



STATE OF NEW MEXICO
DEPARTMENT OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

BATAAN MEMORIAL BUILDING
407 GALISTEO STREET, SUITE 236
SANTA FE, NEW MEXICO 87501
PHONE (505) 827-6320 FAX (505) 827-6338

July 26, 2012

Leo Schmitz, Executive Director
Cumbres & Toltec Scenic Railroad Commission
P.O. Box 561
Antonito, CO 81120

Re: Railroad Visitor Center [RVC]; Proposed Reconstruction of Chama Roundhouse and
Reintroduction of Turntable/C&TS RR, San Juan Extension/SR #136

Dear Leo,

I understand no written comments have been made in response to an inquiry received earlier this year about a potential C&TS RR revision of an earlier plan for a RVC. As you know, the Historic Preservation Division has reviewed and consulted on a number of plans and ideas for a visitor center, with the earlier plan being resolved as a new museum building proposed for the north end of the Chama yard, near Terrace Avenue [New Mexico State Road 17].

This recent idea proposes a more central location in the Chama yard for the RVC, and would utilize existing buildings and new construction. We support the idea of using existing buildings in the interpretation of the Chama yard. Doing so ensures the continued maintenance of the historic buildings, and offers a potentially more focused use of railroad resources.

Thank you for the report by Kevin E. Corwin, *A Brief History of the Roundhouse and Turntable at Chama, New Mexico*, January 12, 1998. The report includes that the surviving roundhouse stalls of today are a remnant of the 1899 nine-stall brick roundhouse; and, the brick roundhouse replaced an original 1882 wood-frame, six-stall roundhouse that was destroyed by fire. Again, from Corwin's report, we understand that a 50' Keystone deck girder turntable had been installed at the site in 1882. In 1925 it was replaced by a 65' deck girder turntable. This turntable was removed after 1945.

The existing roundhouse is a contributing building of the Chama yard. The C&TS RR, San Juan Extension, has also recently been added as a National Historic Landmark [NHL]. Consultation with the National Park Service [NPS] about all of the proposed changes for the RVC is essential and should take place. The NPS can provide guidance so that the changes will not threaten the newly established NHL status of the property.

It is our opinion that these changes can be developed at the site without adverse effect to the property as long as the changes meet appropriate preservation standards. I have enclosed printed material including the Secretary of the Interior's *Standards for Reconstruction* and *Standards for Rehabilitation* [additions], as well as guidelines for both sets of standards. Please review the standards carefully.

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We may discuss the appropriate standards with you at a future date. You will note that under the reconstruction standards, *a reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.* And from the guidelines, *justifying a reconstruction requires detailed physical and documentary evidence to minimize or eliminate conjecture and ensure that the reconstruction is as accurate as possible.* It will be important to determine, through research, whether adequate documentation for an accurate reconstruction is available. Also, you might be interested to note that the guidelines include that *while the use of traditional materials and finishes is always preferred, in some instances, substitute materials may be used if they are able to convey the same visual appearance. Where non-visible features of the building are concerned—such as interior structural systems or mechanical systems—it is expected that contemporary materials and technology will be employed. Re-creating the building site should be an integral aspect of project work.*

We are open to considering the reintroduction of an operating turntable in the location of the previous turntable. A proposal would need to include the specific turntable being proposed, and the proposed archaeological investigation and documentation of the historic turntable location. Several different turntables have been described to us as being proposed for this location.

We look forward to continued discussion about the proposal. And as always, we support the on-going activities of the Cumbres & Toltec Scenic Railroad. I am pleased to inform you that we expect a new State Historic Preservation Officer to be with us in late August, Dr. Jeff Pappas. Please feel free to call me at (505) 827-4045, or Robyn Powell at (505) 827-4057 in the interim, should you want to discuss the project further.

