



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

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March 30, 2022

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 February 24, 2022, letter continuing 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.

NASA's letter provides a response to comments from the SHPO in a letter dated July 16, 2021. Along with the letter, NASA submitted a technical Section 106 report prepared by AECOM dated February 23, 2022. In an email dated October 20, 2022, NASA submitted DPR 523 forms for Building N204A.

The proposed undertaking, as previously described, involves 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 previously 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.

With its previous submittal, NASA identified a potential historic district consisting of several research and support buildings built by the c between 1940 and 1958 that expressed Industrial / Moderne architectural details. The documentation indicated that the district included resources in the APE (Buildings N203, N204A, and N206A – N204 and N205 were found to be non-contributing). NASA proposed 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 determined that the changes proposed to Building N204A would have minimal effects on Buildings N203 and N206A or their character-defining features, proposing a Finding of No Adverse Effect for this undertaking.

The SHPO agreed that this project qualifies as an undertaking with the potential to affect historic properties and that the APE is sufficient to take direct and indirect effects of the undertaking into account and identification.

However, because the undertaking would cause loss of historic fabric from Building N204A and because NASA concluded three buildings may contribute to a potential historic district that was originally identified in 2006, the SHPO commented that it would be appropriate to complete an evaluation of the potential district.

With the recent submittal, NASA provided a full evaluation of Building N204A (constructed in 1949), finding it individually eligible for listing in the National Register under Criteria A and C with a period of significance of 1964 to the present.

NASA also believes the building contributes to a potential National Advisory Committee for Aeronautics (NACA) at Ames Historic District, which would be significant under Criteria A and C with a period of significance of 1939 – 1955. The AECOM memorandum defined the boundaries of the potential district and listed 14 contributing buildings and three non-contributing buildings. Five contributing buildings are already listed, including N200 (individually listed), and N215, N220, and N226 (contributors to the Ames Wind Tunnel Historic District).

After reviewing the documentation submitted, the SHPO offers the following comments.

- The SHPO concurs that Building N204A is individually eligible as described in the DPR 523 forms for the building. However, Building N204A cannot be significant for dates prior to its construction, so the form should be revised to match the narrative description, which lists 1964 to the present as the period of significance.
- While it appears that the NACA at Ames Historic District may be eligible for listing in the National Register as described in the AECOM memorandum, a full and

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formal evaluation of the district should be submitted for SHPO concurrence in the future. The potential period of significance described as 1939 – 1955 seems appropriate and has been taken into account by NASA when considering the effects of the current undertaking.

- The SHPO has no objection to the proposed Finding of No Adverse Effect.
- Please be advised that under certain circumstances, such as unanticipated discovery or a change in project description, NASA may have additional future responsibilities for this undertaking under 36 CFR Part 800.

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

Sincerely,



Julianne Polanco
State Historic Preservation Officer