

National Aeronautics and
Space Administration

Lyndon B. Johnson Space Center
2101 NASA Parkway
Houston, Texas 77058-3696



July 25, 2025

Reply to Attn of: JE-25-048

Mr. Brad Patterson
State Historic Preservation Office
Texas Historical Commission
P.O. Box 12276
Austin, TX 78711-2276

Subject: Initiation of Section 106 Consultation Project Review
Building 31 Renewal for Astromaterials Research & Exploration Science

Dear Mr. Patterson:

The National Aeronautics and Space Administration (NASA), Lyndon B. Johnson Space Center (JSC) is proposing to construct the B31 Renewal for Astromaterials Research and Exploration Science (ARES). The Project is located on Federal Property administered by NASA JSC and, as such, has been determined to be a Federal undertaking subject to consultation under Section 106. Please see the attached enclosures for additional information. JSC is proposing a determination of "No Adverse Effect" for this project. JSC welcomes your comments on this project and the proposed determination.

If you have any questions or need additional information, please contact me at 346-686-5332 or by email at jennifer.l.morrison@nasa.gov.

Sincerely,
**Jennifer
Morrison**

Digitally signed by
Jennifer Morrison
Date: 2025.07.22
16:40:20 -05'00'

Jeni Morrison
JSC Cultural Resources Manager
JSC Environmental Management Office

Enclosures:

1. Project Description
2. Site Map and Proposed Project Area
3. Design Drawings
4. APE Viewshed Analysis – Photos and Renderings
5. Additional Photos

cc:

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ENCLOSURE 1
Project Description

Project Description

The National Aeronautics and Space Administration (NASA), Lyndon B. Johnson Space Center (JSC) is proposing to construct the B31 Renewal for Astromaterials Research and Exploration Science (ARES), consisting of demolition and reconstruction of the West wing of the Planetary and Earth Sciences Laboratory (B31), constructing a Link between all wings of the building, and renovation of the East wing.

B31 houses most of the laboratory and office spaces for the ARES Division, which supports JSC's core planetary science and curation capabilities. The B31 Renewal project consolidates many of ARES' capabilities, currently spread across multiple JSC buildings, into a single facility and upgrades major infrastructure systems and egress structures. While portions of the building and systems have been renovated, B31 has never had a holistic optimization and systems update. Many spaces and systems are beyond their useful life. For example, the spaces in B31W feature low ceiling heights, noncompliant circulation, and a combination of structural systems from different interventions over time. The building's foundation also poses structural concerns for existing facilities. Despite the conditions, programs that utilize the building are doing important work and could do more with building upgrades. The project will update these facilities with modern, sustainable, flexible laboratory and administrative spaces to support ARES' ongoing mission and provide space to accommodate future astromaterials samples from new missions, such as Artemis. In addition, the project will address foundation issues to ensure support for existing and proposed structures. JSC needs space for the curation, analysis, preliminary examination, and allocation of these materials to the scientific community.

B31 Renewal began with a validation of existing conditions and future needs for the ARES program, including review of existing B31 documentation, user interviews, laboratory planning exercises, and a site survey of existing conditions and spaces occupied by ARES at JSC (B9, B31, B36, and B267). Following the existing conditions assessment, the planning effort evaluated available space and future needs for the program, then used these studies as the Basis of Design to create blocking and stacking schemes for ARES Division leadership to determine a path forward. NASA selected the alternative that demolishes the existing West wing and builds a new three-story (plus penthouse) wing in its place to house state-of-the-art labs, cleanrooms, and administrative support spaces. The selected scheme also:

1. Builds a new second floor connector structure to connect the B31 East wing (B31E), the new West wing, and the B31 Astromaterials Curation Annex (B31X) together at the same elevation for improved occupant and workspace collaboration;
2. Upgrades the remaining areas in B31E that haven't yet been renovated, including asbestos abatement and abandoned building systems demolition; and
3. Upgrades the outdated building systems in B31E and the existing first floor connector.

