

**MEMORANDUM OF AGREEMENT
AMONG
THE U.S. DEPARTMENT OF VETERANS AFFAIRS,
THE NEVADA STATE HISTORIC PRESERVATION OFFICER
THE NEVADA DEPARTMENT OF VETERANS SERVICES
AND
THE NEVADA STATE PUBLIC WORKS DIVISION,
DEPARTMENT OF ADMINISTRATION
REGARDING CONSTRUCTION OF THE
NORTHERN NEVADA VETERANS NURSING HOME
RENO, NEVADA
(UT #2015-3777; FEDERAL FAI #32-003; SPWB #13-PO7)**

WHEREAS, the U.S. Department of Veterans Affairs (VA), in cooperation with the Nevada Department of Veterans Services (NDVS), is proposing to issue federal grant funds for the design and construction of a new veterans nursing home in the City of Sparks, in Washoe County, Nevada. The Northern Nevada Veterans Nursing Home (hereinafter referred to as the NNVNH) constitutes an undertaking as defined in the National Historic Preservation Act (NHPA) (54 USC § 300320); and

WHEREAS, the NNVNH consists of an approximately 105,500 square-foot facility housing 96 veterans in a community living environment. The floor plan consists of three 32-bed housing units. Parking for approximately 150 vehicles will be dispersed throughout the site with the majority concentrated at the front entrance. Primary vehicular access for the NNVNH will be from a new right in/right out intersection from northbound Kietzke Lane. In addition to the access from Kietzke Lane, NDVS proposes to construct a roadway connection with existing Northern Nevada Adult Mental Health Services (NNAMHS) campus roadway system; and

WHEREAS, VA has consulted with the Nevada State Historic Preservation Officer (SHPO) pursuant to 36 CFR § 800, implementing Section 106 of the NHPA (54 USC § 306108); and

WHEREAS, VA has defined the NNVNH's area of potential effect (APE) as the geographic areas within which the undertaking may have direct or indirect effects to historic properties (Attachment 1). The APE occupies portions of the NNAMHS campus on 480 Galletti Way in Sparks, Nevada (APN 032-050-56). The direct APE, in which physical ground disturbance related to the construction of the nursing home and where direct impacts to historic properties are possible, is an irregularly shaped block totaling 18.8 acres. The indirect APE is an irregularly shaped polygon surrounding the direct APE and covering a total of 68 acres. It extends for a distance of 10 meters north from the direct APE, 227 meters south, 66 meters west, and 106 meters east; and

WHEREAS, VA has consulted with the public as part of the National Environmental Policy Act (NEPA) process, and made a draft Environmental Assessment for the project available for public review and comment in August of 2015, which included a summary of cultural resources identification efforts and anticipated effects of NNVNH on historic properties; and

WHEREAS, VA, in consultation with the SHPO, determined that the NNVNH will have an adverse effect on two (2) historic properties, S1251/26Wa9890 and S1252/26Wa9892, which VA determined are eligible under the Secretary's Significance Criterion a for listing in the National Register of Historic Places (NRHP); and

WHEREAS, VA, in consultation with the SHPO, identified twelve (12) historic buildings on the NNAMHS campus (Attachment 2) that are located in the Indirect APE for the NNVNH that are currently unevaluated but VA determined that the NNVNH will not have an adverse effect on these historic buildings; and

WHEREAS, in accordance with 36 CFR §800.3(f), VA has invited the following federally recognized tribes, with areas of interest in Washoe County, Nevada, to consult regarding the effects of NNVNH on historic properties, to attend public meetings and to provide input in the design: Lovelock Tribal Council; Summit Lake Paiute Tribal Council; Carson Community Council; Stewart Community Council; Woodfords Community Council; Winnemucca Tribal Council; Yomba Tribal Council; Fort McDermitt Paiute and Shoshone Tribes of the Fort McDermitt Indian Reservation; Paiute Shoshone Tribe of the Fallon Reservation and Colony; Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation; Reno Sparks Indian Colony; Walker River Paiute Tribe; Carson Colony; Dresslerville Colony Ranch; Stewart Community Ranch; Washoe Tribe of Nevada and California; Woodfords Community Ranch; and the Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch; and

WHEREAS, the Reno-Sparks Indian Colony (RSIC), and the Washoe Tribe of California and Nevada (Washoe) (hereinafter collectively referred to as the Tribes) have elected to participate in the resolution of adverse effects and are invited to sign this Memorandum of Agreement (MOA) as Concurring Parties; and

WHEREAS, in accordance with the 36 CFR § 800.3(f), VA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination, and the ACHP has declined to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, VA has consulted with NDVS and the Nevada State Public Works Division of the Department of Administration (SPWD), both of whom have significant financial and management responsibilities in NNVNH, and have agreed to sign this Memorandum of Agreement (MOA) as Invited Signatories; and

NOW, THEREFORE, VA, the SHPO, the NDVS, and the SPWD agree that the NNVNH shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties.

STIPULATIONS

VA shall ensure that the following measures are carried out:

I. MITIGATION OF ADVERSE EFFECTS

A. Documentation and NRHP evaluation of historic buildings in the APE for NNVNH (Attachment 2):

1. A cultural resources management consultant (CRM) hired by SPWD shall prepare individual survey forms for the historic buildings using the SHPO's Architectural Resource Assessment (ARA) forms.
 - a. SPWD shall ensure that the CRM takes any photographs of the buildings prior to the initiation of NNVNH if any modification resulting from the NNVNH would be visible in the image.
 - b. SPWD shall submit drafts of all photographs required in Stipulation I.A.1.a to the SHPO for review and comment. The SHPO will review the draft photographs within five (5) working days of receipt. The SHPO will send comments to SPWD for action, if needed.
 - c. SPWD or the CRM shall make any edits or changes to the draft photographs requested by SHPO within thirty (30) days of receipt of SHPO comments.
2. The CRM hired by SPWD shall make NRHP recommendations for all of the buildings. The recommendations will be prepared and/or reviewed by an architectural historian who is qualified under the Secretary of the Interior's Professional Qualifications Standards (SOI). The architectural historian's assessment shall include both individual building evaluations as well as a determination of whether there is a historic district within the indirect APE for NNVNH.
3. No later than one (1) year from the execution of this MOA, SPWD shall submit the draft individual survey forms and NRHP determinations (hereinafter called the report) to the SHPO for review.
 - a. The SHPO shall have thirty (30) days from receipt to review the draft report. If the SHPO concurs or does not respond within this timeframe, SPWD shall finalize the report.
 - b. If the SHPO requests changes to the report, SPWD shall make all requested changes and resubmit the draft report to the SHPO for review.
 - c. No later than ninety (90) days following SHPO concurrence that the draft report is adequate, SPWD shall finalize the report and submit two final copies of the report to the SHPO.

B. Historic Property Treatment Plan (HPTP) for S1251/26Wa9890 and S1252/26Wa9892:

1. SPWD and VA, in consultation with the SHPO, has finalized an HPTP titled "A Historic Properties Treatment Plan for the Northern Nevada Veterans Homes Project, Sparks, Washoe County Nevada" dated July 11, 2017 (Attachment 3).
 2. SPWD shall ensure that the CRM completes all activities required in the HPTP.
 3. The CRM shall take all photographs required in the HPTP prior to the initiation of any ground-disturbing activities associated with NNVNH.
 - a. SPWD shall submit drafts of all photographs required in the HPTP to the SHPO for review and comment. The SHPO will review the draft photographs within five (5) working days of receipt. The SHPO will send comments to SPWD for action, if needed.
 - b. SPWD or the CRM shall make any edits or changes requested by SHPO within thirty (30) days of receipt of SHPO comments.
 4. SPWD shall provide a draft mitigation document containing the required elements described in the HPTP to the SHPO within twelve (12) months of the execution of this MOA.
 5. The SHPO shall review the draft mitigation document and provide comments back to SPWD. If the SHPO does not respond within 30 days of their receipt of the document, SPWD can assume concurrence with the adequacy of the document and finalize.
 6. SPWD shall make any SHPO requested changes to the draft mitigation document and return the amended document to the SHPO within 60 days of SPWD receipt of SHPO comments. Once the SHPO concurs that the document is adequate, SPWD shall finalize the document and submit two final copies to the SHPO.
- C. Upon SHPO acceptance of the documentation described in Stipulation I.A.1.c and I.B.3.b SPWD may initiate any part of NNVNH.
- D. Historical marker documenting the history of the NNAMHS.
- SPWD and NDVS shall create and install one (1) historical marker through the Nevada Historical Marker Program to document the history of the NNAMHS.
1. SPWD shall fund the installation of Nevada Historical Marker #274 in a publically accessible location at NNAMHS consistent with the requirements of the program (NRS 383.091).

2. No later than October 1, 2017, SPWD and the SHPO shall meet to initiate the development of the marker.
3. SPWD, in consultation with the SHPO, shall determine a suitable location for the marker.
4. No later than March 1, 2018, SPWD shall submit a draft design with interpretive text for the marker to the SHPO for concurrence that the design is adequate, appropriate, and sufficient for a Nevada Historical Marker consistent with NRS 383.091. If the SHPO concurs or does not respond to SPWD within forty-five (45) days from receipt, SPWD may proceed with fabrication and installation of the marker.
5. No later than January 11, 2019, SPWD shall ensure that Nevada Historical Marker #274 is installed.

