

## TEXAS HISTORICAL COMMISSION

*real places telling real stories*

March 1, 2013

J. Michael Nicely, Manager  
Texas Airport Development Office  
Federal Aviation Administration  
2601 Meacham Boulevard  
Fort Worth, Texas 76137

Re: *Project review under Section 106 of the National Historic Preservation Act of 1966, as amended:  
NRHP evaluation and determination of effects coordination for the former Braniff Airways/Dalfort Aerospace building, 7701  
and 7777 Lemmon Avenue, Dallas, Dallas County, Texas (106/FAA/THC Track 201305314)*

Dear Mr. Nicely:

Thank you for your February 12 letter about the above-referenced property, with a determination of its eligibility for listing in the National Register of Historic Places (NRHP). This letter serves as official comment from Texas' State Historic Preservation Officer (SHPO), the Executive Director of the Texas Historical Commission (THC).

THC staff led by Linda Henderson and Adam Alsobrook reviewed the materials we have received about the property, the former Braniff Airways/Dalfort Aerospace facilities at Love Field. Many of these documents are those referenced in your letter, including reports prepared for and by the City of Dallas, letters from concerned citizens and Dallas-area groups, and correspondence from your office, as well as notes, photos, and observations from a November 2012 site visit by THC staff.

The documentation prepared by Geo-Marine Inc. acknowledges that the building is significant under NRHP Criterion A and Criterion C, but argues that the building lacks sufficient integrity. Therefore, the primary question throughout our review has been whether the building retains sufficient integrity to convey its significance for its associations with Braniff Airways and as a work by William Pereira and Charles Luckman. Based on our understanding of the building's history, development, and its current condition, and after applying the aspects of integrity as described by the National Park Service through the National Register bulletins, we have determined that the building does retain enough integrity and therefore is **eligible** for NRHP listing. We understand this is counter to the determination made by the Federal Aviation Administration (FAA), but we also know that your office and ours will continue to work cooperatively through the coordination process together.

Furthermore, we have determined that the proposed demolition of the former Braniff Airways/Dalfort Aerospace building would constitute an **adverse effect** to this historic resource determined to be eligible for listing in the NRHP. Section 106 regulations at 36 CFR 800.6 require that when a determination of adverse effect is made, the Federal agency must seek methods to avoid, minimize, or mitigate the adverse effect. If you choose to proceed with the undertaking, Federal regulations require your office to notify the Advisory Council on Historic Preservation (ACHP) of the adverse



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Braniff Airways/Dalfort Aerospace building, 7701 and 7777 Lemmon Avenue, Dallas, Dallas County, Texas  
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effect and invite them to participate in consultation. Additionally, the views of the public in the local community, and the views of any local preservation groups should also be taken into consideration. If the adverse effect cannot be avoided or minimized, in order to satisfy the provisions of 36 CFR 800 §800.6(b)(1)(i) it will be necessary for your office to develop a Memorandum of Agreement (MOA) that describes mitigation for this adverse effect determination.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Adam Alsobrook at 512/463-6183.**

Sincerely,

A handwritten signature in black ink that reads "Mark Wolfe". The signature is written in a cursive, flowing style.

Mark Wolfe, State Historic Preservation Officer

cc: Mark Duebner, City of Dallas, Aviation Department  
Ann Spillman, Chair, Dallas County Historical Commission  
Mark Doty, Historic Preservation Officer, City of Dallas

MW/aa/lch