



NEVADA
**STATE HISTORIC
PRESERVATION OFFICE**

Department of Conservation and Natural Resources

Brian Sandoval, Governor
Bradley Crowell, Director
Rebecca L. Palmer, Administrator, SHPO

April 5, 2018

Mr. Brian Wacker, PE
Project Manager/Civil Engineer
State Public Works Division
515 E. Musser Street, Suite 102
Carson City, Nevada 89701-4263

Re: Stewart Indian School Welcome Center (Building 2); State of Nevada Public Works Division;
SPWD Project No. 15-P03; proposed seismic construction work for this building

Dear Mr. Wacker:

The Nevada State Historic Preservation Office (SHPO) has reviewed your email dated April 3, 2018 pursuant to the covenants that exist in perpetuity on the Stewart property as well as the requirements of NRS 383.121. The covenants were placed on the Stewart Indian School campus when it was transferred out of federal ownership from the U.S. Department of the Interior Bureau of Indian Affairs (BIA) to the State of Nevada in the 1980s. The covenants contain conditions for transfer to ensure the preservation of the historic integrity pursuant to the National Historic Preservation Act and 36 CFR Part 800.

Please note that our office previously issued our comments regarding the 100% construction documents (drawings and specifications dated August 19, 2016) for Building 2 via our January 11, 2018 letter. The documents were reviewed by the SHPO in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards). As this building will be adaptively reused as the new Welcome Center for the Stewart campus, the Standards for Rehabilitation are the appropriate treatment standards for this project. Compliance with The Standards for Rehabilitation is also stipulated in the covenants. Although our office has not yet received updated drawings that incorporate our comments, it is our understanding that only item 1 (seismic work) in our January 11, 2018 remains for consideration for compliance with the Standards.

It should also be noted that the interior of Building 2 has been unoccupied for a long period of time. However, the masonry building is in relatively good condition on both the exterior and interior. As one of the oldest buildings on campus, it retains a high level of integrity on the interior compared to other buildings on the campus. Its historic social significance lies in its former use as the school's post office. The building consists of a single room with almost all of its historic fabric intact, including but not limited to: plaster, wood flooring, wood windows (some sash are missing), decorative wood ceiling vigas, large stone fireplace, and millwork. It retains all seven aspects of National Register integrity, including location, setting, design, materials, workmanship, feeling and association.

As mentioned in our office's February 14, 2018 email, our office has determined that the three (3) options proposed by the Nevada State Public Works Division for the interior seismic work will have an adverse effect and will be detrimental to this particular building. These alternatives include:

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1. 5 inches of shotcrete with steel dowel and rebar reinforcement on all four walls
2. steel moment frame on all four walls and ceiling
3. FRP (fiber reinforced polymer) with steel tubing on all four walls (and likely the ceiling)

Each of these options will be invasive and adverse either due to loss of historic materials (all historic plaster, historic plane of the wall, damage to historic materials by installation of shotcrete and/or steel, relocation of all millwork, some vigas etc.) or adverse alteration of the character defining features, spaces, and spatial relationships (size, scale, proportion, massing etc.) that characterize this small 13 ft by 19 ft interior space.

Based on your April 3, 2018 email, it is unfortunate that the “adobe” method (e.g. using roof to wall anchors that was suggested by structural engineer Mel Green during our February 14, 2018 meeting) has been determined by H+K Architects / Hyytinen Engineering to not be a viable alternative for this project. Mr. Jeremy Will, Hyytinen Engineering, stated “It is our opinion that these existing walls need to be reinforced, for both in-plane and out-of-plane seismic forces, to protect the occupants and stabilize the building against seismic collapse.” However, our office previously mentioned that option may have likely protected and preserved the existing historic fabric to the greatest extent possible as well as the original design intent of this small building.

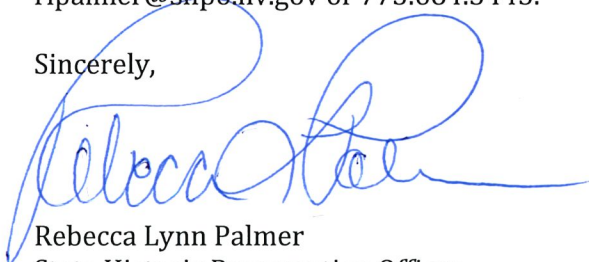
It is our understanding that the Nevada State Public Works Division has selected alternative 1 above (5 inches of shotcrete will be placed on all interior walls of this building which will result in the modification of existing historic building fabric in order to accommodate this approach) as the preferred alternative for this project. Therefore, this approach will **adversely affect** this building and does **not** meet *The Secretary of the Interior’s Standards for the Treatment of Historic Properties*.

Pursuant to the covenants on this property, this approach has been determined by our office to be **detrimental** to this building. However, in order to protect future occupants’ life and safety, our office is providing our written approval through this letter to the Nevada State Division of Public Works for this proposed seismic work.

As our office has previously indicated, the covenants require that Nevada State Public Works Division also obtain written approval from the BIA prior to the start of construction of this project.

Should you have any questions concerning this correspondence, please contact me at rlpalmer@shpo.nv.gov or 775.684.3443.

Sincerely,



Rebecca Lynn Palmer
State Historic Preservation Officer

cc.

Sherry L. Rupert, State of Nevada Indian Commission
Max Hershenow, H+K Architects, Ltd.