E. Landscape and Fencing Design Review.

To ensure that SPWD develops the design for the landscaping and fencing in conformance with the Secretary's Standards for the Treatment of Historic Properties and takes into account the effect of landscaping and fencing on the NNVNH campus as a whole, SPWD shall consult with the SHPO as these plans are being developed. SPWD shall invite the SHPO to participate in any meetings concerning the design of the landscaping and the fence with no less than four days notice.

II. DURATION

This MOA will expire if its terms are not carried out within five (5) years of its execution. Prior to such time, VA may consult with the other Signatory or Invited Signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation V below.

III. MONITORING AND POST-REVIEW INADVERTENT DISCOVERIES

- A. SPWD shall ensure that all clearing, debris removal, rough grading, and any subsurface excavation in native soils or soils not previously disturbed by NNVNH within the direct APE is subject to monitoring by an archaeologist in accord with the requirements found in the Cultural Resources Monitoring and Unanticipated Discovery Plan (Attachment 4, A-C). Monitoring shall also be required for any utility trenching for NNVNH in native soils or soils not previously disturbed by NNVNH.
- B. SPWD, the SHPO, and NDVS may consult at any point during the implementation of NNVNH to determine if archaeological monitoring requirements outlined in Attachment 4 should be modified for NNVNH or for any portion of the APE. Written agreement by all Signatories and Invited Signatories to modifications of the archaeological monitoring requirements for NNVNH, or a portion of the APE, will not require an amendment to the MOA.

- C. Stipulations of this MOA are intended to identify and mitigate adverse effects to historic properties. Unplanned discoveries of buried cultural resources are not anticipated, however if there is an unplanned discovery, VA will ensure that provisions found in Attachment 4.E-H are met.
- D. The SPWD shall allow a Native American monitor to be present during all clearing, debris removal, rough grading and subsurface excavation activities in accord with Stipulation III.A above and as described in Attachment 4.I.

IV. DISPUTE RESOLUTION

Should any Signatory or Invited Signatory to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, VA shall consult with such parties to resolve the objection. If VA determines that such objection cannot be resolved, VA will:

- A. Forward all documentation relevant to the dispute, including VA's proposed resolution, to the ACHP. The ACHP shall provide VA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, VA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and the SHPO, and provide them with a copy of this written response. VA will then proceed according to the final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day period, VA may make a final decision on the dispute and proceed accordingly. Prior to reaching a final decision, VA shall prepare a written response that takes into account any timely comments regarding the dispute from the SHPO, and provide it and the ACHP with a copy of such written response.
- C. VA's responsibility to carry out all actions subject to the terms of this MOA, which are not the subject of the dispute, remains unchanged.

V. AMENDMENTS

This MOA may be amended when all Signatories and Invited Signatories agree to such an amendment in writing. The amendment will be effective on the date a copy signed by all of the Signatories is filed with ACHP.

VI. TERMINATION

- A. If any Signatory or Invited Signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other Signatories and Invited Signatories to attempt to develop an amendment per Stipulation V. If within thirty (30) days (or another period agreed to by all Signatories and Invited Signatories) an amendment cannot be reached, any Signatory

or Invited Signatory may terminate the MOA upon written notification to the other Signatories or Invited Signatories.

- B. Once the MOA is terminated and prior to work continuing on the undertaking, VA must either (a) execute an MOA pursuant to 36 CFR 800.6; or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR 800.7. VA shall notify the Signatories and Invited Signatories as to the course of the action it will pursue.

VII. ANTI-DEFICIENCY CLAUSE

- A. All requirements set forth in this MOA requiring expenditures of VA funds are expressly subject to the availability of appropriations and the requirements of the Anti-Deficiency Act (31 USC §1341).
- B. No obligation undertaken by VA under the name of this MOA shall require or be interpreted to require a commitment to expend funds not appropriated for a particular purpose.

Execution of this MOA by VA, the SHPO, SPWD, and NDVS and implementation of its terms evidence that VA has considered the effects of the undertaking on historic properties and afforded the ACHP an opportunity to comment.

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SIGNATORIES:

U.S. Department of Veterans Affairs

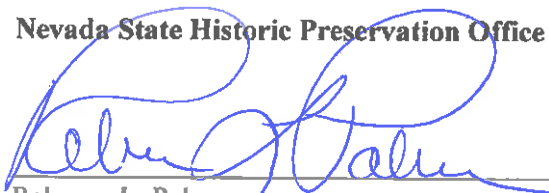


Ed Litvin
Director, Office of Capital Asset Management and Engineering

8/17/2017

Date

Nevada State Historic Preservation Office



Rebecca L. Palmer
State Historic Preservation Officer

08/17/17

Date

INVITED SIGNATORIES:

Nevada Department of Veteran Services

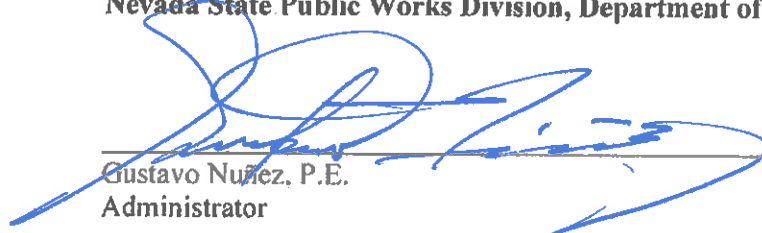


Katherine Miller
Director

8-17-17

Date

Nevada State Public Works Division, Department of Administration



Gustavo Nuñez, P.E.
Administrator

8-17-17

Date

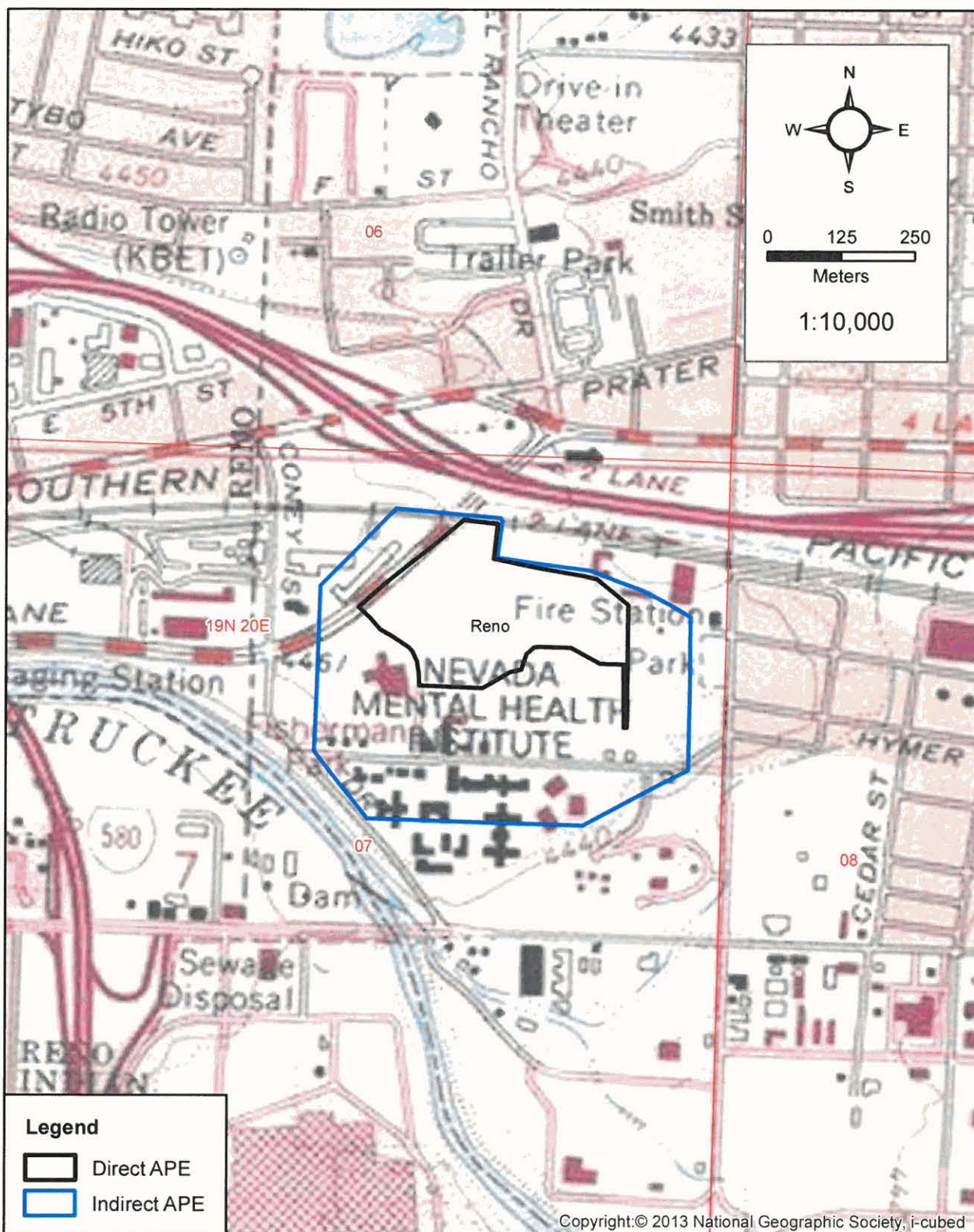
CONCURRING PARTIES:

RENO-SPARKS INDIAN COLONY

Arlan D. Melendez	Date
Chairperson	

WASHOE TRIBE OF NEVADA AND CALIFORNIA

Neil Mortimer	Date
Chairperson	



Attachment 1: Direct and Indirect APE
 Base Map: USGS 7.5' Reno, Nev., 1967 (Photo Revised 1982).
 T.19N., R.20E., Section 7, Datum (NAD 83, meters)
 Project: Documentation of Archaeological Resources for the
 Northern Nevada Veterans Homes Project (KEC-1066)
 Report No. 13-P07; FAI 32-003

kautz
 ENVIRONMENTAL CONSULTANTS, INC.



