



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

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

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VIA Email

In reply, refer to: NASA_2025_0926_00

Trina Meiser
Cultural Resources Manager
NASA Ames Research Center
Mail Stop 213-8
Moffett Field, CA 94035

Subject: Building N-226 Wind Tunnel Demolition Project, NASA Ames Research Center, Moffett Field, Santa Clara County

Dear Ms. Meiser:

The California State Historic Preservation Officer (SHPO) has received the letter dated March 26, 2026, 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, and with the *Programmatic Agreement Among the National Aeronautics and Space Administration, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers Regarding the Management of NASA Centers* (NASA-wide Programmatic Agreement [NPA]) that was executed in October 2025. NASA initiated consultation for the undertaking in a letter dated September 26, 2025, prior to execution of the NPA.

The project will demolish the exterior wind tunnel structure of Building N-226, the former 6- by 6-Foot Supersonic Wind Tunnel, which is a Category 1 Asset (i.e., individually eligible for the National Register of Historic Places [NRHP]) under the NPA. Partial demolition of this historic property is not excluded from Section 106 consultation under the NPA and meets the criteria of adverse effect (36 CFR §800.5[a][1]).

The main building will remain; the south wing offices and other portions of the building have been rehabilitated and will remain in continued use. The project will sever the wind tunnel shafts that connect to the main building at three locations on the north, west, and south sides. The resultant openings in exterior walls of the main building will be filled with reinforced concrete and appropriately sealed with compatible materials to maintain their profiles, e.g., a smooth concrete coating or metal plate within the profile of the openings. No interior changes are included in this project. The area along the western

portion of the lot was previously occupied by associated pressure spheres, cooling towers, and a water storage tank, which were demolished circa 2009. The project will clear the area beneath the exterior wind tunnel structure to grade, similar to the existing condition of the western portion of the lot; soil disturbance to remove aboveground elements will be limited as much as possible. The ground with holes will be filled and compacted with approved soils to its surface level and then will be laid out (or topped) with assorted gravels. Future soil remediation will be assessed after the removal of the structure and addressed in a separate undertaking.

Pursuant to NPA Stipulation VI.A, NASA defined the Area of Potential Effects (APE) as the footprint of Building N-226 and the associated Area of Disturbance (AOD), which is defined as the area, both horizontally and vertically, within which the project activities may disturb earth, including staging areas. Construction activities for this project primarily consist of demolition of the exterior wind tunnel metal structure and the closure of openings in the concrete walls of the remaining Building N-226. Limited ground disturbance will occur in previously disturbed or fill areas, and potential impacts to archaeological resources are not anticipated. The staging area for the demolition project has yet to be identified but will be limited to paved areas adjacent to the building. Therefore, the APE/AOD is defined as the limits of Building N-226 with a 50-foot buffer to address construction activities in its immediate surrounds.

Building N-226 is individually eligible for listing in the NRHP under Criteria A and C (Category 1 Asset) and is a contributing resource to the NRHP-listed Ames Wind Tunnel Historic District and the NRHP-eligible National Advisory Committee on Aeronautics Historic District. Building N-226 is not located in a Heritage Zone as defined under the NPA, so NASA determined that potential indirect effects on historic districts and other historic properties would not otherwise considered.

All ground disturbing activities will substantially conform to the original building footprint and occur within previously disturbed soils. The exposed soil in the APE surrounding Building N-226 was previously surveyed, and no known archaeological sites or historic properties of religious or cultural significance to Indian Tribes are recorded or known in the APE. Therefore, NASA finds that ground disturbing activities related to the project qualify for exclusion under Programmatic Exclusion C (Ground Disturbance Exclusions) pursuant to NPA Appendix F and do not require further consultation. Potential impacts to archaeological resources are not anticipated; inadvertent discoveries will be treated according to NPA Stipulation XV (Inadvertent Discoveries).

NASA ARC has determined the project will result in an adverse effect on Building N-226 and intends to proceed with NPA Stipulation VI.D.4 (Adverse Effects). NASA ARC will complete the mitigation measures listed in NPA Stipulation VIII.B.1 (Recordation of Category 1 Assets). These measures include digital photography of exterior views and interior views (if feasible) in conformance with the most recent NRHP photography

policies and technical requirements prior to on-site work. These project-specific mitigation measures will supplement the Programmatic Mitigation created under the NPA that features a public website and interactive virtual tour highlighting NASA's historic properties, to which information about Building N-226 will be added.

Although the SHPO was not able to respond within the NPA-allotted 30 days, the SHPO offers the following comments.

- The SHPO agrees that this project qualifies as an undertaking with the potential to affect historic properties.
- Identification and evaluation efforts are sufficient for this consultation.
- The SHPO has no objection to the proposed Finding of Adverse Effect.
 - However, NASA should specify that the historic properties adversely affected are (1) the individually-listed Building N-226 and the two historic districts, (2) Ames Wind Tunnel Historic District and (3) National Advisory Committee on Aeronautics Historic District, to which Building N-226 is a contributor.
 - It is unclear from the letter submitted to the SHPO how adverse effects to the historic districts will be mitigated. This situation leads the SHPO to question whether the Recordation efforts described above are sufficient to mitigate this adverse effect, especially given that indirect effects are not being taken into account in this consultation.
 - It seems probable that Building N-226 will remain a contributor to these two historic districts. The SHPO recommends that NASA clarify its post-partial demolition status for the administrative record.
- 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) 503-8599 or mark.beason@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer