



**DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION**

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VIA Email

In reply, refer to: NASA_2021_0525_001

Mr. Jonathan Ikan
Center Cultural Resources Manager
NASA Ames Research Center
Mail Stop 213-8
Moffett Field, CA 94035

Subject: Building N204A Window Replacement, NASA Ames Research Center, Santa Clara County, CA

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the May 25, 2021, letter initiating consultation regarding an undertaking at NASA Ames Research Center (ARC). NASA is consulting with the State Historic Preservation Officer (SHPO) to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. §306108), as amended, and its implementing regulations at 36 CFR Part 800. Along with the letter, NASA submitted a technical Section 106 report prepared by AECOM dated May 24, 2021, that provides the Section 106 analysis, project maps, and photographs.

The proposed undertaking, as described, involves improving seismic risk in Building N204A by removing and replacing windows. Work would include replacing nine existing windows on the west wall and the replacement or infill one window on the south wall (10 windows total). The existing windows are original wood-frame industrial windows in a three-row by four-column configuration of three-pane awning sash. The replacement windows would be aluminum-frame industrial windows with the same configuration and tempered glass panes. Some replacement panes would have black tempered glass to block light for interior usage requirements.

NASA identified the Area of Potential Effects (APE) for the undertaking encompassing the project area (Building N204A) and nearby Buildings N203, N204, N205, and N206A to address potential visual and/or atmospheric intrusions related to the exterior alterations. No ground disturbance is planned.

All four buildings in the APE have been subject to previous surveys in 2001 and 2006. The AECOM memo states that no major alterations were observed in its 2021 investigations.

- Building N203: Constructed in 1942; not individually eligible, but identified as a potential contributor to a historic district of several research and support buildings built by the National Advisory Committee for Aeronautics (NACA) at Ames between 1940 and 1958 that expressed Industrial / Moderne architectural details.
- Building N204: Constructed in 1952; not individually eligible and, because of loss of integrity, is not significant as one of several research and support buildings built by NACA at Ames between 1940 and 1958 that expressed Industrial / Moderne architectural details.
- Building N204A: Constructed in 1955; not individually eligible, but identified as a potential contributor to a historic district of several research and support buildings built by the National Advisory Committee for Aeronautics (NACA) at Ames between 1940 and 1958 that expressed Industrial / Moderne architectural details.
- Building N205: Constructed in 1957; not individually eligible or as a contributor to a potential historic district.
- Building N206A: Constructed in 1946; not individually eligible, but identified as a potential contributor to a historic district of several research and support buildings built by the National Advisory Committee for Aeronautics (NACA) at Ames between 1940 and 1958 that expressed Industrial / Moderne architectural details.

For the purposes of this undertaking, NASA proposes to treat Buildings N203, N204A, and N206A as historic properties and as contributors to an as-yet unidentified historic district within the Ames campus that would be unified by exterior Industrial/Moderne architectural features and potentially eligible for listing in the NRHP under Criterion C.

NASA found that the buildings' contributing or character-defining features are Industrial / Moderne, including utilitarian, reinforced concrete walls; flat roofs; scored concrete and horizontality; symmetrical fenestration; and utility doors. NASA proposes that interior finishes of these buildings are noncontributing features.

NASA determined that the changes proposed to Building N204A would have minimal effects on Buildings N203 and N206A or their character-defining features. For Building N204A, NASA determined the project would not change the overall historic character of the historic property. The removal and replacement of existing wood-frame industrial windows with modern aluminum-frame industrial windows with the same configuration would not impair the building's ability to convey its potential significance. Although the

change from wood-frame to aluminum-frame windows is not strictly an in-kind replacement, the wood-frame windows do not consist of particularly distinctive materials, and the appearance of the building would not change substantially. One window opening on the south side of the building in the first story behind an exterior steel stair may be infilled rather than replaced. This is an obscured opening and is not prominent or character-defining. No significant materials, spaces, or spatial relationships of the potential historic property would be modified because of this project.

Therefore, NASA proposes a Finding of No Adverse Effect for this undertaking. After reviewing the information submitted, the SHPO offers the following comments.

- This project qualifies as an undertaking with the potential to affect historic properties.
- The APE is sufficient to take direct and indirect effects of the undertaking into account and identification.
- Because the undertaking would cause loss of historic fabric from Building N204A, it should be fully and formally evaluated as part of this consultation. Because NASA's consultation documents concluded three buildings may contribute to a potential historic district that was originally identified in 2006, it would be appropriate to complete an evaluation of the potential district.
- Until this information is submitted, the SHPO is unable to conclude that identification and evaluation efforts are sufficient or to comment on the proposed Finding of No Adverse Effect for this undertaking.

If there are any questions or concerns, please contact State Historian Mark Beason, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Julianne Polanco', with a long horizontal line extending to the right.

Julianne Polanco
State Historic Preservation Officer