



STATE OF NEW MEXICO
OFFICE OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

LA VILLA RIVERA BUILDING
228 EAST PALACE AVENUE
SANTA FE, NEW MEXICO 87501
(505) 827-6320

COPY

GARY E. JOHNSON
Governor

Santa Fe, September 12, 2002

Robert B. Montoya, Grants Officer
Bureau of Indian Affairs, Facilities Management
P.O. Box 1248
Albuquerque, New Mexico 87103

Re: Environmental Assessment for Santa Fe Indian School; Santa Fe, NM

Dear Mr. Montoya:

Our office has received your submittal with two copies of the Environmental Assessment prepared by Marron and Associates, on behalf of the Santa Fe Indian School, dated March 2001, for the proposed new construction at the existing School Campus in Santa Fe.

This is the same submittal sent to us by Mr. Marron on April 11, 2001, which we replied to on May 15, 2001, to Lee Maytubby, Acting Deputy Director for the BIA Southwest Region. Because your new submittal is an identical copy of what was sent to us then, our concerns today continue to be the same as those we had then and our reply to you will reflect those concerns again.

To quote directly from our letter to Mr. Maytubby (which is enclosed for your reference), "the proposed undertaking includes planning, design and construction of new educational facilities within campus to house 700 students, to be built in the existing athletic field at the school. The new project does not make any provisions to utilize the many historic buildings already on campus, all of them with substantial historic integrity. In our opinion, these buildings are eligible for listing both as a school district and individually. In contrast, the consultant has deemed them as "aging, obsolete and unsafe structures in need of replacement".

The Environmental Assessment (EA) document submitted to HPD fails to properly address the potential impact of the proposed project on the more than 20 historic buildings on campus. Specifically, the EA fails to clearly identify the future use of those structures as related to the new project. Although the outlined scope of work states that "no buildings will be razed and the new facilities are to be built in back of the older buildings", the Advisory Council on Historic Preservation regulations identify that abandonment of those structures will constitute "demolition by neglect" (36CFR 800.5(2)(vi) and an Adverse Effect on the historic character of the campus. Therefore we request a more detailed scope of work with a clear indication of your future plans for all

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the historic buildings within campus, and preferably, demonstrate an effort on the part of the designers to creatively and fully utilize the cultural resources in the new planning for the school facilities.”

The Santa Fe Indian School is still under the direct jurisdiction of the BIA and the project is being funded with federal monies, so we will continue to follow our standard procedure for compliance review and will expect that both the BIA and the Santa Fe Indian School will comply with the provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and the Advisory Council on Historic Preservation regulations (36 CFR Part 800).

We look forward to working with your staff and the school on this project. If you have any questions regarding these comments, please call Jan Biella at (505) 827-4045 or Pilar Cannizzaro at (505) 827-4054.

Sincerely,



Jan Biella
Acting SHPO
HPD Log # 65762



Pilar M. Cannizzaro
Compliance Reviewer

Cc: Dr. Bruce Harrill, Archaeologist, BIA Southwest Region Office
Enclosures