



AECOM  
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NASA Ames Research Center  
Moffett Field, CA 94035  
aecom.com

**Project name:**  
Facility Security Level Upgrades Project

**Project reference:**  
60586656.0004

**From:**  
Trina Meiser

**Date:**  
September 19, 2024

**To:**  
Jonathan Ikan  
Cultural Resources Manager  
NASA Ames Research Center  
Moffett Field, CA 94035-1000

**CC:**  
Fabian Bonaldi, AECOM  
Christina Logan, NASA

# Memo

**Subject:** Section 106 Consultation on Facility Security Level Upgrades Project, NASA Ames Research Center, Moffett Field, Santa Clara County, California

## 1. Introduction

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) proposes the Facility Security Level Upgrades Project (project or undertaking) at ARC, Moffett Field, Santa Clara County, California. As the lead federal agency, NASA is responsible for compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (54 United States Code 300101 et seq.), which requires federal agencies to take into account the effects of their activities and programs on historic properties, and its implementing regulations in 36 Code of Federal Regulations (CFR) Part 800. The purpose of this memorandum is to provide necessary information for compliance with Section 106, including a description of the undertaking, the Area of Potential Effects (APE), the methodology used to identify and evaluate historic properties within the APE, and the affected historic properties, and an assessment of potential effects resulting from the undertaking.

### 1.1 Project Location

The project is located within the NASA Ames Research Park at ARC, Moffett Field, Santa Clara County, California (see Appendix A; Figures 1 and 2). The project involves the installation of security fencing along the perimeter of Block 15 and exterior security improvements to Building 16. Block 15 is bordered by S. Akron Road to the north, McCord Avenue to the west, and Westcoat Road to the south. The project is located within the boundary of the U.S. Naval Air Station Sunnyvale, California (NAS Sunnyvale) Historic District, which is listed in the National Register of Historic Places (NRHP).

### 1.2 Project Personnel

This study was conducted by cultural resources professionals who meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738). Heather Miller, M.A., Architectural Historian, prepared this memorandum; Trina Meiser, M.A., Senior Architectural Historian, served as the Principal Investigator; Jay Rehor, M.A., RPA, addressed archaeological resources; and Alec Stevenson, M.A., RPA, provided figures.

## 2. Description of the Undertaking

This project involves security improvements for existing facilities to meet minimum Federal Security protection requirements for critical NASA-occupied facilities, including fencing and gates (vehicular and pedestrian) and security cameras. [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

**Building 16.** Security improvements to Building 16 [REDACTED]

**Site work.** Additional project work includes the installation of several new Architectural Barriers Act (ABA) curb ramps near Buildings 15 and 16 including new associated striping; an ABA ramp and a handrail on the north elevation of Building 15; and installation of a new sidewalk and associated striping from McCord Avenue to Building 16.

The staging area for the project is on the west side of McCord Avenue on a paved parking lot area between Buildings T36-A and 566.

## 3. Area of Potential Effects

The APE is defined to address both direct and indirect impacts on historic properties. The APE is located within the NAS Sunnyvale Historic District and accounts for potential indirect effects on the district as a whole but does not include the entire boundary of the district due to the project's scale relative to the size of the district. The APE encompasses areas that may be affected by both temporary and permanent construction activities (see Appendix A; Figure 3). Project activities will occur on the exterior of Building 16. Below-grade activities are limited to the perimeter of Block 15 for the installation of fencing, and the perimeter and interior of Block 15 for excavation for utility lines and grading for new ABA ramps. These areas are included in the APE for direct impacts, with a vertical APE of approximately 7' maximum depth for fence post footings, gate pedestal footings, and to access utilities in limited areas where excavation would occur. Visual impacts resulting from the installation of new fencing and bollards around Block 15 pose limited changes to the setting of the overall historic district and adjacent contributors; therefore, the APE includes Block 15 and a buffer that encompasses the first

tier of immediately adjacent buildings to address potential visual intrusions related to the installation of the fencing.

## 4. Identification of Historic Properties

Historic properties are defined as any district, site, building, structure, or object that is included in or is eligible for listing in the NRHP. The following sections address the methodology and efforts to identify historic properties in the APE.

### 4.1 Archaeological Resources

The land that comprises ARC has changed dramatically since the early 20th century from predominantly agricultural use to a military airfield installation beginning in 1931 and aeronautical research and development beginning in 1939. Extensive surface disturbance occurred throughout ARC with grading and fill to create the airfield and the campuses with hundreds of buildings and structures to support operations.

