

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

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](http://www.ohp.parks.ca.gov)

Armando Quintero, Director

March 15, 2023

VIA Email

In reply, refer to: NASA\_2023\_0206\_001

Mr. Jonathan Ikan  
Center Cultural Resources Manager  
NASA Ames Research Center  
Mail Stop 213-8  
Moffett Field, CA 94035

Subject: Lighter-Than-Air (LTA) Office Replacement Project at Moffett Federal Airfield,  
Santa Clara County

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the February 6, 2023, letter initiating 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.

Along with the letter, NASA submitted a *Memorandum, Section 106 Consultation on Lighter-Than-Air (LTA) Office Replacement Project, NASA Ames Research Center, Moffett Field, Santa Clara County, California*, prepared by AECOM and dated December 2022.

The proposed undertaking, as described, involves removing the six existing modular office trailers between Hangars 2 and 3 and replacing them with ten new trailers on the west side of Hangar 2. NASA would create a fenced storage area, and install necessary utility connections for water, sewer, and electricity, and the resurfacing of asphalt. The ten trailers would include eight modular trailers arranged in two separate 48-by-60-foot groups for office use by LTA staff, a small restroom modular building between 500 and 1,000 square feet located immediately adjacent to the two groups of trailers, and a small printing modular building between 500 and 1,000 square feet immediately adjacent to the two groups of office trailers.

NASA would also install a new electrified research and design (R&D) equipment storage area to the south side of Hangar 2. The area would be approximately 10,000 square feet and surrounded by a 6-foot-tall fence anchored to the existing concrete. Necessary utility connections for water, sewer, and electricity will include installation of

meters and trenching and/or horizontal directional drilling for new connections to existing utility lines. The project will resurface asphalt within the limits of work on the west side of Hangar 2 and replace asphalt in certain locations where asphalt is severely deteriorated. An estimated 3.4 acres of existing asphalt would be reconditioned.

NASA identified the Area of Potential Effects (APE) for the undertaking that encompasses the limits of staging and construction and the extent of potential visual effects resulting from permanent aboveground project improvements. Ground disturbance for the undertaking would be limited to trenching for utilities related to the new office trailers. The maximum cumulative linear extent of new utility line excavation is approximately 50 feet. The vertical APE includes the extent of ground disturbance to a depth of no more than 6.5 feet below existing surface; however, this would likely be less for most utility connections. All other work would occur on or within the existing surface asphalt prism.

The APE is within the boundaries of the National Register-listed U.S. Naval Air Station Sunnyvale, California (NAS Sunnyvale) Historic District and contains individually eligible historic properties and several contributors to the NAS Sunnyvale Historic District, including Hangars 1, 2, and 3, Building 158.

The undertaking would occur in an area surveyed and determined to have low sensitivity for archaeological resources. However, the southern extent of the APE, including the new electrified R&D equipment storage area, is in an area considered to have a heightened sensitivity for near-surface prehistoric and historic-era archaeological resources.

NASA determined that the undertaking would not adversely affect any historic properties within the APE. No archaeological resources are known to exist in the APE. This area is extensively disturbed and previously surveyed with no evidence of cultural materials or sites. If any materials are discovered during construction, all work will cease and the NASA ARC Inadvertent Discovery Policy, Standard Operating Procedure 8 in the ICRMP, will be followed.

No architectural historic properties identified in the APE would be physically affected by this project. The new trailers for the LTA offices are intended to be temporary. The trailers would not be physically connected to Hangar 2 and would be set back 70 feet. In accordance with the Secretary of the Interior's Standards for Rehabilitation, the new construction would not destroy historic materials, features, or the spatial relationships that characterize the property, and would be differentiated but compatible and reversible. No visual, audible, or atmospheric elements would be introduced by this project that would diminish the integrity of the NAS Sunnyvale Historic District or its contributors, specifically Hangars 1, 2, and 3, Building 158, or the airfield, within the APE. NASA finds that the visual impact of the introduction of the new trailers would be

negligible. The scale of the proposed trailers is insignificant compared to the monumental size of Hangar 2, and the trailers would be clearly subordinate to the hangar.

Based upon this analysis, NASA proposes a Finding of No Adverse Effect. After reviewing the information submitted, the SHPO offers the following comments.

- This project qualifies as an undertaking with the potential to affect historic properties.
- The APE is sufficient to take direct and indirect effects of the undertaking into account.
- Identification and evaluation efforts are sufficient for this consultation.
- 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](mailto:mark.beason@parks.ca.gov).

Sincerely,



Julianne Polanco  
State Historic Preservation Officer