This holistic update to the facility effectively resets it for the next 50 years and provides flexibility if future mission needs require additional modifications. The B31 Renewal and new work will combine the existing two-story B31 North wing (B31N), the two-story B31E,

and the two-story B31X, currently under construction, with a new three-story B31 West wing and mechanical penthouse into one cohesive B31 complex. At approximately 141,000 gross square feet (GSF), the project includes approximately 49,000 GSF of new work, 25,000 GSF of renovation, and 14,000 GSF of mechanical penthouse space.

Constructing a new West wing will align the second floor of the new wing with B31X and B31E to provide ease of access between each portion of the building. Additionally, a stronger foundation will be poured for the new West wing, enabling vertical expansion to include a third floor and a mechanical penthouse. A new exposed exterior wall will be built on the northern and partially on the eastern and western sides of the new B31 West wing, as well as above B31X, with rated shaft walls built against the existing B31X walls.

A new second floor Link will be built above the existing historic B31 complex lobby to connect the new West wing to B31E and B31X. The Link will have a combination of both single and double-height spaces to provide physical and visual connections between the wings. A new feature stair connecting the B31 West wing third floor to the B31E second floor and Link will bring the language of the existing historic stair in B31E into the Link and provide an open, physical connection between the spaces. Acting as the literal and symbolic connection between buildings, the Link will feature double-height glazing, emphasizing openness and transparency and framing views of the campus.

B31E will be renovated to accommodate code-compliant restrooms and egress stairs, as well as refreshed offices, workstations, common support spaces, phone rooms, conference rooms, and other breakout spaces. Due to its historic nature, the facades of B31E will remain largely out of scope, with the egress stairs and tie-in to the new Link impacting the existing façade as minimally as possible. The roof will be replaced in-kind over the entire wing. B31N will also remain largely untouched and out of scope except for an in-kind roof replacement.

The design of the visible northern, western, and eastern façades of the new B31 West wing and the B31 Link will respect the historic campus and its design guidelines, while highlighting the scientific activities happening within. The new B31 West wing exposed façade will feature white vertically corrugated metal panel with integral louvers, similar to that found on some of the nearby high-bay facilities, and a polished dark concrete masonry unit block at the base aligning with B31X to pay homage to the dark stone-clad columns found at the lower levels of B31E and adjacent buildings, while providing a durable material for the loading and service areas. The new Link will feature low-iron glazing to highlight the Link space and provide a contrast to the darker glass throughout the existing B31E and B31X buildings. Horizontal sunshades will be located on the southern façade of the glass link to mitigate solar heat gain. The mullions will be modulated to draw datum lines and spacing from the adjacent existing building wings.

The imaging suite and cleanroom block drive the floor heights, layout, and structure of the B31 West wing (First Floor: 15'-6", Second Floor: 18'-0", Third Floor: 15'-6", and Mechanical Penthouse: 20'-0"). To highlight that on the façade of the building and allude to the scientific mission of the facility, the building parti is reflected in a material change aligned

with the vertically stacked imaging and cleanroom blocks. Glass is used at the corridor and stair of the West wing to bring light into the corridors adjacent to the imaging and cleanroom blocks. Windows are spaced throughout the third-floor area to bring light into office and workstation spaces. At the penthouse level, vertical slotted metal panels obscure louvers needed for air intake.

To preserve the historic nature of the B31 complex, the lobby finishes will be carefully protected. This approach includes protection in place, removal and reinstallation, or in-kind replacement of the existing brick flooring and removal, protection, and reinstallation of the paneled wood veneer wall at the entry and historic stair. The new feature stair between the second and third floors draws inspiration from the historic stair, modernized with terrazzo treads and a monolithic wooden railing. Positioned within the Link, it serves as a vertical anchor and symbolic connection between old and new. The interior design will also take cues from the existing historic elements, incorporating touches of terrazzo to reference the historic stair's treads and warm wood veneer to tie in with historic finishes throughout the interior. To further echo ARES's mission, the design will integrate ARES artifacts, such as HVIT test assemblies, into select spaces. The existing lobby's asbestos-containing popcorn ceiling and insulation, along with the downlights, will need to be removed as part of the asbestos abatement process. The new ceiling will incorporate similar downlights into an updated, asbestos-free ceiling material. The renovation will also remove exposed utility cable trays that were added during previous modifications and covered some of the historic wall and ceiling.