Northern Nevada Veterans Home
Project #13-P07/#15-C77
Attachment 2
Building Inventory

Letter	Building #/Name	Year Built	Comments/ Historical Character
A	Building #12 - Vacant	1882	Original Medical Director's Residence - Unreinforced Sandstone Masonry with pitched asphalt shingle roof - Historical
B	Building # 1 -Administration & Clinics	1920	Brick and Glazed Terracotta - West Addition was constructed in 1962 - Historical
C	Building #2 - Canteen & Drop-in Center	1961	Painted Concrete Masonry Units - Historical
E	Building #8 - Service Coordination Programs	1958	Brick with low profile flat roof - Historical
F	Building #10 - Vacant	1954	Old Central Kitchen & Dining Room - Brick with low profile flat roof - Historical
N	Building #22 - House Keeping & Maintenance	1959	Brick with low profile, low sloped flat roof - Historical
O	Building #21 - Warehouse & Purchasing	1971	Concrete masonry units with low sloped shed roof
Q	Building #14/Building #15 Group Homes	1951/1949	Brick with hipped asphalt shingle roof - Historical
R	Buildings 16, 17, & 18 - Group Homes - Vacant	1963	Wood structures with vertical board and batten siding with pitched asphalt shingle roof - Historical
S	Building #13 - Lake's Crossing Center	1974	Painted and unpainted concrete masonry units with transite fascia panels
T	NDOT Maintenance and Equipment	1963	Painted pre-cast tilt-up concrete with low sloped roof - Historical
V	Weights and Measures - Department of Agriculture	1971	Painted Concrete masonry units with stucco fascia panels
W	Building # 3 – Lab/Pharmacy	1925	Brick masonry and steel structure - Historical
X	Building #4	1961	Brick masonry and steel structure is a two level structure with a basement
Y	Building #5 – Medication Clinic	1967	Uninsulated brick masonry structure with a single-ply roofing membrane on a concrete slab/foundation
Z	Kiosk	1961	Wood timber post and beam structure.

A Historic Properties Treatment Plan for the Northern Nevada Veterans Homes Project, Sparks, Washoe County Nevada

Prepared by ZoAnn Campana, M.P.S.



Project No. 13-P07; FAI 32-003

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Cover photo is an overview
of the project area.

Frontpiece illustration, in
lower right corner, is of a
pecked and grooved saurian effigy head
discovered in an Archaic site
in the South Truckee Meadows, Nevada.
Illustration by J.W. Oothoudt

A Historic Properties Treatment Plan For The Northern Nevada Veterans Homes Project, Sparks, Washoe County Nevada

Project No. 13-P07; FAI 32-003

Prepared by:
**ZoAnn Campana, M.P.S.
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1140 Financial Blvd., Suite 100
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Prepared for:
**Mr. Ron Crook
Nevada Division of State Lands
901 S. Stewart Street, Ste. 5003
Carson City, NV 89701**

KEC Project 1066

**July 11, 2017
Revised August 9, 2017**

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1.0 INTRODUCTION

The Nevada Department of Veteran's Services is in the process of obtaining a federal grant from the U.S. Department of Veteran's Affairs (USDVA) for the design and construction of a new State Veteran's Nursing Home in Sparks, Washoe County, Nevada. McGinley and Associates of Reno, Nevada, who have been contracted by the project proponent to develop the draft Environmental Assessment for this undertaking, contracted with Kautz Environmental Consultants, Inc., to complete the cultural resource management activities required to be in compliance with Section 106 of NHPA.

1.1 PROJECT BACKGROUND

Nevada Department of Veteran's Services has requested a federal grant to design and construct a new State Veteran's Nursing Home on lands owned by the State of Nevada. The proposed site is located on the grounds of the Northern Nevada Adult Mental Health Campus on Galletti Way in Sparks, Nevada (APN 032-050-56). Because federal funding will be used for implementation of this project, it is defined as a federal undertaking (36 CFR 800.16[y]). Section 106 of the National Historic Preservation Act (as amended, 1966) and its implementing regulations (36 CFR 800) require that the federal agency (USDVA) providing those funds take into account the effects to historic properties posed by federal undertakings. Consequently, the USDVA must identify historic properties within the project's area of potential effect (APE) and assess the project's potential to adversely affect those historic properties. Adverse effects "are found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" (36 CFR 800.5a[1]). This project, the associated cultural resources report, and the historic property treatment plan (HPTP) are designed to satisfy USDVA's obligations under Section 106.

On 17 July 2015, a KEC field crew conducted an architectural cultural resource inventory of a state-owned parcel (APN 032-050-56) along Galletti Way in Sparks, Washoe County. The KEC field crew conducted a Class III cultural resources inventory of the parcel according to the *Nevada Section 106 Architectural Survey and Inventory Guidelines* (revised Spring 2012). In total, the Class III inventory identified two historic ditches (S1251 and S1252). Both ditches are recommended eligible to the NRHP under Criterion A for their association with the Nevada Insane Asylum. These features retain integrity of association and location, and physical impacts to them will constitute an adverse effect to historic properties.

Resources eligible under Criterion A are directly associated with important historic developments, trends, or events—in this case the ability of the Nevada Insane Asylum to sustain itself financially with limited funding from the Nevada State Legislature. Integrity of location, setting, feeling, and association are essential to these resources retaining eligibility. If any of these aspects of historic integrity are impacted, those impacts must be mitigated.

Both of the historic ditches identified within the project's direct APE are inside the proposed undertaking's construction footprint. With such cultural resources, avoidance is typically preferred. However, as the resources are linear and span the majority of the direct APE's length and width, avoidance may not be feasible. In this particular case, KEC understands that the two resources will most likely be destroyed during the construction process.

1.3 REPORT OUTLINE

Chapter 1 provides a statement of purpose and a brief summary of major project details. Chapter 2 contains the treatment protocols for mitigating adverse effects to NRHP eligible properties located within the project area. Chapter 3 contains the bibliography.

2.0 METHODS AND TREATMENT PROTOCOLS

2.1 MITIGATION PLAN FOR S1251 AND S1252

Mitigation measures should seek to educate the public regarding the importance of significant historic events, trends, or developments, and the association of the specific resource to those historic trends or developments. Photographic and archival documentation are frequently considered to be appropriate measures. Public outreach is encouraged, in the form of the production of historical signs, video production, the production of popular reports, books, or pamphlets, and museum displays.

The documentation standards for resources of state and local significance require a particular set of activities (Nevada SHPO 2014) including: 1) a historical narrative; 2) a detailed physical description of the resource(s); 3) appropriate photo documentation; 4) reproductions of historic photographs, drawings, or plans; and 5) multiple current maps, plans, and sketches. These materials will be organized and presented according to the specific instructions provided in the "Documentation Standards for Historic Resources of Local and State Significance" (Documentation Standards) set forth in the *State Protocol Agreement between the Bureau of Land Management, Nevada and the Nevada State Historic Preservation Officer for Implementing the National Historic Preservation Act* (Appendix B), for acceptance by the Nevada SHPO.

2.1.1 Phased Documentation Activities

In order to create a historical narrative and acquire pertinent documents and historic photos, a thorough review of archival and oral history sources will be consulted. Informants from the Departments of Agriculture and Geography at the University of Nevada Reno (UNR) will be consulted, as well as the Nevada Water Master. Other resources that will be accessed at UNR include the photograph archives and written archives in the UNR Library Special Collections, and those available on the UNR campus at the Nevada Historical Society.

As these two resources were essential for the former Nevada Insane Asylum's farming operations, the written historical narrative will also include a brief history of the Asylum complex itself including an overall site history, what buildings existed in the complex during its period of significance, what buildings from the period of significance still exist today, and any additional land features or landscaping elements (e.g. other ditches, fences, vegetation, fields, roads, formal landscaping, walking paths). Maps, site plans, and historic photos should be included in the narrative to clearly illustrate the architectural history of this complex.

Additionally, KEC will conduct fieldwork using GIS and photography to document both irrigation ditches and their landscape context. This will result in an updated and extensive record that includes both photographic and cartographic media.

Color digital photos will be taken in accordance with the National Park Service's Photo Policy for "Best" practices as outlined in their document: https://www.nps.gov/nr/publications/bulletins/photopolicy/Photo_Policy_update_2013_05_15.pdf. The photos will consist of both overall and detail views of any extant character-defining features. Photos must be comprehensive enough to illustrate the full extent of these two resources and will be keyed to a map or site plan. A hard copy of the photos will be printed on archival paper and the digital images saved on an archival CD per NPS Photo Policy for "Acceptable" practices. One copy shall be submitted to the SHPO for their review and records. The photo documentation must be approved by the SHPO prior to the start of any ground disturbance in the area of these resources.

Finally, KEC will conduct an architectural survey of all buildings 50 years and older within the subject parcel (APN 032-050-56), including 12 buildings originally identified during the consultation process. A Nevada Architectural Resource Assessment (ARA) form will be completed for each resource. In total, 16 resources will



Figure 2.1 S1251 Ditch 1



Figure 2.2 S1252 Ditch 2

Table 2.1 Historic Buildings Located on Northern Nevada Insane Asylum

Letter	Building #/Name	Year Built
A	Building #12 – Vacant	1882
B	Building # 1 –Administration & Clinics	1920
C	Building #2 - Canteen & Drop-in Center	1961
E	Building #8 - Service Coordination Programs	1958
F	Building #10 – Vacant	1954
N	Building #22 - House Keeping & Maintenance	1959
O	Building #21 - Warehouse & Purchasing	1971
Q	Building #14/Building #15 Group Homes	1951/1949
R	Buildings 16, 17, & 18 – Group Homes - Vacant	1963
S	Building #13 - Lake's Crossing Center	1974
T	NDOT Maintenance and Equipment	1963
V	Weights and Measures - Department of Agriculture	1971
W	Building # 3 – Lab/Pharmacy	1925
X	Building #4	1961
Y	Building #5 – Medication Clinic	1967
Z	Kiosk	1961

be documented and are listed in the following table:

A documentary package will be created by a Secretary of the Interior-qualified architectural historian to thoroughly record these ditches via a historical narrative, photos, and maps. Copies of this document will be submitted to the USDVA in both paper and digital formats for them to share with Nevada SHPO. Additional copies will be provided to Nevada Historical Society and the UNR Library, Special Collections.

3.0 REFERENCES

Blustain, J.

2015 *An Architectural Inventory of 18.8 Acres for the Northern Nevada Veterans' Homes Project, Sparks, Washoe County, Nevada.* Project No. FAI 32-003.

Harmon, B.

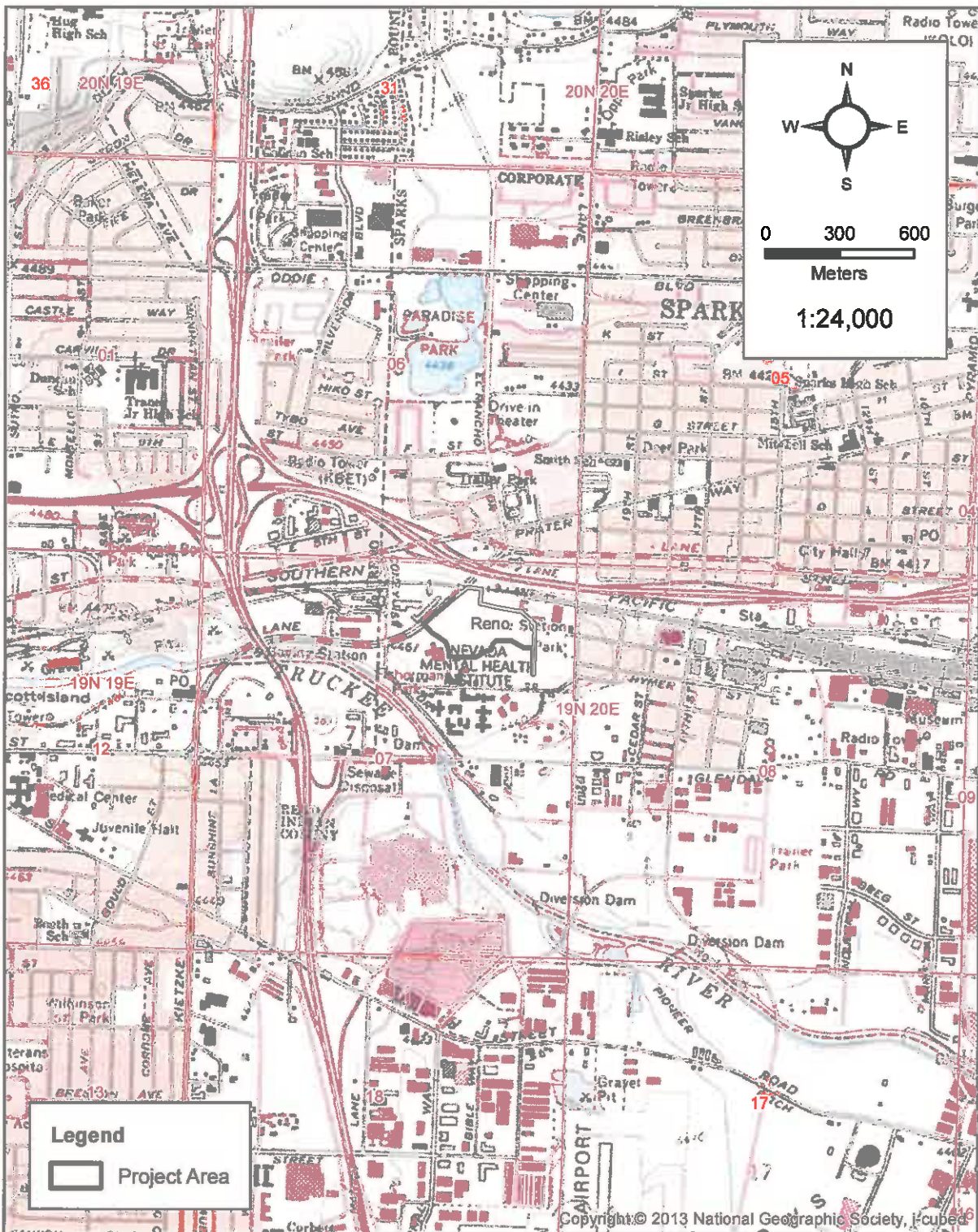
2015 *A Class III Inventory for the Northern Nevada Veterans' Homes Project.* Project No. FAI 32-003.

Nevada State Historic Preservation Office (NSHPO)

2014 "Appendix F: Documentation Standards for Resources of Local and State Significance." *State Protocol Agreement between the Bureau of Land Management, Nevada and the Nevada State Historic Preservation Officer for Implementing the National Historic Preservation Act.* On file at NVSHPO, Carson City.

APPENDIX A

Maps



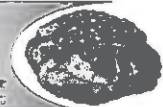
Project Area Map

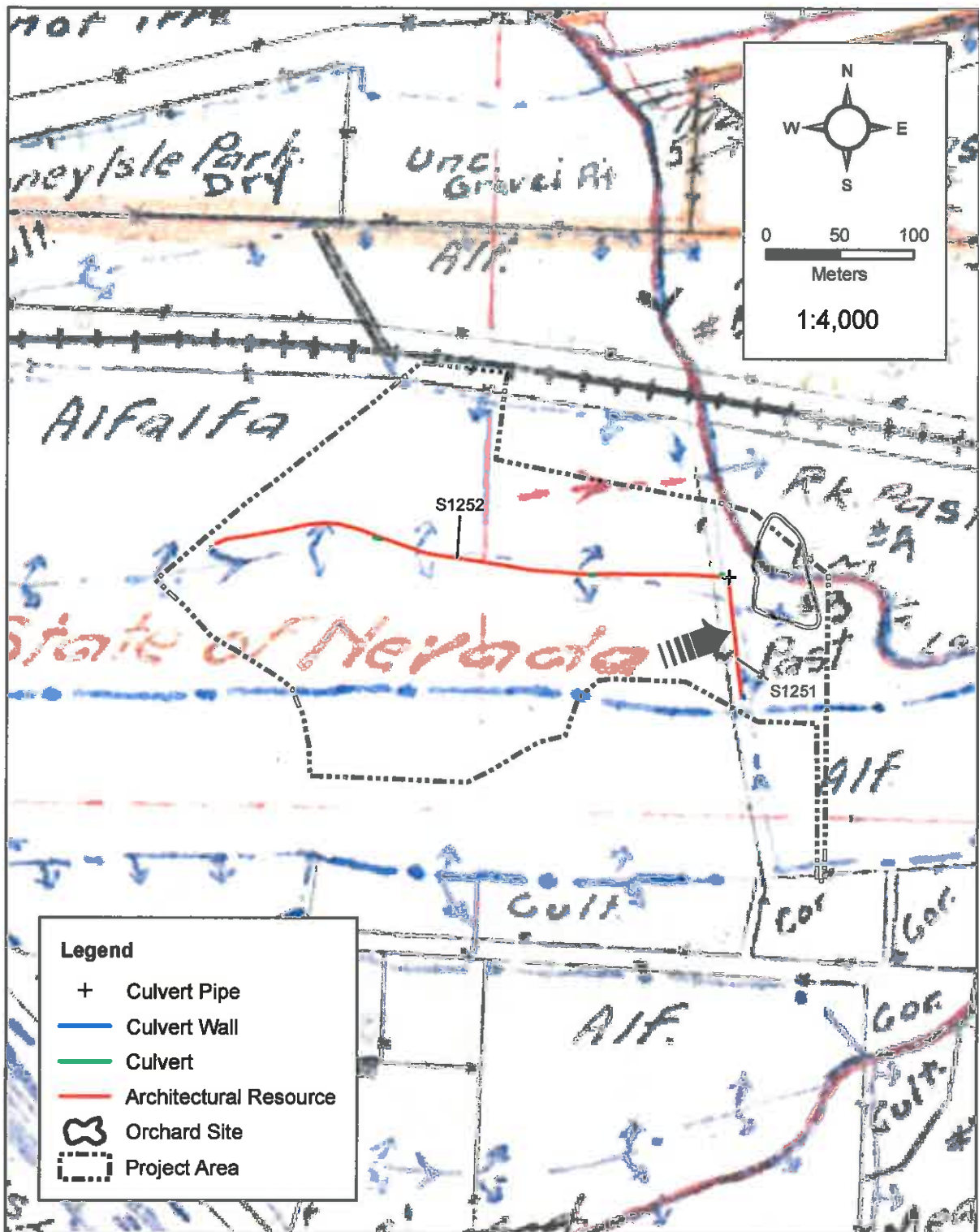
Base Map: USGS 7.5' Reno, Nev., 1967 (Photo Revised 1982). T.19N., R.20E., Section 7, Datum (NAD 83, meters)

Project: Historic Properties Treatment Plan for the Northern Nevada Veterans Homes Project (KEC-1066)

Report No. 13-P07; FAI 32-003

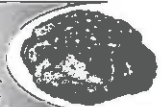
kautz
ENVIRONMENTAL CONSULTANTS, INC.

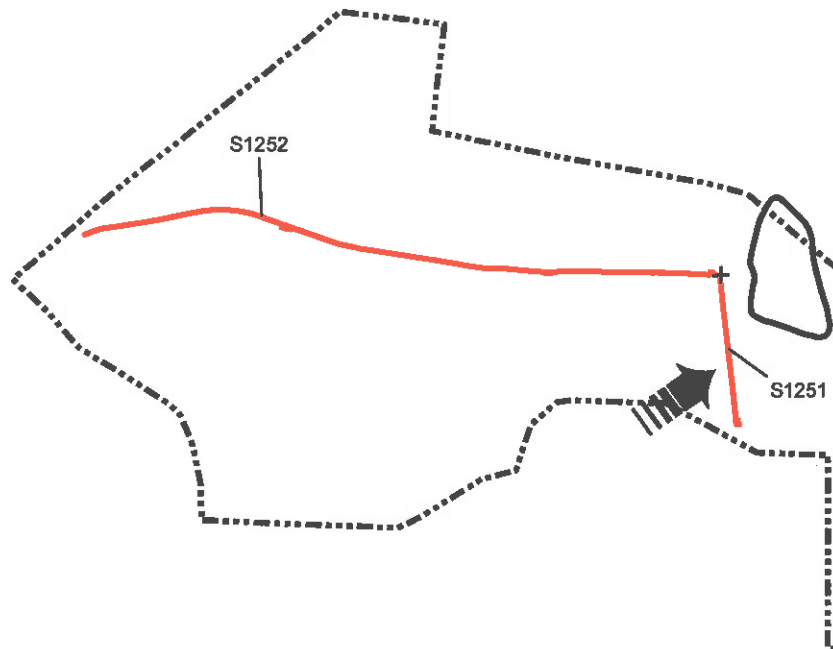
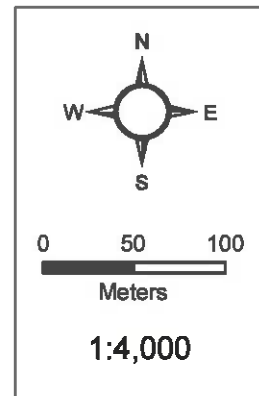




S1251 Historic Map
 Base Map: 1913 Truckee River Adjudication Survey Map
 T.19N., R.20E., Section 7, Datum (NAD 83, meters)
 Project: Historic Properties Treatment Plan for the
 Northern Nevada Veterans Homes Project (KEC-1066)
 Report No. 13-P07; FAI 32-003

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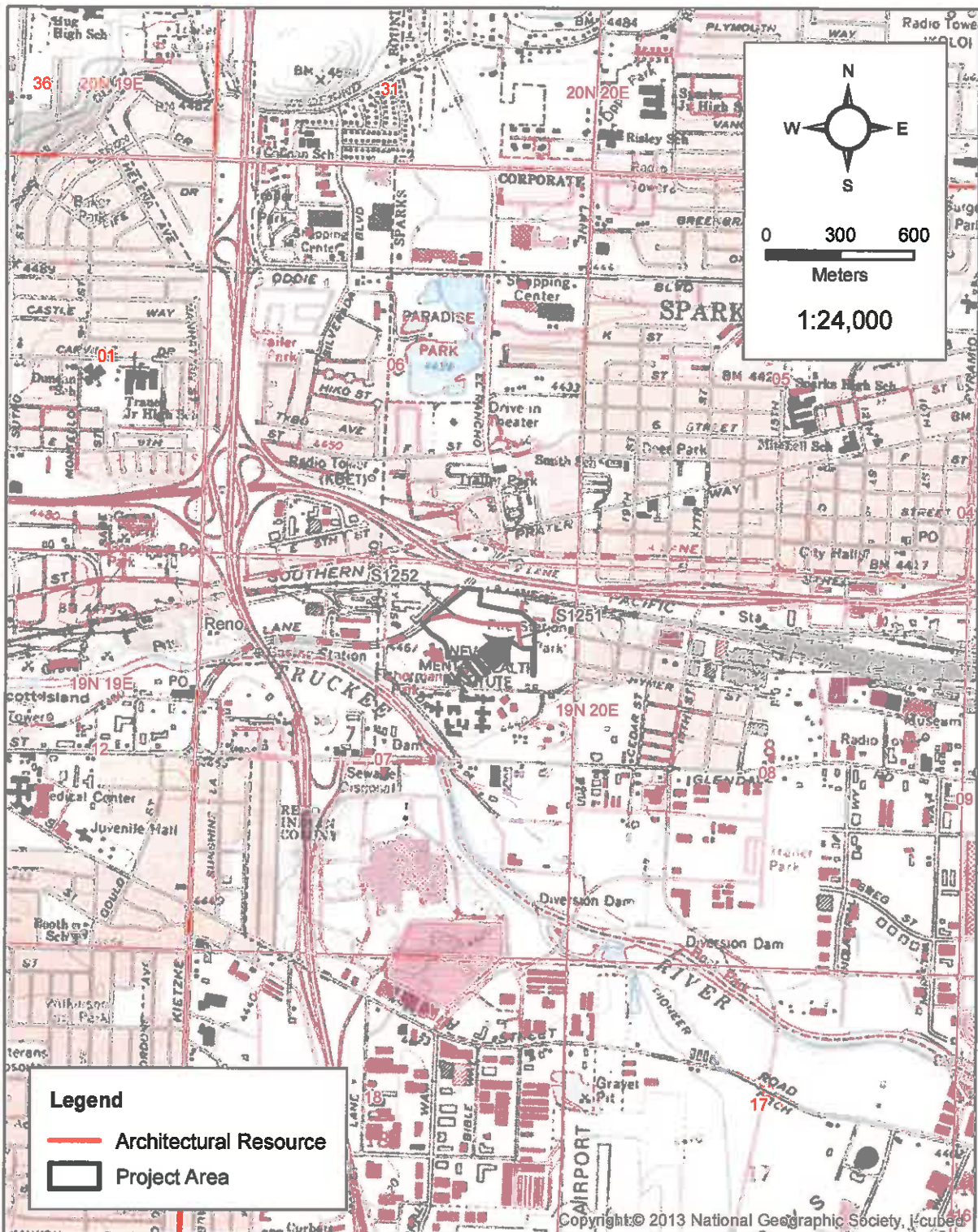
Legend

- + Culvert Pipe
- Culvert
- Culvert Wall
- Architectural Resource
- Orchard Site
- Project Area

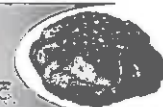
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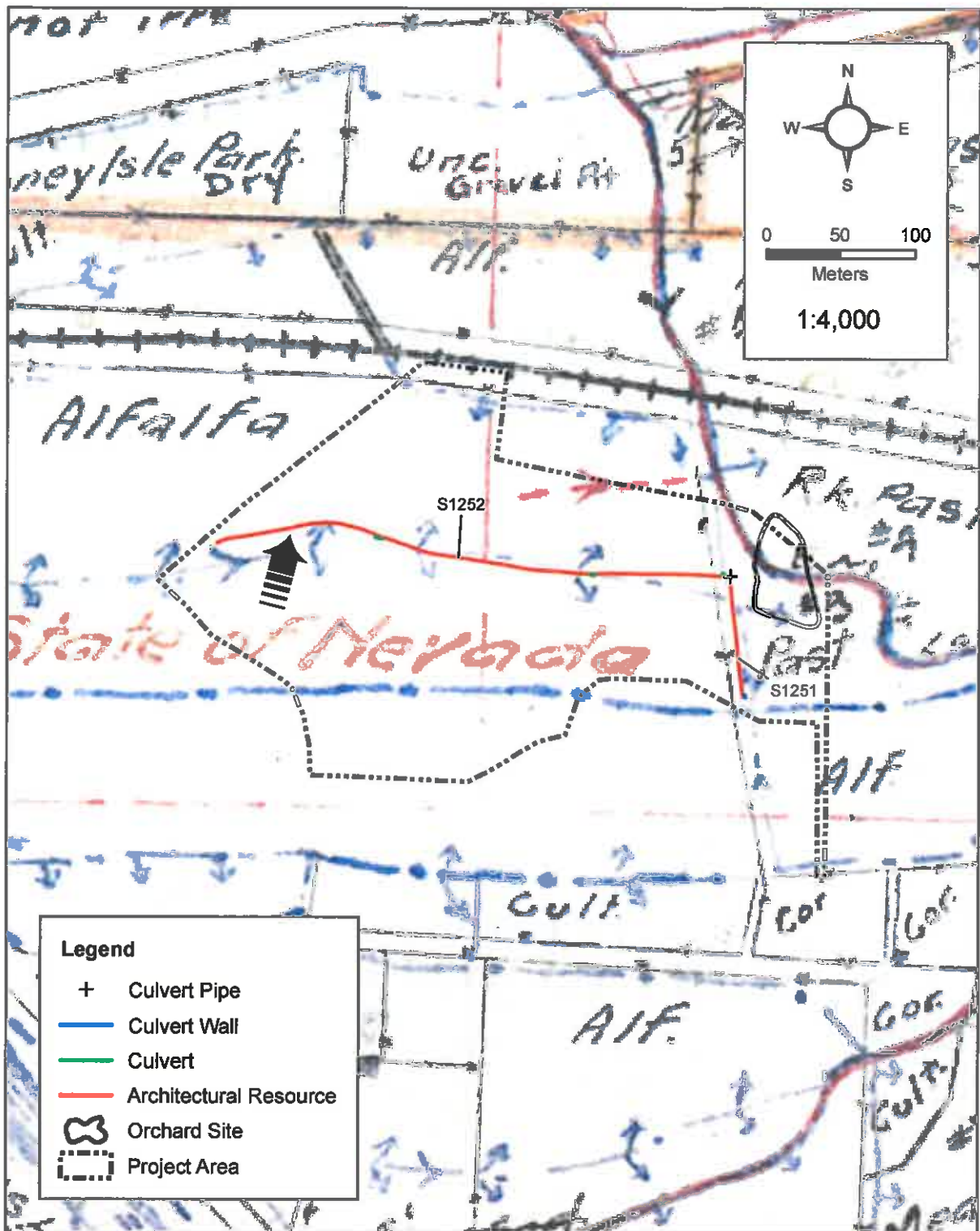
Base Map: USGS 7.5' *Reno, Nev.*, 1967 (Photo Revised 1982). T.19N., R.20E., Section 7, Datum (NAD 83, meters)
 Project: Historic Properties Treatment Plan for the Northern Nevada Veterans Homes Project (KEC-1066)
 Report No. 13-P07; FAI 32-003