Sincerely,

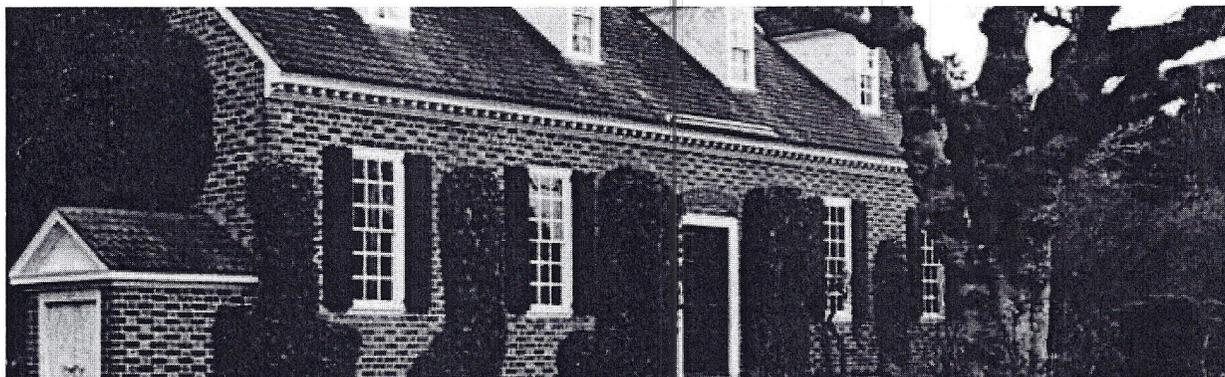


Jan V. Biella
Interim State Historic Preservation Officer
Historic Preservation Division
Log #93761

Xc: Joseph Saldibar, CO Office of Archaeology and Historic Preservation
Civic Center Plaza, 1560 Broadway, Suite 400, Denver, CO 80202

Robyn Powell and Terry Moody, NM Historic Preservation Division

Enclosures: Secretary of the Interior's *Standards and Guidelines for Reconstruction*
Secretary of the Interior's *Standards and Guidelines for Rehabilitation*



STANDARDS FOR RECONSTRUCTION AND GUIDELINES FOR RECONSTRUCTING HISTORIC BUILDINGS



reconstructing

Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

① [STANDARDS](#)

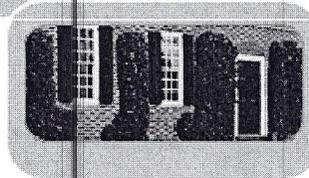
② [GUIDELINES](#)

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standards for reconstruction



-GUIDELINES-

The Approach

Research + Documentation

Building Exterior

Building Interior

Site

Setting

Special Requirements

Energy Efficiency

Accessibility

Health + Safety

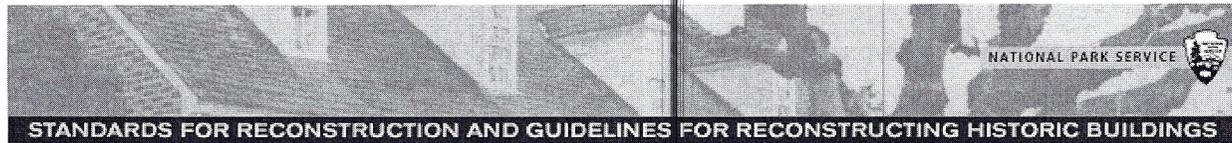
THE STANDARDS

1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.
2. Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.
3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.
5. A reconstruction will be clearly identified as a contemporary re-creation.
6. Designs that were never executed historically will not be constructed.

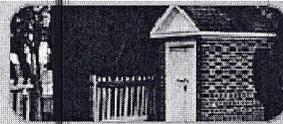
[Guidelines for Reconstruction-->](#)

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RECONSTRUCTION the approach



-GUIDELINES-

The Approach

Research + Documentation

Building Exterior

Building Interior

Site

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Special Requirements

Energy Efficiency

Accessibility

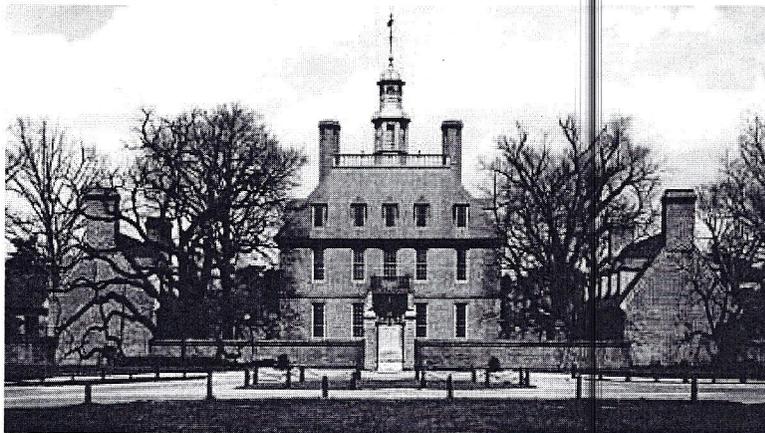
Health + Safety

THE STANDARDS

When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction, Reconstruction may be considered as a treatment. Prior to undertaking work, a documentation plan for Reconstruction should be developed.