The B31 complex is located on Fourth Street due south (of Plant North) of the site of the former B37 and adjacent to B9. The existing facility is eligible for listing on the NRHP under Criterion A (space exploration and significant historic events), Criterion B (historically significant individuals associated with the building), Criterion C (engineering, i.e. historic materials characteristic of a type, period, or method of construction), and Criteria Consideration G, for the significance of work achieved within the past 50 years.

The B31 complex currently includes three wings totaling approximately 69,000 GSF. Two wings were completed in 1966: B31E and B31W. Major improvements to the building include the 13,563 square-foot addition of B31N in 1978, extension of the B31E mezzanine level in 1989, and multiple equipment modifications and construction of new laboratory and cleanroom spaces throughout the building to accommodate evolving mission needs. Construction of B31X is currently nearing completion, adding a 20,000 square-foot wing to the southwest corner of the building. A new backup generator was also added to support B31X. JSC consulted the construction of B31X and the backup generator with the Texas Historical Commission and developed a Memorandum of Agreement (MOA), executed January 26, 2022. Mitigation in accordance with this MOA has been completed, including construction monitoring, HAER Level II Recordation, and 3D laser scanning.

The proposed new B31 Renewal would lie within the National Register of Historic Places (NRHP)-eligible JSC Historic District and within the viewshed of eligible buildings B7, B8, B9, B10, B27, and B29 and, as such, NASA JSC has undertaken significant efforts to reduce,

minimize, or eliminate potential adverse effects to historic properties in the identified Area of Potential Effect (APE). Major architectural elements of the proposed design were developed to be compatible with the historic architecture that defines the nature of the JSC Historic District and its contributing historic properties. Specifically, the new design incorporates size, scale, massing, modular construction, muted colors, and orientation that are compatible with the existing JSC Historic District.

B7 is located on Fourth Street due north from B4N and was constructed in 1964. B7 is eligible for listing on the NRHP under Criterion A (space exploration and significant historic events), Criterion B (historically significant individuals associated with the building), Criterion C (engineering and historic materials characteristic of a type, period, or method of construction), and Criteria Consideration G (the facility has achieved significance within the past 50 years). The new B31 Renewal would be visible from the north façade of B7, but mostly obscured by B31X, an equipment yard, and mature trees that run along Beta Link. The current view is that of Beta Link, scattered mature trees, parked cars, parking lots, and the current B31 complex. The proposed project would retain that view and feel, but with B31 having a modern but conforming reconstructed West wing and Link that blends in with the existing complex.

B8 is located on Fourth Street due south of B10 in the northern portion of the Central Mall and was constructed in 1964. B8 is eligible for listing on the NRHP under Criterion A, Criterion B, and Criterion C. The new B31 Renewal would be visible from the east façade of B8, but mostly obscured by B10, B31X, and mature trees that run along Fourth Street. The current view is that of Fourth Street, scattered mature trees, parked cars, parking lots, and the current B31 complex. The proposed project would retain that view and feel, but with B31 having a modern but conforming reconstructed West wing and Link that blends in with the existing complex.

B9 is located on Fourth Street adjacent to B31 and was constructed in 1966. B9 is eligible for listing on the NRHP under Criterion A, Criterion B, Criterion C, and Criteria Consideration G. The new B31 Renewal would be visible from the east façade of B9 and partially obscured by existing equipment and B31X. The new construction would not be visible from any of the primary entrances to B9. The current view is that of Fourth Street, parked cars, parking lots, and the current B31 complex. The proposed project would retain that view and feel, but with B31 having a modern but conforming reconstructed West wing and Link that blends in with the existing complex.

B10 is located on Fourth Street due north of B8 and was constructed in 1964. B10 is eligible for listing on the NRHP under Criterion A, Criterion C, and Criteria Consideration G. The new B31 Renewal would be visible from the east façade of B10, but mostly obscured by B31X and mature trees that run along Fourth Street. The current view is that of Fourth street, scattered mature trees, parked cars, parking lots, and the current B31 complex. The proposed project would retain that view and feel, but with B31 having a modern but conforming reconstructed West wing and Link that blends in with the existing complex.