A comprehensive investigation of previous archaeological studies at ARC was completed in 2017 (AECOM 2017). This investigation involved a desktop survey of archival resources and a geoarchaeological assessment of the entire ARC site and included an assessment of archaeological sensitivity and the potential for buried archaeological resources. In a letter dated June 22, 2017, the State Historic Preservation Officer (SHPO) found the study results acceptable as a baseline for future investigation and treatment of archaeological resources at ARC and as a reference for professionally qualified staff for future undertakings (NASA\_2015\_0928\_001). The study identified areas of heightened prehistoric and historic sensitivity and also concluded that there is low potential for more deeply buried prehistoric archaeological resources across ARC.

A review of the 2017 investigation indicates that no previously recorded archaeological resources are located within or adjacent to the APE [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The southern edge of the APE is roughly at the northern edge of a field depicted on the 1876 Thompson & West map as part of the "E. Jenkins" property, although as noted in the 2017 investigation, the spatial accuracy of this map is not high (AECOM 2017). The house associated with the Jenkins property is situated further south. A more accurate depiction of the same property, the 1897 The U.S. Coast and Geodetic Survey (USC&GS) *Mountain View and Alviso* T-Sheet, does depict a potential outbuilding on the northern edge of the farm field. In general, it can be assumed that the APE is in an area that contained sparsely developed rural agricultural activities prior to 1931 and it must be assumed that there is a limited potential for encountering buried historic-period archaeological resources within the proposed fence foundation and utility work. Maximum ground disturbance in this area would be limited to the excavation of post holes for fence foundations that would be 6'-3/4" deep and 2' wide and would be spaced every 10'. Trenching to install utilities would also occur, although maps of existing utilities at the location indicate extensive prior disturbance. Given the long history of cutting and filling for military development across ARC, it is not possible to anticipate how deeply buried historic archaeological resources may be, if they are present at all. It is known that the amount of prior subsurface disturbance in this area is high.

As part of a forthcoming update to the 2017 ARC-wide archaeological study, a comprehensive pedestrian survey was completed of the entire APE in October 2023. Although the majority of the APE is paved and built up, all unpaved areas (e.g., planting strips) were inspected, with no evidence of archaeological resources encountered. The nearest archaeological resources identified during the pedestrian survey included a very sparse deposit of fragmentary shell and faunal bone (likely indicative of a disturbed precontact deposit) located in planting strips and in association with a small generator pad, approximately 800 feet south of the current APE.

In addition, as part of the ARC-wide archaeological study update, the California Native American Heritage Commission (NAHC) was contacted on March 19, 2024, requesting a search of their Sacred Lands File. A response from the NAHC was received March 25, 2024, indicating that the Sacred Lands File search was negative. Thirteen individuals and/or groups were identified by the NAHC as having an interest in the area. None of the tribes represented are federally recognized tribes as defined in the NHPA (54 U.S.C. § 300309) and as identified by the U.S. Department of the Interior’s Bureau of Indian Affairs and listed in 81 Federal Register 5019, published January 29, 2016.

The entire APE has low potential for deeply buried precontact sites and was not identified as sensitive for precontact Native American resources (AECOM 2017). Given that the identified historic-era sensitivity is based on a buffer added to late 19th century agricultural developments depicted on low-accuracy historic-era maps, that only a small southern portion of the APE intersects this buffer, that there is a high level of prior disturbance within the APE, and that proposed ground disturbance is relatively limited, it appears that the proposed project has a low potential to disturb archaeological resources. As such, no additional identification efforts or mitigations are recommended.

## 4.2 Architectural Resources

The APE overlaps the NAS Sunnyvale Historic District, which was listed in the NRHP in 1994 (NRHP nomination available at [https://historicproperties.arc.nasa.gov/downloads/summary/nrhp\\_nas\\_19940224.pdf](https://historicproperties.arc.nasa.gov/downloads/summary/nrhp_nas_19940224.pdf)). This study identified 14 buildings that are more than 50 years old and two buildings that are less than 50 years old in the APE (Table 1). Buildings 10, 15, 16, and 17 are listed in the NRHP as contributors to the NAS Sunnyvale Historic District; Buildings 3, 6, 76, 81, 482, 510, 542, 566, and 567 are listed as non-contributors. Building 6 was reevaluated in 2021 and the main building that was constructed in 1933 was recommended as a contributor to the NAS Sunnyvale Historic District (OHP 2021) (see Appendix B for SHPO concurrence letter). AECOM conducted an initial survey of the APE on December 1, 2021, and revisited the site on May 29, 2024, to photograph the changes made to Building 6.

