



## FLORIDA DEPARTMENT *of* STATE

**RICK SCOTT**  
Governor

**KEN DETZNER**  
Secretary of State

Howie Ferguson  
Assistant Director and Senior Project Manager  
UF Planning, Design & Construction  
P.O. Box 115050  
Gainesville, FL 32611-5050

January 27, 2015

RE: DHR Project File No.: 2015-0201  
Project: *Newell Hall Rehabilitation: Finding of Adverse Effect*

Dear Mr. Ferguson:

Our office reviewed the referenced project in accordance with the 2000 *Programmatic Memorandum of Agreement for Protection of Historical Resources* between the University of Florida and the Division of Historical Resources, as well as Chapter 267, *Florida Statutes*, and implementing state regulations, for possible effects on historic properties listed, or eligible for listing, in the *National Register of Historic Places*, or otherwise of historical, architectural or archaeological value.

We note that Newell Hall (Florida Master Site File (FMSF) No. AL535) is listed on the *National Register of Historic Places*. Newell Hall was individually listed on the *National Register* in 1979 and was included as a contributing resource to the University of Florida Campus Historic District (FMSF No. AL2552) which was listed on the *National Register* in 1989 and updated in 2008. The 2008 update expanded the period of significance to 1956. Under this period of significance, Newell Hall's 1943-44 interior modifications and 1940s annex and arcade are considered to be historic.

The proposed scope of work for Newell Hall includes demolition of the existing annex and connecting arcade, construction of a multilevel annex with multilevel connections to Newell Hall, interior demolition and construction, and exterior modifications to Newell Hall. Based on the current scope of work, it is the opinion of this office that the proposed project will constitute an adverse effect to both Newell Hall and the University of Florida Campus Historic District.

Our office makes the following recommendations to avoid or minimize the adverse effect to both the building and the historic district. We note that the Facilities Program for the project should be amended to reflect these comments:

1. The Facilities Program should be amended to reflect the 2008 update to the University of Florida Campus Historic District. It should be clear that the 1943-44 interior modifications, annex, and connecting arcade are within the period of significance and are considered to be historic. The pdf of the 2008 update is attached to this document. We can provide a hard copy at your request.



Division of Historical Resources  
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2. All exterior modifications to Newell Hall should meet the Secretary of the Interior's Standards for Rehabilitation (the Standards).
3. Historic windows should be retained and repaired if necessary. If replacement of historic windows is determined necessary by the University of Florida, a case study and explanation of why the historic windows require replacement rather than repair should be provided to our office for review and approval. If the windows are determined not to be historic, replacement windows should meet the Standards for in-kind replacement.
4. All interior modifications to Newell Hall should meet the Standards. At a minimum, the Standards require retention of primary public spaces and circulation routes. This comprises all interior features and finishes, including ceiling and floor finishes and features. Historic material should be repaired or replaced in kind.
5. Additional information is required about the potential addition of stairways before our office can assess compliance with the Standards.
6. The annex and connecting arcade should be retained and rehabilitated according to the Standards.
7. If the existing annex and arcade cannot be retained, new construction should be designed according to the Standards. New construction should refer to *Preservation Brief 14, ITS No. 3, ITS No. 18, and New Constructing within the Boundaries of Historic Properties*. The following references provide additional direction in meeting the Standards and should be consulted during the design process:
  - a. *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* <http://www.nps.gov/tps/standards/rehabilitation/rehabilitation-guidelines.pdf>
  - b. *Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns* <http://www.nps.gov/tps/how-to-preserve/briefs/14-exterior-additions.htm>
  - c. *Preservation Brief 18: Rehabilitating Interiors in Historic Buildings – Identifying Character-Defining Features* <http://www.nps.gov/tps/how-to-preserve/briefs/18-rehabilitating-interiors.htm>
  - d. *ITS No. 3: New Additions to Mid-Sized Historic Buildings* <http://www.nps.gov/tps/standards/applying-rehabilitation/its-bulletins/ITS03-Additions-MidSizeBuildings.pdf>
  - e. *ITS No. 18: New Additions to Mid-Sized Historic Buildings* <http://www.nps.gov/tps/standards/applying-rehabilitation/its-bulletins/ITS18-Additions-MidSizeBuildings.pdf>
  - f. *New Construction within the Boundaries of Historic Properties* <http://www.nps.gov/tps/standards/applying-rehabilitation/successful-rehab/new-construction.htm>
  - g. *New Additions to Historic Buildings* <http://www.nps.gov/tps/standards/applying-rehabilitation/successful-rehab/additions.htm>
  - h. Additional resources can be found at <http://www.nps.gov/tps/how-to-preserve/briefs.htm> and <http://www.nps.gov/tps/how-to-preserve/by-topic.htm>

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8. Our office should be consulted at each design phase of the project – schematic, design development/partial construction documents, and 100% construction documents. The purpose of this consultation will be to provide our office with an opportunity to ensure that the project is meeting the Secretary of the Interior’s Standards for Rehabilitation or that appropriate mitigation is undertaken for work that does not meet the Standards.

We request that the University of Florida consider alternative design approaches that would better allow the Standards to be met and that avoid or minimize adverse effects to Newell Hall. However, as specified in Section V. 1. A. of the *Programmatic Memorandum of Agreement* between the University of Florida and the Division of Historical Resources, should the University of Florida believe that aspects of the proposed scope of work for Newell Hall cannot be modified to meet the Standards please provide a Project Case Report (PCR) documenting the reasons why preservation is not feasible and prudent.

Our office hopes to work with the University of Florida to avoid or minimize adverse effects to Newell Hall. We look forward to working with the University of Florida to achieve a design plan that will preserve Newell Hall and meet the University’s future needs for the structure. We would also like to thank the University of Florida for involving our office early in the planning process.

If you have any questions, please contact Jason Aldridge, Historic Sites Specialist, by email at [Jason.Aldridge@dos.myflorida.com](mailto:Jason.Aldridge@dos.myflorida.com), or by telephone at 850.245.6333 or 800.847.7278.

Sincerely

A handwritten signature in blue ink, appearing to read "Robert F. Bendus". The signature is stylized and includes a large loop at the end.

Robert F. Bendus, Director  
Division of Historical Resources  
& State Historic Preservation Officer