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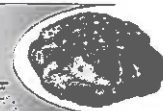
S1252 Historic Map

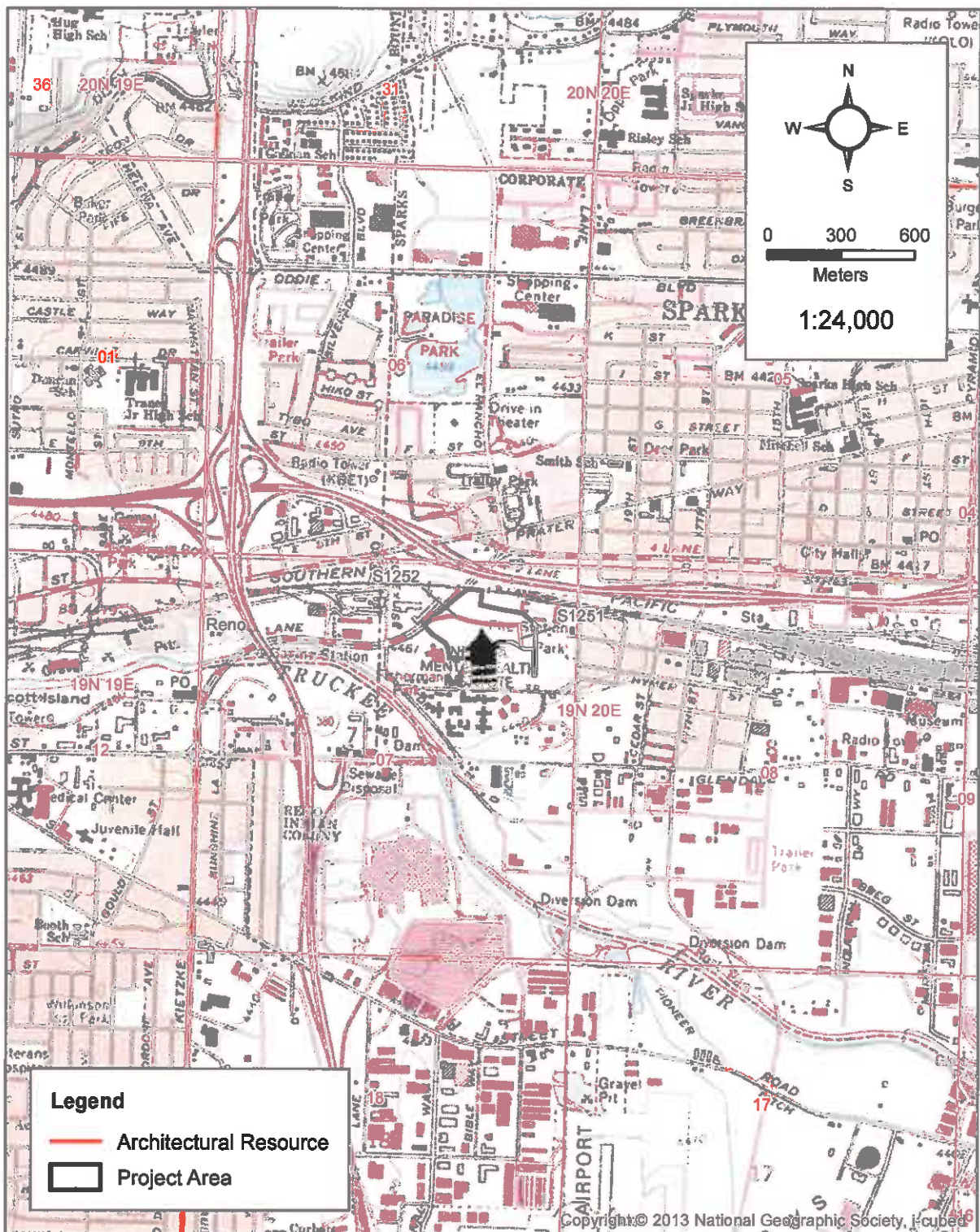
Base Map: 1913 Truckee River Adjudication Survey Map
T.19N., R.20E., Section 7, Datum (NAD 83, meters)

Project: Historic Properties Treatment Plan for the
Northern Nevada Veterans Homes Project (KEC-1066)
Report No. 13-P07; FAI 32-003

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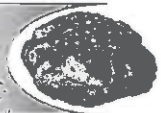


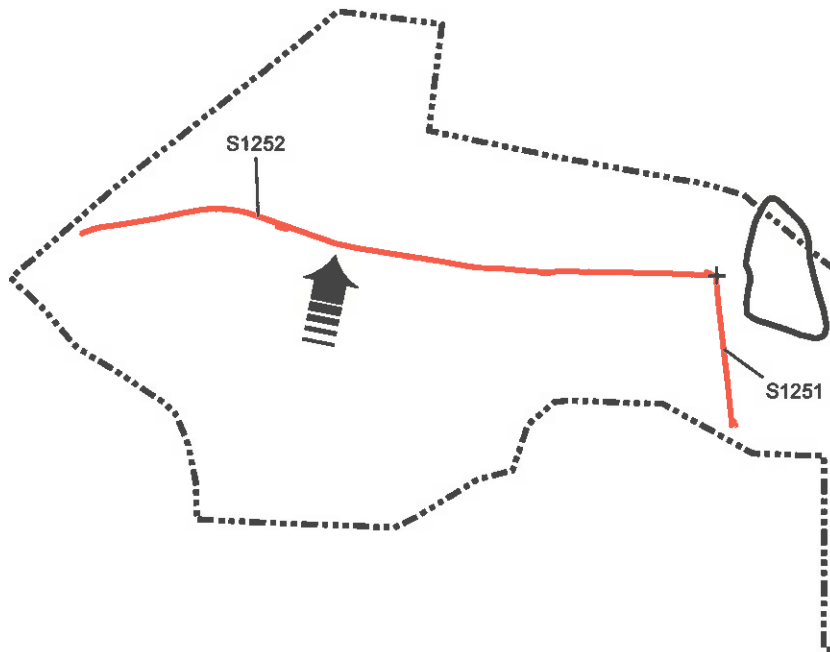
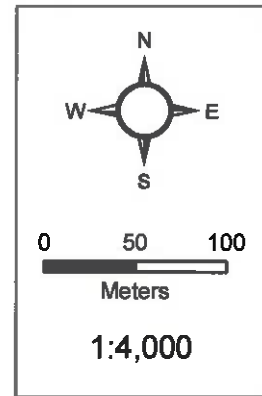


S1252 Location Map

Base Map: USGS 7.5' Reno, Nev., 1967 (Photo Revised 1982). T.19N., R.20E., Section 7, Datum (NAD 83, meters)
 Project: Historic Properties Treatment Plan for the Northern Nevada Veterans Homes Project (KEC-1066)
 Report No. 13-P07; FAI 32-003

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Legend

- + Culvert Pipe
- Culvert
- Culvert Wall
- Architectural Resource
- ⊕ Orchard Site
- ⋯ Project Area

S1252 Sketch Map

Base Map: USGS 7.5' *Reno, Nev.*, 1967 (Photo Revised 1982). T.19N., R.20E., Section 7, Datum (NAD 83, meters)
 Project: Historic Properties Treatment Plan for the Northern Nevada Veterans Homes Project (KEC-1066)
 Report No. 13-P07; FAI 32-003



APPENDIX B

State Protocol Agreement

STATE PROTOCOL AGREEMENT

between

The Bureau of Land Management, Nevada

and

The Nevada State Historic Preservation Officer

for

Implementing the National Historic Preservation Act

Revised December 22, 2014

APPENDIX F: MITIGATION STANDARDS FOR HISTORICAL RESOURCES OF LOCAL AND STATE SIGNIFICANCE

This appendix deals with treatment of historic, not prehistoric, resources and provides standards for historic resources eligible for inclusion in the NRHP at a state or local level of significance, not at a national level of significance. Should BLM propose to affect historic resources significant at the state or local level, the agency may propose treatment to mitigate the effect. In the past, BLM not only consulted with the SHPO but also sought advice from the National Park Service (NPS) on the kinds of treatment that would be required. NPS no longer requires HABS/HAER documentation on properties of local or state significance.