**Table 1. Architectural Resources in the APE**

Resource	Date	Eligibility Status	Effects Analysis
Building 3 – Originally the Officer’s Club, now Training and Conference Center	1933	Not individually eligible – Non-contributing to NAS Sunnyvale Historic District	N/A
Building 6 – Originally the Motor Test Building, now Recycling & Storage <sup>^</sup>	1933	Not individually eligible – Non-contributing to NAS Sunnyvale Historic District [1933 main building, ca. 1947 and ca. 1967 building extensions] (1994); Recommended as a Contributor [1933 main building] (2021) with SHPO concurrence	No Adverse Effect
Building 10 – Boiler Plant Facility and Facility Maintenance Shop	1932	Listed – Contributing to NAS Sunnyvale Historic District	No Adverse Effect
Building 15 – Security Station	1933	Listed – Contributing to NAS Sunnyvale Historic District	No Adverse Effect
Building 16 – Public Works	1933	Listed – Contributing to NAS Sunnyvale Historic District	No Adverse Effect
Building 17 – Administration and Telephone Exchange	1933	Listed – Contributing to NAS Sunnyvale Historic District	No Adverse Effect

Resource	Date	Eligibility Status	Effects Analysis
Building 76 – Locksmith Shop	1944	Not individually eligible – Non-contributing to NAS Sunnyvale Historic District	N/A
Building 81 – Security General Storage	1944	Not individually eligible – Non-contributing to NAS Sunnyvale Historic District	N/A
Building 107 – Navy ROICC Administration Building	1948	Recommended as not individually eligible; Not in the NAS Sunnyvale Historic District boundary	N/A
Building 482 – Public Works Storage Facility	1963	Not individually eligible – Non-contributing to NAS Sunnyvale Historic District	N/A
Building 510 – Administrative Building	1967	Not individually eligible – Non-contributing to NAS Sunnyvale Historic District	N/A
Building 542 – Storage	1973	Not individually eligible – Non-contributing to NAS Sunnyvale Historic District	N/A
Building 566 – Administrative Building	1979	Not individually eligible – Non-contributing to NAS Sunnyvale Historic District	N/A
Building 567 – Facilities Maintenance Warehouse	1978	Not individually eligible – Non-contributing to NAS Sunnyvale Historic District	N/A
Building T-36A	2002	In the NAS Sunnyvale Historic District boundary, but less than 50 years old	N/A
U.S. Geological Society (USGS) M2M Lab Building*	2023	In the NAS Sunnyvale Historic District boundary, but less than 50 years old	N/A
<p>Notes:</p> <p>^The most up-to-date aerial photography base in online GIS applications is dated 2021. The non-contributing wings on Building 6 were demolished in early 2022 and are therefore depicted on the attached Figures.</p> <p>*This building is not depicted on the most up-to-date aerial photography base in online GIS applications (2021) and is therefore not depicted on the attached Figures.</p>			

## 5. Affected Historic Properties

### 5.1.1 NAS Sunnyvale Historic District

Listed in the NRHP in 1994, the NAS Sunnyvale Historic District is significant under NRHP Criteria A and C, and originally included only the earliest Spanish Colonial campus buildings around Shenandoah Plaza and Hangars 1, 2, and 3. The original periods of significance of the district were identified as 1930 through 1935 and 1942 through 1946. The utilitarian style of later buildings was noted in the NRHP nomination; however, at the time of the nomination, several buildings were not yet 50 years old and were not considered contributing under the statement of significance that focused on Spanish Colonial Revival-style architecture and the engineering feat related to the airfield hangars.

In 2013, a historic property survey of Moffett Field was conducted to evaluate the significance of additional resources related to the airfield and concluded that the airfield and related resources are eligible for the NRHP under an expanded context for the NAS Sunnyvale Historic District (AECOM 2013). The SHPO concurred on expanding the boundary of the district on June 6, 2013 (NASA\_2013\_0417\_001) with an additional period of significance of 1942 to 1961 for the airfield (see Appendix A, Figure 2 for expanded historic district boundary). The district's statement of significance was also revised to include the World War II and Cold War military missions.

No major alterations to the district have occurred since it was listed in 1994, with the exception of removal of the exterior materials of Hangar 1 to remediate hazardous materials, which is actively being replaced at the time of report writing (see Photograph 1). The district retains its integrity and remains eligible for the NRHP.

The historic properties in the APE are Buildings 6, 10, 15, 16, and 17 because they are contributors to the NAS Sunnyvale Historic District.

### 5.1.2 Building 6 – Originally the Motor Test Building, now Recycling & Storage

Building 6 is a two-story, steel bar-reinforced concrete, industrial building with a rectangular plan on a concrete slab foundation, with minimal Spanish Colonial Revival/Mission-style details (Photograph 1). The two-story building was originally constructed in 1933 as the Motor Test Building for the lighter-than-air dirigible USS *Macon*. Two, single-story additions were constructed on the west and north sides of the building in ca. 1947 and ca. 1967, respectively. The building was determined to be a non-contributor to the NAS Sunnyvale Historic District in 1994. However, a reevaluation of the building in 2021 recommended the 1933-constructed portion of the building as a contributor to the NAS Sunnyvale Historic District and the additions as non-contributors. The SHPO concurred with the reevaluation on September 27, 2021, (NASA\_2021\_0419\_001) and the single-story additions were demolished between October 2021 and February 2022.



Photograph 1. Building 6, west and south elevations, with Hangar 1 in background, view facing northeast. The west elevation of Building 6 faces the project site

### 5.1.3 Building 10 – Boiler Plant Facility and Facility Maintenance Shop

Building 10 is a two-story, concrete, Spanish Colonial Revival/Mission-style industrial building with an irregular T-plan on concrete slab foundation (Photograph 2). The building was the original helium and boiler plant for the operation of Hangar 1 and the lighter-than-air dirigible USS *Macon*, and later functioned as a heat plant for the installation. The building incorporates Spanish Mission-style design elements, particularly the elaborate



bracketed pilasters on the west elevation of the building. Built in 1932, Building 10 is listed in the NRHP as a contributor to the NAS Sunnyvale Historic District. No major alterations to the exterior of the building have occurred since it was listed in 1994.



Photograph 2. Building 10 in foreground, west elevation facing the project site, view facing northeast

#### 5.1.4 Building 15 – Security Station

Building 15 is a one- to one-and-1/2-story Spanish Colonial Revival-style building with a winged U-plan on concrete slab foundation, frame construction, stucco siding, and a low-pitched Spanish tile gabled roof above the central area of the building and flat roof on the wings (Photograph 3). Fenestration includes metal-framed multilight industrial windows, glazed wood doors, and modern replacement single-panel doors and rollup garage doors. Built in 1933, Building 15 originally served as the fire station, laundry, and garage, and is listed in the NRHP as a contributor to the NAS Sunnyvale Historic District. No major alterations to the exterior of the building have occurred since it was listed in 1994.



**Photograph 3. Building 15, north and west elevations, view facing southeast**

### **5.1.5 Building 16 – Public Works**

Building 16 is a one-story Spanish Colonial Revival-style building with a complex plan and several wings, frame construction, stucco siding, and a complex roof with flat and gabled areas (Photograph 4). Fenestration includes metal-framed, multilight industrial windows, glazed wood doors, and modern replacement single-panel doors. Built in 1933, Building 16 originally served as the locomotive crane shed and is listed in the NRHP as a contributor to the NAS Sunnyvale Historic District. No major alterations to the exterior of the building have occurred since it was listed in 1994.



**Photograph 4. Building 16, south and west elevations, view facing northeast**



### 5.1.6 Building 17 – Administration and Telephone Exchange

Building 17 is a two-story Spanish Colonial Revival-style building with a symmetrical, cruciform plan, frame construction, stucco siding, and a low-pitched Spanish tile gabled roof (Photograph 5). It is located at the head of Shenandoah Plaza and is its most prominent building. This building set “the design criteria that is followed through the original campus plan” (NRHP 1994). Built in 1933, Building 17 is listed in the NRHP as a contributor to the NAS Sunnyvale Historic District. No major alterations to the exterior of the building have occurred since it was listed in 1994.



Photograph 5. Building 17, east (rear) elevation, opposite Building 15 project site, view facing northwest

## 6. Assessment of Effects

Per 36 CFR § 800.5(a)(1), an adverse effect results when an undertaking may alter, either directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the historic property’s integrity.

There are no known archaeological sites in the APE, and the APE is in an area with a low potential for buried precontact sites. The southernmost portion of the proposed work is within an area identified as having potential sensitivity for historic-era archaeological resources, defined by a rural farm containing potential outbuildings (AECOM 2017). Given that the identified historic-era sensitivity is based on a buffer added to late 19th century agricultural developments depicted on low-accuracy historic-era maps, that only a small southern portion of the APE intersects this buffer, that there is a high level of prior disturbance within the APE, and that proposed ground disturbance is relatively limited, it appears that the proposed project has a low potential to disturb previously undocumented archaeological resources. Should the project uncover previously unknown subsurface archaeological resources, contractors will immediately halt construction, secure the site, and notify NASA of the unanticipated discovery. NASA will follow the standard operating procedure for unanticipated discoveries as outlined in the Integrated Cultural Resources Management Plan (ICRMP) for ARC (AECOM 2014). Through implementation of mitigation measures outlined in the standard operating procedure for unanticipated discoveries, the undertaking would have no adverse effect on archaeological historic properties.

The survey identified five contributors to the NRHP-listed NAS Sunnyvale Historic District in the APE: Buildings 6, 10, 15, 16, and 17. Project activities will occur on the exterior of Building 16 and within Block 15. Building 10 is

within the project site. Built in 1932-33 adjacent to Shenandoah Plaza to the west, Buildings 10, 15, 16, and 17 are significant for their Spanish Colonial Revival-style architectural features in relation to the district.

**Block 15 Security Fencing.** The new fencing proposed to enclose Block 15 will introduce new features in the immediate vicinity of Buildings 6, 10, 15, 16, and 17. New features in front of Building 15 will include removable bollards along the north and west elevations of the building (Photograph 5). However, these bollards will be no more than 3' tall and will not obscure the features of these elevations. The new fencing around Block 15 will consist of 8' tall chain-link fencing with a 12" barbed-wire top guard, and slats, [REDACTED]. Chain-link fencing already exists in some areas around the yard and will be replaced (Photograph 7). The views of the maintenance yard are not character-defining for the historic district, and the primary elevations of the historic buildings in Block 15, including Buildings 10, 15, and 16 and will still be visible from the streets (Photograph 8; see also Photographs 2-4 and 6-8). Introduction of new fencing that encloses Block 15 near adjacent historic properties, including Buildings 6 and 17 would not alter or destroy any of the character-defining features that contribute to the significance of historic district (Photographs 4 and 9).

**Building 15.** The new ABA ramp and handrail proposed on the east side of the north elevation of Building 15 would introduce a new visual element to the building but would not alter any of the Spanish Colonial Revival-style character-defining features of the building that contribute to the significance of historic district (Photograph 10).

**Building 16.** [REDACTED]  
[REDACTED] these features are small in scale and will not alter or destroy any of the character-defining features of the building that contribute to the significance of historic district.

**Additional Work.** New ABA curb ramps near Buildings 15 and 16, a new sidewalk from McCord Avenue to the north elevation of Building 16, and new associated striping will introduce new street-level features that will not alter or destroy any of the character-defining features of any of the nearby buildings that contribute to the significance of historic district.





**Photograph 6. Building 15, north and west elevations along where removable bollards will be installed, at the intersection of S. Akron Road and McCord Avenue, view facing southeast**



**Photograph 7. Building 15, east elevation with existing gate and fencing that will be replaced by the current project, view facing southwest**



**Photograph 8. Project site, rear yard of Building 15 (far left) to be enclosed with additional fencing, Building 76 (non-contributing) at center (Building 10 behind), view facing northeast**





**Photograph 9. Building 6 in foreground, project site with east elevation of Building 16 on far left and portion of Building 510 at center, to be enclosed with new fencing, view facing northwest**



**Photograph 10. Location of proposed ramp on north side of Building 15 (at center), facing southeast**

Overall, the proposed alterations would have minimal impacts on Buildings 15 and 16, and to the setting of Buildings 6, 10, 15, 16, and 17. The alterations would not detract from any historic characteristics or character-defining features of the contributing buildings or the district, or compromise the properties' integrity of location, design, setting, materials, workmanship, feeling, or association. Therefore, the undertaking would not result in adverse effects on the historic properties.

## 7. Summary of Findings

The criteria of adverse effect were applied to historic properties in the APE, specifically Buildings 6, 10, 15, 16, and 17, which are contributors to the NAS Sunnyvale Historic District. The proposed undertaking would not alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the NRHP. Therefore, a finding of No Adverse Effect per 36 CFR § 800.5(b) would be appropriate for this undertaking.

## 8. References

AECOM, 2013. *Historic Property Survey Report for the Airfield at NASA Ames Research Center, Moffett Field, California*. Accessible online at [https://historicproperties.arc.nasa.gov/downloads/hpsr\\_airfield.pdf](https://historicproperties.arc.nasa.gov/downloads/hpsr_airfield.pdf).

AECOM, 2014. *Integrated Cultural Resources Management Plan for NASA Ames Research Center, Moffett Field, California*. Accessible online at [https://historicproperties.arc.nasa.gov/downloads/icrmp\\_nasa\\_arc\\_all.pdf](https://historicproperties.arc.nasa.gov/downloads/icrmp_nasa_arc_all.pdf).

AECOM, 2017. *NASA Ames Research Center Archaeological Resources Study*. Accessible online (redacted) at [https://historicproperties.arc.nasa.gov/downloads/section106\\_achaeology\\_20170224\\_nasa\\_att.pdf](https://historicproperties.arc.nasa.gov/downloads/section106_achaeology_20170224_nasa_att.pdf).

National Register of Historic Places (NRHP), 1994. U.S. Naval Air Station Sunnyvale, California, Moffett Field, Santa Clara County, California, NRHP # 94000045. Accessible online at [https://historicproperties.arc.nasa.gov/downloads/nrhp\\_registration.pdf](https://historicproperties.arc.nasa.gov/downloads/nrhp_registration.pdf).

Office of Historic Preservation (OHP). 2021. RE: NASA\_2021\_0419\_001 to NASA ARC, Subject: USGS M2M Lab Building Project, Parcel 15, NASA Ames Research Center, Moffett Field, Santa Clara County, California. September 27.

Science Applications International Corporation (SAIC), 1999. *Inventory and Evaluation of Cold War Era Historical Resources: Moffett Federal Airfield and NASA Crows Landing Flight Facility*. Prepared by Alexandra C. Cole for Science Applications International Corporation, Santa Barbara, California. Accessible online at [https://historicproperties.arc.nasa.gov/map\\_coldwar/coldwar.html](https://historicproperties.arc.nasa.gov/map_coldwar/coldwar.html).

