

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

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September 20, 2016

In reply, reference to: NASA_2016_0808_001

Keith Venter
Historic Preservation Officer
Facilities Engineering Branch
NASA Ames Research Center
Mail Stop 213-8
Moffett Field, CA 94035

Subject: Construction of Bay View Campus, NASA Ames Research Center, Santa Clara County, CA

Dear Mr. Venter:

Thank you for your August 3, 2016, letter initiating consultation regarding an undertaking at NASA Ames Research Center (ARC). NASA is consulting with the State Historic Preservation Officer (SHPO) in order 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 also provided a report entitled "Bay View Campus Section 106 Technical Report" prepared by Page & Turnbull and dated July 2016. NASA also provided supplemental information via email dated August 19, 2016, in response to an email inquiry from SHPO staff.

The proposed undertaking, as described, involves construction of an office complex and support facilities on the currently undeveloped Bay View site, which is located at the northwest corner of the ARC property and is subject to long-term Enhanced Use Lease by Planetary Ventures, LLC (effective May 14, 2008). The design for the new campus consists of three domed office buildings of varying heights atop a shared podium structure. The largest building will rise 140 feet above project grade with a 360,000 square foot footprint; the medium building will rise 115 feet above project grade with a 202,500 square foot footprint; and the smallest building will rise 90 feet above project grade with a footprint of 52,900 square feet. The open space between the buildings will form a central plaza.

The podium, or basement level, will be used for parking, mechanical equipment, storage, and other support functions. Two entrances for vehicles will be located on the western perimeter. It will be supported with auger displacement concrete piles 18

inches in diameter and 95 feet deep arranged in groups of three to six piles below pile caps on a grid arrangement 30 feet by 30 feet on center.

Surface parking lots will be located at the south and east ends of the campus, and a five-story parking structure and the Central Utility Plant will be located east of the smallest of the three office buildings. Up to 105,000 square feet of short-term corporate housing three or four stories tall will be built east of the office buildings, with approximately 200 units wrapping around the parking structure. New fencing will be installed along the entire site perimeter, with a set of access gates on North Perimeter Road. The plan calls for landscaping that creates sustainable and environmentally sensitive buffer between the campus and the wetlands to the north.

NASA defined the Area of Potential Effect (APE) to include the entire NASA ARC facility, including the US Army and California Air National Guard areas. The APE contains the NAS Sunnyvale Historic District, the proposed NASA Ames Wind Tunnel Historic District, and individually eligible resources (Administration Building, Arc Jet Complex, Systems Development Facility / Structural Dynamics Laboratory, and Flight and Guidance Simulation Lab). None of these resources is within the Bay View Parcel.

NASA conducted a record search for previous archaeological surveys in the APE. One prehistoric site was recorded in the project area in 1912. Surveys in the 1970s failed to locate this site or any other additional artifacts, leading NASA to believe the site was destroyed by agricultural activity in the area. A new surface survey of the project area in June 2016 did not locate any indicators of the previously recorded site or any other historic or prehistoric sites.

Because the project area is outside the boundaries of the existing and proposed historic districts and because of the lack of resources encountered on the surface of the project area, NASA proposes a Finding of No Adverse Effect for this undertaking. After reviewing the information submitted to my office, the SHPO offers the following comments:

- The project as described constitutes an undertaking with the potential to affect historic properties.
- The technical report indicates that non-building uses may be cited in the 200-foot wetland buffer zone, such as walking paths, bike trails, boardwalks, underground infrastructure, solar / wind energy generation, and support structures. Please note that introduction of large energy generation features and the infrastructure they require is not clearly identified or defined in the information provided and seems to go beyond the defined scope of work for this consultation. Such

features could require further Section 106 compliance depending upon the size, siting, and ground disturbance.

- The APE is sufficient to take direct and indirect effects into account.
- According to the technical report, William Self Associates (WSA) performed Native American consultation in 2015. Please provide the status and results of NASA's government-to-government consultation with interested Tribes.
- Site CA-SCL-23 was recorded in the area as early as 1909 but no evidence of the site was observed during the current effort (partially due to gravel cover and dense vegetation). The WSA report references subsequent work, including backhoe testing in 1995, but does not provide sufficient details of that previous work to substantiate the conclusion that the site has been completely destroyed by historic land use activities. Please provide copies of all site record forms for CA-SCL-23 and a more detailed analysis of the previous work (with supporting documentation such as soil profiles and mapping) such that it is clear the site was either destroyed by previous activities or in fact was incorrectly mapped back in 1909-1912 and there are no archaeological sites at this specific location.
- Until this information is provided, the identification and evaluation step of the Section 106 process is not complete.

The SHPO looks forward to continuing consultation on this undertaking. If you have any questions or concerns, please contact Mark Beason, State Historian, at (916) 445-4047 or mark.beason@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer