November 20, 2017

Sarah Hanzel  
City of Rapid City  
Community Planning & Development Services  
300 6th St  
Rapid City SD 57701-5035  

RE: SDCL 1-19A-11.1 Consultation  
Project: 170824005S – 430 Main Street (Gambles Store) – Exterior alterations  
Location: Pennington County  
(CORC)

Dear Ms. Hanzel:

Thank you for the opportunity to comment on the above referenced project pursuant to South Dakota Codified Law 1-19A-11.1. The South Dakota Office of the State Historic Preservation Officer (SHPO) would like to provide the following comments concerning effect of the proposed undertaking on the non-renewable cultural resources of South Dakota.

On November 1, 2017, we received your case report regarding the above referenced project to make exterior alterations to 430 Main Street in Rapid City. This building is a contributing resource in the Rapid City Commercial Historic District, which is listed on the National Register of Historic Places. State law (SDCL 1-19A-11.1) outlines a specific process which must be followed prior to any governmental action that may impact any historic property that is included on the National or State Registers of Historic Places.

Based on the information provided in the case report, the project proponents have modified the original proposal to take into account several of the Rapid City Historic Preservation Commission’s (HPC) concerns. For instance, the current proposal will leave more of the original yellow brick visible rather than cover it with metal and EIFS; the canopies were redesigned to reference the original metal canopies; and the glass blocks at the entrances will be restored. All of these modifications are positive and will help to maintain the architectural integrity of the building.

Upon further review of the revised proposal, however, the SHPO has determined that portions of the current proposal do not meet the Secretary of the Interior’s Standards for the Treatment of Historic Properties – Rehabilitation (Standards), as required by ARSD 24:52:07:02. Specifically:

- Standard #2 states: "The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Standard #5 states: "Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved." The original porcelain enamel tiles around the base of the building help define the character of this relatively simple building. Their removal and
replacement with split face CMU block is not in keeping with these standards and the historic appearance of the building.

- To bring the proposal into compliance with Standard #2 and #5, we recommend that the panels be replaced with a material that is more visually compatible with the existing porcelain enamel tiles. We recommend using a ceramic, stone, or metal material with a smooth face to match the existing or historic visual appearance.

- Standard #9 states: “New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.” Three portions of the proposal do not currently meet Standard #9 but may be modified to meet it.

- The current proposal indicates that the existing cast stone parapet cap will be replaced with metal; however, it is unclear whether the existing cast stone parapet is in need of repair or replacement. If the existing stone parapet cap is failing, we recommend using a metal cap in a color as close to the existing cast stone as possible to minimize the visual change.

- Several areas of original yellow brick will be covered with bronze metal Bridger Steel siding. While we understand that the metal siding will be attached in a manner that will minimize harm to the underlying brick, we recommend leaving as much of the original brick exposed as possible to lessen the effect of the change. For instance, we recommend leaving exposed brick at the main corner entrance while covering the brick at the two secondary entrances.

- The original corner entrance will be raised and clad in metal siding to emphasize the main entry and create mechanical space. We recognize the need to conceal the new mechanical systems, which will be located above the corner entrance. However, we recommend altering the proposed design to maintain the original brick below the new canopy and making changes only above the new canopy to conceal the mechanical equipment.

We appreciate the modifications that the property owner has already been willing to make with this project, and we suggest that the additional modifications outlined above would bring this project into compliance with the Secretary of the Interior Standards for Historic Preservation. If these additional modifications are made, we believe the project would not have an adverse impact on the historic building.

As you take these comments into consideration, please remember that under State law our office only provides comments and recommendations pertaining to preservation standards, and the City of Rapid City will determine whether to issue the necessary permits for this project. Their decision is based on consideration of all feasible and prudent alternatives, including economic practicability, and whether the proposal contains planning to minimize harm to the historic property. If the City proceeds with the issuance of the permits, then ten days' notice to our office by certified mail is required along with a record of factors considered in making this decision for our files.
If you have any questions or concerns, please contact Ted Spencer at (605) 773-6296 or at Ted.Spencer@state.sd.us. Your concern for the non-renewable cultural heritage of South Dakota is appreciated.

Sincerely,

Jay D. Vogt
State Historic Preservation Officer

[Signature]

Ted Spencer
Director, State Historic Preservation Officer