



Carson City Planning Division

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MEMORANDUM

Historic Resource Commission meeting of January 11, 2018

TO: Historic Resource Commission **Item E-7**

FROM: Hope Sullivan, AICP
Planning Manager

DATE: January 4, 2018

SUBJECT: HRC-17-203 – Observations and recommendations of the State Historic Preservation Office

On September 14, 2017, the State's Certified Local Government coordinator, a staff member at the State Historic Preservation Office (SHPO), interviewed the Historic Resources Commission (HRC) chair and staff as well as attended the HRC meeting. Based on the interviews, review of documents, and meeting attendance, the SHPO sent the attached November 8, 2017 letter providing observations and recommendations.

This item is on the agenda to provide the Commission the opportunity to discuss the letter, and to determine if any of the recommendations should be considered in a work program.



November 8, 2017

Hope Sullivan
Planning Manager and CLG Representative
Carson City, Planning Division
108 E. Proctor Street
Carson City, NV 89701

RE: State FY2018 Review of Carson City for Certified Local Government Program

Dear Ms. Sullivan:

Thank you so much for you and your commissioners' time on Monday, September 14. As part of this office's updates to the Certified Local Government (CLG) program, we will be providing annual reviews to all CLGs, including Carson City, as an opportunity to address training and education needs for your City staff and commissioners, as well as more hands-on support from SHPO staff. The review below is based on observations made by the office's CLG Coordinator on September 14, both in a meeting with yourself and your commission chair, Michael Drews, and during the regular Historic Resources Commission (HRC or Commission) that evening. Should you have any questions about the observations and recommendations below, please contact my CLG Coordinator, Jim Bertolini, at jbertolini@shpo.nv.gov or (775) 684-3436.

General Observations

The Commission and staff reflected a strong, positive relationship with their constituency. Regularly during the commission meeting, the comments and discussion between applicants and the Commission demonstrated clear approachability and an ability to function as a resource to the community. The tone of conversations between the public and the Commission was consistently collaborative.

Items Requiring Corrective Action

Below are items observed by the CLG Coordinator that are inconsistent with federal and/or state statute, regulations, or policies governing the CLG program in Nevada. Corrective action on the part of the local government is required to remain in compliance with the program.

- None observed.

Items Recommended for Future Action

Below are items observed by the CLG Coordinator that are not necessarily inconsistent with the federal and state requirements of the CLG program, but may cause difficulties for the local government if left unaddressed.

- Commission Membership and Training – City staff and the HRC may need to consider commissioner training to reinforce appropriate processes and ensure consistency of action. During the review of a development application in the meeting, staff provided the

Commission with a defensible recommendation that the subject property was non-contributing to the Carson City Historic District, and recommended the development be considered as compatible new construction under the guidelines. However, the discussion among the attending Commissioners, though defensible in its final form, generally failed to reference the City's ordinance or design review guidelines in discussion. This appears to have been aggravated by a lack of documentation about which properties within the Carson City Historic District were contributing, and thus subject to greater rigor of review under the City's design guidelines. Discussion during a public preservation Commission meeting should always remain well grounded in the Commission's governing ordinance and design guidelines to avoid charges of being arbitrary and capricious. The CLG Coordinator is available to assist with Commissioner training on this point.

- Survey and Inventory – As referenced above, while the City has available survey records and National Register documentation on hand, it appears to lack a clear inventory of those properties over which the HRC has regulatory authority. In order to establish clear regularly authority, it is strongly recommended that the HRC either inventory the Carson City Historic District to clarify which properties have been designated as historic by the Carson City Board of Supervisors, or that action be taken by the Board of Supervisors to do so. Regardless of how the record is clarified, it is important for the public to understand how and when the HRC exercises its authority to ensure public support for the program remains strong.

Items Suggested for Future Action

Below are suggestions to improve the operations of the local preservation program. There is no requirement to respond to these suggestions; they are provided as helpful guidance to improve the local governments operations. SHPO staff is available to provide guidance on these options, if desired.

- Ordinance and Design Review – The HRC and City staff expressed a strong desire to ensure that the City's adopted design guidelines remain consistent with the *Secretary of the Interior's Standards for Treatment of Historic Properties* (the Standards), a requirement of the CLG program for local governments with design review. The National Park Service regularly updates the Standards as new methods and technologies become available. The Carson City Board of Supervisors adopted the current iteration of the Carson City Historic District Development Standards in 2005. It is generally best to update design guidelines every 10 to 15 years to ensure treatment methods remain current. An update of the Development Standards would be eligible for CLG grant funding under the Preservation Planning program area.
- Survey and Inventory – As mentioned during the review on September 14, the Nevada SHPO is attempting to enhance Nevada residents' access to the Historic Tax Credit program, a tax incentive meant to support the rehabilitation of privately owned properties listed in the National Register for income-producing uses. Several properties in downtown Carson City, including the Bank Saloon (Jack's Bar) and the Virginia and Truckee Railroad Depot are already listed and provide their owners with potential access to the Tax Credit (note that there are additional requirements to qualify). Carson City may want to explore

Hope Sullivan
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an evaluation of its downtown area for eligibility for the National Register as an Historic District. If eligible, and a listing successfully pursued, this would provide additional owners in the downtown area with access to this redevelopment tool. This would be eligible for a CLG grant under the Survey and Inventory and/or National Register program areas.

- Public Participation – During discussion, it was mentioned that Carson City's current citywide historic preservation plan is out of date. Because of the immense value of having a formal community-wide plan to guide preservation efforts, the creation or updating of local historic preservation plans remains a priority for the Nevada SHPO. Carson City may want to consider pursuit of an update to its citywide preservation plan, including a sizeable public outreach effort, to help guide the City's preservation activities and help increase their effectiveness. This would be eligible for a CLG grant under the Preservation Planning program area.

Again, please contact the CLG Coordinator if you have questions regarding the observations, recommendations, or suggestions listed above. Thank you very much for Carson City's participation in the CLG program.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Palmer".

Rebecca Palmer
Nevada State Historic Preservation Officer