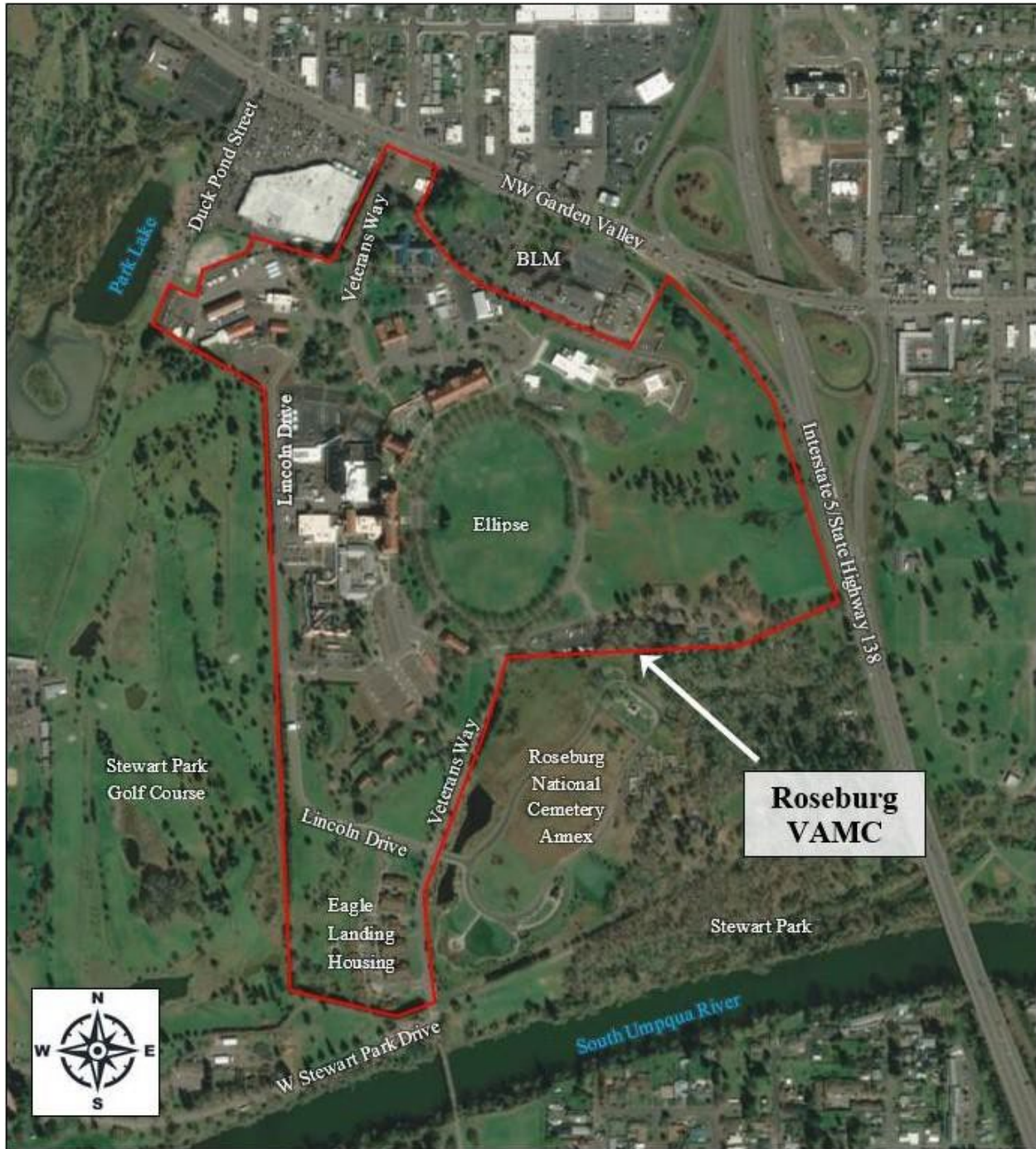


Figure 1 - Roseburg VAMC Campus

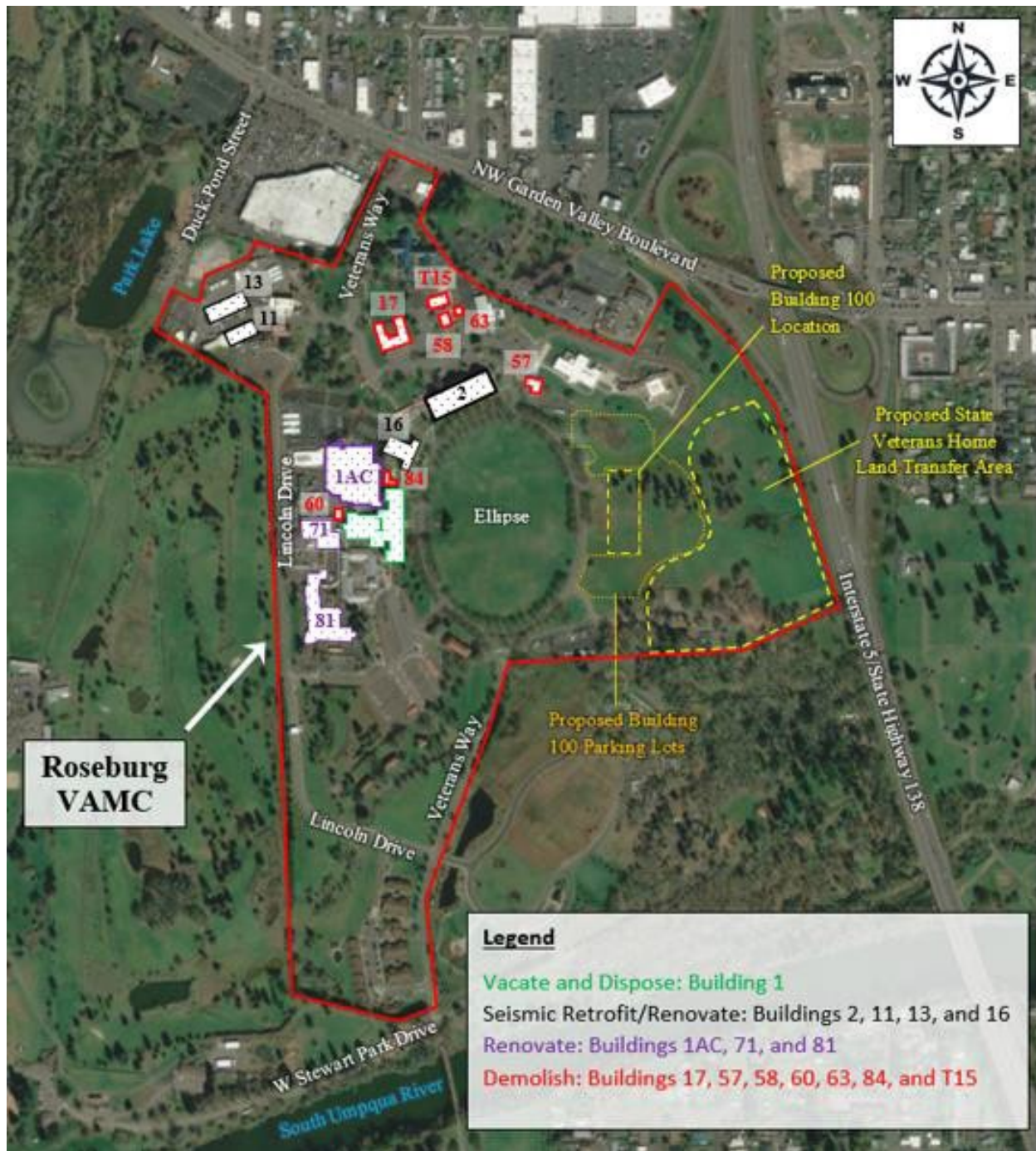


Figure 2 - Roseburg VAMC Campus with approximate locations of proposed component projects

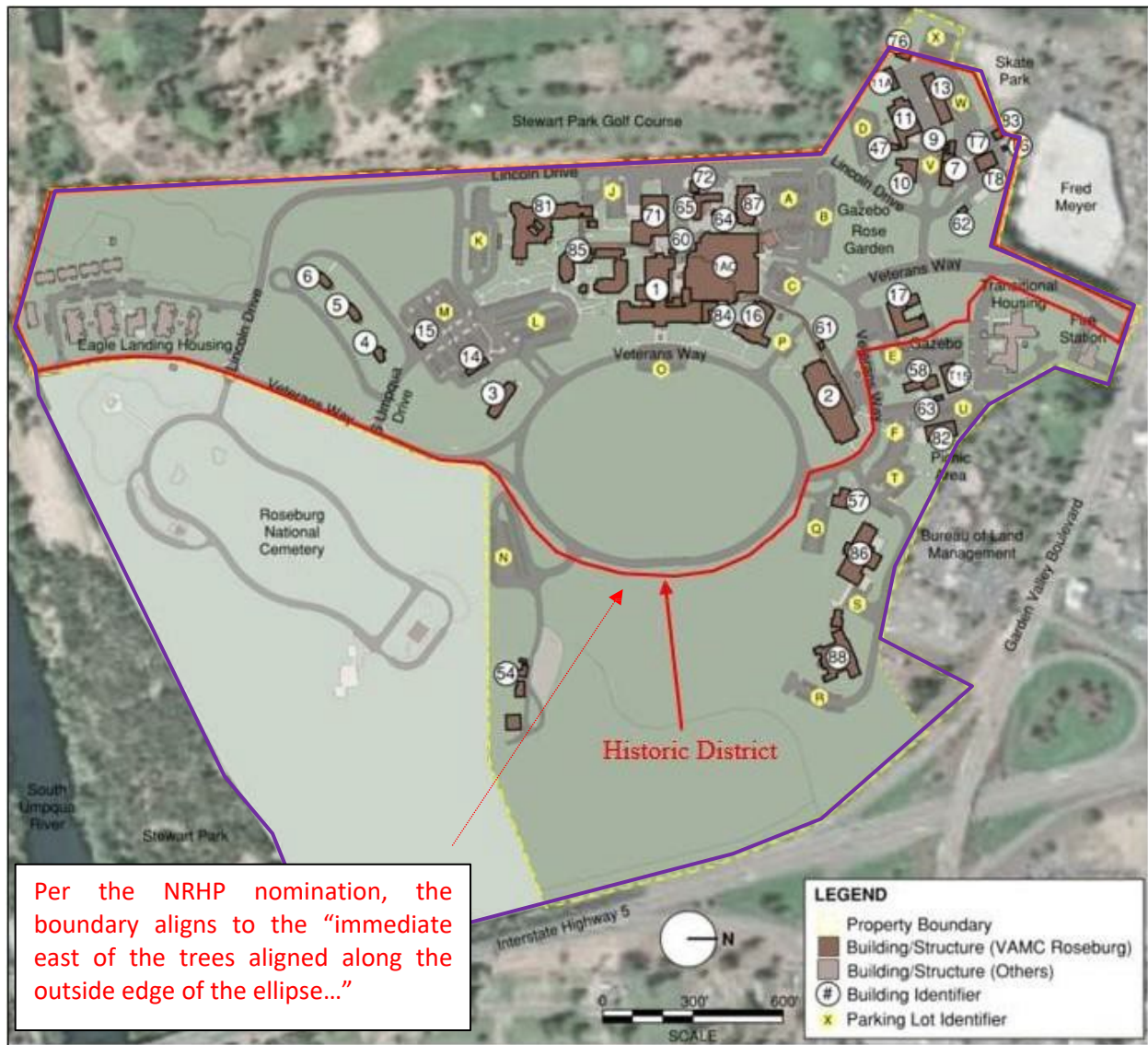


Figure 3 - Area of Potential Effects (APE) indicated in purple

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

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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

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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.

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ATTACHMENT E: COMPONENT PROJECT FORM

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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,
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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.](#)

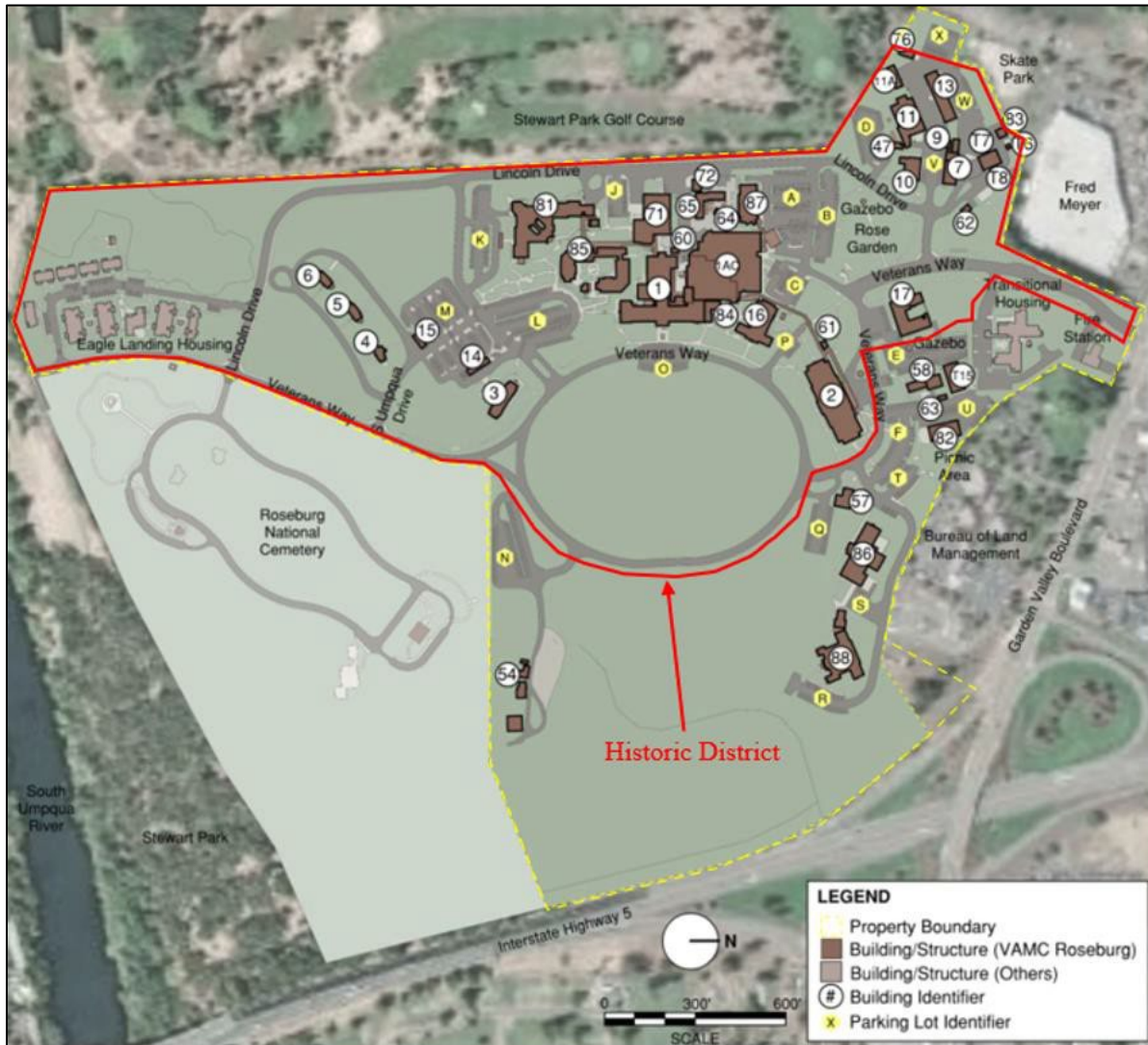
4. FINDING OF EFFECT

- ☐ 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

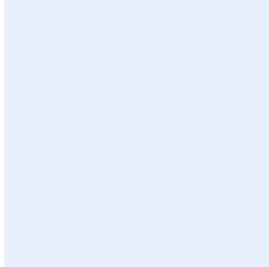
Component Projects to Date:

Component Project	Determination of Effect with Dates	Status

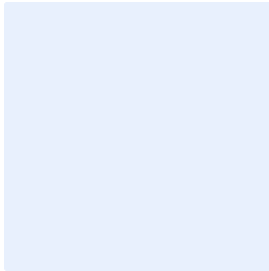
COMPONENT PROJECT REVIEW FORM

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

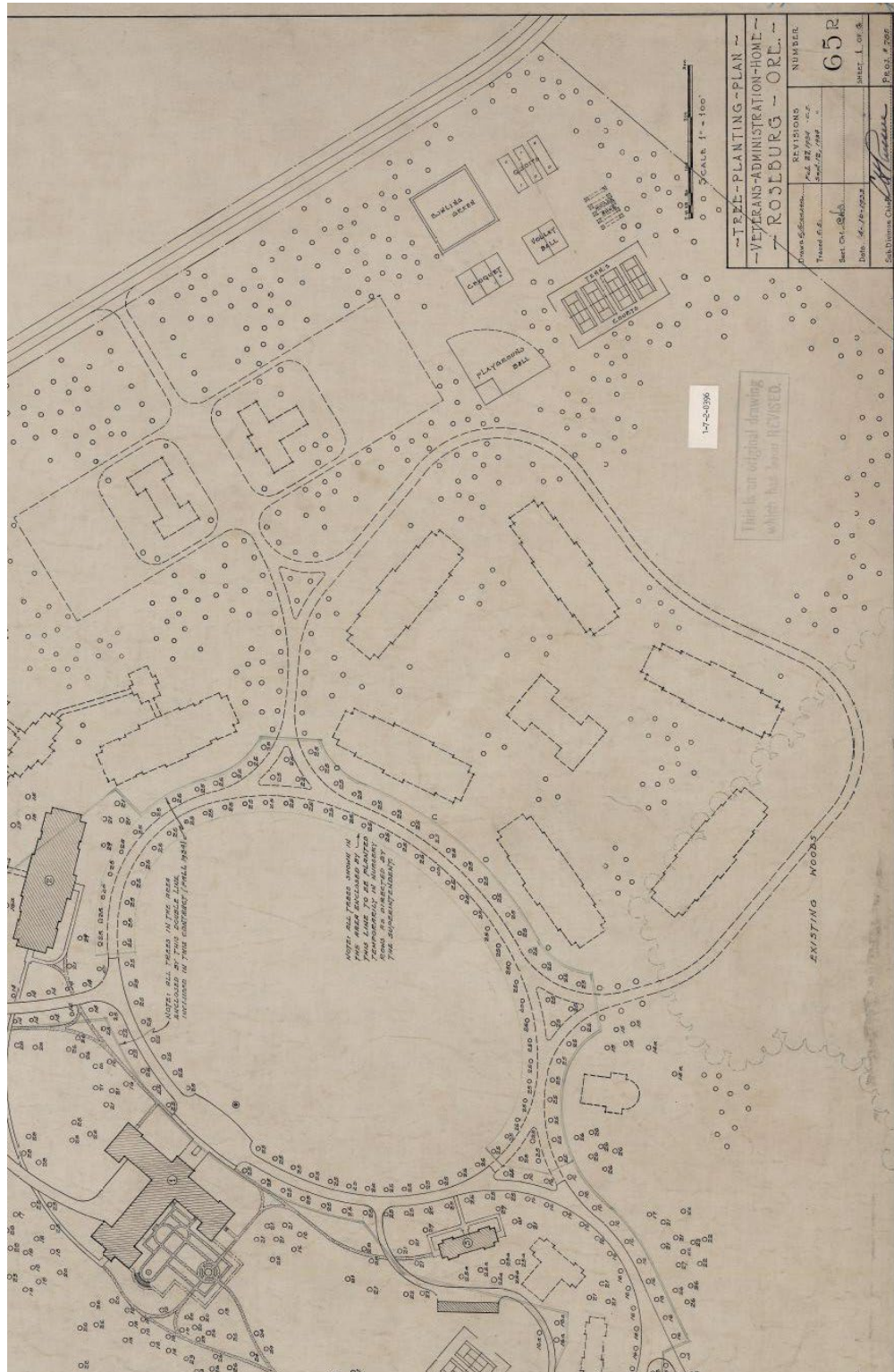
**Undertaking: Seismic and Functional Improvement of the Roseburg VA Medical Center,
Roseburg, Douglas County, Oregon
OR SHPO Reference No. 23-0877**

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.

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Figure 4 - Tree Planting Plan of 1933

APPENDIX E – SITE PHOTOGRAPHS

SITE PHOTOGRAPHS



Photo #1: South entrance to the Roseburg VAMC campus.



Photo #2: Maintenance area located in the northwestern portion of the campus.



Photo #3: Northern portion of the campus.



Photo #4: Looking west across the Ellipse at Building 1.



Photo #5: Looking north across the eastern portion of the campus.



Photo #6: Looking south across the southwestern portion of the campus.

SITE PHOTOGRAPHS



Photo #7: Drainage ditch located in the eastern portion of the campus.



Photo #8: Seasonal wetland in eastern portion of the campus.



Photo #9: Looking west across the proposed Building 100 area on the eastern portion of the campus.



Photo #10: Looking north across the proposed Building 100 area on the eastern portion of the campus.



Photo #11: London planetree-lined campus roadway along the eastern side of the Ellipse.



Photo #12: Looking northwest at Building 1 on the western portion of the campus.

SITE PHOTOGRAPHS



Photo #7: Looking southeast at Building 60 on the western portion of the campus.



Photo #14: Looking north at Building 17 on the northern portion of the campus.



Photo #15: Gazebo (now demolished) located in the southeastern portion of the campus.



Photo #16: Tree-lined street on the southwestern portion of the campus.



Photo #17: Building 81 on the western portion of the campus.



Photo #18: Building 2 on the northern portion of the campus.

SITE PHOTOGRAPHS



Photo #19: Roseburg Fire Department (801 NW Garden Valley Blvd) located on the northern campus boundary.



Photo #20: Orchard Knoll Apartments (1401 NW Veterans Way) located in the northern portion of the campus.



Photo #21: Eagle Landing Apartments (990 NW Veterans Way) located in the southwestern portion of the campus.



Photo #22: Northwesternly adjoining Fred Meyer grocery store.



Photo #23: Northernly adjoining U.S. Bureau of Land Management – Roseburg Office.



Photo #24: Northernly adjoining commercial properties beyond the intersection of NW Garden Valley Boulevard and NW Estelle Street.

SITE PHOTOGRAPHS



Photo #25: Southeast adjoining Roseburg National Cemetery Annex.



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Photo #27: Looking south at east adjoining walking path and Interstate 5 entrance ramps.



Photo #28: Northwest adjoining Roseburg Skate Park.



Photo #29: Riverfront Park located southeast of the campus beyond the National Cemetery.



Photo #30: South Umpqua River located south of the campus beyond W. Stewart Park Drive.

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BASELINE AIR QUALITY AND RECOMMENDATIONS REPORT

FOR THE PROPOSED

SEISMIC AND FUNCTIONAL IMPROVEMENT PROJECTS

ROSEBURG VA MEDICAL CENTER
913 NW GARDEN VALLEY BOULEVARD
ROSEBURG, OREGON



U.S. DEPARTMENT OF VETERANS AFFAIRS

OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT
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PREPARED BY:

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April 15, 2024

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1. INTRODUCTION

This Baseline Air Quality and Recommendations Report was prepared for the U.S. Department of Veterans Affairs (VA) by TTL Associates, Inc. (TTL) for the proposed Seismic and Functional Improvement Projects at the Roseburg VA Medical Center (Roseburg VAMC) located at 913 NW Garden Valley Boulevard in Roseburg, Oregon. This report was prepared to support a National Environmental Policy Act (NEPA) Programmatic Environmental Assessment (PEA) that is being prepared for the proposed projects.

The Roseburg VAMC campus has functional and size deficiencies that do not meet VA's modern standards for the delivery of health care services to our nation's Veterans. Additionally, the campus is located within a seismically active area, classified as having a "high" distribution of damaging seismic activity and a seismic study of the campus found that several campus buildings, including the main hospital building (Building 1) and the mental health building (Building 2), do not meet current seismic building code standards and are at risk of significant damage or failure from a major seismic event. To correct these seismic and functional deficiencies, VA is proposing a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the campus, including construction of a new outpatient clinic building (Building 100) to replace the function of Building 1. In addition, VA plans to transfer approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home (domiciliary or nursing home for Veterans). VA is currently in the preliminary, pre-design phase for the proposed Seismic and Functional Improvement Projects.

This report describes the existing (baseline) air quality conditions at the Roseburg VAMC campus and surrounding area, assesses the short-term air quality effects associated with the proposed seismic and functional improvements construction projects, and evaluates the long-term operational air quality effects associated with the completed new and updated facilities. As details regarding the project design and construction are not yet available, construction-related air quality effects are considered preliminary based on available information and conservative assumptions.

2. BACKGROUND

The approximately 114-acre Roseburg VAMC campus is located within the central portion of the City of Roseburg, west of Interstate 5 and north of the South Umpqua River. The campus is located within an institutional and recreational land use area with considerable greenspace that is surrounded by fully developed, mixed residential, commercial, and industrial areas. Figures 1 and 2 depict the location of the Roseburg VAMC campus.

The Roseburg VAMC property was selected by VA in 1931 for a new tuberculosis hospital. The initial phase of construction included 13 buildings and was completed in 1933. VA reclassified the hospital as a neuropsychiatric hospital in 1937. The main hospital and administrative buildings were constructed along a road (Veterans Way) on the north and west sides of a large central greenspace, generally known as the Ellipse. The residential quarters were located southwest of the Ellipse and the utility/maintenance buildings were constructed north/northwest of the Ellipse. Since the 1930s, the Roseburg VAMC campus has been transformed to meet the changing health care needs of area Veterans. The VAMC campus gradually added new buildings and additions, with increased development in the early 2000s. Figure 3 is an aerial photograph of the Roseburg VAMC campus. Figure 4 depicts the current campus configuration.

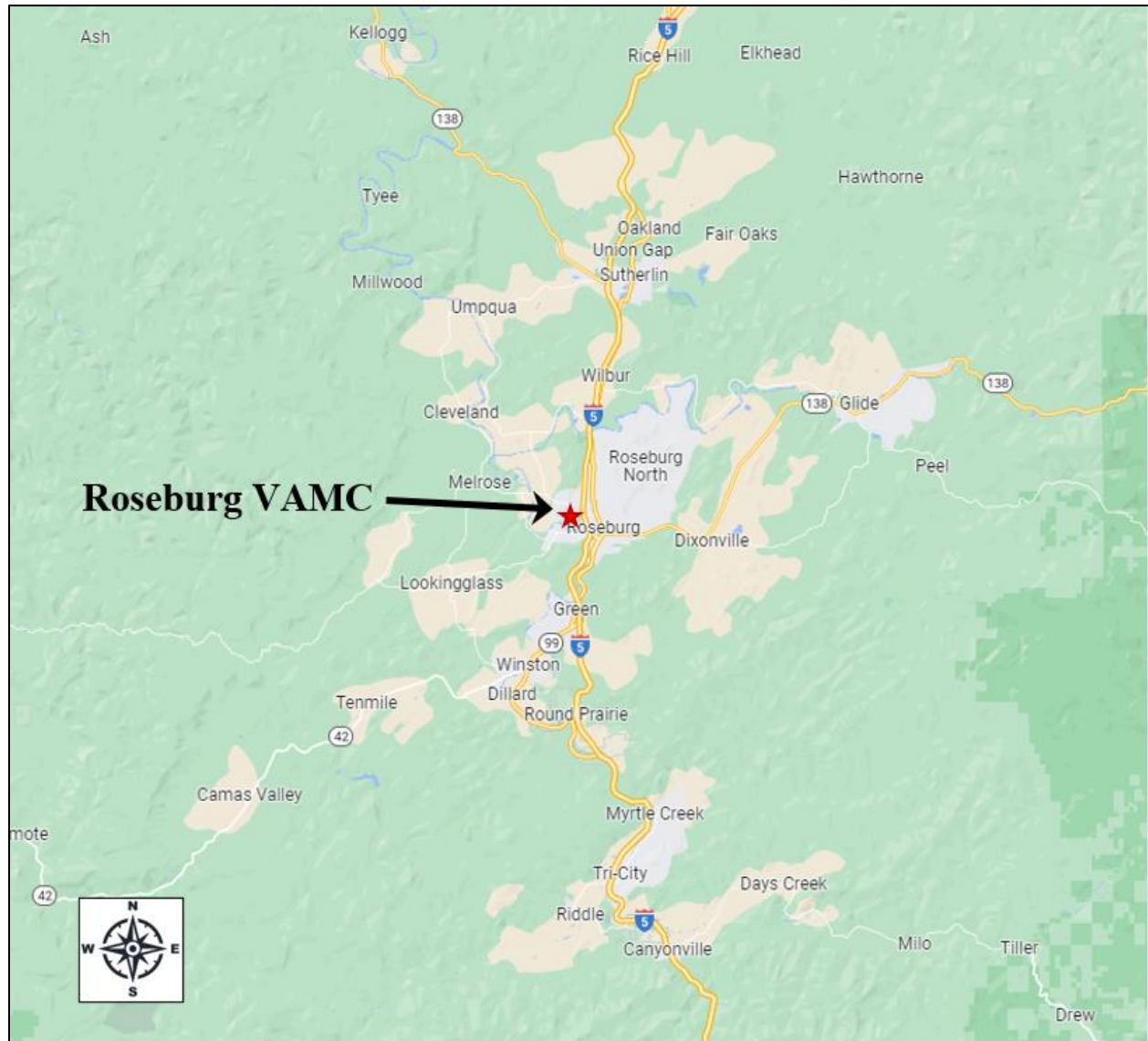


Figure 1 Regional Location Map

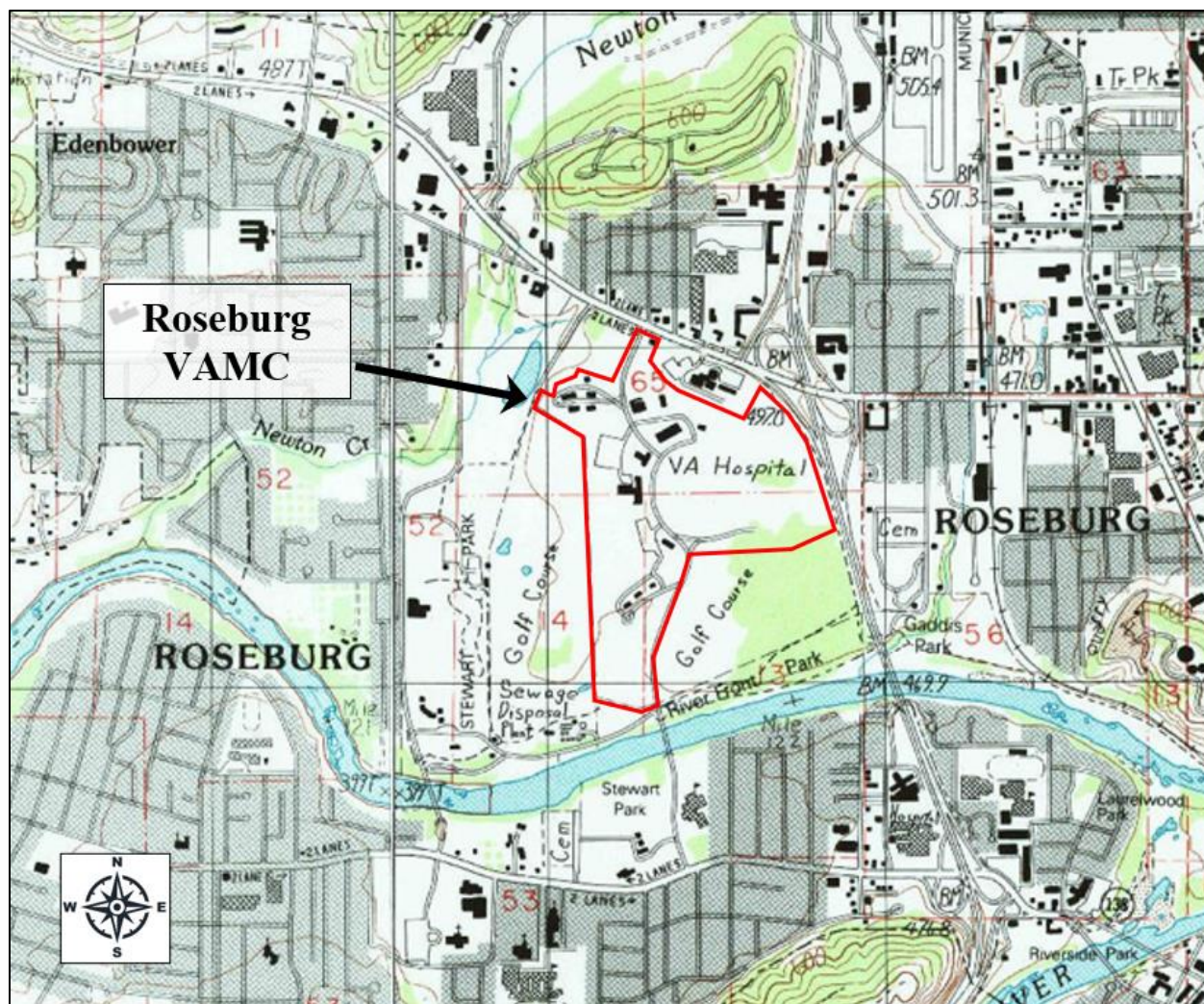


Figure 2 Topographic Location Map (Roseburg East and Roseburg West, OR 1987)



Figure 3 Aerial Photograph of Roseburg VAMC Campus

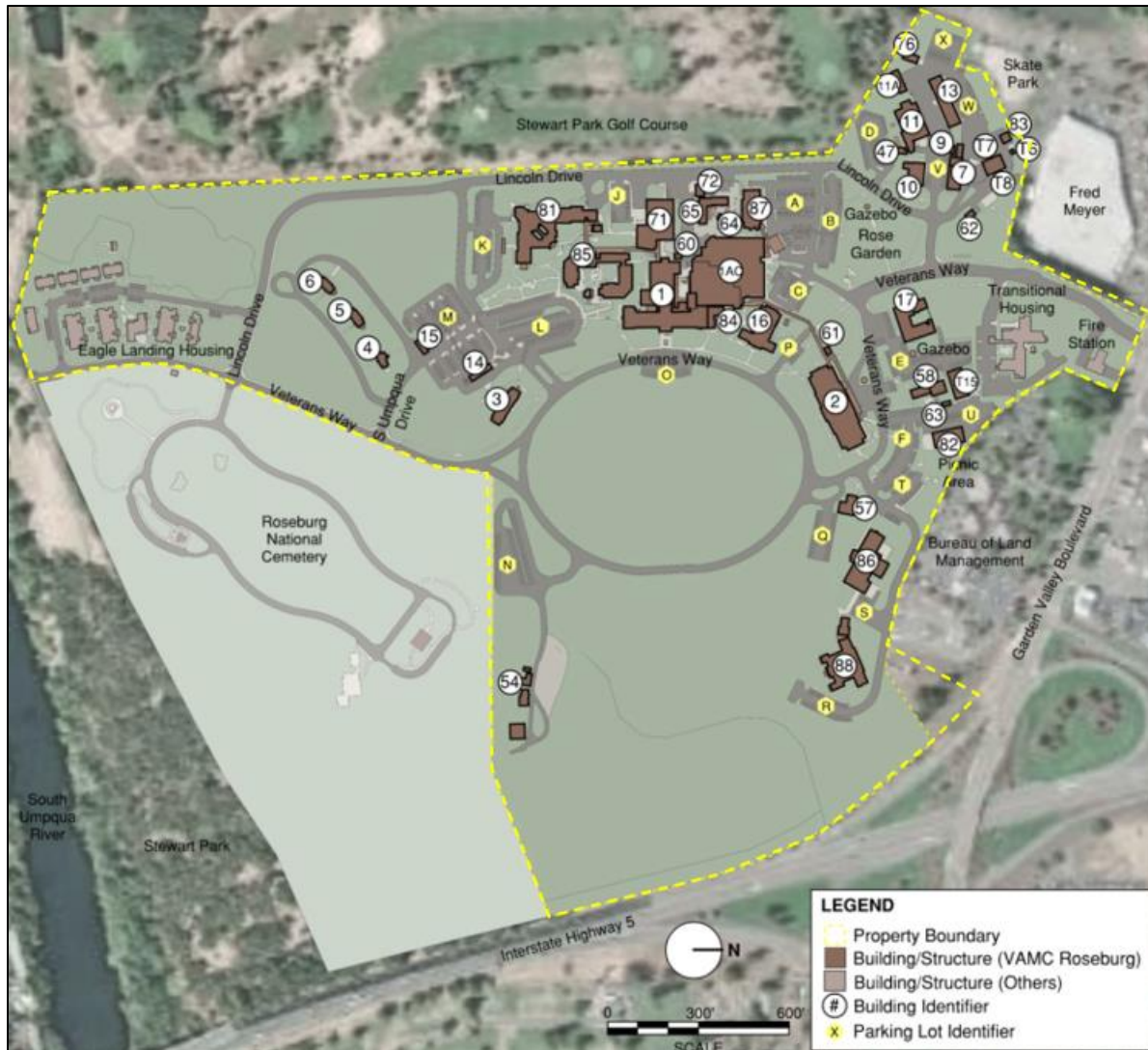


Figure 4 Existing Roseburg VAMC Campus Configuration

3. PROPOSED ACTION

VA's Proposed Action includes a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the campus, including construction of a new main hospital building (Building 100) to replace the function of Building 1 and the transfer, repurpose or disposal of Building 1, once vacated, following the process in the VA *Real Property Disposal Guide*. In addition, VA proposes to transfer approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home. All of the projects are located entirely within the Roseburg VAMC campus on land currently owned by the federal government.

The primary components of the Proposed Action include the following:

New Construction

- Constructing a 3 to 4-story, approximately 165,000 building gross square feet (BGSF) building (Building 100) east of the Ellipse perimeter road. The building would be designed to improve patient care, meet modern health care delivery standards, consolidate clinical departments, and improve workplace conditions. Existing clinical functions within the seismically-deficient, undersized, approximately 126,500 BGSF Building 1 would be relocated to Building 100. Additionally, clinics within Building 1AC would be relocated to Building 100 to improve health care delivery.
- Constructing approximately 425 surface parking spaces north, east, and south of Building 100 to support the parking needs of the building.
- Vacating and disposing of Building 1 once Building 100 is operational. Building 1, the current main hospital building, is a 5-story, red brick building that was constructed in 1933 and is located west of the Ellipse. Disposition plans would be determined in the future, at the appropriate time. VA would carefully assess transfer, repurpose and disposal options for Building 1 following the process in the *VA Real Property Disposal Guide*. VA would evaluate the potential adaptive reuse, transfer to another agency or private entity, or, if no use is determined viable, demolition. The *VA Real Property Disposal Guide* prioritizes reuse, adaptation, and transfer before considering other options.

Seismic Retrofit and Renovation

- Seismically retrofitting/renovating Building 2, the approximately 74,500 BGSF mental health clinic building. Building 2 is a 3-story red brick building that was constructed in 1933 and is located north of the Ellipse. Retrofitting would include the demolition of the interior of the building and the installation of the structural upgrades and new mechanical systems to the building interior. It is anticipated that little or no exterior modification would be required. Following the completion of the upgrades, the building interior would be redesigned and constructed to meet the current health care delivery requirements. The existing mental health clinic and administrative functions would remain in retrofitted/renovated Building 2. In addition, administrative and support spaces from Buildings 1, 17, and 57 would be relocated to Building 2.
- Seismically retrofitting/renovating Buildings 11 (laundry), 13 (warehouse), and 16 (chapel/auditorium). Building 11 is a one-story, approximately 13,000 BGSF red brick building that was built in 1933 with an addition constructed between 1985 and 2000. Building 13 is a one-story, approximately 8,000 BGSF red brick building that was constructed in 1933. Building 16 is a two-story, approximately 11,300 BGSF building that was constructed in 1936. Building 16 is located northwest of the Ellipse. Buildings 11 and 13 are located in the northwestern, engineering/maintenance portion of the campus. The seismic retrofits are anticipated to include selective demolition of the interiors of the buildings, the installation of shear walls and other interior improvements, and interior renovation. Some exterior retrofits may be constructed on the sides and rear of Building 16 to minimize interior impact to the auditorium. The proposed renovation would retain the chapel and auditorium within Building 16. Following renovation, the buildings would be returned to their current uses.

Renovation/Additions

- Renovating the vacated clinical space of the ambulatory care/outpatient clinic building (Building 1AC) for an approximately 30-bed community living center (CLC) facility. Building 1AC is a one-

story, approximately 47,000 BGSF brick and concrete addition to Building 1 that was constructed in 1994. Approximately 25,000 BGSF of space within Building 1AC would be vacated and renovated. In addition, education facilities that are currently located in Building 2 would be relocated to Building 1AC.