Choosing Reconstruction as a Treatment

Whereas the treatment Restoration provides guidance on restoring—or re-creating—building features, the **Standards for Reconstruction and Guidelines for Reconstructing Historic Buildings** address those aspects of treatment necessary to re-create an entire non-surviving building with new material. Much like restoration, the goal is to make the building appear as it did at a particular—and most significant—time in its history. The difference is, in **Reconstruction**, there is far less extant historic material prior to treatment and, in some cases, nothing visible. Because of the potential for historical error in the absence of sound physical evidence, this treatment can be justified only rarely and, thus, is the least frequently undertaken. Documentation requirements prior to and following work are very stringent. Measures should be taken to preserve extant historic surface and subsurface material. Finally, the reconstructed building must be clearly identified as a contemporary re-creation.



In the 1930s reconstruction of the 18th century Governor's Palace at Colonial Williamsburg, Virginia, the earliest archeological remains of the brick foundation were carefully preserved in situ, and serve as a base for the reconstructed walls. Photo: The Colonial Williamsburg Foundation.

Research and Document Historical Significance

Guidance for the treatment Reconstruction begins with **researching and documenting** the

building's historical significance to ascertain that its re-creation is essential to the public understanding of the property. Often, another extant historic building on the site or in a setting can adequately explain the property, together with other interpretive aids. Justifying a reconstruction requires detailed physical and documentary evidence to minimize or eliminate conjecture and ensure that the reconstruction is as accurate as possible. Only one period of significance is generally identified; a building, as it evolved, is rarely re-created. During this important fact-finding stage, if research does not provide adequate documentation for an accurate reconstruction, other interpretive methods should be considered, such as an explanatory marker.

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Investigate Archeological Resources

Investigating archeological resources is the next area of guidance in the treatment **Reconstruction**. The goal of physical research is to identify features of the building and site which are essential to an accurate re-creation and must be reconstructed, while leaving those archeological resources that are not essential, undisturbed. Information that is not relevant to the project should be preserved in place for future research. The archeological findings, together with archival documentation, are then used to replicate the plan of the building, together with the relationship and size of rooms, corridors, and other spaces, and spatial relationships.

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Identify, Protect and Preserve Extant Historic Features

Closely aligned with archeological research, recommendations are given for **identifying, protecting, and preserving** extant features of the historic building. It is never appropriate to base a **Reconstruction** upon conjectural designs or the availability of different features from other buildings. Thus, any remaining historic materials and features, such as remnants of a foundation or chimney and site features such as a walkway or path, should be retained, when practicable, and incorporated into the reconstruction. The historic as well as new material should be carefully documented to guide future research and treatment.

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Reconstruct Non-Surviving Building and Site

After the research and documentation phases, guidance is given for Reconstruction work itself. Exterior and interior features are addressed in general, always emphasizing the need for an *accurate depiction*, i.e., careful duplication of the appearance of historic interior paints, and finishes such as stencilling, marbling, and graining. In the absence of extant historic materials, the objective in reconstruction is to re-create the appearance of the historic building for interpretive purposes. Thus, while the use of traditional materials and finishes is always preferred, in some instances, substitute materials may be used if they are able to convey the same visual appearance. Where non-visible features of the building are concerned--such as interior structural systems or mechanical systems--it is expected that contemporary materials and technology will be employed. Re-creating the building site should be an integral aspect of project work. The initial archeological inventory of subsurface and aboveground remains is used as documentation to reconstruct landscape features such as walks and roads, fences, benches, and fountains.

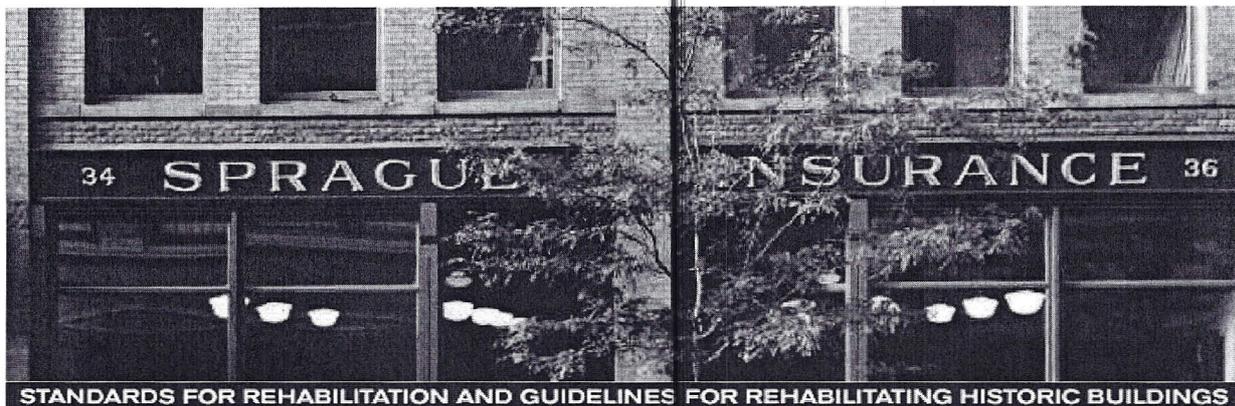
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Energy Efficiency/Accessibility/Health and Safety Code Considerations

Code requirements must also be met in **Reconstruction** projects. For code purposes, a reconstructed building may be considered as essentially new construction. Guidance for these sections is thus abbreviated, and focuses on achieving design solutions that do not destroy extant historic features and materials or obscure reconstructed features.

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rehabilitating

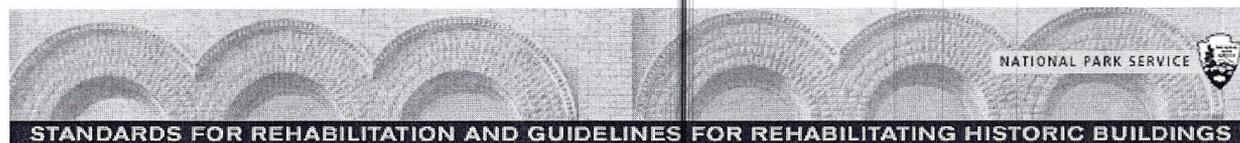
Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.

① [STANDARDS](#)

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standards for rehabilitation



1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in a such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

-GUIDELINES-

The Approach

Exterior Materials

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[Wood](#)
[Architectural Metals](#)

Exterior Features

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[Entrances + Porches](#)
[Storefronts](#)

Interior Features

[Structural System](#)
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REHABILITATION the approach



When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate, Rehabilitation may be considered as a treatment. Prior to undertaking work, a documentation plan for Rehabilitation should be developed.

Choosing Rehabilitation as a Treatment

In **Rehabilitation**, historic building materials and character-defining features are protected and maintained as they are in the treatment Preservation; however, an assumption is made prior to work that existing historic fabric has become damaged or deteriorated over time and, as a result, more repair and replacement will be required. Thus, latitude is given in the **Standards for Rehabilitation and Guidelines for Rehabilitation** to replace extensively deteriorated, damaged, or missing features using either traditional or substitute materials. Of the four treatments, only Rehabilitation includes an opportunity to make possible an efficient contemporary use through alterations and additions.

Identify, Retain, and Preserve Historic Materials and Features

Like Preservation, guidance for the treatment **Rehabilitation** begins with recommendations to identify the form and detailing of those architectural materials and features that are important in defining the building's historic character and which must be retained in order to preserve that character. Therefore, guidance on **identifying, retaining, and preserving** character-defining features is always given first. The character of a historic building may be defined by the form and detailing of exterior materials, such as masonry, wood, and metal; exterior features, such as roofs, porches, and windows; interior materials, such as plaster and paint; and interior features, such as moldings and stairways, room configuration and spatial relationships, as well as structural and mechanical systems.

Protect and Maintain Historic Materials and Features

After identifying those materials and features that are important and must be retained in the process of **Rehabilitation** work, then **protecting and maintaining** them are addressed. Protection generally involves the least degree of intervention and is preparatory to other work. For example, protection includes the maintenance of historic material through treatments such as rust removal, caulking, limited paint removal, and re-application of protective coatings; the cyclical cleaning of roof gutter systems; or installation of fencing, alarm systems and other temporary protective measures. Although a historic building will usually require more extensive work, an overall evaluation of its physical condition should always begin at this level.

Repair Historic Materials and Features

-GUIDELINES-

The Approach

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Interior Features

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Site

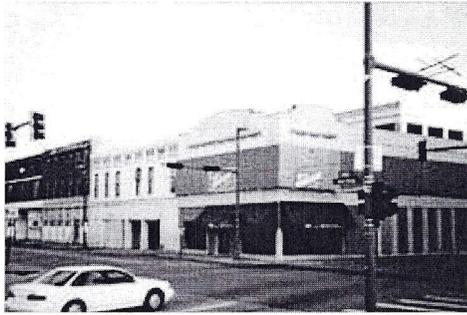
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THE STANDARDS

Next, when the physical condition of character-defining materials and features warrants additional work **repairing** is recommended. **Rehabilitation** guidance for the repair of historic materials such as masonry, wood, and architectural metals again begins with the least degree of intervention possible such as patching, piecing-in, splicing, consolidating, or otherwise reinforcing or upgrading them according to recognized preservation methods. Repairing also includes the limited replacement in kind--or with compatible substitute material--of extensively deteriorated or missing parts of features when there are surviving prototypes (for example, brackets, dentils, steps, plaster, or portions of slate or tile roofing). Although using the same kind of material is always the preferred option, substitute material is acceptable if the form and design as well as the substitute material itself convey the visual appearance of the remaining parts of the feature and finish.



