

## STATE OF NEVADA Department of Conservation and Natural Resources

Joe Lombardo, *Governor*James A. Settelmeyer, *Director*Rebecca L. Palmer, *Administrator* 

June 24, 2024

Megan Berner, MA, MFA Arts & Culture Manager City of Reno PO Box 1900 Reno, Nevada, 89505

RE: Covenant Review, First Church of Christ, Scientist (Lear Theater), 528 W. First Street, Reno,

Washoe County, Nevada

Dear Ms. Berner:

Thank you for providing photographs, drawings, and responses to our questions and comments dated March 29, 2024. Our office received drawings and other information on May 13 and June 11, 2024 and has reviewed the additional information pursuant to the Commission for Cultural Centers and Historic Preservation (CCCHP) Covenants that expire on December 31, 2060 and the Save America's Treasures covenant that expires on December 31, 2059.

The SHPO has the following comments and requests for additional information about the following work described by the City of Reno (City):

- Concrete The existing condition photographs depict poor concrete condition at the walkways at grade. However, concrete at other locations, especially the historic front steps and landing, appear to have only minimal damage. The Secretary of the Interior's Standards for Rehabilitation (Standards) require that historic building materials be retained and repaired rather than replaced if possible. Please submit additional information regarding patching and repair methodologies for the historic concrete steps and landing. Our office would be happy to discuss proposed repair methodologies with the City's concrete contractor if needed. There is a typo on Drawing L3-01. Note 1.4 is mistakenly keyed to the front entrance's character defining steps. Note 1.4 refers to "concrete ramps". The drawing should be corrected so there is no confusion that the surface of the concrete steps is to be reconstructed and that no ramps are planned for the main entrance.
- Stair and Landing Site Walls Please provide additional information on the condition of the historic walls at the entry stairs and landing, and whether repairs to those walls are required.
- Historic Handrails at Upper Steps Please confirm whether alterations will be made to the
  existing handrails at the upper steps. The initial submission indicated that those handrails are not
  ADA compliant and may be modified, while the most recent submission does not contain that
  note.
- New Handrails at Curved Lower Steps The Standards require that new additions be compatible
  yet differentiated, to not lend a false sense of history. The proposed new handrail at the lower

steps contains C-scrolls within the balustrade, which does recall the design of the historic handrails. However, the "floating" upper handrail design and the omission of the scroll at the terminus of the handrail, appears to be differentiated enough to meet the Standards. If the height of the new handrail differs, that will help differentiate it further. Please confirm the height of the historic handrails compared to the height of the new handrails.

- Landscaping Historic photographs of the building depict large deciduous trees at the perimeter of the lot and narrow evergreens such as cypresses used as accents. Was research conducted to determine the historic landscape plan? Please submit additional information about the historic landscaping at the building. The current proposed landscaping plan does not appear to be based on this property's historic landscape design.
- Exterior Lighting Please submit manufacturer's cut sheets depicting the proposed lights that will be installed at the site.
- Exterior Lighting Please submit additional information regarding the proposed repairs to existing lighting, including photographs of the existing lighting and the proposed repair methodology.
- ADA Ramp Please submit an elevation drawing, or ideally a rendering, that illustrates how the proposed ramp will look in relation to the building.
- ADA Ramp The City's May 13, 2024 email included an inquiry as to whether a ramp should be constructed before the building's future programming is known. The City must make that decision based on their own factors such as funding, timeline for construction, estimated opening date, estimated use by the public, and code compliance. The SHPO notes that since the nonhistoric additions to the building's west elevation removed the north and west entrances, the east side entrance is a logical location for a ramp. The proposed ramp design begins at W. 1st Street at the rear of the building and runs alongside the building. That placement will help the ramp be less visible than the current ramp. For guidance on the placement and design of ADA ramps, see **NPS** Preservation Brief #32, "Making Historic **Properties** Accessible." https://www.nps.gov/orgs/1739/upload/preservation-brief-32-accessibility.pdf
- Cameras The SHPO looks forward to receiving these details once they are complete.

The SHPO gives the City permission to proceed with the following work:

- 1. Landscaping demo and site grading;
- 2. Irrigation system installation;
- 3. New outdoor electrical installation, not including light fixtures.

The SHPO <u>does not</u> give the City permission to construct the following:

## Wrought Iron Perimeter Fence And Gates:

The current proposal will encompass the entire property with two sets of 12 foot wide 6-foothigh double gates on the front south entrance (note seven foot high where the double gates meet) and will have multiple single arched gates on other sides of the property.

Although there is a similar, but much shorter, fence on the adjacent property along the alley, this proposed fortress-like 6-foot-high wrought iron fence with spears every four inches is not compatible with the setting of this building and its use as a public cultural center.

The National Register nomination refers to the building's "prominent setting". The amended Section 8 states that the "property was especially desirable for its position overlooking the Truckee River." The original Section 8 states that Paul Williams "rendered the Christian Science church in Neoclassical elegance, but at a scale that complemented the towering cottonwood trees that lined the Truckee River and asserted itself, but did not dominate, its location in the Biggest Little City in the World." Thus, setting is an important character defining feature of this building from its prominent location and historically designed formal approach down to the Truckee with its elegantly designed, terraced and colonnaded entrance on the south elevation.

The Standards' Guidelines for Rehabilitation do not recommend "installing protective fencing on a building site, when necessary for security, without taking into consideration their location and visibility so they negatively impact the historic character of the site." (page 139)

The Standards also do not recommend "introducing a new feature that is visually incompatible with the site or that alters or destroys the historic site patterns or use." (page 142)

The proposed fence is not appropriate for this historic property and is not compatible in terms of size, scale, design, material, or color and will negatively impact the historic character of this building, its setting and feeling, and its historic relationships on this site, especially to the river. Therefore, this fence is not consistent with Standards 1, 2, and 9 and the existing covenants and is *not approved*.

The existing "temporary" chain-link fencing is appropriate during construction activities and may remain in place, provided it is entirely removed once construction is complete.

Sincerely,

Rebecca Lynn Palmer

State Historic Preservation Officer