- Remodeling the interior and adding a small wing to an existing CLC building (Building 81). The addition would result in approximately 7 additional CLC beds. Building 81 is a one-story, approximately 24,000 BGSF brick and cement-fiber board building that was constructed in the western portion of the campus in 1999.
- Renovating the interior of Building 71 (patient food and nutrition, and campus canteen). Building 71 is a one-story, approximately 17,000 BGSF red brick building that was constructed in the western portion of the campus in 1994.

Demolition

- Demolishing five buildings in the northern portion of the campus, totaling approximately 21,000 BGSF, to allow for improved site access and parking. These buildings include Building 17 (VAMC offices), Building 57 (VA police station), Building 58 (environmental management and greenhouse), Building 63 (hazardous materials storage), and Building T15 (storage). Building 17 is a one-story, approximately 9,900 BGSF red brick building that was constructed in 1938. Building 57 is a one-story, approximately 2,400 BGSF building that was constructed in 1967. Building 58 is a one-story, approximately 3,800 BGSF building that was constructed in 1970 (greenhouse) and 1990s (building). Building 63 is an approximately 400 BGSF storage building constructed in 1980. T15 is a one-story, approximately 4,500 BGSF building that was constructed in 1995. Functions within Buildings 17 and 57 would be relocated to Building 2. Functions within Buildings 58, 63 and T15 would be relocated to Building 3.
- Depending on the disposition of Building 1, demolishing Building 60 (400 BGSF electrical utility building) and Building 84 (1,100 BGSF MRI building). These buildings are located adjacent to and support Building 1.

Existing Parking Lot Modification

- Rebalancing existing surface parking lots at the campus. Once Building 1 operations are transferred to Building 100, less parking would be needed in the western portion of the campus. Other proposed projects would also affect existing parking in the northern and western portions of the campus. It is anticipated that approximately 97 new parking spaces would be constructed, 165 parking spaces would be demolished, and 189 parking spaces would no longer be used. However, the future disposition of Building 1 would determine the number of parking spaces needed in the western portion of the campus. Existing parking lots would likely be used for construction contractor parking and material storage and/or temporary swing space for the Proposed Action construction.

Infrastructure and Utilities

- Constructing/realigning campus roads to provide access to proposed Building 100, the future State Veterans Home, and other campus buildings. Veterans Way may be extended (reconnected) from the northern campus entrance between Buildings 2 and 16 to the road circling the Ellipse, which would lead to new roads in the eastern portion of the campus that would serve Building 100 and the State Veterans Home. Other campus road modifications may also be constructed to improve traffic flow and pedestrian safety.

- Infrastructure upgrades to support the proposed development, including installing, relocating, and removing campus utilities, as necessary, based on the final design.

Campus Enhancements

- Installation of picnic tables, benches, pavilions, and/or exercise equipment on four concrete pads along the perimeter of the Ellipse.
- Renovating and enhancing of the existing flagpole area within the Ellipse in front of Building 1. The project would include renovating the base of the existing American flagpole, removal of the landscape trees and shrubs behind the flagpole, and installation of additional flagpoles, a walkway, and new landscaping behind the American flagpole.

Land Transfer for State Veterans Home

- Transferring approximately 14 acres of land located in the eastern portion of the campus to the State of Oregon for ODVA's future construction of a State Veterans Home. Based on preliminary information provided by ODVA, it is anticipated that the State Veterans Home would include several connected, single-story buildings totaling approximately 130,000 BGSF and would include approximately 150 beds.

Figure 5 depicts the general locations of the Proposed Action projects.

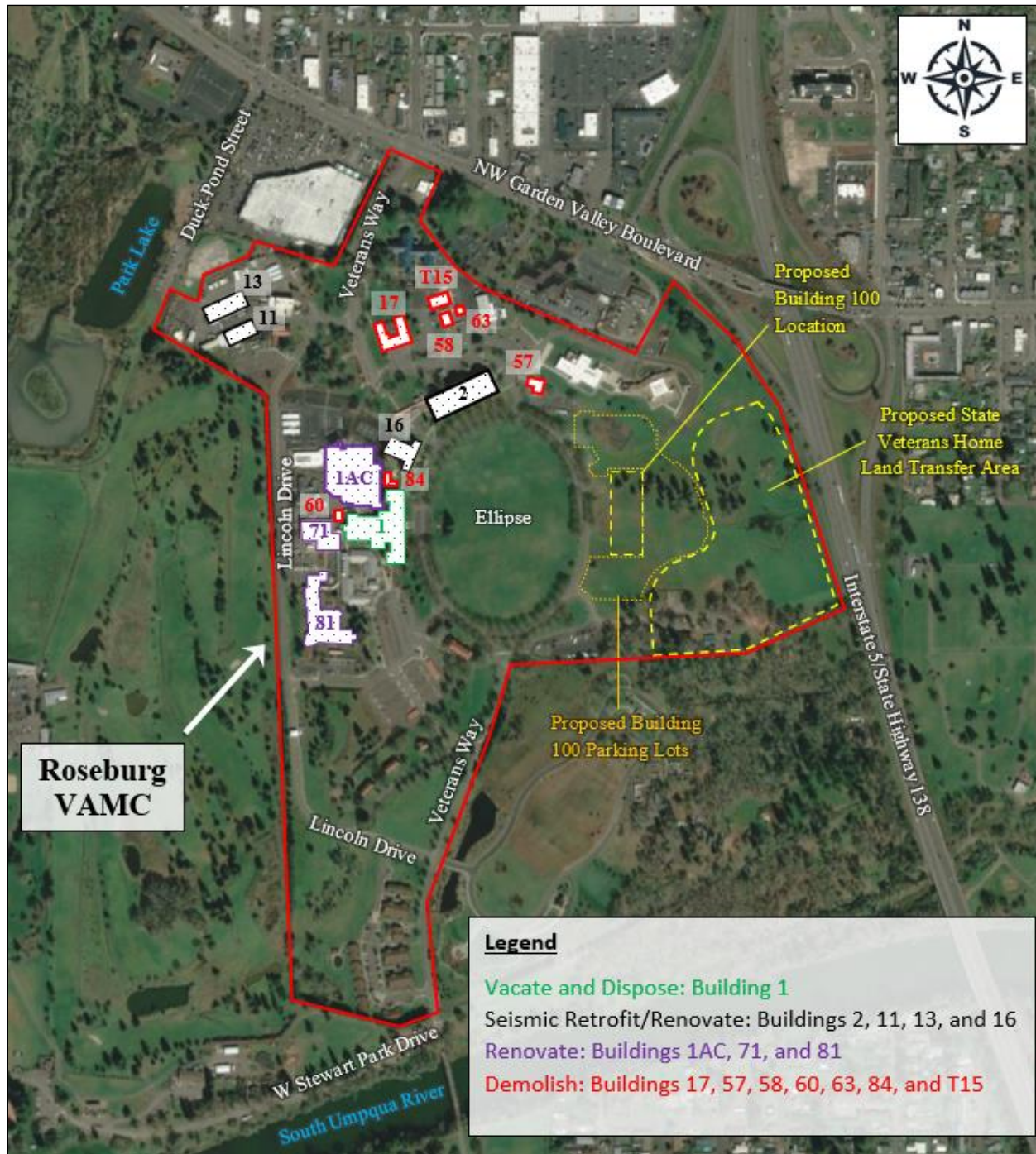


Figure 5 Approximate Locations of the Proposed Action Projects

The Proposed Action construction activities would be conducted in phases over a period of approximately 10 years to minimize campus disruption, support continued campus operations, and minimize the need for temporary swing space during construction. VA is currently in the preliminary, pre-design phase for the Proposed Action projects, and project design details are not yet available. VA anticipates that Proposed Action construction would begin in 2024 and would be completed in 2033. VA anticipates that the seismic retrofitting and renovation of Buildings 11, 13 and 16 could begin as early as 2026 and could be completed in 2027; Building 100 construction could begin in 2027 and be completed in 2029; and the seismic

retrofitting and renovation of Building 2 could begin in 2029 and could be completed in 2030. Some swing space would be provided by the existing campus buildings, but VA assumes that temporary trailers or modular buildings would also be installed on the Roseburg VAMC campus during construction to accommodate campus operations. VA estimates Building 1 could be vacated and available for transfer, reuse or disposal after 2030. VA anticipates transferring the 14-acre area to the State of Oregon by 2026. Design and construction of the State Veterans Home would be conducted by ODVA, subject to the availability of funding. VA projects the State Veterans Home could be constructed between 2030 and 2033.

4. AIR QUALITY AND REGULATORY REQUIREMENTS

4.1 Federal Requirements

4.1.1 Ambient Air

The U.S. Environmental Protection Agency (U.S. EPA) defines ambient air in 40 CFR Part 50 as “that portion of the atmosphere, external to buildings, to which the general public has access.” In compliance with the 1970 Clean Air Act and the 1977 and 1990 Clean Air Act Amendments, U.S. EPA has promulgated National Ambient Air Quality Standards (NAAQS). The NAAQS were enacted for the protection of the public health and welfare, allowing for an adequate margin of safety. U.S. EPA has issued NAAQS for the following pollutants, called “criteria pollutants”:

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen oxides (NO_x)
- Ozone (O₃)
- Particulate matter (PM), divided into two size classes:
 - Aerodynamic size less than or equal to 10 micrometers (PM₁₀)
 - Aerodynamic size less than or equal to 2.5 micrometers (PM_{2.5})
- Sulfur dioxide (SO₂)

Carbon Monoxide

CO is a colorless, odorless gas that can be harmful when inhaled in large amounts. CO is released when something is burned. The greatest sources of CO to outdoor air are cars, trucks and other vehicles or machinery that burn fossil fuels. Of all pollutants for which short-term health standards exist, CO is emitted in the greatest quantity. The impact of CO is usually limited to the local vicinity of its emission. Since CO is of particular concern with respect to vehicular traffic, the highest ambient concentrations tend to occur near congested roadways and intersections, particularly during wintertime periods of air stagnation.

Lead

Sources of lead emissions vary from one area to another. At the national level, major sources of lead in the air are ore and metals processing and piston-engine aircraft operating on leaded aviation fuel. Other sources are waste incinerators, utilities, and lead-acid battery manufacturers. The highest air concentrations of lead are usually found near lead smelters. As a result of U.S. EPA's regulatory efforts, including the removal of lead from motor vehicle gasoline, levels of lead in the air decreased by 98 percent between 1980 and 2014.

Nitrogen Oxides

Nitrogen dioxide (NO₂) is one of a group of highly reactive gases known as oxides of nitrogen or nitrogen oxides (NO_x). Other nitrogen oxides include nitrous acid and nitric acid. NO₂ is used as the indicator for the larger group of nitrogen oxides. NO₂ primarily gets in the air from the burning of fuel. NO₂ forms from emissions from cars, trucks and buses, power plants, and off-road equipment.

Ozone

Ozone (O₃) occurs both in the Earth's upper atmosphere and at ground level. Ozone can be good or bad, depending on where it is found. Atmospheric (good) ozone occurs naturally in the upper atmosphere, where it forms a protective layer that shields us from the sun's harmful ultraviolet rays. Ground-level (bad) ozone is not emitted directly into the air, but is created by chemical reactions between oxides of nitrogen and volatile organic compounds (ozone precursors). This happens when pollutants emitted by cars, power plants, industrial boilers, refineries, chemical plants, and other sources chemically react in the presence of sunlight. Ground-level ozone is most likely to reach unhealthy levels on hot sunny days in urban environments, but can still reach high levels during colder months. Ozone can also be transported long distances by wind, so even rural areas can experience high ozone levels.

Particulate Matter (PM₁₀ and PM_{2.5})

Particulate matter comes in many sizes and shapes and can be made up of hundreds of different chemicals. Some particulates are emitted directly from a source, such as construction sites, unpaved roads, fields, smokestacks or fires. Most particles form in the atmosphere as a result of complex reactions of chemicals such as sulfur dioxide and nitrogen oxides, which are pollutants emitted from power plants, industries and automobiles. There are federal standards for the emission of particulate matter less than or equal to 10 micrometers in size (PM₁₀) and particulate matter less than or equal to 2.5 micrometers in size (PM_{2.5}), because these sizes of particulate matter contribute the most to human health effects and regional haze. The highest ambient concentrations generally occur near the emission sources, such as residential outdoor burning and wood-burning stoves, forest fires, and motor vehicle tailpipes on major roads. PM_{2.5} has a greater impact than PM₁₀ at locations farther from the emitting source because it is smaller and remains suspended in the atmosphere longer.

Sulfur Oxides

Sulfur dioxide (SO₂) is used as the indicator for the larger group of gaseous sulfur oxides (SO_x) as it is the SO_x compound of greatest concern. Other gaseous SO_x (such as SO₃) are found in the atmosphere at concentrations much lower than SO₂. Emissions that lead to high concentrations of SO₂ generally also lead to the formation of other SO_x. The largest sources of SO₂ emissions are from fossil fuel combustion at power plants and other industrial facilities.

Areas are designated by U.S. EPA as “attainment”, “non-attainment”, “maintenance”, or “unclassified” with respect to the NAAQS. Regions in compliance with the standards are designated as “attainment” areas. In areas where the applicable NAAQS are not being met, a “non-attainment” status is designated. Areas that have been classified as “non-attainment”, but are now in compliance, can be re-designated “maintenance” status if the state completes an air quality planning process for the area. Areas for which no monitoring data is available are designated as “unclassified”, and are by default considered to be in attainment of the NAAQS.

Information from the U.S. EPA Green Book internet website (January 2024) indicates that the Roseburg VAMC is located in an area (Douglas County) that is in full attainment for the NAAQS pollutants.

The general conformity provision of the CAA prohibits the federal government from conducting, supporting, or approving any actions that do not conform to a U.S. EPA-approved State Implementation Plan (SIP), the state's plan for achieving and maintaining compliance with the goals of the CAA. Federal actions with emissions below de minimis levels specified in 40 CFR 93.153(b) are exempt from the general conformity regulations. The general conformity provision does not apply to criteria pollutants that are in attainment of the NAAQS. As the Roseburg VAMC is located in an area of full attainment for the NAAQS pollutants, the conformity regulations are not applicable to the Proposed Action.

4.1.2 Operating Permits

The CAA regulates criteria pollutants as well as 188 specifically listed hazardous air pollutants (HAPs). The Title V Operating Permit Program under 40 CFR 70 requires stationary sources that meet the definition of a “major source” of criteria pollutants or HAPs to apply for and obtain a Title V operating permit. A major source of HAPs has the potential to emit (PTE) more than 10 tons per year (tpy) of any individual HAP, or 25 tpy of any combination of HAPs. The definition of major source for criteria pollutants is dependent on the air quality attainment status of the region where the source is located (i.e., areas that are in attainment or non-attainment with the NAAQS). Major sources have a PTE more than 100 tpy of any criteria pollutant in an attainment area or lower levels in various classifications of non-attainment (i.e., marginal, moderate, serious, severe, and extreme). The Roseburg VAMC does not have a stationary major source of criteria pollutants or HAPs and is not required to have a Title V operating permit.

4.1.3 Greenhouse Gases

Gases that trap heat in the atmosphere and can contribute to global warming are often called greenhouse gases (GHGs). Some greenhouse gases, such as carbon dioxide, occur naturally and are emitted to the atmosphere through natural processes and human activities. Other greenhouse gases (e.g., fluorinated gases) are created and emitted solely through human activities. The principal greenhouse gases that enter the atmosphere because of human activities are:

- Carbon dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)
- Fluorinated gases (e.g., hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride)

Carbon dioxide is the GHG that is normally emitted in the greatest amount and generally contributes the most to climate change. Each GHG has its own global warming potential. To express the average emission rate and global warming potential of the combined GHG constituents, GHG emission rates are commonly expressed as the equivalent amount of carbon dioxide (CO₂e).

Other than U.S. EPA requirements for Mandatory Reporting of Greenhouse Gases Rule (40 CFR Part 98), which requires reporting of greenhouse gas data and other relevant information from large, non-mobile GHG emissions sources in the United States, no federal regulations are currently in place for GHG emissions.

In January 2023, the Council on Environmental Quality (CEQ) released revised interim guidance for federal agencies on consideration of GHG emissions and the effects of climate change in NEPA reviews, which describes how federal agencies should consider the effects of GHG emissions and climate change in their NEPA decision-making documents. The guidance indicates that federal agencies should consider both the potential effect of a proposed action on climate change, as indicated by its estimated GHG emissions, and the implications of climate change for the environmental effects of a proposed action. The guidance states NEPA reviews should quantify proposed actions' GHG emissions, place GHG emissions in appropriate

context and disclose relevant GHG emissions and relevant climate impacts, and identify alternatives and mitigation measures to avoid or reduce GHG emissions. The guidance also indicates that the agency analysis should be commensurate with the projected GHG emissions and climate impacts of the proposed action. The 2023 interim guidance does not include a threshold or screening level for GHG emission evaluations. CEQ's December 2014 guidance recommended that agencies consider 25,000 metric tons of carbon dioxide equivalent emissions on an annual basis as a threshold for GHG emissions, below which quantitative analysis of GHG is not recommended.

4.2 State of Oregon Requirements

Federal Clean Air Act Sections 111 and 112 allow U.S. EPA to transfer primary implementation and enforcement authority for most of the federal air quality standards to state regulatory agencies through a process called delegation. Clean Air Act permitting in Oregon is the shared responsibility of U.S. EPA Region 10 and other agencies depending on geographic location within the state. The Oregon Department of Environmental Quality (ODEQ) Air Quality Division (AQD) oversees air permitting throughout the majority of Oregon (including Roseburg) to control present and future sources of emissions of air contaminants through Chapter 468 - Environmental Quality Generally of the Oregon Revised Statutes (ORS) and Chapter 340 - Department of Environmental Quality, Division 200 through 268 (Air Quality Standards) of the Oregon Administrative Rules (OAR).

ODEQ develops and implements a wide range of pollution controls, including regulating air pollution from the industry and transportation sectors. Basic and General Air Contaminant Discharge Permits (ACDP) are established for some of the most common industry types in Oregon. These permits follow the rules contained in OAR 340 Division 200 through 268. General ACDPs are issued by order for a period of up to ten years and then individual sources are assigned to the General ACDP if they meet the qualifications. Actual emissions from the source must be less than the Generic Plant Site Emission Limits (PSELs) contained in the General ACDP. The ACDP PSELs are listed below in Table 1.

Table 1
ODEQ General ACDP PSELs for Roseburg VAMC

Pollutant	Limit	Units
PM	24	tons per year
PM ₁₀	14	tons per year
PM _{2.5}	9	tons per year
SO ₂	39	tons per year
NO _x	39	tons per year
CO	99	tons per year
VOC	39	tons per year
GHGs (CO _{2e})	74,000	tons per year

The Roseburg VAMC currently operates its boiler plant under ACDP General Permit Source No. 10-0034-11-01 and gasoline dispensing facility under ACDP General Permit Source No. 10-0034-22-01. Roseburg VAMC also formerly maintained an ACDP General Permit (Source No. 10-0034-20-01) for ethylene oxide sterilizers. However, the VAMC discontinued using ethylene oxide sterilizers in November 2022 and cancelled this permit in 2023. Based on the 2023 Annual Reporting Forms for Roseburg VAMC (Appendix A), the VAMC emissions are well below the ACDP PSELs.

Installation of additional equipment or modification to existing equipment at the Roseburg VAMC as part of the Proposed Action (such as new boilers) would require a new or revised ACDP General Permit from ODEQ AQD.

OAR Rule 340-208-0210 (requirements for fugitive emissions) indicates no person may cause or permit any materials handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. These requirements include using water or chemicals to control dust during demolition, construction, grading and clearing of land on unpaved roads, stockpiles, and other surfaces that can create dust.

4.3 Local Requirements

Douglas County and the City of Roseburg do not maintain air quality regulations or ordinances.

5. AFFECTED ENVIRONMENT AND SENSITIVE RECEPTORS

5.1 Existing Air Quality

The approximately 114-acre Roseburg VAMC campus is located within an institutional and recreational land use area with considerable greenspace that is surrounded by fully developed, mixed residential, commercial, and industrial areas. The campus is bordered to the north by a Bureau of Land Management office, a Fred Meyer grocery store, and NW Garden Valley Boulevard, beyond which are commercial properties. The campus is bordered to the east by Interstate 5, beyond which are residential and commercial properties and a cemetery. The campus is bordered to the south by the Roseburg National Cemetery Annex, wooded land, W. Stewart Park Drive, and a City of Roseburg Parks Maintenance Facility, beyond which is the South Umpqua River. The campus is bordered to the west by Stewart Park Golf Course (Roseburg municipal golf course), Roseburg Skate Park, and Stewart Park Natural Area.