B27 is located on Fifth Street south of B26 and was constructed in 2005. B27 is eligible for listing on the NRHP under Criterion A, Criterion B, and Criteria Consideration G. The new B31 Renewal would be visible from the northwest corner of B27, but mostly obscured by B31E and mature trees that run along Fifth Street. The current view is that of Fifth Street, scattered mature trees, parked cars, parking lots, and the current B31 complex. The proposed project would retain that view and feel, but with B31 having a modern but conforming reconstructed West wing and Link that blends in with the existing complex.

B29 is located at the intersection of Link Four and Beta Link adjacent to B34 and was constructed in 1964. B29 is eligible for listing on the NRHP under Criterion A, Criterion B, Criterion C, and Criteria Consideration G. The new B31 Renewal would be visible from the north façade of B29, but mostly obscured by mature trees that run along Beta Link. The current view is that of Beta Link, scattered mature trees, a small parking overhang structure, parked cars, parking lots, and the current B31 complex. The proposed project would retain that view and feel, but with B31 having a modern but conforming reconstructed West wing and Link that blends in with the existing complex.

Photos and renderings were taken from historic buildings located in the identified visual APE to better demonstrate potential impacts to the current viewshed in the JSC Historic District (Enclosure 4: APE Viewshed Analysis – Photos and Renderings). The B31 Renewal would be minimally visible from buildings B7, B8, B10, B27, and B29, and would not pose an adverse effect due to the mature trees and buildings that adequately suppress views in the direction of the newly proposed construction. The B31 Renewal would be fully visible at ground level from only B9. Buildings B26 and B28 are also within the visual APE but are ineligible and were excluded from analysis. Based on a visual analysis of the renderings and photos included in Enclosure 4, the new B31 Renewal will have no adverse effect to historic properties or the JSC Historic District in the indirect (visual) APE.

Regarding potential adverse effects in the direct APE, the existing B31W will be demolished and replaced with a new West wing, and a new Link will be constructed to connect the wings of the building. This demolition and alteration to the NRHP-eligible B31 complex will have an adverse effect to the historic property in the direct APE. To mitigate this impact, NASA has already completed a HAER Level II report and 3D laser scans of the historic building.

Regarding impacts to archaeological resources, in 2013, NASA JSC conducted a 100 percent pedestrian and reconnaissance archaeological survey of the approximately 1,670-acre campus. Additionally, in 2017, NASA JSC completed the Historic and Architectural Survey and Evaluation of Facilities, identifying and making recommendations of significance on all 459 of JSC's assets. Based on the findings of these studies, there are no known archaeological sites in the direct APE.

Regarding cumulative effects to the JSC Historic District, the new B31 Renewal, like other additions within the District that have occurred since the original development of the Center, would be constructed in a manner that preserves the anticipated continuity of the growth of the space program since the 1960s and conforms to JSC's buildings, whereby structures

remain well spaced, uncluttered, and along an existing grid with no new access roads. Therefore, NASA determines the proposed new B31 Renewal would not pose a cumulative adverse effect to the JSC Historic District.

Consistent with the obligations under Section 106 of the National Historic Preservation Act (NHPA), NASA JSC will seek input from interested parties and the public on this project. NASA JSC requests your approval of the previously completed mitigation and concurrence to proceed with finalizing the design and construction of the B31 Renewal project. Thank you for your attention to this consultation.

ENCLOSURE 2
Site Map and Proposed Project Area

Site Map and Proposed Project Area



ENCLOSURE 3
Design Drawings

ENCLOSURE 4
APE Viewshed Analysis with Photos and Renderings

APE Viewshed Analysis with Photos and Renderings

APE Photos:



Looking southwest from proposed B31 Renewal toward B7 (visible; mostly obscured by mature trees)



Looking southwest from proposed B31 Renewal toward B8 (visible; mostly obscured by B10 and mature trees)



Looking west from proposed B31 Renewal toward B9 (visible; partially obscured by existing equipment)



Looking southwest from proposed B31 Renewal toward B10 (visible; mostly obscured by mature trees)



Looking southeast from proposed B31 Renewal toward B27 (visible; mostly obscured by mature trees)



Looking south from proposed B31 Renewal toward B29 (visible; mostly obscured by mature trees)