SmithGroup and Gray & Pape, Revised 2021 June 14. *USGS M2M Lab Building, NASA ARC Parcel 15 Section 106 Technical Report*.

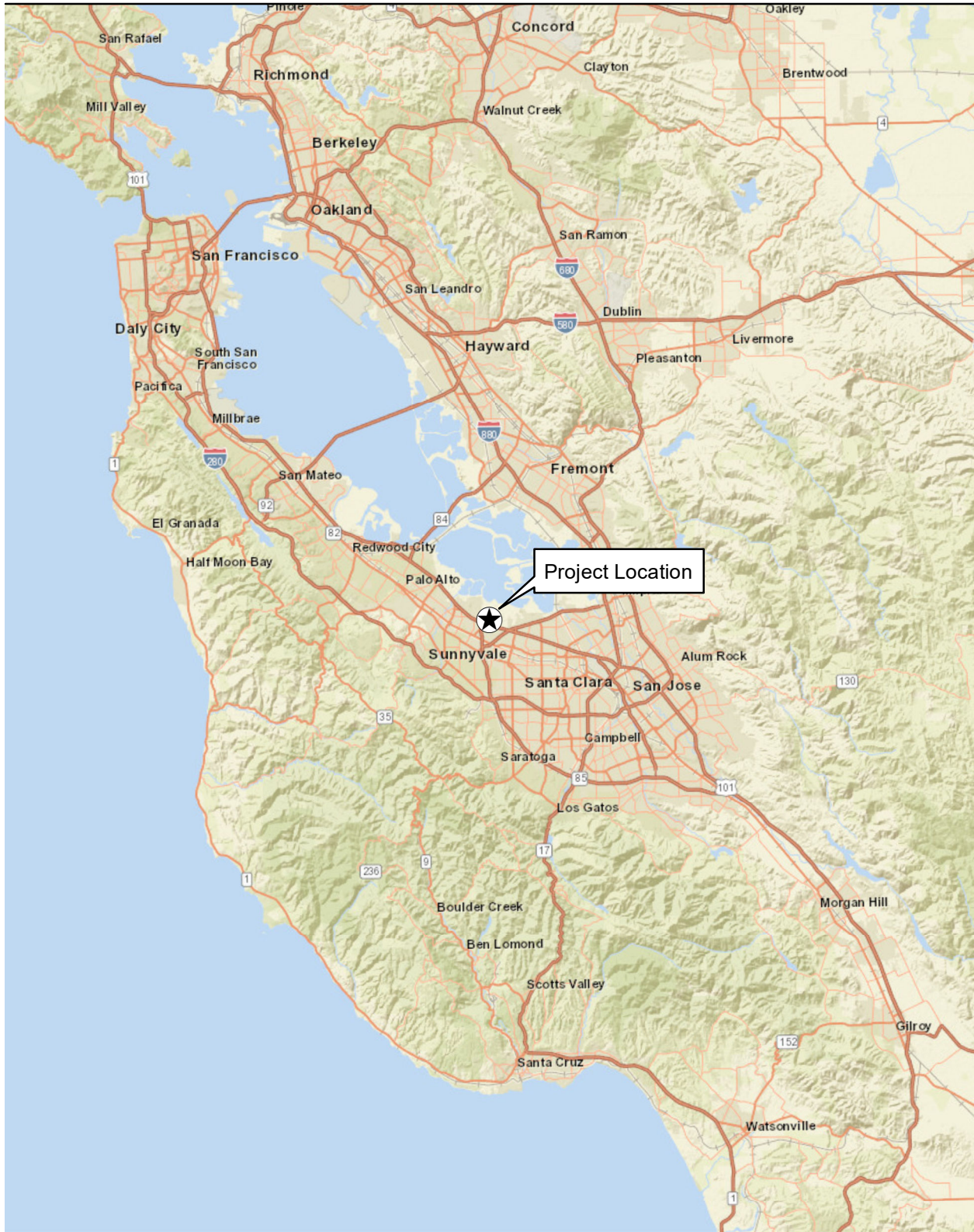
## Attachments

Appendix A: Figures 1–4 (Project Location, Project Site, APE, Archaeological Sensitivity)

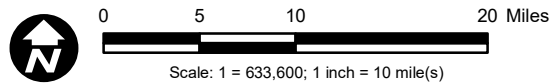
Appendix B: Building 6 SHPO Concurrence Letter



