

National Aeronautics and Space Administration



**Ames Research Center**  
Moffett Field, California 94035

February 24, 2022

Ms. Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation  
Department of Parks & Recreation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816

Attn: Mr. Mark Beason

**Subject:** Section 106 Consultation for Building N204A Window Replacement Project at Ames Research Center, Moffett Field, California (NASA\_2021\_0525\_001)

Dear Ms. Polanco:

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) received your letter dated July 16, 2021, containing comments on NASA ARC's determinations of eligibility and finding of effect for the proposed Building N204A Window Replacement Project (project or undertaking) located on the Ames Campus of NASA ARC at Moffett Field, Santa Clara County, California. NASA ARC retained AECOM to supplement the technical study for this project with additional evaluation of potential historic properties in the Area of Potential Effects (APE).

The NASA ARC responses to the State Historic Preservation Officer's (SHPO's) comment requesting additional information are provided below.

**SHPO comment:**

*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.*

**NASA response:** AECOM conducted fieldwork and research for the evaluation of a potential historic district at the Ames Campus for eligibility for the National Register of Historic Places (NRHP) from November 2021 through February 2022. Research focused on the history of National Advisory Committee for Aeronautics (NACA), the development of the NACA Ames

Aeronautical Laboratory at Moffett Field, campus architecture, and long-range construction program.

*Identification Efforts*

AECOM conducted an intensive-level survey of former NACA buildings at NASA ARC from November 29 through December 1, 2021, to identify common architectural and development themes of the early campus. Based on the results of the survey, 14 buildings were identified that had common characteristics as contributors to a potential historic district, and three buildings were identified as non-contributors (Table 1). Four of the 14 buildings – Buildings N200, N215, N220, and N226 – are already listed in the NRHP.

**Table 1. Potential Historic District Resources**

<b>Resource</b>	<b>Date</b>	<b>Eligibility Status</b>
N200*	1943	Contributor; individually listed in the NRHP
N201	1944	Contributor
N202	1950	Contributor
N203	1942	Contributor
N204A	1955	Contributor
N206A	1946	Contributor
N207	1946	Contributor
N207A	1949	Non-contributing
N210	1941	Contributor
N211	1945	Contributor
N212	1950	Contributor
N213	1950/1965	Non-contributing
N215*	1941	Contributor; listed in NRHP as a contributor to the Ames Wind Tunnel Historic District
N219	1940	Contributor
N220*	1940	Contributor; listed in NRHP as a contributor to the Ames Wind Tunnel Historic District
N226*	1946	Contributor; listed in NRHP as a contributor to the Ames Wind Tunnel Historic District
N235	1964	Non-contributing

Note: \*Previously listed in the NRHP

AECOM prepared an evaluation for the potential historic district that was identified as the NACA Ames Historic District (NACA District). Attached is a technical memorandum dated February 23, 2022, with the historic property evaluation and California Department of Parks and Recreation 523 forms for the potential district.

*Evaluation*

The NACA District is significant under NRHP Criterion A for its association with the development of the second NACA aeronautical laboratory (the first on the West Coast) in anticipation of World War II, and for continued aeronautical research in the post-World War II period. The collection of contributing buildings that compose the NACA District reflects the immediate need for additional aeronautical research facilities in the United States to support national defense efforts in the lead up to World War II, and the continued general aeronautical and special research directives from technical subcommittees at NACA or various branches of the military in the post-war period. With the adoption of the Navy’s rocket-launch satellite plan in 1955 as Project Vanguard, which marked the beginning of the space program in the United

States, research at the NACA Ames Aeronautical Laboratory began to shift away from aeronautics towards early space research projects. This shift was aided by advancements in computer technologies and flight simulators that were added to the campus by the late 1950s in the immediate pre-NASA period. The period of significance for the NACA District under NRHP Criterion A spans from the establishment of the NACA Ames Aeronautical Laboratory in 1939 to the creation of Project Vanguard in 1955, which marked the beginning of the space program in the United States.