To assist in preparing a treatment plan and in estimating costs, this appendix provides standards for treatment of historic resources as agreed upon by BLM and SHPO.

A. Definition of Local and State Significance

Within the framework of the NRHP, the level of significance is defined as the geographic magnitude or scope of a property's historical significance and can be national, state, or local. Local significance is defined as the importance of a property to the history of its community, such as a town, city, or county. Likewise, state significance refers to the importance of a resource to the history of the state in which it is located.

B. Documentation Standards

In order to satisfy the documentation requirements for historic properties eligible for NRHP at the local or state level of significance, a report detailing the historical context and significance of the property and architectural and engineering documentation, including plans and photographs, must be prepared and submitted. The requirements for these elements are as follows:

Historical Documentation is a detailed record of the historical context and significance of a property presented in a report format. Historical documentation will employ appropriate methodology to obtain the desired information. Methods and techniques of historical research should be chosen to obtain needed information in the most efficient manner. Sources will be recorded so that other researchers can verify or locate information discovered during research. Historical research to create documentation uses secondary source materials, archival materials, and primary sources, such as personal records, deed and title books, newspapers, plats, maps, atlases, photographs, vital records, censuses, historical narratives, and interviews with individuals. The historical documentation section should include the following elements:

Title Page should include the title of the report, including the nature and location of the undertaking, the author of the report, the sponsoring institution, association, or agency, and the date the report was prepared.

Table of Contents should list report chapters and all subdivisions, including study unit sections. Pagination must be shown in the table of contents.

Introduction should summarize the purpose of the documentation, the eligibility criteria used to evaluate the resource, the level of significance the resource possesses, the reason for the treatment (i.e., impending threat to the resource), objectives for conducting the historical documentation, the scope of the project, and the agencies involved. A map showing the location of the project must be included.

Documentation Methodology should include an explanation of the procedures used to execute the documentation, including the name of the researcher, date of the research, sources searched, and limitations of the project.

Historical Narrative should provide a full description of the resource(s), a historical context against which significance is assessed, and a comprehensive history of the resource. This section should include a historic context. The thematic study units identified in the Nevada Comprehensive Preservation Plan (1991) should guide the historical context.

Bibliography references to secondary sources should indicate author, title, and date of publication. Primary sources should be identified by name, collection identifier, and location. Interviews should be noted including the date and location of the interview, names of both parties.

Photos and other documentation of the historic significance of the building, site, structure, or object will be conveyed through drawings, photographs, and other materials that comprise documentation. The appropriate level of documentation for properties eligible for the National Register at a local, regional, or state level of significance must include digital photographs of exterior and interior views of the resource. Please include a photo log and site plan detailing the date the photo was taken, its orientation, the name of the photographer, and the photo number.

Exterior photographs should be documented by at least six views including the front and one side; the rear and one side; the front elevation; environmental view showing the building as part of its larger landscape; major elements of the building, including doors, windows, additions, etc.; and details such as materials and hardware.

Interior photographs should yield information about the floor plan. Three or four views should be sufficient to document the significant elements of the interior, unless the resource is large or complex. Reproductions of historic photographs should be included, if available. Photocopies of existing drawings or plans (including scale) should be included, if available. If permission is required to reproduce historic photographs, plans, maps, or other materials, it is the responsibility of the researcher to obtain proper authorizations. Copies of permission forms must be submitted with the report. In addition, drawings, site plans, and sketch plans should be included. The site plan must include the resource's orientation in its natural landscape and include the scale and a north arrow. The sketch plan will show the layout and floor plan of the resource, including all

associated features. The sketch plan need not be a "measured drawing," but an approximate scale should be included.

C. Records Storage--Repositories

BLM will add one copy of each treatment report to the State's architectural resources inventory that will be available for public inspection at the SHPO office subject to BLM's prior determination whether to withhold information from the public about the location, character, or ownership.

BLM will send one copy, which will include the original digital photographs, to one of the following repositories, depending on the location of the resource being documented subject to BLM's determination whether to withhold information from the public about the location, character, or ownership.

1. The Nevada Historical Society, Reno
2. The Nevada State Museum and Historical Society, Las Vegas
3. The Northeastern Nevada Historical Society, Elko
4. The North Central Nevada Historical Society, Winnemucca
5. The Central Nevada Historical Society, Tonopah

There are four Certified Local Governments (CLGs) in the State of Nevada, which will receive one copy of the treatment documentation for any resources within their boundaries. The four CLGs are represented by the following organizations:

1. The Historical Resources Commission, City of Reno
2. The Historical Architecture Review Commission, Carson City Historic District
3. The Las Vegas Historical Commission, City of Las Vegas
4. The Comstock Historic District Commission, Virginia City

Attachment 4

Cultural Resources Monitoring and Unanticipated Discovery Plan (Plan)

SPWD shall ensure that Archaeological monitoring of ground-disturbing activities will be conducted in accordance with the following Plan. Participants in this Plan include SPWD, the SHPO, the project's construction management firm, the CRS, and the Tribes. To allow for clear communication among all participants, each organization will designate a Point of Contact (POC) to receive and transmit all cultural resources-related communications.

A. Worker Environmental Awareness Training

SPWD shall ensure that all persons working in the field are provided with archaeological and cultural resource awareness training and that subsequent hires will be required to be trained prior to operating in the field. Training can be in association with SPWD's construction management firm's safety and/or related job training and project orientation.

B. Designation of a Cultural Resources Specialist (CRS)

At least 24 hour prior to the start of any project-related ground disturbance, SPWD will identify a lead CRS. The CRS will possess training and background conforming to the Secretary of Interior's Professional Qualifications Standards, as published 36 CFR Part 61. In addition, the CRS shall have the following qualifications:

1. The CRS's qualifications shall be appropriate to the needs of the resources and shall include a background in anthropology, archaeology, history, architectural history, or a related field; and
2. At least three years of archaeological or historic, as appropriate, resources mitigation and field experience in Nevada; and
3. At least one year of experience in a decision-making capacity on cultural resources projects in Nevada and the appropriate training and experience to make recommendations regarding the significance of cultural resources.

C. Construction Monitoring and Reporting

For the purposes of this plan, archaeological construction monitoring is defined as on-the-ground, close-up observation of construction related ground disturbance by a Cultural Resources Monitor (CRM) who is empowered in a discovery situation to halt all activities in the immediate vicinity of the discovery with a buffer of 15 meters to ensure protection of the discovery. CRMs shall have the following qualifications:

1. A BS or BA degree in anthropology, archaeology, historical archaeology or a related field and one year's experience monitoring in Nevada; or
2. An AS or AA degree in anthropology, archaeology, historical archaeology, or a related

field, and two years of experience monitoring in Nevada; or

3. Enrollment in upper division classes pursuing a degree in the fields of anthropology, archaeology, historical archaeology, or a related field, and two years of monitoring experience in Nevada.

CRMs report directly to the CRS on a daily basis. The CRM watches for any kind of archaeological remains that are exposed during ground-disturbing construction activities. The CRM will be responsible for:

1. The definition and identification of any discovered cultural or archaeological find.
2. Halting all construction in the vicinity of a find in order to evaluate the discovery.
3. The preparation of a daily log of construction activities observed and any archaeological discoveries made.
4. The preparation a daily log or daily email for the CRS.

The CRS will be responsible for:

1. The immediate supervision and assignment of CRMs.
2. The determination as to whether any newly discovered cultural materials can be treated as eligible for listing in the NRHP for the purposes of NNVNH (see Section E below).
3. Ensuring that either they or the CRMs will be equipped with basic archaeological field equipment necessary to record and map discovered sites and photograph the finds. A full suite of field gear needed to recover cultural materials will be brought on site as required. If necessary, the CRS will arrange with the construction superintendent's field office to cache frequently needed gear or supplies.
4. Determinations of the number of CRMs needed taking into account such factors as number of active ground-disturbing work areas, archaeological sensitivity, and proximity to known resources.
5. The preparation of a brief weekly monitoring report to be provided to SPWD and the SHPO in an electronic format.

A representative for the lead construction company will be designated prior to construction and will be responsible for providing a weekly construction schedule detailing the next week's planned activities to the project engineering firm for the purpose of scheduling archaeological and Native American monitors (Section H). The construction schedule will describe work locations, depths of anticipated excavations, and estimated duration of construction activities.

Recognizing that construction can be dynamic, notification of any need for a monitor will be provided to the project-engineering firm no less than 48 hours prior to the commencement of construction.

D. Discoveries of Materials Less Than 45 Years of Age

All of the materials listed below are less than 45 years of age and, unless of exceptional significance as determined by the CRM/CRS, are considered not eligible for the NRHP and do not merit recordation or mitigation if discovered during monitoring or construction. If there is any doubt regarding the age of a historic-period find, SPWD and CRS will discuss this with the CRM when giving notice of the find. The following materials will not be recorded:

1. Plastic products limited to Styrofoam® and other foamed polystyrene products, Velcro®, Teflon®-coated cookware, polyvinylchloride (PVC) pipe, high-density polyethylene, polypropylene, polyimide, thermoplastic polyester, linear low density polyethylene, liquid crystal polymers, and products marked with resin codes,
2. Cans made from aluminum or bi-metal, or those with pull-tab or push-tab (metal or plastic) openings,
3. Aluminum foil containers,
4. Synthetic tires and car parts unless determined to be over 45 years in age or found in association with resources over 45 years in age,
5. Modern electronics (CD players, VCRs, electronic appliances, personal electronics, computers, printers),
6. Compact disks, floppy computer disks, magnetic tape media,
7. Unidentifiable metal fragments not found in association with other historic materials,
8. Rubberized metal, and
9. Clothing or shoes made of plastic or synthetic materials unless determined to be over 45 years in age or found in association with resources over 45 years in age.

