

RECOMMENDATIONS

NRHP ASSESSMENTS

The primary goal of this project was to determine if any of the identified resources in the project area meet the criteria for inclusion in the NRHP. These assessments can only be made following the development of a historic context that examines the broad historical trends and patterns associated with NWIRP Dallas. The extant resources that serve as tangible links to the historic context are then divided into property types, which are defined by their shared physical traits and associative qualities. Such a step facilitates an analysis of the built environment and how the extant resources not only represent the plant's history but also their relative significance. Properties that qualify for listing in the NRHP are those that are significant because 1) they meet at least one of the four NRHP Criteria, and 2) they retain sufficient integrity to convey their significance.

After a careful analysis, the following properties meet NRHP Criteria and are recommended as eligible for inclusion in the NRHP under Criteria A:

Facility 1, Manufacturing Building

Facility 6, Manufacturing Building

Facility 16, Hangar

All other properties are recommended as ineligible for the NRHP. Following its review of the draft report, the Texas SHPO concurred

with these assessments (please see Appendix C).

Those properties deemed eligible for inclusion in the NRHP are subject to provisions stated in Section 106 of the National Historic Preservation Act of 1966. A brief overview of federally mandated obligations and recommended responses appears in the Management of NRHP-Eligible Properties section of this chapter.

NRHP CRITERIA CONSIDERATION G

The NRHP Criteria state that a property normally must be at least 50 years old to be considered for inclusion in the NRHP. This age threshold ensures that sufficient time has elapsed for qualified professionals to more objectively evaluate the relative merits and contributions of, as well as the significance associated with, a property. In rare instances, a property that is less than 50 years old can be eligible for the NRHP if it possesses "exceptional significance," as defined by the National Park Service in NRHP Criteria Consideration G. To consider such possible occurrences, the historic context and the period of significance developed for the project extend to the end of the Cold War (1991). While the vast majority of the documented properties contributed either directly or indirectly to the Cold War effort, none meet the high standard of "excep-

tional significance” to qualify for NRHP eligibility under Criteria Consideration G.

SCHEDULED UPDATES AND REEVALUATION

All properties at NWIRP Dallas that met the recommended 50-year age threshold have been assessed for the NRHP eligibility. However, with the passage of time, other properties at the plant will be 50 years old and should be reevaluated. Although these properties have already been assessed under NRHP Criteria Consideration G, they will no longer need to possess “exceptional significance” and should be reevaluated under the more standard and conventional NRHP Criteria.

The Navy’s planned disposal of the plant by 2006 warrants the reevaluation of properties that will reach the 50-year mark between 2000 and 2006. Such a step will meet short-term needs and cultural resource management responsibilities. The following properties will meet the 50-year age threshold by the time of the Navy’s planned disposal of NWIRP Dallas and should be reevaluated:

No.	Name	Date
93	Shipping & Manufacturing Bldg	1953
94	Structures Test Lab	1954
95	Test Cell Building	1954
97	Hangar (Engineer Flight Test)	1954
98	Water Pumphouse (Potable)	1954
99	Water Storage Tank (Potable)	1954
100	Water Storage Tank (Potable)	1954
101	Powerhouse Storage Building	1955
102	Machine Tool/Furniture Building	1954
103	Test Cell Building	1954
104	Paint Hangar	1956
105	Paint Stripping Building	1956
106	Engine Assembly Building	1954
107	Low-Speed Wind Tunnel	1955
109	Gasoline Pumphouse	1954
110	Fuel Calibration Shelter	1955
114	Engine Storage Building	1955
115	Fire Station	1954
117	Water Pumphouse (Fire)	1956

If the plant remains under Navy stewardship after 2006, the report should be updated and the additional properties reassessed. Although it is unreasonable to reevaluate these properties on a yearly basis, the survey report should be updated in 2012. This period of time complies with the six-year cycle established by the Navy and DOD and standard cultural resource management practices.