The NACA District is significant under NRHP Criterion C for its association with Smith J. DeFrance, Engineer-in-Charge/Director and John F. Parsons, Construction Lead/Assistant Director, who led the design and development of the NACA Ames Aeronautical Laboratory campus; for exemplifying the Moderne architectural style used on early NACA-era campuses as part of a building campaign to express modernity with an economic design that was continued even after the initial frenzied construction phase and well into the post-war period because of lack of funding; and for its representation as a significant and distinguishable entity whose components may lack individual distinction. The District comprises 14 buildings that feature Art Deco and Streamline Moderne-style designs developed between 1939 and 1955 under a long-range building campaign under DeFrance and Parsons. Economy played a large role in construction plans into the post-war period, and the development of Streamline Moderne-style buildings continued decades after the style was no longer popular because these buildings were cheap to design and construct. This continued use of the Streamline Moderne architectural style on the campus produced a continuity of design that was utilized until 1955, when Contemporary-style buildings and additions became the prevalent style of new construction on the campus. The period of significance for the NACA District under NRHP Criterion C begins in 1939 with the establishment of the NACA Ames Aeronautical Laboratory and ends in 1955 with the construction of the last Streamline Moderne-style building at the campus.

Overall, the NACA District retains sufficient historic integrity to its period of significance under all seven aspects to physically convey its historic significance.

The character-defining features of the 14 contributing resources to the NACA District that convey Art Deco and Streamline Moderne designs as part of the building program under DeFrance and Parsons during the NACA era (1939–1955) are:

- Concrete exteriors
- Horizontal banding/scoring
- Industrial windows in groups (typically metal)
- Metal entry doors
- Tripartite scoring/banding
- Flat roof with no overhang
- Metal flashing along the roofline
- Entrances with rounded edge cantilevered concrete canopies
- Incised logos/signs/decorative vertical lines around main entrances
- Symmetrical designs

With the exception of the four previously listed buildings in the NRHP (N200, N215, N220, and N226), none of the contributing buildings are individually eligible for the NRHP because they lack individual architectural distinction or historical significance.

#### *Determination of Eligibility*

Based on the evaluation conducted by qualified architectural historians who meet the Secretary of the Interior's professional qualifications standards, NASA ARC has determined that the NACA District is eligible for the NRHP under Criteria A and C with a period of significance from 1939, the date of founding of the Ames Aeronautical Laboratory, to 1955, representing the shift towards early space research projects and corresponding with the last building constructed utilizing Moderne architectural design during the NACA period.

#### *Effects Assessment*

The NRHP-eligible NACA District and three of its contributors, Buildings N203, N204A, and N206A, were identified in the APE. NASA proposes to remove and replace windows in Building N204A. The project does not involve any physical changes to Buildings N203 or N206A; therefore, no direct impacts on those buildings are anticipated.

As previously outlined in the technical report dated May 24, 2021 (AECOM 2021) and according to the current revised technical report dated February 23, 2022, the undertaking would not result in an adverse effect due to its conformance with the Secretary of the Interior's Standards for Rehabilitation. The alterations would have minimal impact on the ability of Building N204A to convey its historical associations as part of the NACA District. The project would not significantly alter the characteristics of the NRHP-eligible NACA District in an adverse manner.

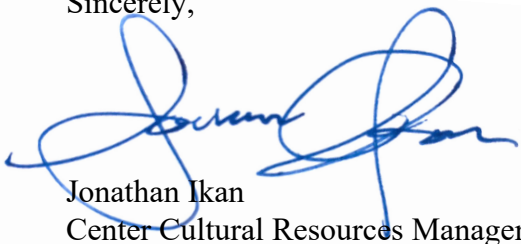
#### *Finding of Effect*

Based on the analysis conducted by qualified architectural historians who meet the Secretary of the Interior's professional qualifications standards, NASA ARC has made a finding of No Adverse Effect.

NASA ARC requests the SHPO's concurrence on NASA ARC's determination of eligibility pursuant to 36 Code of Federal Regulations (CFR) 800.4(c)(2) and on NASA's finding of No Adverse Effect related to this project pursuant to 36 CFR 800.5(b). NASA requests the SHPO's response within 30 days of receipt of this letter, as specified in 36 CFR 800.5(c).

Please contact me at [jonathan.d.ikan@nasa.gov](mailto:jonathan.d.ikan@nasa.gov) or at (650) 604-6859 with your comments or questions.

Sincerely,



Jonathan Ikan  
Center Cultural Resources Manager



Ames Research Center, MS 213-8  
Moffett Field, California 94035

**cc:**

HQ/EMD/Rebecca Klein, Ph.D., RPA

**Enclosure**

Memorandum, prepared by AECOM, dated February 23, 2022.