CRMs shall have sufficient familiarity with historic-era resources prior to monitoring at the project location to differentiate materials that are more than 45 years of age from more recent materials.

E. Discoveries of Materials 45 Years of Age or Older

The CRS shall ensure that all cultural resources more than 45 years in age will be recorded on appropriate forms, mapped, and photographed.

Previously undiscovered cultural resources more than 45 years in age in categories Section E.2 and Section E.3 below will be treated as not eligible under the Secretary of Interior's Criterion d for the purposes of the NNVNH and will be mitigated in the manner described in Section E-1 below. Cultural resources not included in categories Section E.2 or Section E.3 will be evaluated for their NRHP eligibility consistent with Attachment 6.F. Any deposits containing human remains will not be treated using the process outlined in Section E.1.

1. Mitigation for discoveries treated as eligible for the purposes of NNVNH:
 - a. The CRS/CRM shall halt construction in the immediate vicinity of the discovery with a buffer of 15 meters to ensure protection of the discovery.
 - b. The CRS shall record the discovery on the Nevada Intermountain Antiquities Computer System (IMACS) form. The form shall identify the category (from Sections E.2 and E.3) for each discovery.
 - c. The CRS shall ensure that each form is accompanied by a location map and photographs of the discovery.
 - d. The CRS shall not collect artifacts found in discoveries described in Section E.2 and Section E.3.
 - e. The CRS shall notify SPWD's Construction Manager that construction may resume.
 - f. The CRS shall submit the required IMACS form for each individual discovery as an attachment to the next Cultural Resources Weekly Compliance Report.

2. The following classes of prehistoric archaeological resources shall be treated as not eligible for the NRHP under the Secretary of Interior's Criterion d for the purposes of NNVNH:
 - a. Small, sparse (less than three pieces per square meter) lithic scatters.
 - b. Sparse occurrences of fragments of fire-affected rock weighing less than 15 grams (less than three pieces per square meter, with no other cultural constituents within 1 square meter).
 - c. Small clusters (less than 0.5 meter x 0.5 meter in horizontal extent) of unidentifiable, unworked, and not fire-affected shell or bone (whole or fragmented) not in association with artifacts or other cultural materials.
 - d. Isolated (not found within 30 meters of other artifacts) prehistoric artifacts.

3. The following classes of historic archaeological resources shall be treated as not eligible for the NRHP under the Secretary of Interior's Criterion d for the purposes of the NNVNH:
 - a. Roadside disposal of debris or refuse.
 - b. Unmodified bovine, or other domesticated animal bone.
 - c. Small, isolated artifact concentrations (fewer than five artifacts or the fragments of one object) with no subsurface deposit.
 - d. Deposits of concrete, brick or other building materials not *in situ*.
 - e. Metal, concrete or ceramic pipes, conduits, or culverts not *in situ*.
 - f. Isolated (not found within 30 meters of other artifacts) historic artifacts.

F. Unanticipated Discoveries Requiring NRHP Evaluation

In the event that construction activities reveal previously unidentified cultural resources that are not described in the categories found in Sections E-2 and E-3, the following procedures shall be implemented:

1. The CRM/CRS and SPWD's Construction Manager shall ensure that all ground-disturbing construction activity will cease within a 15-meter radius around the entirety of the discovery.
2. SPWD and/or CRS shall ensure that the discovery is adequately fenced or flagged and that remains protected until SPWD, in consultation with the SHPO, issues a NTP.
3. The CRS shall notify the SPWD POC no later than 24 hours following the time of discovery.
4. The CRS will initiate an evaluation of the discovery and within 24 hours, the CRS shall provide a NRHP eligibility recommendation for the discovery to the SPWD that will include a site record and a summary report of the testing operations.
 - a. Evaluations of cultural resources will be made, if possible, from the data collected during monitoring or auger probing. If additional information is needed to evaluate the NRHP eligibility of a discovery, limited testing by hand excavation units (0.5 x 0.5 meter, 1 x 1 meter) will be conducted until sufficient information is collected to allow for a NRHP evaluation.
 - b. All testing operations will cease upon collection of sufficient data to allow for a NRHP evaluation.
5. SPWD, within two (2) working days of receipt of the notification of the discovery, shall notify the SHPO, and the Tribes as appropriate, of the discovery and provide a NRHP eligibility determination for the discovery.
6. The SHPO, and the Tribes as appropriate, shall have seven (7) working days from receipt to comment on SPWD and/or VA's determination of NRHP eligibility for the discovery. If no timely response is received, SPWD and/or the VA will assume concurrence with the determination.
7. If SPWD and/or the VA, in consultation with the SHPO and the Tribes, determines that a discovery is not eligible for the NRHP, SPWD will provide a written determination to the NNVNH construction manager that construction activities may proceed within the discovery and avoidance area, as defined in Section F.1, within two (2) working days.
8. If SPWD and/or VA, in consultation with the SHPO and the Tribes, determines that a discovery is a historic property and cannot be permanently avoided by NNVNH redesign, SPWD, through its CRS, will develop an HPTP in that is consistent with the *Secretary of Interior's Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716-44742, September 23, 1983) (Standards) and that takes into consideration the ACHP's Section 106 Archaeology Guidance (2009; available online at www.achp.gov/archguide), and any other applicable guidelines or standards.

9. SPWD and/or VA will review and comment on any or all draft HPTPs within fifteen (15) calendar days of receipt.
10. Upon SPWD and/or VA approval of any or all HPTPs, SPWD and/or VA shall submit the draft HPTPs to the SHPO for review.
11. SPWD and/or VA shall concurrently provide a copy of the draft HPTPs to the Tribes as appropriate.
12. The SHPO, and the Tribes as appropriate, shall provide comments to SPWD and/or VA within fifteen (15) calendar days of receipt of any or all draft HPTPs. If no comments are received within the comment period, SPWD and/or VA may assume the SHPO and the Tribes have no objection to the contents of any or all of the draft HPTPs.
13. SPWD's CRS will address any comments provided by the SHPO, and the Tribes as appropriate, and supply final HPTPs to the SPWD and/or VA within ten (10) calendar days of SPWD's receipt of those comments.
14. Upon approval of a final HPTP, SPWD and/or VA shall provide final copies of the HPTP to the SHPO, and the Tribes as appropriate, and SPWD will initiate any or all of reviewed and finalized HPTPs.

G. Avoidance Areas for Cultural Resources

Avoidance areas will consist of the entirety of the cultural resource and will include a 15-meter buffer around the resource. The avoidance areas will be physically marked on the ground with survey lath and high visibility fencing. Maps illustrating the avoidance areas will be provided to participants of this Plan to aid in the avoidance of sensitive resources and for NNVNH planning purposes. The map(s) will be updated during NNVNH implementation to reflect any changes resulting from a receipt of a NTP, or the identification of an unanticipated discovery.

H. Human Remains

Human remains may be discovered during project construction or during archaeological excavations. Human remains and associated grave goods will be handled according to provisions of the appropriate state statutes with guidance provided by the SHPO and SPWD.

1. In the event that human remains are discovered, the CRM/CRS and/or SPWD's Construction Manager shall halt all construction activity within fifteen (15) meters of the discovery. No further activity will take place within this buffered area until SPWD receives written notice to proceed from the SHPO.
2. The CRS will immediately notify SPWD, the SHPO, SPWD and/or VA, and the Sparks Police Department by telephone followed by written notification of the discovery. SPWD

will provide 24-hour on-site security, if deemed appropriate. Protection of the buffered area will remain in place until the SHPO and SPWD and/or VA have approved appropriate disposition of the human remains and any associated grave goods in accordance with applicable state statutes.

3. The CRS, in coordination with the SPWD, the SHPO, and the Sparks Police Department will assess age, possible ethnic affiliation, and the particular circumstances of interment.
4. Should the remains be identified as Native American, SPWD will coordinate with the SHPO to administer the requirements of NRS 383.
5. For all other remains, the CRS will coordinate with SPWD and the SHPO to ensure appropriate reinterment in the historic cemetery established under Section 1.1 of Chapter 196, Statutes of Nevada 2009, page 718.

I. Native American Participation

SPWD will make provisions for the participation of Tribal monitor(s) during ground-disturbing activities. The Tribal monitor(s) will be from one of the two groups affected by the project including the Washoe Tribe of California and Nevada and the Reno-Sparks Indian Colony. Each Tribe participating in the project will provide SPWD with a POC to receive all monitoring related communication. If prehistoric artifacts are encountered during ground disturbance, project archaeologists, SPWD, and the SHPO will ensure that Tribal monitors are consulted to ensure that cultural features are treated appropriately. Construction within the buffered area of a discovery of prehistoric artifacts will not occur until the affected Tribe is given notice by SPWD that ground disturbance is planned in undisturbed soil and given the opportunity to monitor that ground disturbance.

SPWD shall invite a Tribal monitor to be on site during all data recovery and mitigation efforts. SPWD shall ensure that notification of the need for a tribal monitor will be provided no less than 24 hours prior to the commencement of work. Tribal monitors will be responsible for providing monitoring updates to Tribes.