## APPENDIX A



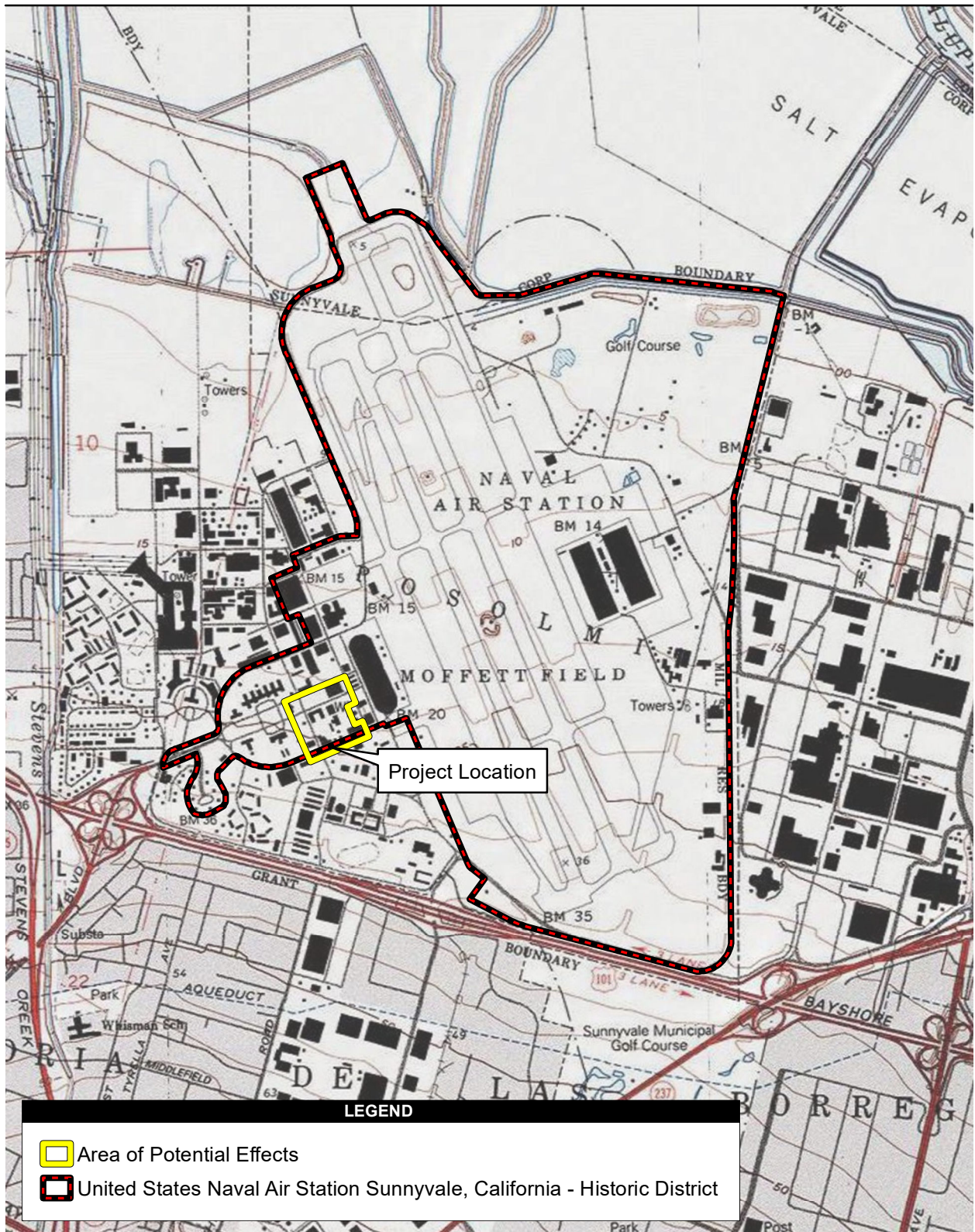
Source: ESRI, AECOM, NASA



**Figure 1**  
**Project Location**

Facility Security Level Upgrades Project





Source: ESRI, AECOM, NASA, National Geographic Society; USGS 7.5' Topographic Quadrangle: Mountain View



**Figure 2**  
**Project Site**

**Facility Security Level Upgrades Project**

Path: \\na.aecomnet.com\fs\AMER\SanDiego-USSDGI\DCS\Projects\NASA\900-CAD-GIS\02\_Maps\02\_Report\_Maps\Facility\_Security\_Level\_Upgrades\FacilitySecurityLevelUpgrades\_Figure02\_Topo.mxd, 5/29/2024, stevensona1

**The following content was redacted from this public posting:**

Figure 3: APE Map

Figure 4: Archaeological Sensitivity Map

## **APPENDIX B**



**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)

September 27, 2021

VIA Email

In reply, refer to: NASA\_2021\_0419\_001

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

Subject: USGS M2M Lab Building Project, Parcel 15, NASA Ames Research Center,  
Moffett Field, Santa Clara County, California

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the August 17, 2021, email and figures continuing 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 email, NASA submitted figures illustrating the construction and demolition included in the project.