Looking northeast from B7 toward proposed B31 Renewal (visible; mostly obscured by B31X, equipment yard, and mature trees)



Looking northeast from B8 toward proposed B31 Renewal (visible; mostly obscured by B31X and mature trees)



Looking east from B9 toward proposed B31 Renewal (visible; partially obscured by existing equipment and B31X)



Looking northeast from B10 toward proposed B31 Renewal (visible; mostly obscured by B31X and mature trees)



Looking northwest from B27 toward proposed B31 Renewal (visible; mostly obscured by B31E and mature trees)



Looking north from B29 toward proposed B31 Renewal (visible; mostly obscured by mature trees)

Renderings:



South Entrance showing second floor Link and new West wing behind



South Façade showing second and third floor Link with new West wing behind



View from northeast showing new third floor Link with stairway and new West wing (right)



View from northwest showing new B31 West and B31X (right)

ENCLOSURE 5
Additional Photos

Additional Photos



South façade of B31W (left) before B31X construction



South façade of B31X (nearing construction completion) with B31W behind



B31E (front) and B31N (right) with B31W behind (left) before B31X construction



B31E (front) and B31N (right) with B31W and B31X, nearing construction completion, behind (left)



B31 original entrance



B31X new entrance, nearing construction completion



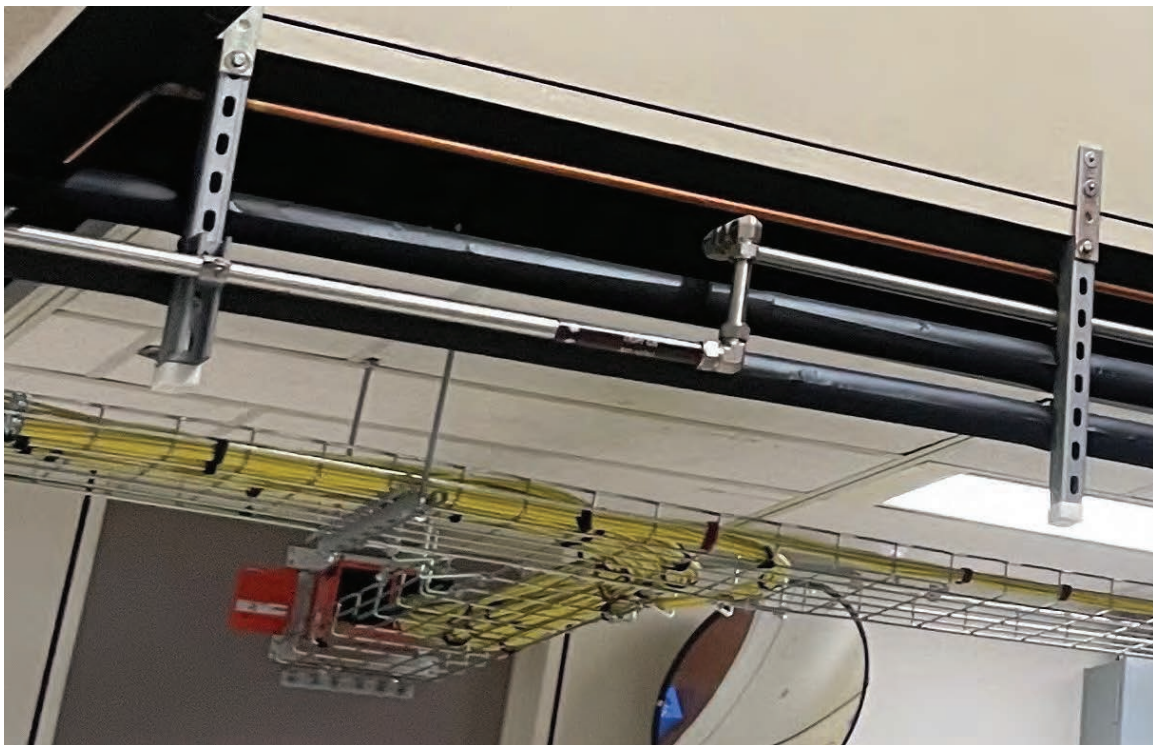
B31 representative interior laboratory space example