Existing air pollution sources in the Roseburg VAMC area include general operations and vehicle traffic associated with the campus and nearby commercial properties, and vehicles traffic on nearby roadways including Interstate 5 and NW Garden Valley Boulevard. On-road vehicular traffic along area roadways is likely the largest consistent contributor to air pollutant emissions in the project area. Vehicles contribute most of the carbon monoxide (CO), nitrogen dioxide (NO₂), and GHGs. Stationary equipment used at institutional facilities, commercial businesses, and industrial facilities in the area are secondary sources of emissions. Residential heating, lawn maintenance (with gasoline powered equipment), and occasional regional forest fires also seasonally contribute to area air pollution.

The Roseburg VAMC is an institutional facility that provides primary health care services, mental health care services, specialty care services, and administrative support services typical of a large medical campus. Primary air emissions from the VAMC are associated with daily staff, patient and visitor vehicular traffic and the operation of the VAMC's boiler plant (Building 7), various other boilers and generators, and fueling areas.

5.2 Sensitive Receptors

Sensitive receptors are land uses for which there is a sensitivity to air quality, such as residences, schools, hospitals, nursing homes, playgrounds and parks.

Sensitive air quality receptors in the vicinity of the Roseburg VAMC campus include:

- Roseburg VAMC users.
- Orchard Knoll Apartments, a transitional housing facility owned by the Housing Authority of Douglas County (HADCO) and located on the northern portion of the Roseburg VAMC campus through an enhanced use lease (EUL) agreement with VA.
- Eagle Landing Apartments, a low-income housing facility owned by Neighborworks Umpqua and located in the southern portion of the Roseburg VAMC campus through an EUL agreement with VA.
- Roseburg National Cemetery Annex located adjacent to the southeast of the campus.
- Stewart Park Golf Course located adjacent to the west of the campus.
- Stewart Park Natural Area located adjacent to the west of the northwestern portion of the campus.
- Roseburg Masonic Cemetery located approximately 300 feet east of the campus, across I-5.

- Residential neighborhood located approximately 350 feet north of the campus, across NW Garden Valley Boulevard.
- Residential neighborhood located approximately 450 feet east of the campus, across I-5.
- Riverfront Park located approximately 800 feet southeast of the campus.
- Stewart Park located approximately 1,000 feet west of the campus.
- Gaddis Park located approximately 1,400 feet southeast of the campus, across I-5.

Sensitive air quality receptors in the Roseburg VAMC campus vicinity are depicted on Figure 6.

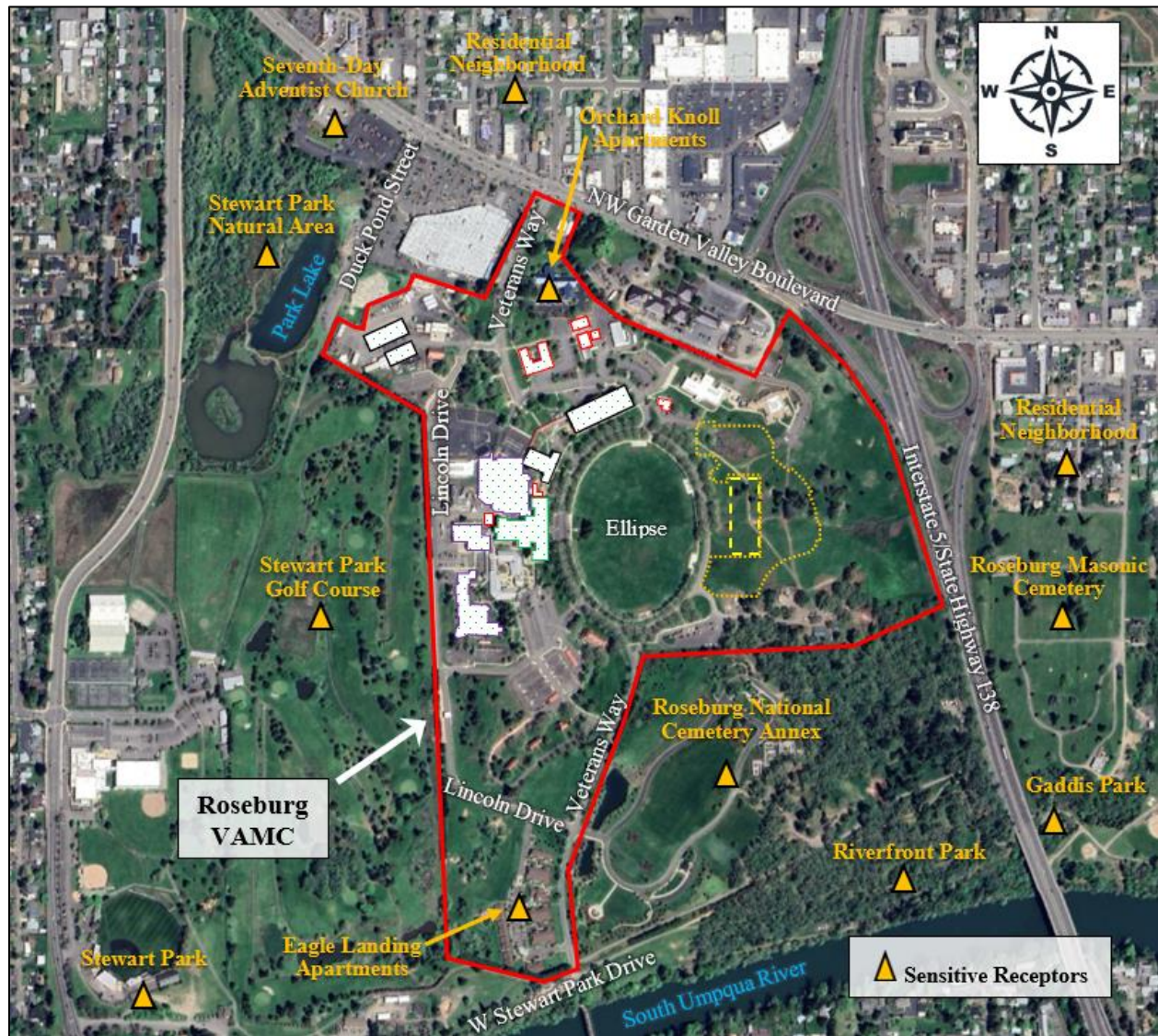


Figure 6 Sensitive Air Quality Receptors

6. AIR QUALITY IMPACTS

This section assesses the potential short-term, construction-related and long-term, operational air quality impacts of the proposed seismic and functional improvements projects. The Proposed Action projects described in Section 3, including the construction of a new, approximately 165,000 BGSF outpatient clinic (Building 100) and associated surface parking lots; seismic retrofitting and renovation of Buildings 2, 11, 13, and 16; renovation of Buildings 1AC, 71, and 81 with a small addition to Building 81; demolition of Buildings T15, 17, 57, 58, and 63 (and possibly 60 and 84); and construction of supporting infrastructure and roads, form the basis for the short-term, construction-related air quality impact evaluation. The Proposed Action also includes the disposal of Building 1 once Building 100 is operational and the transfer of approximately 14 acres of land to the State of Oregon for the future development of a State Veterans Home; however, the scopes of these projects are not known at this time. For the purpose of the air quality impact evaluation, it is assumed that Building 1 would be seismically retrofitted and renovated for reuse by others (similar to Building 2) and a 130,000 BGSF, 150-bed State Veterans Home would be constructed on 14-acre transfer area by ODVA. The long-term, operational air quality impacts are based on the estimated increase in patient, visitor, and staff traffic to the Roseburg VAMC campus after the proposed seismic and functional improvement projects are completed, including the operation of Building 100, the operation of the State Veterans Home on the 14-acre transfer parcel, and the assumed reuse of Building 1 for general office purposes compatible with VAMC operations. As previously noted, the proposed projects are in the pre-design phase. Therefore, the impact analyses are preliminary and based on assumed project sequencing and timing, general construction concepts and traffic estimates, and conservative assumptions.

6.1 Short-Term Construction Air Quality Impacts

The proposed seismic and functional improvements projects would result in short-term, construction-related air quality impacts associated with the disturbance of asbestos and lead-based paint within the project buildings, fugitive dust generated during construction, and construction equipment and construction traffic emissions.

6.1.1 Asbestos and Lead Based Paint

The existing Roseburg VAMC campus buildings that are planned to be demolished (Buildings T15, 17, 57, 58, and 63, and possibly 60 and 84), the campus buildings that will be seismically retrofitted and renovated (Buildings 2, 11, 13, and 16, and possibly Building 1); and the campus buildings that will be renovated (Buildings 1AC, 71, and 81), are known or assumed to contain asbestos-containing building materials (ACM) and lead-based paint (LBP). Identified ACMs would be removed by licensed asbestos abatement contractors in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) and State of Oregon requirements prior to building renovation and/or demolition. Asbestos abatement procedures require the removal of ACM with various controls and monitoring to prevent asbestos emissions. With the implementation of the required asbestos abatement procedures, there would be no significant asbestos air quality impacts.

The renovation and/or demolition of buildings containing LBP can result in the generation of LBP-containing dust. Standard renovation and demolition best management practices (BMPs) to control dust would reduce LBP dust emissions to less-than-significant levels. Recommended dust control BMPs are listed in Section 7.

6.1.2 Fugitive Dust

Demolition and construction activities may have adverse impacts on air quality due to the production of dust. Dust can result from a variety of activities, including building demolition, excavation, grading, and vehicle travel on paved and unpaved surfaces. Dust from demolition and construction can lead to adverse health effects and nuisance concerns, such as reduced visibility on nearby roadways. The amount of dust is dependent on the intensity of the activity, soil type and conditions, wind speed, and dust suppression activities used. Implementing standard dust control measure BMPs, such as spraying surfaces with water, greatly reduces dust emissions from demolition and construction. Recommended dust control BMPs are listed in Section 7.

Fugitive dust emissions are greatest during demolition and the initial excavation and grading stages of a construction project, when large areas are disturbed by heavy construction equipment. Fugitive dust, also referred to as total suspended particulates (TSP), that may be generated during the demolition of Buildings T15, 17, 57, 58, and 63 and the grading/earthwork phases for the construction of new campus roads, Building 100, and the State Veterans Home were estimated using the emission factor for heavy construction equipment from U.S. EPA AP-42, Compilation for Air Pollutant Emission Factors. The estimated TSP is calculated based on the number of acres disturbed, the AP-42 emission factor (1.2 tons per acre per month), the duration of the disturbance, and the control efficiency (80% per AP-42). U.S. EPA guidance was used to estimate the fractions thereof of PM₁₀ and PM_{2.5}.

Table 2 summarizes the estimated total fugitive dust emissions associated with the proposed project demolition and grading/earthwork activities. Appendix B contains spreadsheets with the estimated fugitive dust emissions calculations.

Table 2 Estimated Total Fugitive Dust Emissions During Demolition and Initial Construction

Activity	Acres	Emission Factor (tons/acre/month)	Duration (months)	Control Efficiency	TSP (tons)	PM ₁₀ (tons)	PM _{2.5} (tons)
Demolition	1	1.2	3	80 %	0.72	0.24	0.02
Road Construction	1	1.2	3	80 %	0.72	0.24	0.02
Building 100 and Parking	9	1.2	5	80 %	10.80	3.56	0.36
State Veterans Home	14	1.2	5	80 %	16.80	5.54	0.55

The estimated demolition and construction fugitive dust emissions of PM₁₀ and PM_{2.5} are well below the general conformity de minimis levels for criteria pollutants in maintenance areas (100 tons per year).

6.1.3 Construction Equipment and Construction Traffic Emissions

Construction-related air emissions would include the exhaust from the operation of off-road construction equipment at the Roseburg VAMC campus during the seismic and functional improvements projects as well as the exhaust from on-road, construction-related vehicles. The internal combustion engines that power off-road construction equipment emit air pollutants, including diesel particulate matter, that can temporarily degrade local air quality in the vicinity of the construction activity. Tailpipe emissions from construction

worker vehicles, contractor and delivery trucks, and heavy-duty haul trucks traveling on public roads to and from the Roseburg VAMC campus would also be a source of air pollutant emissions during the proposed construction projects.

Annual criteria pollutant emissions from the proposed seismic and functional improvements projects construction activities were estimated using the U.S. EPA MOtor Vehicle Emission Simulator (MOVES) program, using assumed construction equipment and traffic for each project and anticipated construction project durations.

VA anticipates the Proposed Action construction activities would be completed within ten years; however, the sequencing and timing for these projects have not been fully determined. Preliminary project sequencing and timing information provided by VA were used to establish a year-by-year schedule of construction activities for the purpose of air emissions modeling, as criteria pollutant emissions are evaluated on an annual basis.

The Proposed Action construction activities were evaluated based on the following phasing:

YEAR	ACTIVITY
2025	<ul style="list-style-type: none"> Building 81 renovation and addition
2026	<ul style="list-style-type: none"> Buildings 11, 13, and 16 seismic retrofit and renovation Building 71 renovation
2027	<ul style="list-style-type: none"> Building 100 and associated parking construction (Year 1) Site infrastructure, utility improvements, and reconfiguration of campus roads
2028	<ul style="list-style-type: none"> Building 100 and associated parking construction (Year 2)
2029	<ul style="list-style-type: none"> Building 2 seismic retrofit and renovation (Year 1)
2030	<ul style="list-style-type: none"> Building 2 seismic retrofit and renovation (Year 2) Building 1AC renovation
2031	<ul style="list-style-type: none"> Buildings 17, 57, 58, 63, and T15 (and 60 and 84 if necessary) demolition Building 1 seismic retrofit and renovation (Year 1)
2032	<ul style="list-style-type: none"> Building 1 seismic retrofit and renovation (Year 2) State Veterans Home construction on 14 acres (Year 1)
2033	<ul style="list-style-type: none"> State Veterans Home construction on 14 acres (Year 2)

The MOVES program was used to derive criteria pollutant and GHG emission rates for various off-road construction equipment (excavators, backhoes, dozers, loaders, air compressors, generators, welders, etc.) for each calendar year of construction. The emission rates are reported in grams per hour and converted to pounds per hour. Annual off-road construction emissions were calculated as $E = n \times H \times D \times EF$; where E = emission in pounds per year; n = the number of pieces of equipment of a specified equipment type; H = hours per day of equipment operation; D = days per year of equipment operation; and EF = the MOVES-generated emission factor by equipment type. Each set of construction activities (1 to 2 sets per year) was calculated separately, with all calendar year activities summed for annual total emissions.

The MOVES program was also used to estimate criteria pollutant and GHG emissions from on-road construction traffic, including construction worker vehicles (assumed to be passenger trucks), contractor and delivery trucks, and heavy-duty haul trucks traveling to and from the Roseburg VAMC campus for

each calendar year of construction. The emission rates are reported in grams per trip per vehicle type, based on a conservative assumption of a 50-mile one-way trip for each vehicle. The emission rates were converted to pounds per trip. Annual on-road construction emissions were calculated as $E = n \times T \times D \times ET$; where E = emission in pounds per year; n = the number of vehicles per vehicle type; T = number of vehicle trips per day; D = days per year of vehicle trips; and ET = the MOVES-generated emissions per trip by vehicle type.

Appendix C contains spreadsheets with the estimated off-road and on-road construction emissions for each year of the Proposed Action construction projects. The following sections summarize the construction activities and associated emissions for year of construction (2025 through 2033).

6.1.3.1 2025 Estimated Construction Emissions

Construction projects that are assumed to occur in 2025 include the interior renovation/remodeling of Building 81 (24,000 BGSF) and the construction of a small addition to this building. Construction activities that are assumed to occur in 2025 include contractor mobilization/demobilization, site preparation, grading, the installation of foundations, exterior construction, and interior construction and renovation. The estimated off-road and on-road construction emissions for 2025 are summarized in Table 3.

Table 3 Estimated 2025 Construction Emissions

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	Estimated Annual Emissions (tons)		
		Construction Equipment	Construction Traffic	Total (2025)
Carbon Monoxide	100*	0.15	2.54	2.69
Nitrogen Oxides	100*	0.35	0.19	0.54
Sulfur Oxides	100*	Negligible	Negligible	Negligible
Volatile Organic Compounds	100*	0.03	0.10	0.13
PM ₁₀	100*	0.02	Negligible	0.02
PM _{2.5}	100*	0.02	Negligible	0.02
GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)		
Carbon Dioxide equivalent	25,000	136	276	412

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

As noted in Section 4, the Roseburg VAMC campus is located within a full attainment area for the NAAQS criteria pollutants. The general conformity de minimis levels in maintenance areas are provided for information, but are not applicable to the Proposed Action. As shown in Table 3, the estimated construction emissions for 2025 are well below the general conformity de minimis levels for criteria pollutants in maintenance areas. Estimated construction GHG emissions for 2025 are also well below the 25,000 metric tons carbon dioxide equivalent threshold below which CEQ did not recommend quantitative analysis.

6.1.3.2 2026 Estimated Construction Emissions

Construction projects that are assumed to occur in 2026 include the seismic retrofitting and renovation of Building 11 (13,000 BGSF), Building 13 (8,000 BGSF), and Building 16 (11,300 BGSF) and the interior renovation of Building 71 (17,000 BGSF). Construction activities that are assumed to occur in 2026 include contractor mobilization/demobilization, interior demolition and seismic retrofitting, and interior buildout/renovation. The estimated off-road and on-road construction emissions for 2026 are summarized in Table 4.

Table 4 Estimated 2026 Construction Emissions

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	Estimated Annual Emissions (tons)		
		Construction Equipment	Construction Traffic	Total (2026)
Carbon Monoxide	100*	0.55	5.86	6.41
Nitrogen Oxides	100*	1.29	0.39	1.68
Sulfur Oxides	100*	Negligible	Negligible	Negligible
Volatile Organic Compounds	100*	0.11	0.21	0.32
PM ₁₀	100*	0.08	0.01	0.09
PM _{2.5}	100*	0.08	0.01	0.09
GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)		
Carbon Dioxide equivalent	25,000	446	663	1,109

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

As shown in Table 4, the estimated construction emissions for 2026 are well below the general conformity de minimis levels for criteria pollutants in maintenance areas. Estimated construction GHG emissions for 2026 are also well below the 25,000 metric tons carbon dioxide equivalent CEQ threshold.

6.1.3.3 2027 Estimated Construction Emissions

Construction projects that are assumed to occur in 2027 include the first year of construction of Building 100 (165,000 BGSF) and the associated surface parking lots (425 parking spaces) and the installation of campus infrastructure, utility improvements, reconfiguration of campus roads to support the Proposed Action. Construction activities that are assumed to occur in 2027 for Building 100 include contractor mobilization/demobilization, site preparation and grading, installation of foundations (assuming some caissons), and exterior and interior building construction. Site infrastructure construction activities are assumed to include contractor mobilization/demobilization, installation and replacement of utilities, and installation and replacement of campus roads, in particular the extension of Veterans Way to the Ellipse loop road. The estimated off-road and on-road construction emissions for 2027 are summarized in Table 5.

Table 5 Estimated 2027 Construction Emissions

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	Estimated Annual Emissions (tons)		
		Construction Equipment	Construction Traffic	Total (2027)
Carbon Monoxide	100*	0.82	15.84	16.66
Nitrogen Oxides	100*	2.52	1.16	3.68
Sulfur Oxides	100*	Negligible	0.01	0.01
Volatile Organic Compounds	100*	0.18	0.56	0.74
PM ₁₀	100*	0.13	0.03	0.16
PM _{2.5}	100*	0.13	0.03	0.16
GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)		
Carbon Dioxide equivalent	25,000	1,344	1,919	3,263

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

As shown in Table 5, the estimated construction emissions for 2027 are well below the general conformity de minimis levels for criteria pollutants in maintenance areas. Estimated construction GHG emissions for 2027 are also well below the 25,000 metric tons carbon dioxide equivalent CEQ threshold.

6.1.3.4 2028 Estimated Construction Emissions

Construction projects that are assumed to occur in 2028 include the completion of construction of Building 100 and its associated surface parking lots. Construction activities that are assumed to occur in 2028 include interior building construction, final grading and paving of the parking lots, landscaping, and contractor cleanup and demobilization. The estimated off-road and on-road construction emissions for 2028 are summarized in Table 6.

Table 6 Estimated 2028 Construction Emissions

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	Estimated Annual Emissions (tons)		
		Construction Equipment	Construction Traffic	Total (2028)
Carbon Monoxide	100*	0.24	8.40	8.64
Nitrogen Oxides	100*	0.70	0.51	1.21
Sulfur Oxides	100*	Negligible	0.01	0.01
Volatile Organic Compounds	100*	0.06	0.29	0.35
PM ₁₀	100*	0.04	0.01	0.05
PM _{2.5}	100*	0.04	0.01	0.05

GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)		
Carbon Dioxide equivalent	25,000	369	1,036	1,405

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

As shown in Table 6, the estimated construction emissions for 2028 are well below the general conformity de minimis levels for criteria pollutants in maintenance areas. Estimated construction GHG emissions for 2028 are also well below the 25,000 metric tons carbon dioxide equivalent CEQ threshold.

6.1.3.5 2029 Estimated Construction Emissions

Construction projects that are assumed to occur in 2029 include the first year of seismic retrofitting and renovation of Building 2 (74,500 BGSF). Construction activities that are assumed to occur in 2029 include contractor mobilization/demobilization, interior demolition/seismic retrofitting, and interior buildout/renovation. The estimated off-road and on-road construction emissions for 2029 are summarized in Table 7.

Table 7 Estimated 2029 Construction Emissions

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	Estimated Annual Emissions (tons)		
		Construction Equipment	Construction Traffic	Total (2029)
Carbon Monoxide	100*	0.31	9.82	10.13
Nitrogen Oxides	100*	0.98	0.65	1.63
Sulfur Oxides	100*	Negligible	0.01	0.01
Volatile Organic Compounds	100*	0.07	0.35	0.42
PM ₁₀	100*	0.05	0.02	0.07
PM _{2.5}	100*	0.04	0.01	0.05
GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)		
Carbon Dioxide equivalent	25,000	414	1,339	1,753

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

As shown in Table 7, the estimated construction emissions for 2029 are well below the general conformity de minimis levels for criteria pollutants in maintenance areas. Estimated construction GHG emissions for 2029 are also well below the 25,000 metric tons carbon dioxide equivalent CEQ threshold.

6.1.3.6 2030 Estimated Construction Emissions

Construction projects that are assumed to occur in 2030 include the completion of seismic retrofitting and renovation of Building 2 and the renovation of Building 1AC (25,000 BGSF to be renovated). Construction activities that are assumed to occur in 2030 include contractor mobilization/demobilization, interior demolition (Building 1AC), and interior buildout/renovation (Buildings 2 and 1AC). The estimated off-road and on-road construction emissions for 2030 are summarized in Table 8.

Table 8 Estimated 2030 Construction Emissions

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	Estimated Annual Emissions (tons)		
		Construction Equipment	Construction Traffic	Total (2030)
Carbon Monoxide	100*	0.16	7.50	7.66
Nitrogen Oxides	100*	0.45	0.35	0.80
Sulfur Oxides	100*	Negligible	Negligible	Negligible
Volatile Organic Compounds	100*	0.03	0.26	0.29
PM ₁₀	100*	0.02	0.01	0.03
PM _{2.5}	100*	0.02	0.01	0.03
GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)		
Carbon Dioxide equivalent	25,000	146	1,004	1,150

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

As shown in Table 8, the estimated construction emissions for 2030 are well below the general conformity de minimis levels for criteria pollutants in maintenance areas. Estimated construction GHG emissions for 2030 are also well below the 25,000 metric tons carbon dioxide equivalent CEQ threshold.

6.1.3.7 2031 Estimated Construction Emissions

Construction projects that are assumed to occur in 2031 include the demolition of Buildings 17, 57, 58, 63, and T15 (and possibly 60 and 84), totaling approximately 22,500 BGSF, and the first year of seismic retrofitting and renovation of Building 1 (126,500 BGSF) for reuse by others. Construction activities that are assumed to occur in 2031 for the building demolition project include contractor mobilization/demobilization, building demolition, off-site disposal of the demolition debris, and restoration of the demolition areas through a combination of repaving and landscaping. Construction activities associated with Building 1 that are assumed to occur in 2031 include contractor mobilization, interior demolition/seismic retrofitting, and interior buildout/renovation. The estimated off-road and on-road construction emissions for 2031 are summarized in Table 9.

Table 9 Estimated 2031 Construction Emissions

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	Estimated Annual Emissions (tons)		
		Construction Equipment	Construction Traffic	Total (2031)
Carbon Monoxide	100*	0.30	5.97	6.27
Nitrogen Oxides	100*	1.17	0.35	1.52
Sulfur Oxides	100*	Negligible	Negligible	Negligible
Volatile Organic Compounds	100*	0.07	0.21	0.28
PM ₁₀	100*	0.05	0.01	0.06
PM _{2.5}	100*	0.04	0.01	0.05
GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)		
Carbon Dioxide equivalent	25,000	697	889	1,586

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

As shown in Table 9, the estimated construction emissions for 2031 are well below the general conformity de minimis levels for criteria pollutants in maintenance areas. Estimated construction GHG emissions for 2031 are also well below the 25,000 metric tons carbon dioxide equivalent CEQ threshold.

Although not planned at this time, if VA is unable to identify any suitable reuse options for Building 1, Building 1 may be demolished. As demolition would result in different construction air emissions than seismic retrofitting and renovation, this alternate scenario was also evaluated. Appendix D contains spreadsheets with the estimated off-road and on-road construction emissions for the demolition of Building 1 during 2031. Emissions associated with the demolition of Building 1 would generally be similar to or less than those associated with the seismic retrofitting and renovation of the building.

6.1.3.8 2032 Estimated Construction Emissions

Construction projects that are assumed to occur in 2032 include the completion of seismic retrofitting and renovation of Building 1 and the first year of construction of the State Veterans Home on the 14-acre area by ODVA. Construction activities associated with Building 1 that are assumed to occur in 2032 include interior buildout/renovation, cleanup, and contractor demobilization. Construction activities that are assumed to occur in 2032 for the State Veterans Home include contractor mobilization/demobilization, site preparation and grading, installation of foundations, and exterior and interior building construction. The estimated off-road and on-road construction emissions for 2032 are summarized in Table 10.

Table 10 Estimated 2032 Construction Emissions

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	Estimated Annual Emissions (tons)		
		Construction Equipment	Construction Traffic	Total (2032)
Carbon Monoxide	100*	0.33	12.66	12.99
Nitrogen Oxides	100*	1.29	0.64	1.93
Sulfur Oxides	100*	Negligible	0.01	0.01
Volatile Organic Compounds	100*	0.08	0.44	0.52
PM ₁₀	100*	0.05	0.02	0.07
PM _{2.5}	100*	0.05	0.02	0.07
GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)		
Carbon Dioxide equivalent	25,000	766	1,891	2,657

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

As shown in Table 10, the estimated construction emissions for 2032 are well below the general conformity de minimis levels for criteria pollutants in maintenance areas. Estimated construction GHG emissions for 2032 are also well below the 25,000 metric tons carbon dioxide equivalent CEQ threshold.

6.1.3.9 2033 Estimated Construction Emissions

Construction projects that are assumed to occur in 2033 include the completion of construction of the State Veterans Home and its associated surface parking lots. Construction activities that are assumed to occur in 2033 include interior building construction, final grading and paving of the parking lots, landscaping, and contractor cleanup and demobilization. The estimated off-road and on-road construction emissions for 2033 are summarized in Table 11.

Table 11 Estimated 2033 Construction Emissions

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	Estimated Annual Emissions (tons)		
		Construction Equipment	Construction Traffic	Total (2033)
Carbon Monoxide	100*	0.30	6.30	6.60
Nitrogen Oxides	100*	1.25	0.26	1.51
Sulfur Oxides	100*	Negligible	0.01	0.01
Volatile Organic Compounds	100*	0.07	0.22	0.29

PM ₁₀	100*	0.05	0.01	0.06
PM _{2.5}	100*	0.04	0.01	0.05
GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)		
Carbon Dioxide equivalent	25,000	766	965	1,731

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

As shown in Table 11, the estimated construction emissions for 2033 are well below the general conformity de minimis levels for criteria pollutants in maintenance areas. Estimated construction GHG emissions for 2033 are also well below the 25,000 metric tons carbon dioxide equivalent CEQ threshold.

6.2 Long-Term Operational Air Quality Impacts

Operational (long-term) air quality impacts associated with the proposed seismic and functional improvements projects include stationary equipment emissions associated with the new facilities, such as from boilers and generators, and transportation-related emissions associated with patients, staff, and visitors using the expanded Roseburg VAMC campus facilities.

6.2.1 Stationary Equipment Emissions

The primary increased stationary equipment emissions for with the Proposed Action would be associated with operation of boilers for Building 100 and the State Veterans Home. The Project Book prepared for the Major Project (chiefly the construction of Building 100 and the renovation of Buildings 2 and 1AC) by Anderson Engineering in 2022 preliminarily evaluated the capacity of the current campus boiler plant (Building 7) to serve the steam needs of Building 100. This analysis found that Building 100 would require an approximately 50 percent increase in steam production from the current boiler plant, which would be below, but near the boiler plant capacity. The Project Book stated that a detailed analysis of the steam demands for Building 100 and the ability of the campus boiler plant to meet these demands would be conducted during project design. It is unknown at this time if Building 100 would be connected to the campus boiler plant or would utilize a separate boiler system. The State Veterans Home would be operated by ODVA and would utilize a separate boiler system.

VA provided the 2023 Annual Reporting Form for the operation of the Building 7 boiler plant (Appendix A). In 2023, the central boiler plant consumed 53.73 million cubic feet of natural gas, 829 gallons of diesel #2, and 5 gallons of propane. The Annual Reporting Form provided estimated air emissions for 2023, which are listed in Table 12. Based on the estimated Building 100 steam demand provided in the Project Book, it is estimated that boiler air emissions for Building 100 would be approximately 50 percent of existing Building 7 boiler plant emissions. The State Veterans Home is anticipated to have a slightly smaller total square footage (130,000 BGSF) than Building 100 (165,000 BGSF), but is conservatively assumed to have a similar steam demand and boiler emissions. Estimated boiler emissions for Building 100 and the State Veterans Home are provided in Table 12.

Table 12 Estimated Future Boiler Emissions

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	Estimated Annual Emissions (tons)		
		2023 Roseburg VAMC Boiler Plant	Additional Building 100	Additional State Veterans Home
Carbon Monoxide	100*	2.26	1.13	1.13
Nitrogen Oxides	100*	2.69	1.35	1.35
Sulfur Oxides	100*	0.05	0.03	0.03
Volatile Organic Compounds	100*	0.15	0.08	0.08
PM ₁₀	100*	0.07	0.04	0.04
PM _{2.5}	100*	0.07	0.04	0.04
GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)		
Carbon Dioxide equivalent	25,000	2,936	1,468	1,468

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

While the estimated increased boiler emissions associated with the Proposed Action (primarily from Building 100 and the State Veterans Home) are preliminary and based on limited available data, these estimated emissions are well below the general conformity de minimis levels for criteria pollutants in maintenance areas and the 25,000 metric tons carbon dioxide equivalent CEQ threshold.

Diesel-fueled emergency generators associated with the new Roseburg VAMC campus facilities would only operate intermittently and for short periods of time when the electrical service to the buildings is interrupted. Air emissions from the emergency generators would be very minor.

6.2.2 Traffic Emissions

The Proposed Action would result in a localized increase in vehicle air emissions from patients, staff and visitors driving to the campus, which would have expanded facilities and parking. Wells + Associates completed a Traffic Impact Analysis for the Proposed Action in February 2024. The traffic study included an evaluation of the additional daily vehicle trips that would be generated by the operation of Building 100, the 150-bed State Veterans Home, and the reuse of Building 1 for general office use by others. The traffic study estimated a net increase of 1,504 daily vehicle trips to the Roseburg VAMC campus as a result of the Proposed Action. Regional vehicle emissions would be similar to current emissions, as most patients, staff and visitors who would use the expanded Roseburg VAMC facilities already currently travel to the campus and other facilities in the Roseburg area.

The MOVES program was used to estimate criteria pollutant and GHG emissions from the additional vehicle traffic associated with the operation of the expanded facilities provided by the Proposed Action. Modeling was conducted for the year 2033, the approximate year of the completion of the Proposed Action construction projects. The estimated 1,504 additional daily vehicle trips were assumed to consist of 516

passenger cars (49 percent), 516 passenger trucks (49 percent), and 22 commercial trucks (2 percent) fueled by gasoline. The emissions are reported in grams per day, based on a conservative assumption of a 50-mile one-way trip (100 miles per day) for each vehicle. The estimated emissions were converted to pounds per day and multiplied by 250 days (number of weekdays minus federal holidays) to estimate annual vehicle emissions.

Appendix D contains the spreadsheet with the estimated annual operational traffic emissions. Table 13 summarizes the annual increased traffic emissions in 2033. As shown in Table 13, the estimated 2033 additional vehicle emissions are below the general conformity de minimis levels for criteria pollutants in maintenance areas and the estimated GHG emissions are below the 25,000 metric tons carbon dioxide equivalent threshold. Subsequent years would have similar, but lower additional vehicle emissions as vehicle emission rates decrease each year.

Table 13 Estimated Additional Annual Traffic Emissions as a Result of the Proposed Action

Pollutant	General Conformity De Minimis Rate for Maintenance Areas (tons/year)	2033 Estimated Annual Additional Traffic Emissions (tons)
Carbon Monoxide	100*	53.83
Nitrogen Oxides	100*	1.14
Sulfur Oxides	100*	0.05
Volatile Organic Compounds	100*	1.91
PM ₁₀	100*	0.07
PM _{2.5}	100*	0.06
GHG Emissions	2014 CEQ Threshold (metric tons)	Estimated Annual Emissions (metric tons)
Carbon Dioxide equivalent	25,000	7,490

* - provided for information, but not applicable for the Roseburg VAMC area, which is in full attainment of the NAAQS.

7. MANAGEMENT MEASURES

The following construction management measures and BMPs are recommended to reduce air emissions associated with the proposed projects:

- Remove asbestos containing materials (ACMs) in accordance with the federal and state requirements prior to building renovation or interior demolition activities.
- Implement dust control measures during interior demolition/renovation to control possible lead-based paint emissions.
- Use appropriate dust suppression methods such as water sprays or dust palliative during site demolition and construction activities.

- Minimize vehicle speed while traveling on unpaved surfaces.
- Cover soil piles when practicable.
- Minimize work during periods of high winds when practicable.
- Maintain the engines of construction equipment according to manufacturers' specifications.
- Minimize idling of construction equipment while the equipment is not in use.
- Locate stationary operating equipment as far away from sensitive receptors as possible.
- Select material transportation routes as far away from sensitive receptors as possible.

8. SUMMARY AND CONCLUSIONS

The Roseburg VAMC is an institutional facility that provides primary health care services, mental health care services, specialty care services, and administrative support services typical of a large medical campus. Primary air emissions from the VAMC are associated with daily staff, patient and visitor vehicular traffic and the operation of the VAMC's central boiler plant (Building 7), other boilers and generators, and fueling areas.

The proposed seismic functional improvements projects would result in temporary, short-term construction-related air quality impacts associated with the disturbance of asbestos and lead-based paint within the project buildings, and fugitive dust generated during demolition and construction. These less-than-significant, construction-related emissions would be minimized through the recommended management measures and BMPs outlined in Section 7.

The proposed projects would also result in short-term air emissions from the operation of off-road construction equipment at the campus and on-road construction-related vehicles. Construction criteria pollutant and GHG emissions were modeled for each Proposed Action construction project for calendar years between 2025 and 2033 based on assumed project construction phasing and schedules, assumed construction equipment use, and estimated associated construction vehicle traffic. The modeling found that annual construction emissions for all of the proposed construction projects are well below the general conformity de minimis levels (100 tons per year) for criteria pollutants in maintenance areas, although these criteria are not applicable to the Proposed Action as the Roseburg VAMC is located within a full attainment area. Estimated GHG emissions are also well below the 25,000 metric tons carbon dioxide equivalent threshold below which CEQ did not recommend quantitative analysis.

The proposed seismic upgrade and functional improvements projects would result in long-term (operational) air quality impacts associated with stationary source emissions from the operation of boilers for Building 100 and the State Veterans Home and transportation-related emissions associated with patients, staff, and visitors using the expanded Roseburg VAMC campus facilities. Based on the February 2024 Traffic Impact Analysis, it is estimated that approximately 1,054 additional daily vehicle trips to the Roseburg VAMC campus would result from the Proposed Action. Modeling was conducted to estimate criteria pollutant and GHG emissions from the additional vehicle traffic associated with the completed projects in 2033. The modeling found that annual additional long-term vehicle emissions associated with the Proposed Action would be below the general conformity de minimis level for criteria pollutants in maintenance areas and the GHG emissions would be below the 25,000 metric tons carbon dioxide

equivalent threshold. Subsequent years would have similar, but lower additional vehicle emissions as vehicle emission rates decrease.

APPENDIX G – IPAC REPORT



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oregon Fish And Wildlife Office
2600 Southeast 98th Avenue, Suite 100
Portland, OR 97266-1398
Phone: (503) 231-6179 Fax: (503) 231-6195



In Reply Refer To:
Project Code: 2024-0012200
Project Name: Roseburg VAMC

November 02, 2023

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). This is not a consultation.

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2))

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Oregon Fish And Wildlife Office
2600 Southeast 98th Avenue, Suite 100
Portland, OR 97266-1398
(503) 231-6179

PROJECT SUMMARY

Project Code: 2024-0012200

Project Name: Roseburg VAMC

Project Type: Commercial Development

Project Description: The U.S. Department of Veterans Affairs (VA) is proposing a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the Roseburg VA Medical Center campus.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@43.223374699999994,-123.36456879593848,14z>



Counties: Douglas County, Oregon

ENDANGERED SPECIES ACT SPECIES

There is a total of 5 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Marbled Murrelet <i>Brachyramphus marmoratus</i> Population: U.S.A. (CA, OR, WA) There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4467	Threatened
Northern Spotted Owl <i>Strix occidentalis caurina</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1123	Threatened

INSECTS

NAME	STATUS
Franklin's Bumble Bee <i>Bombus franklini</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7022	Endangered
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

FLOWERING PLANTS

NAME	STATUS
Kincaid's Lupine <i>Lupinus sulphureus ssp. kincaidii</i>	Threatened
There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3747	

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

-
1. The [Bald and Golden Eagle Protection Act](#) of 1940.
 2. The [Migratory Birds Treaty Act](#) of 1918.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are bald and/or golden eagles in your project area.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
<p>Bald Eagle <i>Haliaeetus leucocephalus</i></p> <p>This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.</p> <p>https://ecos.fws.gov/ecp/species/1626</p>	<p>Breeds Jan 1 to Sep 30</p>
<p>Golden Eagle <i>Aquila chrysaetos</i></p> <p>This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.</p> <p>https://ecos.fws.gov/ecp/species/1680</p>	<p>Breeds Jan 1 to Aug 31</p>

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read the supplemental information and specifically the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

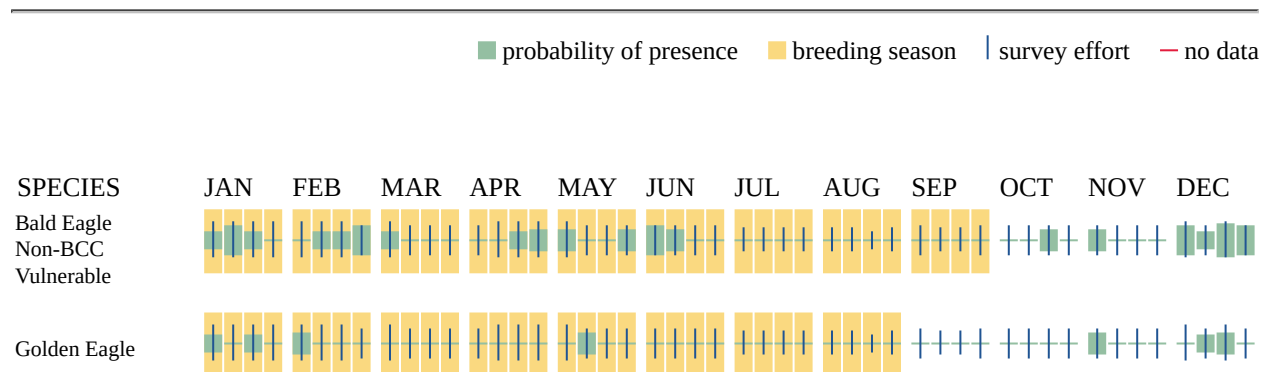
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.