This two-story brick commercial building--with its corner storefront--was originally constructed ca. 1876, then remodeled in 1916 in the Craftsman style and given a new, distinctive roofline. It served a number of uses, including a hotel, boarding house, saloon, restaurant, liquor store, warehouse, and office furniture showroom. The red brick walls had been painted several times over the years. Rehabilitation work included removal of multiple paint layers using a chemical stripper and thorough water rinse; spot repointing with matching mortar; and appropriate interior alterations. The building is now being used as a retail shop. Photos: NPS files.

Replace Deteriorated Historic Materials and Features

Following repair in the hierarchy, **Rehabilitation** guidance is provided for **replacing** an entire character-defining feature with new material because the level of deterioration or damage of materials precludes repair (for example, an exterior cornice; an interior staircase; or a complete porch or storefront). If the essential form and detailing are still evident so that the physical evidence can be used to re-establish the feature as an integral part of the rehabilitation, then its replacement is appropriate. Like the guidance for repair, the preferred option is always replacement of the entire feature in kind, that is, with the same material. Because this approach may not always be technically or economically feasible, provisions are made to consider the use of a compatible substitute material. It should be noted that, while the National Park Service guidelines recommend the replacement of an entire character-defining feature that is extensively deteriorated, they never recommend removal and replacement with new material of a feature that--although damaged or deteriorated--could reasonably be repaired and thus preserved.

Design for the Replacement of Missing Historic Features

When an entire interior or exterior feature is missing (for example, an entrance, or cast iron facade; or a principal staircase), it no longer plays a role in physically defining the historic character of the building unless it can be accurately recovered in form and detailing through the process of carefully documenting the historical appearance. Although accepting the loss is one possibility, where an important architectural feature is missing, its replacement is always recommended in the **Rehabilitation** guidelines as the first or preferred, course of action. Thus, if adequate historical, pictorial, and physical documentation exists so that the feature may be accurately reproduced, and if it is desirable to re-establish the feature as part of the building's historical appearance, then designing and constructing a new feature based on such information is appropriate. However, a second acceptable option for the

replacement feature is a new design that is compatible with the remaining character-defining features of the historic building. The new design should always take into account the size, scale, and material of the historic building itself and, most importantly, should be clearly differentiated so that a false historical appearance is not created.

Alterations/Additions for the New Use

Some exterior and interior alterations to a historic building are generally needed to assure its continued use, but it is most important that such alterations do not radically change, obscure, or destroy character-defining spaces, materials, features, or finishes. Alterations may include providing additional parking space on an existing historic building site; cutting new entrances or windows on secondary elevations; inserting an additional floor; installing an entirely new mechanical system; or creating an atrium or light well. Alteration may also include the selective removal of buildings or other features of the environment or building site that are intrusive and therefore detract from the overall historic character. The construction of an exterior addition to a historic building may seem to be essential for the new use, but it is emphasized in the **Rehabilitation** guidelines that such new additions should be avoided, if possible, and considered only after it is determined that those needs cannot be met by altering secondary, i.e., non character-defining interior spaces. If, after a thorough evaluation of interior solutions, an exterior addition is still judged to be the only viable alternative, it should be designed and constructed to be clearly differentiated from the historic building and so that the character-defining features are not radically changed, obscured, damaged, or destroyed. Additions and alterations to historic buildings are referenced within specific sections of the Rehabilitation guidelines such as Site, Roofs, Structural Systems, etc., but are addressed in detail in New Additions to Historic Buildings (see nav bar, right).

Energy Efficiency/Accessibility Considerations/Health and Safety Code Considerations

These sections of the guidance address work done to meet accessibility requirements and health and safety code requirements; or retrofitting measures to improve energy efficiency. Although this work is quite often an important aspect of **Rehabilitation** projects, it is usually not a part of the overall process of protecting or repairing character-defining features; rather, such work is assessed for its potential negative impact on the building's historic character. For this reason, particular care must be taken not to radically change, obscure, damage, or destroy character-defining materials or features in the process of meeting code and energy requirements.

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