As previously described, the proposed undertaking, involves construction of a new laboratory building of approximately 50,000 sq ft that will house a multidisciplinary group of programs and users. The project would remove the maintenance facility shed, alter Building 6 with the removal of additions to the structure while maintaining the original 1933 portion of the building, and leave Building 5 unaltered in place.

In response to NASA's initiation letter (dated April 13, 2021), the SHPO returned a letter dated June 4 requesting requested further information regarding several aspects of the undertaking. NASA responded with a second letter dated June 24, and the SHPO responded with an email dated August 17. The current NASA email and figures provides the most recent response to the SHPO's inquiries.

- NASA clarified that the project description *does* include precast driven piles, which would be driven approximately 50 feet below the ground surface.
- NASA revised the Area of Potential Effect (APE) as extending to a depth of 65

feet, the maximum depth of the piles.

- The SHPO's June 4 letter contained concerns regarding identification efforts, especially regarding evaluation efforts for Building 6. In particular, the SHPO finds it inappropriate to treat a portion of a building as eligible for listing in the National Register while treating additions to that building as ineligible and proposing demolition.
  - The response clarified that NASA evaluated Building 6 to update its eligibility for listing in the National Register of Historic Places (NRHP). It was previously identified as noncontributing to the NAS Sunnyvale Historic District in the 1994 NRHP nomination. The new evaluation provided an assessment of Building 6's historical significance and integrity, including an assessment of its additions, and concluded that Building 6 is eligible as a contributor to the NAS Sunnyvale Historic District, but that its additions either do not date to the period of significance or do not retain integrity.

Along with the June 24 letter, NASA provided an updated and revised technical report. After reviewing NASA's responses to comments and the revised report, the SHPO offered additional questions for clarification in the July 26 email, and NASA responded with the August 17 email.

- The SHPO asked NASA to clarify an error in the technical report by confirming that the NAS Sunnyvale Historic District's period of significance is 1930-1961.
  - NASA confirmed that this is correct.
- The SHPO asked NASA to confirm that the agency agrees with the technical report that Building 0006 is eligible as a contributor to the NAS Sunnyvale Historic District formally.
  - NASA responded that, based on the significance identified in the 2021 technical report, NASA has determined that Building 6 is not individually eligible for listing in the National Register, but is eligible as a contributor to the NAS Sunnyvale Historic District.
- The SHPO asked NASA to clarify the technical report's assertion that the 1947 extension of Building 006 is significant but does not retain integrity to express its historic significance. No specific integrity issues were described that would preclude this portion of Building 006 from contributing to its significance.

- NASA responded by pointing out that the portion of the 1944 addition to Building 006 that housed the engine test stand was removed when the ca. 1967 addition was constructed.
- The ca. 1947 extension represents a continuation of Building 006's motor/engine test function, which was an important activity at US NAS Sunnyvale during the original and expanded periods of significance. However, the loss of the engine test stand and modifications to fenestration and siding over the years have compromised the extension's ability to convey this historical function.
- NASA also restated the conclusion that the ca. 1967 northwest extension to Building 006 was constructed outside of the original and expanded periods of significance for the US NAS Sunnyvale Historic District, and as such does not support the historical significance of Building 006 as a contributing resource.
- The SHPO requested that NASA confirm that the scope of work had not changed to include full demolition of Building 006 as figure D-18 on page 57 of the revised technical report seemed to indicate.
  - NASA confirmed that the project description only includes partial demolition of Building 006 (the 1947 and 1967 additions).
- Finally, the SHPO stated that given the depth of ground disturbance, which seems likely to exceed previous disturbance, archaeological monitoring seems appropriate.
  - NASA responded that USGS has committed to archaeological monitoring during ground-disturbing activities.

Based upon these exchanges of requests and clarification, the SHPO offers the following comments.

- As stated in the SHPO's June 4 letter, this project qualifies as an undertaking with the potential to affect historic properties.
- After revision and clarification by NASA, the APE appears to be sufficient.
- After revision and clarification by NASA, identification and evaluations efforts are sufficient.
- The SHPO concurs that Building 006 is not individually eligible for listing in the

National Register.

- The SHPO also concurs that Building 006 contributes to the significance of the NAS Sunnyvale Historic District. The SHPO concurs that the two additions to the building do not contribute to its significance because one does not date to the period of significance and the other does not retain integrity.
- Based upon this information, the SHPO has no objection to the proposed Finding of No Adverse Effect for this undertaking.
- 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.
- Finally, the SHPO recommends that NASA make it clear in future consultations about evaluation statuses and what is being asked of the SHPO with regard to identification efforts. It would also be useful if NASA completed a formal update to the NAS Sunnyvale Historic District nomination to include the revised period of significance and contributors, which would eliminate the confusion other parties and consultants seem to have about these details about the historic district.

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