Non-BCC
Vulnerable

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Jan 1 to Sep 30
California Gull <i>Larus californicus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10955	Breeds Mar 1 to Jul 31

NAME	BREEDING SEASON
Clark's Grebe <i>Aechmophorus clarkii</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10575	Breeds Jun 1 to Aug 31
Evening Grosbeak <i>Coccothraustes vespertinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9465	Breeds May 15 to Aug 10
Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Jan 1 to Aug 31
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Olive-sided Flycatcher <i>Contopus cooperi</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3914	Breeds May 20 to Aug 31
Rufous Hummingbird <i>selasphorus rufus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8002	Breeds Apr 15 to Jul 15
Western Grebe <i>aechmophorus occidentalis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743	Breeds Jun 1 to Aug 31
Wrentit <i>Chamaea fasciata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10668	Breeds Mar 15 to Aug 10

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read the supplemental information and specifically the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

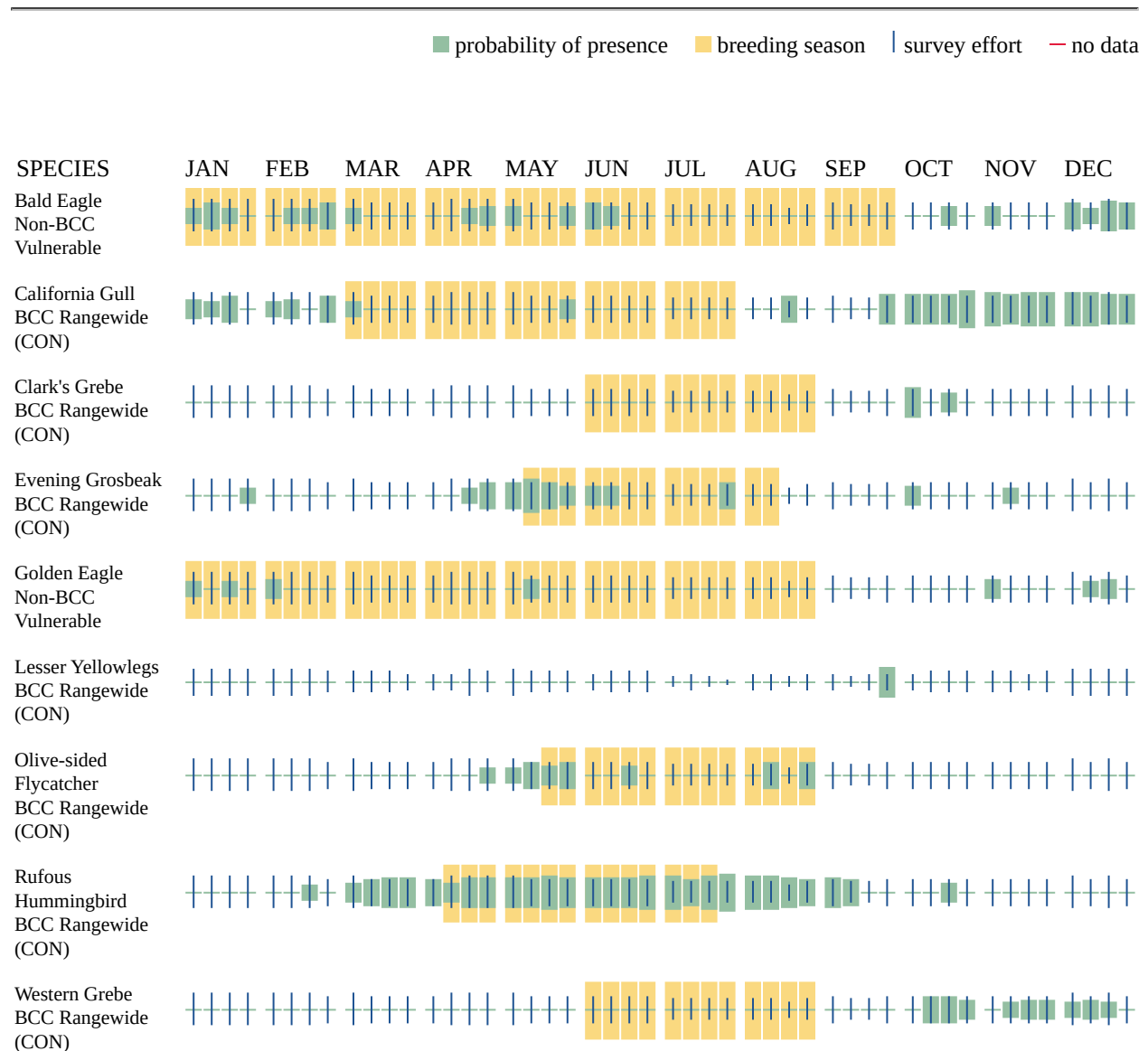
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.



Wrentit
BCC Rangewide
(CON)



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Department of Veterans Affairs
Name: Lee Brewer
Address: 44265 Plymouth Oaks Boulevard
City: Plymouth
State: MI
Zip: 48170
Email: lbrewer@ttlassoc.com
Phone: 7178880249

APPENDIX H – PUBLIC NOTICES AND COMMENTS

**NOTICE OF SCOPING AND PUBLIC INVOLVEMENT UNDER THE
NATIONAL ENVIRONMENTAL POLICY ACT AND
SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED SEISMIC AND FUNCTIONAL IMPROVEMENT PROJECTS
ROSEBURG VA MEDICAL CENTER
ROSEBURG, OREGON**

The U.S. Department of Veterans Affairs (VA) requests input on the scoping of a National Environmental Policy Act Environmental Assessment (EA) for proposed Seismic and Functional Improvement Projects (Proposed Action) at the Roseburg VA Medical Center (Roseburg VAMC) located at 913 NW Garden Valley Boulevard in Roseburg, Oregon.

Multiple Roseburg VAMC campus buildings have functional and size deficiencies that do not meet VA's modern standards for the delivery of health care services to our nation's Veterans. Additionally, a seismic study of the campus found that five buildings, including the main hospital building (Building 1) and mental health building (Building 2), are at risk from seismic activity and do not meet current seismic building standards. VA also seeks to bolster Veteran services by partnering with the State of Oregon to support the future development of a State Veterans Home.

To address these challenges, VA is proposing a series of construction, renovation, seismic retrofitting, and demolition projects at locations across the Roseburg VAMC campus (the Proposed Action). The Proposed Action includes the construction of a new approximately 165,000-square-foot Outpatient Specialty Care Clinic building (Building 100) with associated parking to replace the functions currently in Building 1; seismically retrofitting/renovating Buildings 2, 11, 13 and 16; demolishing seven buildings totaling approximately 25,000 square-feet; associated infrastructure and utility upgrades; and the transfer of approximately 14 acres of campus land to the State of Oregon for the future development of a State Veterans Home.

Prior to transfer of operations from Building 1 to Building 100, VA will assess possible future uses for Building 1 which will be vacant following the transfer. This assessment process will follow the VA Real Property Disposal Guide which prioritizes reuse, adaptation, and transfer to another agency or private entity before consideration of other options, including possible demolition.

Through this notice, VA is also providing the public with information about this undertaking and seeking public comment and input about the undertaking's effects on historic properties pursuant to Section 106 of the National Historic Preservation Act.

VA seeks comments on this proposal, specifically on the scope of issues for NEPA analysis, input on potential alternatives to the proposed action, information regarding any existing analyses relevant to the Proposed Action, and/or information concerning historic properties at the site. Comments will be accepted in either in person or in writing.

In person comments will be accepted during two public meetings at the Roseburg VAMC where VA will present information regarding the proposed projects. The location, times and dates of the public meetings are:

WHEN: **Wednesday, June 28, 2023, from 7:00 pm to 9:00 pm**
 Thursday, June 29, 2023, from 10:00 am to 12:00 pm

WHERE: **Roseburg VAMC Building 16 Auditorium**

The public may also submit written comments/input via email to yacoenvironment@va.gov. Comments will be accepted through **July 20, 2023** and must include “***Roseburg VAMC NEPA Scoping***” on the subject line of the email.

VA anticipates publishing the Draft EA for a 30-day public review and comment period in the Fall of 2023. VA will publish a notice of availability of the Draft EA in The News-Review and solicit public comments at that time.

Affidavit of Publication

The News-Review

Of Douglas County

Roseburg, Oregon

ISSUED DAILY EXCEPT MONDAY & SATURDAY

STATE OF OREGON

COUNTY OF DOUGLAS } ss.

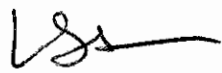
I, LAURA STUDEBAKER, being first duly sworn, depose and say that I am the CLASSIFIEDS MANAGER, of The News-Review, a newspaper of general circulation, as defined by ORS 193.010 and 193.020; printed and published at Roseburg in the aforesaid county and state; that the _____

#89016 Legal Notice of #8855 NEPA SCOPING NOTICE

a printed copy of which is hereto annexed, was published in the entire issue of said newspaper for 2 successive and consecutive days in the following issue:

06/18/2023 06/20/2023

The fee actually charged by such newspaper for such publication is \$891.00



**NOTICE OF SCOPING AND PUBLIC INVOLVEMENT UNDER THE
NATIONAL ENVIRONMENTAL POLICY ACT AND
SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED SEISMIC AND FUNCTIONAL IMPROVEMENT PROJECTS
ROSEBURG VA MEDICAL CENTER
ROSEBURG, OREGON**

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Multiple Roseburg VAMC campus buildings have functional and size deficiencies that do not meet VA's modern standards for the delivery of health care services to our nation's Veterans. Additionally, a seismic study of the campus found that five buildings, including the main hospital building (Building 1) and mental health building (Building 2), are at risk from seismic activity and do not meet current seismic building standards. VA also seeks to bolster Veteran services by partnering with the State of Oregon to support the future development of a State Veterans Home.

To address these challenges, VA is proposing a series of construction, renovation, seismic retrofitting, and demolition projects at locations across the Roseburg VAMC campus (the Proposed Action). The Proposed Action includes the construction of a new approximately 165,000-square-foot Outpatient Specialty Care Clinic building (Building 100) with associated parking to replace the functions currently in Building 1; seismically retrofitting/renovating Buildings 2, 11, 13 and 16; demolishing seven buildings totaling approximately 25,000 square-feet; associated infrastructure and utility upgrades; and the transfer of approximately 14 acres of campus land to the State of Oregon for the future development of a State Veterans Home.

Prior to transfer of operations from Building 1 to Building 100, VA will assess possible future uses for Building 1 which will be vacant following the transfer. This assessment process will follow the VA Real Property Disposal Guide which prioritizes reuse, adaptation, and transfer to another agency or private entity before consideration of other options, including possible demolition.

Through this notice, VA is also providing the public with information about this undertaking and seeking public comment and input about the undertaking's effects on historic properties pursuant to Section 106 of the National Historic Preservation Act.

VA seeks comments on this proposal, specifically on the scope of issues for NEPA analysis, input on potential alternatives to the proposed action, information regarding any existing analyses relevant to the Proposed Action, and/or information concerning historic properties at the site. Comments will be accepted in either in person or in writing.

In person comments will be accepted during two public meetings at the Roseburg VAMC where VA will present information regarding the proposed projects. The location, times and dates of the public meetings are:

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Thursday, June 29, 2023, from 10:00 am to 12:00 pm

WHERE: Roseburg VAMC Building 16 Auditorium

From: Peters, Jami A.(ROS) <Jami.Peters@va.gov>
Sent: Friday, July 7, 2023 2:31 PM
To: VACO Environment
Subject: Roseburg VAMC NEPA Scoping

I was at the 6/29 Roseburg presentation.

- First off – you did a great job. Would love to see the PowerPoint shared with the employees.
- Second, locally the Lede was buried – it should have been advertised as information on the Historic Buildings and The Future..... more people would have shown up. As I have spread the word, most ask why they did not know about it.

I just walked the area of the proposed building 100 and State home – there is a softball field set up there..... Will that be moved to a different location? Pre-COVID we had many games and tournaments with other campuses.

I have also heard more ghost stories as I have spoke with people about the future renovations.

- One concern that has come up (and not related to current builds) is that we put in that wonderful black fence around the campus – but it has messed with normal migration of local animals. Maybe a gated nature bridge could be looked at? The deer and Nutria no longer migrate from the pond on the Garden Valley side to the pond at the cemetery.

Jami Peters, MBA (she/her/hers)

TOD Mon 7:45-1615 T/W & Fri 8:00-1630, Thur 8:30-1700

Administrative Support Assistant

Office of Community Care

Roseburg VA Health Care System

Phone: 541-440-1000 Ext: 40534



From: VACO Environment <VACOEnvironment@va.gov>
Sent: Monday, July 24, 2023 5:56 PM
To: Prescott, Kevin J. (ROS); Abreu, Hector M.; Rob Clark; 'Kelly Sellers Wittie'
Subject: FW: [EXTERNAL] FW: VA SCOPING COMMITTEE COMMENT

CAUTION! This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Input RE Scoping Notice

From: mixon97471@charter.net <mixon97471@charter.net>
Sent: Tuesday, July 18, 2023 9:57 AM
To: VACO Environment <VACOEnvironment@va.gov>
Subject: [EXTERNAL] FW: VA SCOPING COMMITTEE COMMENT

From: "dennis anderson"
To: mixon97471@charter.net
Cc:
Sent: Monday July 17 2023 12:48:27PM
Subject: VA SCOPING COMMITTEE COMMENT

Dear Sirs,

I was in the audience for your meeting on June 29th at the RVAMC and though I am reluctant to say it, my feelings are that your meeting was in fact disengenuous. When asked if your anticipated actions had been budgeted you told us no, yet in meetings that had been held prior to yours, the proposed budget and other facts were brought forth by VA employees. Mixed messages have never formed a good effort or a trust in what's said next.

You asked our our opinion about noise, I'll ask you that same question. How will the VA control the anticipated sounds of both demolition and construction so that the surrounding community, schools and businesses are not impacted?

Your "team" asked for our concerns about air quality and again my question would be, "knowing the age of our buildings and the fact the plans are to demolish/retrofit/rebuild/enhance/etc, commonly used building materials would have been both asbestos and lead based paint. How do you plan to contain those environmentally dangerous items and what is the plan for the correct disposal of those contaminated materials?

Your engineering processes proved that the new building (100) would require 410 parking spaces. Has your engineering process determined how many construction vehicles will be required to enter and exit the campus at Roseburg during the life of this project?

Are you aware the two entrances/exits to this facility will not accomodate necessary construction vehicles?

Lastly, has the VA met with the City of Roseburg to discuss this project? I think not and so wonder, why not! This project will generate massive traffic problems on already over burdened city thorough-fares. This is not even to mention the disruption in care to the veterans of Douglas County.

Dennis Anderson
290 Cambridge Dr. Sutherlin, Or. 97479
817-929-6657
went2texas@yahoo.com
Veteran and a RVAMC patient

[Sent from Yahoo Mail for iPad](#)

From: VACO Environment <VACOEnvironment@va.gov>
Sent: Monday, July 24, 2023 5:56 PM
To: 'Kelly Sellers Wittie'; Prescott, Kevin J. (ROS); Rob Clark; Abreu, Hector M.
Subject: FW: [EXTERNAL] FW: Roseburg VAMC NEPA Scoping

CAUTION! This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Input RE Scoping Notice

From: mixon97471@charter.net <mixon97471@charter.net>
Sent: Tuesday, July 18, 2023 9:56 AM
To: VACO Environment <VACOEnvironment@va.gov>
Subject: [EXTERNAL] FW: Roseburg VAMC NEPA Scoping

From: mixon97471@charter.net
To: "vacoenvionment@va.gov"
Cc:
Sent: Tuesday July 18 2023 8:52:25AM
Subject: Roseburg VAMC NEPA Scoping

Comments from the meeting.

Whatever is being planned will have a great impact on the local traffic and economy. I talked to the City Manager and voiced concerns about ingress and egress to the VA during the construction period.

The VA is one of the top four employers locally so any disruptions that will affect the daily operations can cause problems. Considerations of construction not to disrupt the daily operations of the VA will need to be taken.

Location of the new building 100 near the final honors building needs to consider the noise from rifle volleys conducted almost daily at funerals during final services.

The Roseburg VA catchment area is growing in population faster than the city growth. This is a concern as the outside medical services are being taxed, especially the Mercy Hospital that offers the only local Emergency Room service. The proposed VA Medical Center does not include an ER. The aging population is going to need this kind of service.

Douglas County in which Roseburg VA resides is the #1 County in the USA with 58.1% of the Veteran population seeking healthcare at the VA. As Veterans age and look for places to retire, they tend to migrate to rural areas like the Roseburg Medical Center Catchment area.

Thank You for your time.

Lawrence W Mixon - USARMY Vietnam Veteran and patient

331 Deschutes Lane

Roseburg, Oregon

Secretary of The Vietnam Veterans of America Chapter 805 and VA Volunteer.

Email mixon97471@charter.net

Phone 503 308-3355

From: VACO Environment <VACOEnvironment@va.gov>
Sent: Monday, July 24, 2023 5:53 PM
To: Rob Clark; Abreu, Hector M.; Prescott, Kevin J. (ROS); 'Kelly Sellers Wittie'
Subject: FW: Roseburg VAMC NEPA scoping

CAUTION! This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Input RE Scoping Notice

From: Horton, Kristin L.(ROS) <Kristin.Horton2@va.gov>
Sent: Thursday, July 20, 2023 2:55 PM
To: VACO Environment <VACOEnvironment@va.gov>
Subject: Roseburg VAMC NEPA scoping

Good afternoon,

I am a new VAMC employee, but a long-time resident of Roseburg. The VA campus in our little community is no less than our identity. We are a small city of less than 24,000 with virtually no other historical sites of such significance. Our ties to these stately old buildings run as deep as our commitment to our nation, our families, and our veterans. We have worked, grieved, served, and saved on this campus. The legacy that is set in the very bricks of the structures being considered for destruction is too great a loss for our population. A tour of the campus is all one needs to sense the importance of honoring the story told by these buildings. They connect us to a greater whole that is our country and our amazing network of veterans' services and most importantly, they connect us to the men and women who created them.

With that being said, I implore you to consider some creative options to preserving our campus structures. We have a brand new local medical school that would benefit from a state-of-the-art simulation and hospital training facility. This is exactly what we could offer on the vacated 5th floor of building 1, which is not rated for hospital use, but potentially acceptable for a learning lab. This partnership would fill a desperate need to develop more qualified healthcare professionals in our rural area. We are fortunate here in the Northwest to have several grass roots organizations devoted to preserving and re-purposing similar historic buildings for public use. Please consider the examples set by McMenamins and by Revolution Hall in downtown Portland. Enriching our community while enhancing the veteran and employee experience could be common goals, readily accomplished through such a partnership.

Please also keep in mind the reverence due to the adjacent National Cemetery. Preserving the surrounding landscape to maintain peace and solemnity for the families of veterans who have passed is an honored tradition. Keeping a campus that is majestic and well-maintained is a form of respect for the visitors who may measure our value of their passed loved ones by the way we tend final encampment. This shared boundary would lend the beautiful ground floor of building 1 to the development of a museum. We could use this space to preserve the stories of veterans who have passed through its doors since 1932.

We are a scrappy logging town by birth, grown into a more diverse city with a renewed interest in saving the very best of who we are and how we got here. The VA Medical Center complex is more than just a property on a map or an asset on a ledger to us; it is our history and our bond to the country that we still fight for and honor every day. Once again, please consider with an open mind and creative outlook how we might save this unique legacy.

Thank you for your time,

Kristin Horton, RPh
Roseburg VAMC

NOTICE OF AVAILABILITY
DRAFT PROGRAMMATIC ENVIRONMENTAL ASSESSMENT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED SEISMIC AND FUNCTIONAL IMPROVEMENT PROJECTS
ROSEBURG VA MEDICAL CENTER
ROSEBURG, OREGON

The U.S. Department of Veterans Affairs (VA) announces the availability of a Draft Programmatic Environmental Assessment (PEA) for public review and comment. The Draft PEA evaluates the potential environmental effects of the proposed Seismic and Functional Improvement Projects (Proposed Action) at the Roseburg VA Medical Center (Roseburg VAMC) located at 913 NW Garden Valley Boulevard in Roseburg, Oregon.

Multiple Roseburg VAMC campus buildings have functional and size deficiencies that do not meet VA's modern standards for the delivery of health care services to our nation's Veterans. Additionally, a seismic study of the campus found that seven campus buildings, including the main hospital building (Building 1) and mental health building (Building 2), are at risk from seismic activity and do not meet current seismic building standards. VA also seeks to bolster Veteran services by partnering with the State of Oregon to support the future development of a State Veterans Home.

To address these challenges, VA is proposing a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the Roseburg VAMC campus (the Proposed Action). The Proposed Action includes the construction of a new approximately 165,000 building gross square feet (BGSF) building (Building 100) with associated surface parking to replace the functions currently in Building 1; seismically retrofitting/renovating Buildings 2, 11, 13, and 16; renovating Buildings 1AC, 71, and 81; demolishing five buildings totaling approximately 21,000 BGSF; campus roadway, infrastructure, and utility upgrades necessary to support the proposed development; and the proposed transfer of approximately 14 acres of campus land to the State of Oregon for the future development of a State Veterans Home.

Prior to transfer of operations from Building 1 to Building 100, VA will assess possible future uses for Building 1, which will be vacant following the transfer. This assessment process will follow the VA Real Property Disposal Guide, which prioritizes reuse, adaptation, and transfer to another agency or appropriate private entity before consideration of other options, including possible demolition.

VA prepared the Draft PEA in accordance with the NEPA (40 CFR Part 1500), the Council on Environmental Quality Guidance and VA NEPA implementation regulations (38 CFR Part 26).

The Draft PEA is available for review at the Roseburg Public Library located at 1409 NE Diamond Lake Boulevard in Roseburg, OR and on the VA website at

<https://www.cfm.va.gov/environmental/index.asp>.

VA will hold two public meetings at the Roseburg VAMC where VA will provide information regarding the proposed projects, present a summary of the Draft PEA, and accept comments from the public. The location, times and date of the public meetings are:

WHEN: **Tuesday, May 21, 2024, from 10:00 am to 12:00 pm**
 Tuesday, May 21, 2024, from 7:00 pm to 9:00 pm

WHERE: **Roseburg VAMC Building 16 Auditorium**

The public may also submit written comments via email to vacoenvironment@va.gov. Comments will be accepted through **June 3, 2024** and must include “**Roseburg VAMC Draft PEA**” on the subject line of the email. VA will prepare and publish the Final PEA following the 30-day public comment period. VA will address and incorporate relevant comments in the Final PEA.

For additional information or questions, please contact Bruce Mack, Environmental Engineer at vacoenvironment@va.gov with the subject line “Roseburg VAMC Draft PEA”.

The News-Review

AFFIDAVIT OF PUBLICATION

State of Florida, County of Orange, ss:

Laquansay Nickson Watkins, being first duly sworn, deposes and says: That (s)he is a duly authorized signatory of Column Software, PBC, duly authorized agent of The News-Review, a newspaper printed and published in the City of Roseburg, County of Douglas, State of Oregon, and that this affidavit is Page 1 of 2 with the full text of the sworn-to notice set forth on the pages that follow, and the hereto attached:

PUBLICATION DATES:

May. 3, 2024

May. 5, 2024

NOTICE ID: 83mGtDbgdKLFewM10B30

PUBLISHER ID: 100354

NOTICE NAME: PEA NOA 042624

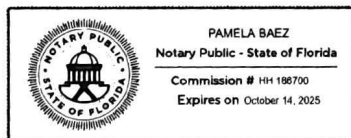
Publication Fee: \$698.92

I declare under penalty of perjury under the law of Oregon that the foregoing is true and correct

(Signed) Laquansay Nickson Watkins

VERIFICATION

State of Florida
County of Orange



Subscribed in my presence and sworn to before me on this: 05/09/2024

[Signature]

Notary Public

Notarized remotely online using communication technology via Proof.

NOTICE OF AVAILABILITY DRAFT PROGRAMMATIC ENVIRONMENTAL ASSESSMENT U.S. DEPARTMENT OF VETERANS AFFAIRS

PROPOSED SEISMIC AND FUNCTIONAL IMPROVEMENT PROJECTS ROSEBURG VA MEDICAL CENTER ROSEBURG, OREGON

The U.S. Department of Veterans Affairs (VA) announces the availability of a Draft Programmatic Environmental Assessment (PEA) for public review and comment. The Draft PEA evaluates the potential environmental effects of the proposed Seismic and Functional Improvement Projects (Proposed Action) at the Roseburg VA Medical Center (Roseburg VAMC) located at 913 NW Garden Valley Boulevard in Roseburg, Oregon.

Multiple Roseburg VAMC campus buildings have functional and size deficiencies that do not meet VA's modern standards for the delivery of health care services to our nation's Veterans. Additionally, a seismic study of the campus found that seven campus buildings, including the main hospital building (Building 1) and mental health building (Building 2) are at risk from seismic activity and do not meet current seismic building standards. VA also seeks to bolster Veteran services by partnering with the State of Oregon to support the future development of a State Veterans Home.

To address these challenges, VA is proposing a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the Roseburg VAMC campus (the Proposed Action). The Proposed Action includes the construction of a new approximately 165,000 building gross square feet (BGSF) building (Building 100) with associated surface parking to replace the functions currently in Building 1; seismically retrofitting/renovating Buildings 2, 11, 13, and 16; renovating Buildings 14C, 71, and 81; demolishing five buildings totaling approximately 21,000 BGSF; campus roadway infrastructure, and utility upgrades necessary to support

the proposed development, and the proposed transfer of approximately 14 acres of campus land to the State of Oregon for the future development of a State Veterans Home.

Brine Mack Environmental
Engineer at vacoenvironment@va.gov with the subject line 'Roseburg VAMC Draft PEA'

Pub 100354 Dates May 3 and 5 2024

Prior to transfer of operations from Building 1 to Building 100, VA will assess possible future uses for Building 1, which will be vacant following the transfer. This assessment process will follow the VA Real Property Disposal Guide, which prioritizes reuse, adaptation and transfer to another agency or appropriate private entity before consideration of other options including possible demolition.

VA prepared the Draft PEA in accordance with the NEPA (40 CFR Part 1500) the Council on Environmental Quality Guidance and VA NEPA implementation regulations (38 CFR Part 26). The Draft PEA is available for review at the Roseburg Public Library located at 1409 NE Diamond Lake Boulevard in Roseburg, OR and on the VA website at <https://www.cfm.va.gov/environmental/index.asp>.

VA will hold two public meetings at the Roseburg VAMC where VA will provide information regarding the proposed projects present a summary of the Draft PEA, and accept comments from the public. The location, times and date of the public meetings are:

WHEN:
Tuesday, May 21, 2024, from 10:00 am to 12:00 pm

Tuesday, May 21, 2024, from 7:00 pm to 9:00 pm

WHERE:
Roseburg VAMC Building 16 Auditorium

The public may also submit written comments via email to vacoenvironment@va.gov. Comments will be accepted through **June 3, 2024** and must include 'Roseburg VAMC Draft PEA' on the subject line of the email. VA will prepare and publish the Final PEA following the 30-day public comment period. VA will address and incorporate relevant comments in the Final PEA.

For additional information or questions please contact



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

May 3, 2024

Sent via email

**SUBJECT: Notice of Availability – Draft NEPA Programmatic Environmental Assessment
Proposed Seismic and Functional Improvement Projects, Roseburg VA
Medical Center, 913 NW Garden Valley Boulevard, Roseburg, Oregon**

Dear Valued Stakeholder:

The U.S. Department of Veterans Affairs (VA) announces the availability of a Draft Programmatic Environmental Assessment (PEA) for public review and comment. The Draft PEA evaluates the potential environmental effects of the proposed Seismic and Functional Improvement Projects (Proposed Action) at the Roseburg VA Medical Center (Roseburg VAMC) located at 913 NW Garden Valley Boulevard in Roseburg, Oregon. The location of the Roseburg VAMC campus is shown on Figures 1 and 2. Figure 3 provides an aerial photograph of the campus.

VA has prepared the Draft PEA according to the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code 4321-4370h), the Council on Environmental Quality Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and VA Implementing Regulations (38 CFR Part 26).

Multiple Roseburg VAMC campus buildings have functional and size deficiencies that do not meet VA's modern standards for the delivery of health care services to our nation's Veterans. Additionally, a seismic study of the campus found that seven campus buildings, including the main hospital building (Building 1) and mental health building (Building 2), are at risk from seismic activity and do not meet current seismic building standards. VA also seeks to bolster Veteran services by partnering with the State of Oregon to support the future development of a State Veterans Home.

To address these challenges, VA is proposing a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the Roseburg VAMC campus (the Proposed Action). The Proposed Action includes:

- Constructing a 3 to 4-story, approximately 165,000 building gross square feet (BGSF) building (Building 100) with associated surface parking on the eastern portion of the campus to replace the functions currently within Building 1 (approximately 126,500 BGSF).
- Seismically retrofitting/renovating Buildings 2 (mental health), 11 (laundry), 13 (warehouse), and 16 (chapel/auditorium).
- Renovating Buildings 1AC (ambulatory care/outpatient clinic), 71 (patient food and nutrition, campus canteen), and 81 (Community Living Center) and constructing a small addition to Building 81.
- Demolishing five buildings [Buildings 17 (VAMC offices), 57 (VA police station), 58 (environmental management and greenhouse), 63 (hazardous materials storage), and T15

(storage)] in the northern portion of the campus, totaling approximately 21,000 BGSF, to allow for improved site access and parking.

- Existing parking lot modifications.
- Campus roadway, infrastructure, and utility upgrades, as necessary, to support the proposed development.
- Transferring approximately 14 acres of land in the eastern portion of the campus to the State of Oregon for the future development of a State Veterans Home.

Prior to transfer of operations from Building 1 to Building 100, VA will assess possible future uses for Building 1, which will be vacant following the transfer. This assessment process will follow the *VA Real Property Disposal Guide*, which prioritizes reuse, adaptation, and transfer to another agency or appropriate private entity before consideration of other options, including possible demolition.

The Proposed Action construction activities would be conducted in phases over approximately 10 years to minimize campus disruption, support continued campus operations, and minimize the need for temporary swing space during construction. All elements of this Proposed Action are located entirely within the Roseburg VAMC campus on land currently owned by the Federal Government. Figure 4 depicts the current campus configuration. Figure 5 illustrates the primary Proposed Action construction areas.

Concurrent with this mailing, a Notice of Availability for the Draft PEA will be published in *The News-Review*. A hard copy of the Draft PEA is available at the Roseburg Public Library located at 1409 NE Diamond Lake Boulevard in Roseburg, OR for review and comment.

The Draft PEA is also available on the via the VA CFM Environmental Program Office website at <https://www.cfm.va.gov/environmental/index.asp>.

VA will hold two public meetings at the Roseburg VAMC where VA will provide information regarding the proposed projects, present a summary of the Draft PEA, and accept comments from the public. The location, times and date of the public meetings are:

WHEN: Tuesday, May 21, 2024, from 10:00 am to 12:00 pm
Tuesday, May 21, 2024, from 7:00 pm to 9:00 pm

WHERE: Roseburg VAMC Building 16 Auditorium

Please submit your comments on the Draft PEA via email by **June 3, 2024**, to vacoenvironment@va.gov with the subject line “Roseburg VAMC Draft PEA”. VA will prepare and publish the Final PEA following the 30-day public comment period. VA will address and incorporate relevant comments in the Final PEA.

For additional information or questions, please contact us at vacoenvironment@va.gov with the subject line “Roseburg VAMC Draft PEA”.

Respectfully,

Glenn Elliott
Director, Project Development Service (PDS)
Office of Construction and Facilities Management (CFM)
U.S. Department of Veterans Affairs (VA)