MANAGEMENT OF NRHP-ELIGIBLE PROPERTIES

Section 106 of the NHPA of 1966 (36 CFR 800) requires federal agencies to consider the impact their actions may have on NRHP-eligible properties. These actions, called Undertakings, may be either direct or indirect. Examples of undertakings include moderate to extensive repairs or renovations to a building, subsurface disturbance in or near an NRHP-eligible building, structure, or archeological site, or simply the conveyance of a federally owned property to a non-federal entity. To ensure compliance with the Section 106 provision, the report recommends that the Navy:

- Consult with the Texas SHPO regarding any proposed projects or actions that may impact NRHP-eligible properties,
- develop an Integrated Cultural Resource Management Plan, and
- adopt a Programmatic Agreement or Memorandum of Agreement.

A more detailed discussion of these topics follows.

SHPO CONSULTATION

NAVAIR is the Department of the Navy’s steward of NWIRP Dallas and is therefore responsible for consultation and coordination with the Texas SHPO. However, NAVAIR lacks qualified and experienced personnel to address cultural resource management needs and Section 106 compliance. The report rec-

ommends that NAVAIR designate the Historic Preservation Officer (HPO) of Southern Division, Naval Facilities Engineering Command (SOUTHNAVFACENGCOM) as the Navy's principal point of contact regarding cultural resource management matters affecting NWIRP Dallas. Mr. Ronald N. Johnson, Code 064RJ, presently serves as the HPO of SOUTHNAVFACENGCOM.

NAVAIR should also instruct the current tenant/operator, Vought Aircraft Industries, to consult with the HPO of SOUTHNAVFACENGCOM about any projects (undertakings) that might impact the NRHP-eligible properties. At a minimum, the Texas SHPO requires 30 days to review the proposed work and comment on potential impacts on NRHP-eligible properties. Additional time may be needed to mitigate or offset these effects. To streamline and/or possibly eliminate unnecessary delays, this coordination should occur early in the planning stage to provide the SHPO sufficient time to review the proposed undertaking and, if necessary, coordinate and implement mitigative efforts.

DEVELOPMENT OF A MEMORANDUM OF AGREEMENT

To comply with Section 106, federal agencies often consult, sign, and adopt some type of formal agreement with the SHPO outlining procedures for managing NRHP-eligible properties. Usually this only includes the federal agency and the SHPO, but the Advisory Council on Historic Preservation (ACHP) and other parties with vested interests in the NRHP-eligible properties may also be signatories of any agreement. These agreements are advantageous because they clearly delineate the roles and responsibilities of all parties involved, and they describe what procedures should be followed.

There are two basic types of agreements. A Programmatic Agreement, typically known

as a PA, is more general in scope and provides a more strategic approach to cultural resource management. A PA outlines a series of actions and steps that should be followed under a variety of circumstances and situations. It is flexible by design because it must include provisions for both planned and unanticipated undertakings over a multi-year period of time.

In contrast, a Memorandum of Agreement, or MOA, is more limited in scope because it usually deals with a single action or undertaking over a shorter period of time. It contains many of the same provisions typically incorporated into a PA but is more narrowly defined. It addresses issues that will result from a specified undertaking.

For NWIRP Dallas, the adoption of an MOA, rather than a PA, represents the most logical and cost-effective method of managing significant cultural resources. The HPO of SOUTHNAVFACENGCOM should supervise the development and adoption of a MOA.

INTEGRATED CULTURAL RESOURCE MANAGEMENT PLAN

The Integrated Cultural Resources Management Plan (ICRMP) is a document that outlines the means by which DOD installations comply with federal cultural resource regulations. As stated in DOD Instruction 4715.3, the ICRMP implements policies, assigns responsibilities, and prescribes procedures for the management of cultural resources on property under DOD control. Major components of an ICRMP report include:

- a summary of previous cultural resource investigations;
- a historic background that examines events and trends associated with the development and operation of the project area;

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- an inventory of identified cultural resources;
- a summary of federal preservation-related regulations and the Department of the Navy's cultural resource responsibilities;
- an analysis of significant cultural resources; and
- recommended preservation and cultural resource management procedures.

The report recommends that NAVAIR fund the preparation of an ICRMP. The ICRMP should

be prepared by persons meeting the Secretary of the Interior's Professional Qualifications Standards for their respective disciplines. Once approved by the SHPO, the ICRMP can be incorporated into, or be a provision of the MOA. For NWIRP Dallas, much of the information generated for the cultural resources survey, such as the historic background and inventory of properties, can be included in the ICRMP, thereby reducing costs. The preparation of the ICRMP should be overseen by the HPO of SOUTHNAVFACENGCOM.