B31 representative interior laboratory space example



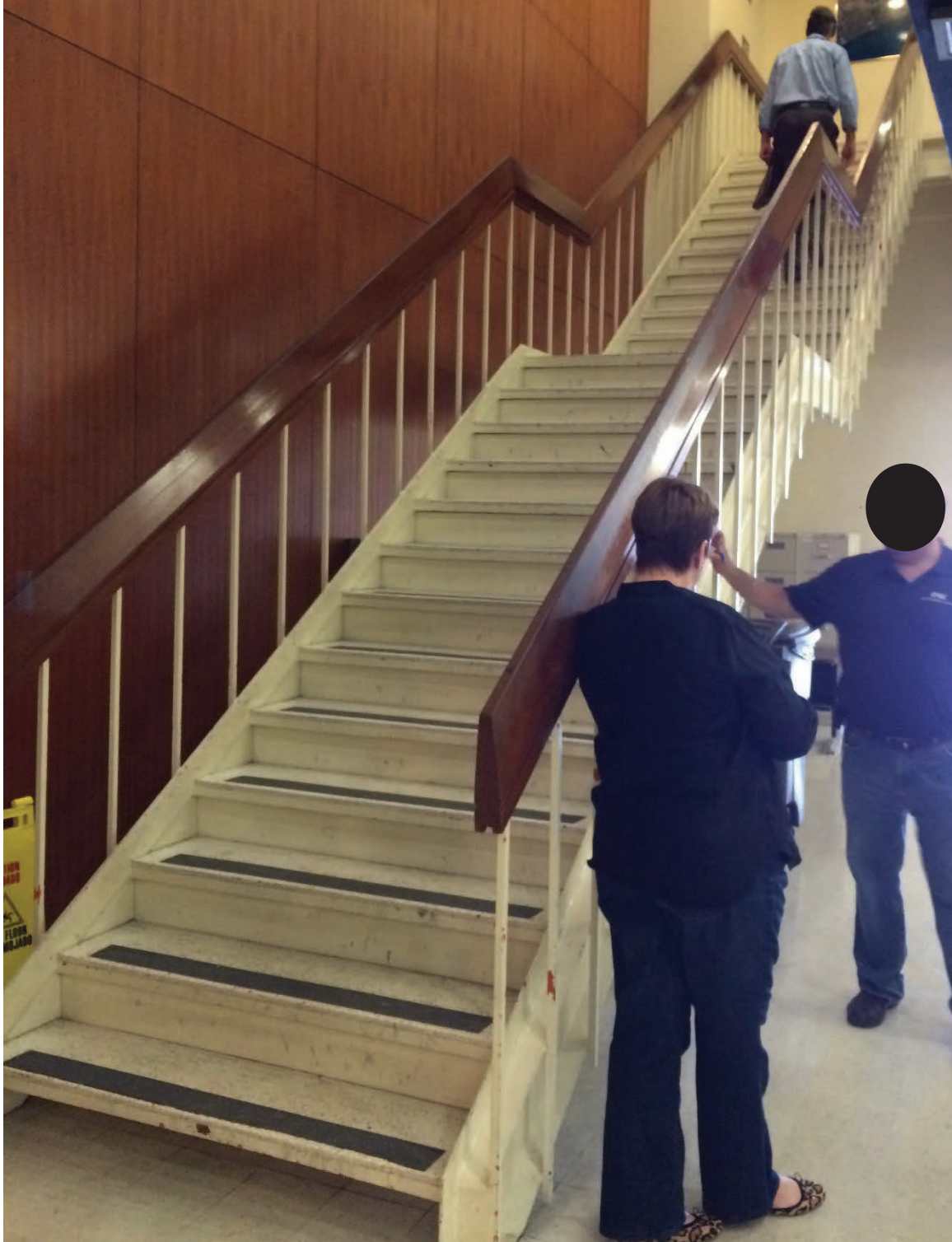
B31 representative interior laboratory space example



Example B31 utility trays from previous modifications to be removed



B31 original lobby finishes (brick floor, wood veneer wall) to be preserved



B31 original stairway with wood veneer wall to be preserved