Figure 1: Roseburg VAMC Location Map

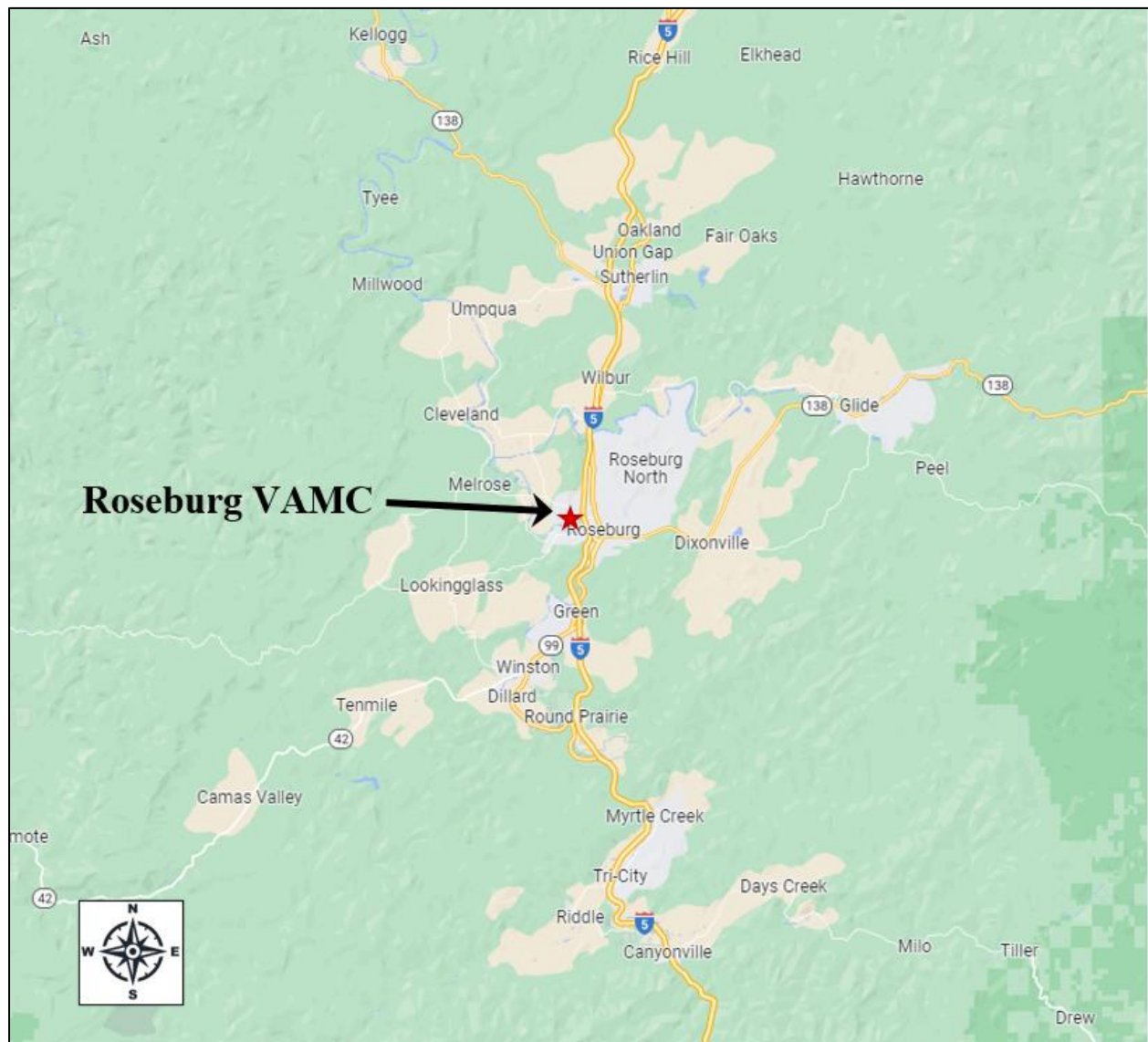


Figure 2: Topographic Location Map

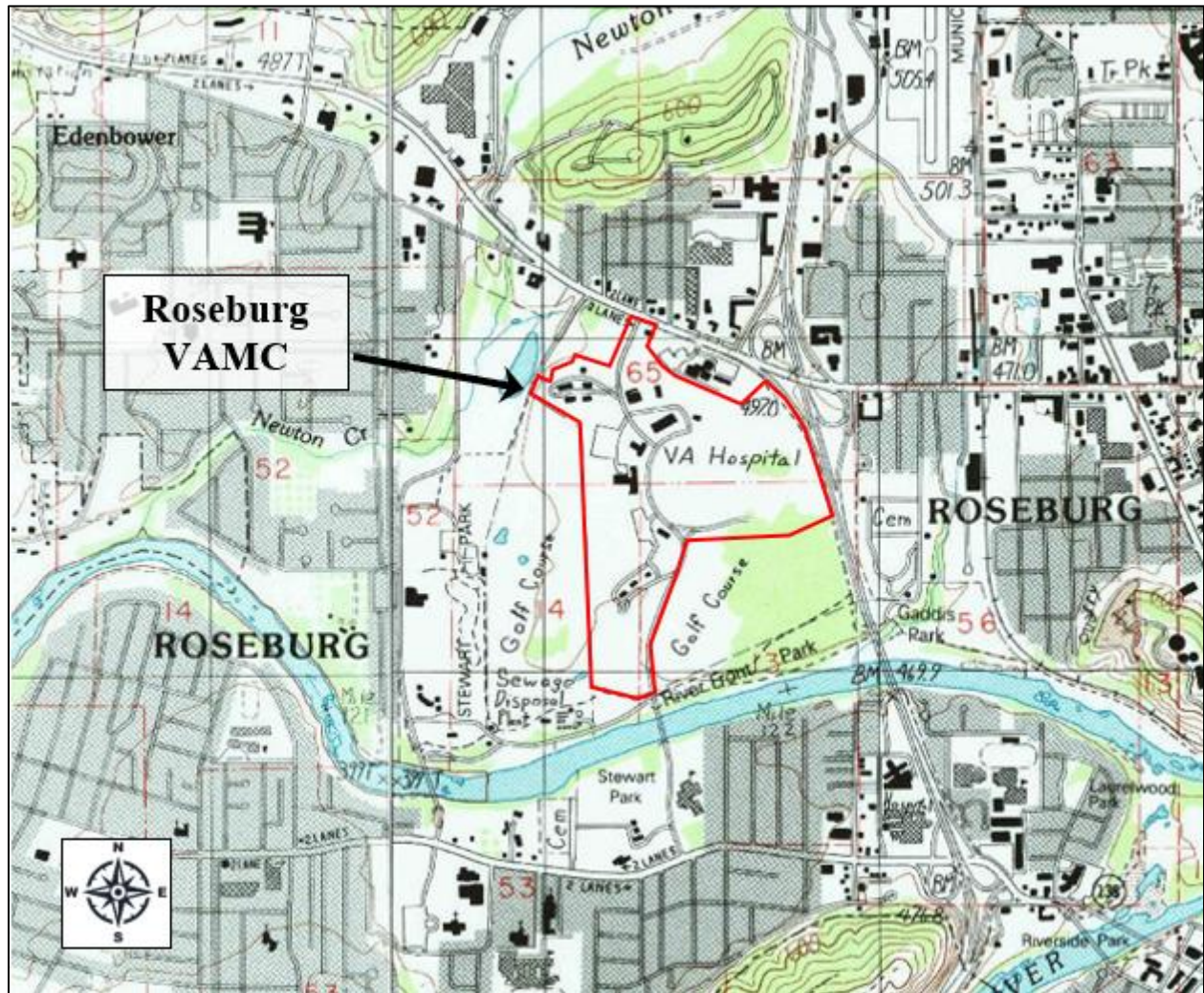


Figure 3: Aerial Photograph of Roseburg VAMC Campus

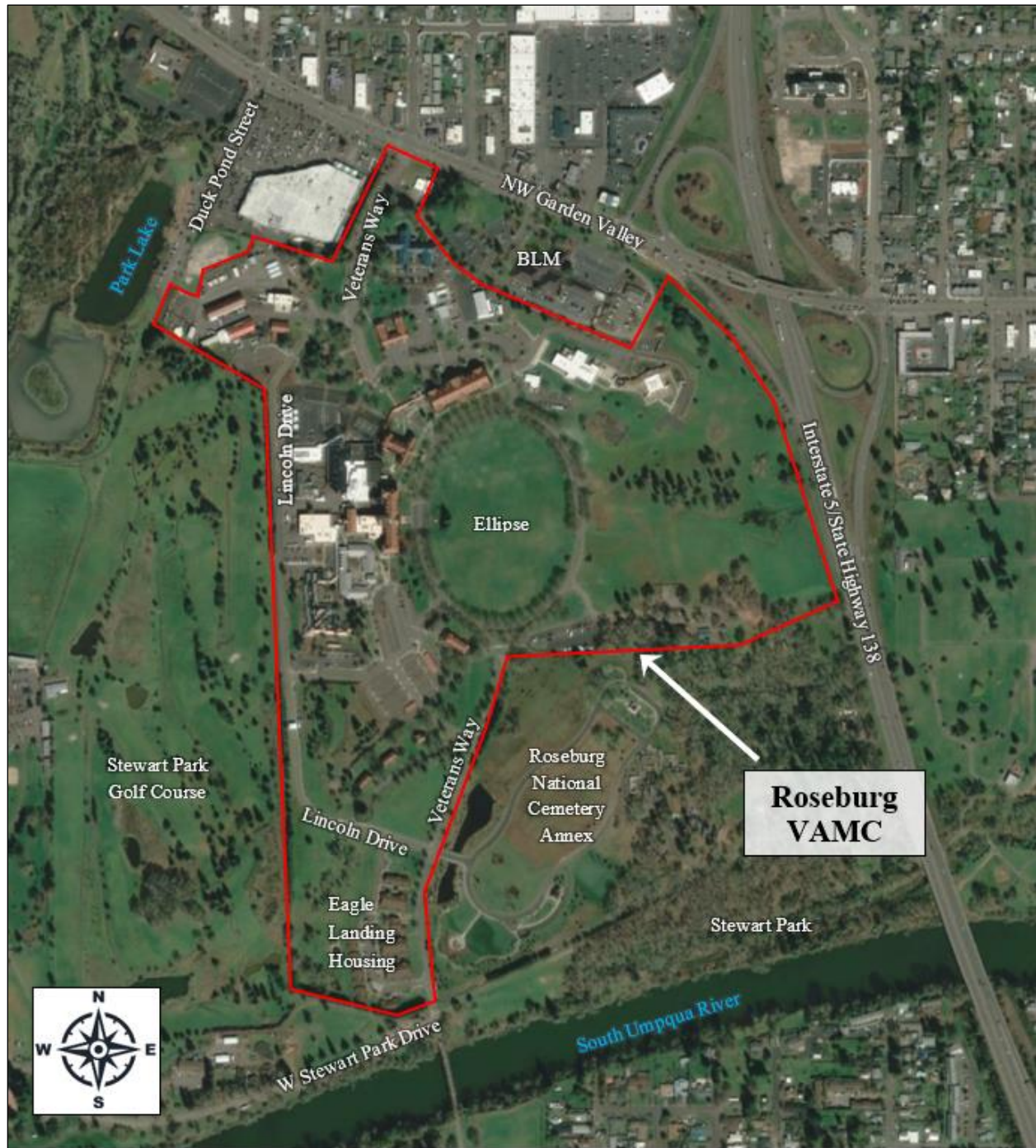


Figure 4: Existing Roseburg VAMC Campus Configuration

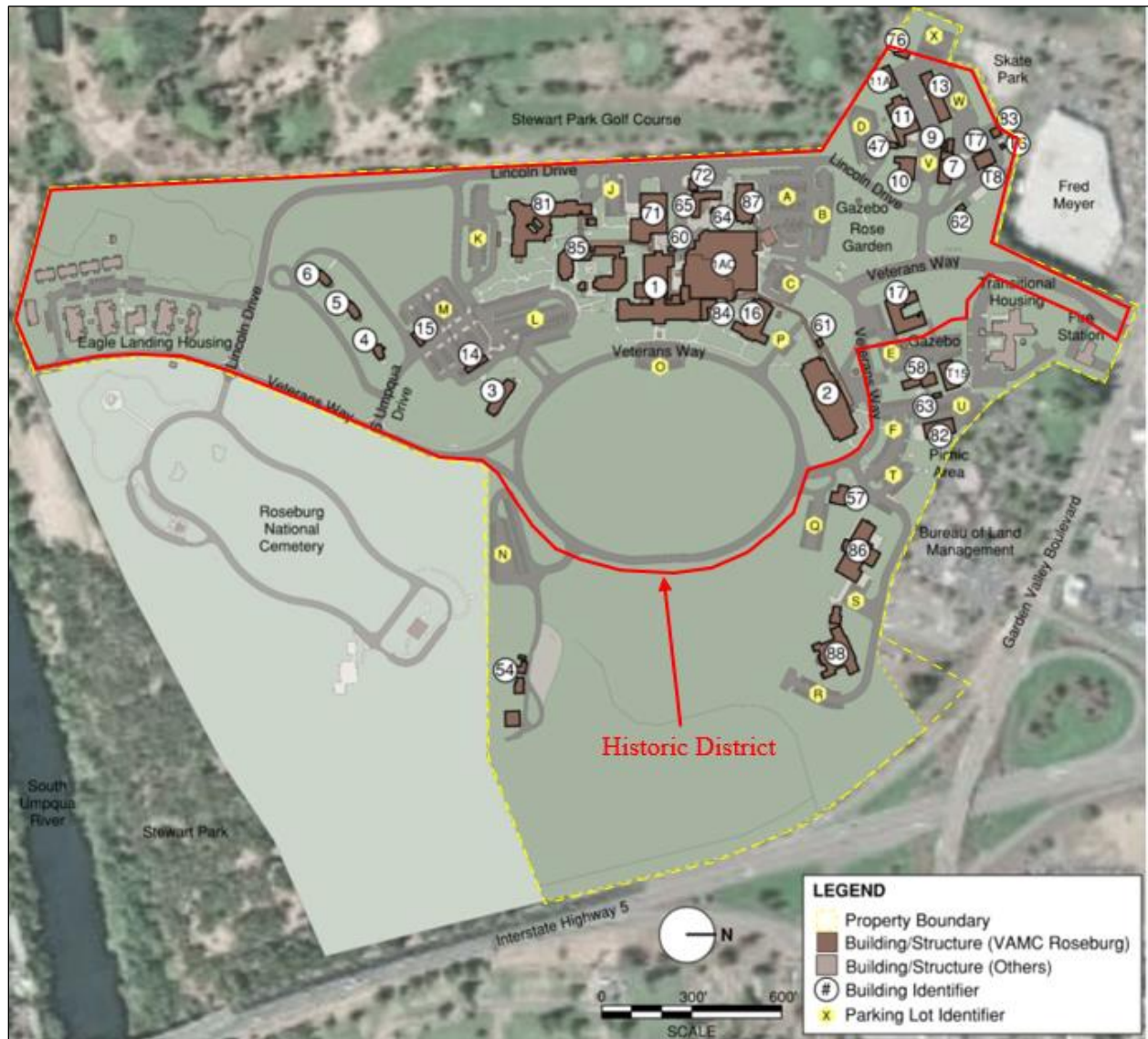
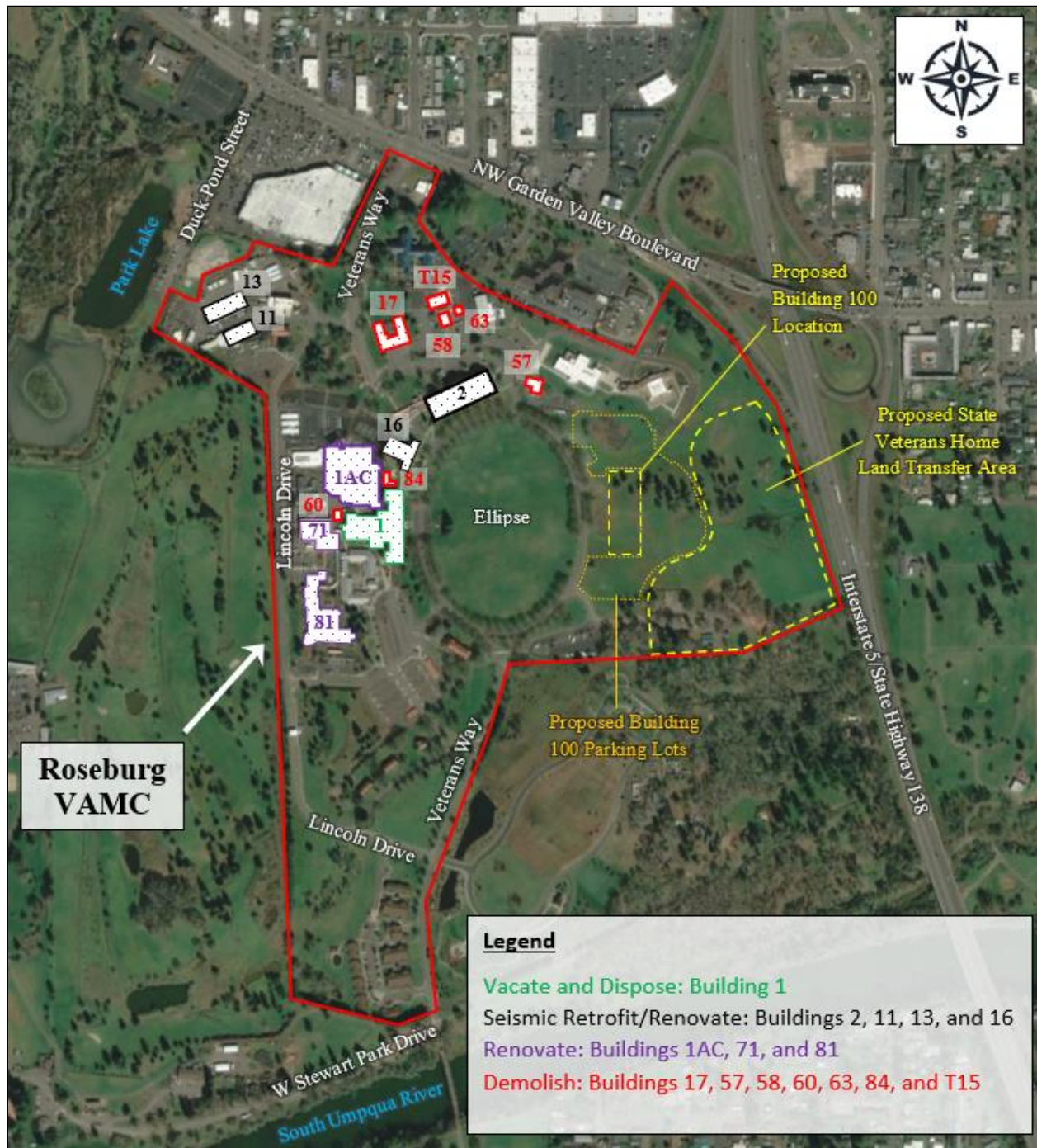


Figure 5: Proposed Action Project Locations





REGION 10

SEATTLE, WA 98101

May 31, 2024

Glenn Elliott, Director
Project Development Service
Office of Construction and Facilities Management
U.S. Department of Veterans Affairs
810 Vermont Avenue, Northwest
Washington DC 20420

Dear Glenn Elliott:

The U.S. Environmental Protection Agency has reviewed the U.S. Department of Veterans Affairs (VA)'s Draft Programmatic Environmental Assessment (DPEA) for the proposed Seismic and Functional Improvement Projects at Roseburg VA Medical Center (VAMC) in Oregon (EPA Project Number 24-0029-VA). The EPA conducted its review pursuant to the National Environmental Policy Act (NEPA) and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA and requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The DPEA evaluates the potential environmental impacts associated with several construction, seismic retrofitting, renovation, and demolition projects for the Roseburg VAMC campus, which is in a seismically active area. Project activities will involve construction of a 3-4 story building and 425 surface parking spaces; demolition/disposal of more than six buildings; seismic retrofit/renovation of five buildings; renovation of 2 buildings; remodeling of one building; parking lot modifications; access road construction and improvements; and transfer of 14 acres of land for State Veterans Home. These activities will occur in phases over a 10-year period to minimize impacts. When complete, the proposed projects will improve the VAMC campus resiliency to earthquakes, correct functional and space deficiencies, and establish a State Veterans Home in Roseburg.

For analysis of impacts from the proposed projects, VA considered the proposed action and a no action alternative. As the proposed projects are currently in preliminary and predesign phases, VA will conduct supplemental analyses as needed to complete the evaluation of the proposed projects' potential impacts. The VA anticipates conducting, for example, additional NEPA analysis for future disposal of Building 1 (current main hospital building) and development of the State Veterans Home.

The EPA review of the DPEA finds no significant environmental concerns to address in the Final PEA (FPEA). Our enclosed comments and recommendations are provided to improve the assessment of the proposed projects in the FPEA.

Thank you for the opportunity to review the DPEA for the proposed projects. If you have questions about this review, please contact Theo Mbabaliye of my staff at (206) 553-6322 and mbabaliye.theogene@epa.gov, or me, at (206) 553-6387 and baca.andrew@epa.gov.

Sincerely,

Andrew J. Baca
Acting Director
Environmental Justice Community Health and
Environmental Review Division

Enclosures

**US EPA Comments on the proposed Seismic and Functional
Improvement Projects at Roseburg VA Medical Center
Douglas County, OR
May 2024**

Potential impacts to air quality

The EPA recommends the Final PEA (FPEA) document:

- Estimate air emissions from all sources (e.g., stationary and mobile sources) for the analysis area; discuss the timeframe for release of these emissions; and determine whether the emissions will exceed National Ambient Air Quality Standards (NAAQS). For accurate air emission estimates, use the latest version of EPA's Motor Vehicle Emission Simulator (MOVES4).¹
- Include a summary of the project-related Mobile Source Air Toxics analysis results using the most recent EPA model for analysis of these emissions and related health risks.² If there will be significant air toxics emissions, consider giving preference to contractors using highest engine Tier available (Tier 3 or 4) machinery to reduce air toxics emissions during implementation of the projects. In the analysis, include recent data on the number of daily vehicular traffic to and from the campus (distinguish vehicle types), number of boilers and related emissions, overall cumulative traffic in the area, and account for project phases, such as construction, operation, and maintenance. The DPEA doesn't include this information and it is difficult to determine whether mobile source air toxics emissions from the projects and other surrounding sources are significant and warrant further assessment.
- Ensure the above analyses include off-site mobile source air emissions of vehicles and trucks along likely corridors to and from the campus from both the construction and operations of the project with respect to criteria air pollutants and air toxics, including diesel particulate matter emissions. When assessing these impacts, in addition to residential communities by the project sites and along corridors to the sites, consider sensitive receptors and vulnerable populations such as communities with Environmental Justice (EJ) concerns, park/recreational users, schools, daycares, seniors/nursing homes, hospitals, and other healthcare facilities. Providing a diesel exhaust emissions analysis of the long-term increased vehicular traffic and its impact on the surrounding community would be helpful.
- Discuss plans to monitor air quality in the project area and take corrective action if the NAAQS are not met. This is important because there are sensitive receptors in the project area and motor vehicle traffic will increase in the area due to the projects.³ Localized air quality conditions can also be substantial (e.g., during wildfire burns), even though area-wide and/or long-term emissions monitoring may show compliance with NAAQS. Although background concentrations of criteria pollutants within the analysis area may be currently below standards, there is potential for significant local air emissions from the project due to fugitive dust releases during ground disturbing activities and cumulative effects from surrounding activities. Changes in climate for Oregon also indicate there will be larger and more frequent wildfires, which may

¹ <https://www.epa.gov/moves/latest-version-motor-vehicle-emission-simulator-moves>. Accessed 5/29/2024.

² <https://www.epa.gov/national-air-toxics-assessment>. Accessed 5/29/2024.

³ DPEA, p. 53.

exacerbate air conditions locally.⁴ The air quality analysis does not currently include data to show the extent to which these sources of emissions may be impacting the NAAQS. Consideration of the cumulative health impacts caused by the project (construction, operation, and maintenance phases) and other sources to communities with EJ concerns will also be important, as well as coordination with public health agencies and industry, which often have data on human health and environmental hazards.

- Identify appropriate mitigation measures and best management practices to reduce emissions and comply with federal and state air quality regulations. Emphasis on fugitive dust management and control will be important during the demolition and construction phases of the projects.
- Provide information on coordination with other entities in the area, such as Oregon Department of Environmental Quality (ODEQ) and Social and Health Services and local air organizations, to ensure emissions due to the proposed project are reduced and mitigated throughout the proposed projects lifespan.

Potential impacts to water quality

The EPA recommends the FPEA:

- Provide up to date information on the anticipated National Pollutant Discharge Elimination System permit application process and recommended measures to protect water quality. A related Stormwater Pollution Prevention Plan may also be required, as well as construction best management practices (BMPs).
- Discuss water use and conservation and indicate steps to be taken to ensure sustainable water use during the projects, including water reliability for the facilities, and the effects of climate change. The facilities' design, for example, may include elements such as use of recycled water for landscaping, xeric landscaping, and water conservation outreach to maximize water conservation. More information is available within EPA's *Water Conservation Plan Guidelines*.⁵
- Indicate plans to coordinate with other stormwater management entities in the project area, such as ODEQ, to ensure that state and tribal water resources are protected from impacts associated with the proposed projects' construction and operation activities. This is important because stormwater discharges off-campus into Park Lake and to the South Umpqua River, which is on the State of Oregon's EPA-approved 303(d) list of impaired water bodies due to exceedances of water quality standards for chlorine, iron, phosphorus, pH, temperature, flow modification, and habitat modification.⁶

The DPEA indicates that water quality may be adversely affected if the project construction activities, including surface grading, excavation, and surface pavement, and building roofs alter the hydrology of springs and surface runoff. Where that occurs, erosion may carry sediment to surface waters and

⁴ <https://oregonstate.app.box.com/s/7mynjzhda9vunbzqib6mn1dcpd6g5jka>. Accessed 5/29/2024.

⁵ <https://www.epa.gov/watersense/water-conservation-plan-guidelines> Accessed 5/29/2024.

⁶ DPEA, p. 27.

pollutants to local drainages and the underlying aquifer. In addition, land disturbance, material storage, waste disposal, inadvertent chemical or hazardous liquid spills, and compaction produced by vehicular traffic may affect recharge to the local aquifer and groundwater quality. Consideration coordination with other agencies, particularly ODEQ, to ensure state and tribal water resources are protected during the project implementation.

The proposed surface water drainage and retention systems and BMPs will lessen the impacts of stormwater runoff from impervious surfaces. Pollutants are still likely to accompany discharge to surface waters and infiltrate to ground water. In addition to obtaining NPDES permit for the projects, note that under Section 438 of the Energy Independence and Security Act, federal agencies must reduce stormwater runoff from federal development projects to protect water resources.⁷ Please consult the EPA Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of EISA.⁸ In addition to strategies outlined in this guidance, it will also be useful to consult with ODEQ for relevant stormwater management practices in the project area.

Energy Efficiency and Sustainability

The EPA recommends the FPEA discuss energy efficiency and conservation in the context of Executive Order 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability* and show how the projects will comply.⁹ The proposed project will involve construction, operation and maintenance of buildings and facilities and the EPA recommends the FPEA include information on energy use and conservation, consistent with E.O. 14057 including:

- Increase facility energy efficiency.
- Measure, report, and reduce greenhouse gas emissions from direct and indirect activities.
- Conserve and protect water resources through efficiency, reuse, and stormwater management.
- Eliminate waste, recycle, and prevent pollution.
- Leverage agency acquisitions to foster markets for sustainable technologies and environmentally preferable materials, products, and services.
- Design, construct, maintain, and operate high performance sustainable buildings in sustainable locations.
- Strengthen the vitality and livability of the communities in which facilities are located.

Potential Impacts to Cultural Resources

The EPA encourages the VA to continue consultations with affected Tribes and incorporate feedback from the Tribes when making decisions regarding the proposed action and any impacts to cultural

⁷ <https://www.govinfo.gov/content/pkg/BILLS-110hr6enr/pdf/BILLS-110hr6enr.pdf>. Accessed 5/29/2024.

⁸ <https://www.epa.gov/nps/stormwater-management-federal-facilities-under-section-438-energy-independence-and-security-act>. Accessed 5/29/2024.

⁹ <https://www.fedcenter.gov/programs/eo14057/> Accessed 5/29/2024.

resources. The DPEA indicates the proposed action will result in both direct and indirect impacts to cultural resources. If additional engagement with Tribes is undertaken, the EPA recommends the FPEA:

- Describe issues raised during engagement events with Tribes and how those issues will be addressed.
- Include a copy of the final Programmatic Agreement (PA) and recommended measures to minimize adverse effects to cultural resources. The EPA notes a draft PA has been prepared to address impacts to cultural resources but access to the PA was not included in the DPEA.

Project monitoring and adaptive management

The proposed project has the potential to impact resources in the project area and vicinity for an extended period. The EPA recommends the FPEA:

- Include a monitoring program designed to assess impacts from the project and effectiveness of the proposed mitigation measures.
- Indicate in the document how the monitoring program will be used as an effective feedback mechanism to ensure environmental objectives will be met throughout the project period. For example, monitor criteria pollutants and take corrective action if pollutant levels exceed standards or pose risk to human health and the environment.
- Discuss lessons learned from past practices in developing similar projects, identify new challenges, such as climate change, and incorporate this information to help improve the design and management of the proposed projects.