



November 15, 2017

Kirsten Nalley, PE, SE
Project Manager/Structural Engineer
State Public Works Division
2300 McLeod Street
Las Vegas, NV 89104

Re: Old Gym Cleanup Project, Stewart Indian School, Carson City, Nevada
Nevada State Public Works Division and the Nevada Indian Commission

Dear Ms. Nalley,

The Nevada State Historic Preservation Office (SHPO) has reviewed the subject documents received November 2, November 14, and November 15, 2017 in accordance with NRS 383.121 and the July 1982 Quitclaim Deed/Covenants for the transfer of the Stewart Indian School.

The State of Nevada Public Works Division (SPWD) and the Nevada Indian Commission (NIC) are coordinating SHPO review for the following two phases of the Old Gym Cleanup Project.

Phase 2 (Current Phase)

Phase 2 entails cleanup and hazardous materials abatement of the Old Gym, including: removing 932 square feet of VCT tile from secondary spaces on the ground floor, removing 50 square feet of wood from the crawlspace access area on the ground floor, removing plaster ceilings from the secondary spaces of the ground floor, removing non-historic pipes and pipe insulation, scraping loose lead-based paint, and removing six small sections of wall to facilitate investigation of the wall structure. Historic radiators will be retained. The scope of work specifies that historic materials such as walls and door frames be protected. As it appears that the plaster ceilings in the secondary spaces are deteriorated beyond repair, the SHPO agrees to conduct Phase II work, provided that all nearby historic materials are retained and protected during work.

In order for this project to meet the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, any historic building materials that are removed should be replaced in-kind. Please provide detailed photographs of the historic materials in situ so that they can be appropriately matched during the design phase of this project.

Please note that although the labeled photographs specify that most cabinets will be retained and stored, the attached scopes of work states that "several old book cases and miscellaneous items [. . .] can be disposed of as general construction debris," and that "the contractor is to remove and properly dispose of [. . .] metal cabinets, HVAC ducting, and miscellaneous wood structures." Historic *built-in* cabinets or other built-in building elements shall not be disposed of without prior SHPO review.

Kirsten Nalley
Page 2 of 2
November 15, 2017

Phase 1 (Completed Oct. 12, 2017)

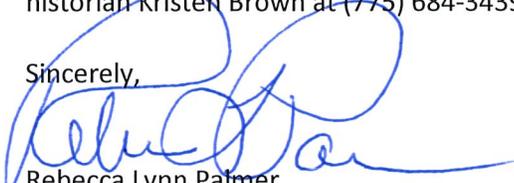
Per earlier conversations with the SPWD and NIC, it was SHPO's understanding that Phase 1 of the Old Gym cleanup project entailed only debris removal, light cleaning, and hazardous materials testing. The submitted materials state, however, that 6,000 square feet of historic wood flooring was removed from the main gym area during Phase 1.

This removal occurred without SHPO consultation. The SHPO understands how important and time-sensitive CIP projects are. However, in order to meet the stipulations of the Quitclaim Deed/Covenants and the requirements of NRS 383.121, consultation with SHPO must be initiated early in the project planning process. If the flooring was removed due to poor condition, this should have been demonstrated during consultation and then work could have proceeded with written SHPO agreement.

As noted above, in order for this project to meet the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, any historic building materials that are removed must be replaced in-kind.

Should you have questions concerning this correspondence, please contact SHPO staff architectural historian Kristen Brown at (775) 684-3439 or by email at knbrown@shpo.nv.gov.

Sincerely,



Rebecca Lynn Palmer
State Historic Preservation Officer

cc via email: Sherry Rupert, Nevada Indian Commission