



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

April 13, 2022

VIA Email

In reply, refer to: NASA\_2022\_0310\_001

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

Subject: Arc Jet Complex Security Fence Project, NASA Ames Research Center, Santa Clara County

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the March 10, 2022, 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, prepared by AECOM dated March 9, 2022, that provides the Section 106 analysis, project maps, and photographs.

NASA proposes to replace and improve existing security fencing surrounding the Arc Jet Complex and its related facilities. Work would include the following:

- Demolish the existing fencing on the north side of the 60-MW Power Supply Substation, on the east side of the Arc Jet Complex adjacent to Building N234A, and on the southwest side of the Arc Jet Complex along the SVS plenum.
- Extend the 60-MW Power Supply Substation ground grid for additional transformers; relocate fence and gates on the north side of the substation 12 feet north of the existing fence location; and install a new 4-to 8-foot electrified steel chain-link fence with fabric, security lighting on posts, and sloped barbed wire at the top.
- Install new 9-foot chain-link fence with fabric or privacy slats and gates at the southwest section along the plenum and the east section adjacent to Building N234A and the Cooling Towers.
- Install new concrete footings for fence posts measuring 12 inches in diameter and buried up to 42 inches deep.

NASA identified the Area of Potential Effects (APE) for the undertaking limited to the Arc Jet Complex where the fence would be installed. Below-grade activities are limited to the excavation areas for the project with a vertical APE with a maximum depth of 42 inches for the new fence post concrete footings (approximately 65 new or replaced footings total).

Based upon the 2017 investigation, the proposed work is in an area of low archaeological sensitivity and was not identified as sensitive for either prehistoric or historic-period resources. One area of heightened historic-period archaeological sensitivity associated with the nineteenth-century farm is within 1,000 feet, but it is not anticipated that resources associated with the farm would be within the APE. Ground disturbance for the undertaking would be at a maximum depth of 42 inches, and existing utilities within the APE indicate extensive prior disturbance. Because the amount of prior subsurface disturbance in the project area is high and the APE was not identified as sensitive, the potential for previously unidentified, intact resources is low. The portion of the APE where ground disturbance will occur is currently paved, graveled, or obscured with landscaping. No archaeological survey was conducted.

The APE is within the boundaries of the Arc Jet Complex Historic District, which was listed in the National Register in 2017. NASA proposes to relocate and replace the existing security fence to the north of the 60-MW Power Supply Substation, which is not a contributing feature of the Arc Jet Complex. The project would remove and replace the existing fencing on the southwest side of the Steam Vacuum System (SVS) plenum, which is a contributing feature of the Arc Jet Complex. The project would also remove a section of existing fencing and install new fencing along the east side of the complex between Building N234A, which is not a contributing feature of the Arc Jet Complex, and the Cooling Towers, which are a contributing feature.

Although the project will introduce new chain-link fencing in proximity to contributing features of the Arc Jet Complex, including the SVS plenum and the Cooling Towers, the new fencing will not visually affect the historic property in a manner that would diminish the Arc Jet Complex's integrity. Therefore, NASA proposes a Finding of No Adverse Effect for this undertaking.

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.
- Based upon the information submitted, the SHPO has no objection to the proposed Finding of No Adverse Effect for this undertaking.

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- 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,

A handwritten signature in blue ink, consisting of a stylized 'J' followed by a horizontal line extending to the right.

Julianne Polanco  
State Historic Preservation Officer