

National Aeronautics and Space Administration

**Ames Research Center**  
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Subject: Continuing Section 106 consultation – Response to September 20, 2016 letter from SHPO  
Bay View Campus at the NASA Ames Research Center, Santa Clara County, CA

Dear Ms. Polanco,

Thank you for your response regarding the proposed undertaking at the Bay View Campus, NASA Ames Research Center, dated September 20, 2016. This letter serves to provide responses and additional information as requested, and to continue consultation in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations at 36 CFR Part 800.

Below are responses to the comments outlined in the September 20, 2016 letter;

1. **Comment:** *The project as described constitutes an undertaking with the potential to affect historic properties.*

**Response:** Comment noted.

2. **Comment:** *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.*

**Response:** SHPO comment is noted. For clarification, no solar/wind energy generation is currently proposed in the 200-foot wetland buffer zone. In the event that such features are proposed in the future, NASA will review them or any other future proposed site features and determine if such activities proposed for NASA approval constitute a future undertaking as defined in Section 106 800.16(y).

3. **Comment:** *The APE is sufficient to take direct and indirect effects into account.*

**Response:** Comment noted.

4. **Comment:** *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.*

**Response:** The WSA consultation in 2015 was for the Moffett Towers 2 project on the other side of the airfield from the Bay View project site, and is included in the technical report in the interest of complete disclosure of all potentially relevant data.

For the proposed Bay View project, NASA has not conducted government-to-government consultation with Indian tribes because there are no interested tribes and no federally-recognized tribes at NASA ARC. In 2002, NASA sent a draft EIS to the Amah Tribe of the Ohlone Costanoan Indians. The tribe was not listed on the list of commenters to the EIS, therefore it is presumed they did not provide any comments and are not an interested party.

(See [http://www.nasa.gov/sites/default/files/578505main\\_EIS.pdf](http://www.nasa.gov/sites/default/files/578505main_EIS.pdf))


5. **Comment:** *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.*

**Response:** Please see the following attachments with analysis;

- **Attachment A:** Table 1: History of Archaeological Research regarding CA-SCI-23, and Figures 1-4.
  - **Attachment B:** 1993 Archaeology Reports regarding CA-SCL-23 (Garaventa et al. Revised May 1993; Garaventa, Guedon, DiPasqua, et al. December 1993)
  - **Attachment C:** DPR 523 Primary Recorded Form for Crittendon Mound, CA-SCL-23, No. P-43-000043. Prepared by Kathleen Kovar (1995).
  - **Attachment D:** DPR 523 Continuation Sheet for Crittendon Mound, CA-SCL-23, No. P-43-000042. Prepared by Allen Estes, William Self Associates (September 2016).
6. **Comment:** *Until this information is provided, the identification and evaluation step of the Section 106 process is not complete.*

**Response:** NASA believes the enclosed information will provide an adequate response to your questions and request for further information. I would like to reiterate our request for expedited consultation in accordance with 36 CFR 800.3(g), as noted in the letter of initiation of Section 106 consultation dated August 3, 2016. The Undertaking has a time sensitive schedule. The SHPO's assistance with progress and completion of this consultation is greatly appreciated.

Sincerely,



Keith Venter  
Historic Preservation Officer



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Enclosures: Attachments A-D.