

National Aeronautics and Space Administration

**Ames Research Center**  
Moffett Field, California 94035



September 22, 2022

Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation Department of Parks & Recreation  
1725 23rd Street, Suite 100  
Sacramento, CA 85816

Attn: Mark A. Beason

Subject: Section 106 Consultation for the Building 19 First Floor Renovation Project, NASA Ames Research Center, Moffett Field, Santa Clara County, California

Dear Ms. Polanco:

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) requests initiation of consultation under Section 106 of the National Historic Preservation Act of 1966 (54 United States Code §306108), as amended, for the Building 19 First Floor Renovation Project (project or undertaking) at the NASA Ames Research Park at NASA ARC, Moffett Field, Santa Clara County, California. NASA ARC has determined that this project constitutes an undertaking under Section 106.

In support of its responsibilities under Section 106, NASA ARC retained AECOM Technical Services, Inc. to conduct a technical study for this project. The study was conducted by cultural resources professionals who meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738). Enclosed for your review is a Section 106 Technical Memorandum, dated September 22, 2022, which includes a more detailed description of the undertaking, the Area of Potential Effects (APE), identification efforts, and the affected historic properties, and concludes with an assessment of potential effects resulting from the undertaking, summarized below.

*Description of the Undertaking*

The project scope of work primarily includes remodeling interior first-floor office spaces in Building 19 for programs of the United States Geological Survey (USGS). The project will increase existing office spaces from 88 offices, three conference rooms, and a training room to approximately 190 workspaces consisting of enclosed offices and semi-enclosed work pods, seven conference rooms, and three open space areas. Alterations to Building 19 to prepare it for expanded occupancy will include partial demolition of existing office-related rooms, bathrooms, mechanical, electrical, and plumbing, and replacement with new walls, partitions, bathrooms,

mechanical, electrical, plumbing, lighting, and security upgrades. Additional interior preparation work will include abatement of materials, including asbestos insulation.

Limited exterior work will include new ramps and accessibility features at two entrances to Building 19 for compliance with the Americans with Disabilities Act (ADA), a storage-transfer lift, security card readers at exterior door entrances on the first floor, the addition of USGS-program antennae, and other mechanical and equipment, including modification of two sash windows in the rear elevations for mechanical ventilation.

For full project description, refer to the attached technical memo.

#### *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 on Shenandoah Plaza 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. The APE is defined as the limits of staging and construction for the undertaking and encompasses Shenandoah Plaza and the five major contributors surrounding the plaza: Building 17 (Administration Building), Building 19 (Bachelor Enlisted Quarters), Building 20 (Bachelor Officers Quarters), Building 23 (Instruction Building/ Dispensary), and Building 25 (Administration and Auditorium Building/Theater) (see attached technical memo, Attachment A; Figure 3). The majority of the work will occur inside Building 19, and exterior alterations will be limited. Therefore, it is unlikely that this undertaking will have indirect effects on other significant buildings or resources within direct view of Building 19 but outside of Shenandoah Plaza, which is the core of the historic district's significance related to its Spanish Colonial Revival architecture.

#### *Affected Historic Properties*

Buildings 17, 19, 20, 23, and 25 are listed in the National Register of Historic Places (NRHP) as contributors to the NAS Sunnyvale Historic District and are significant for their Spanish Colonial Revival architecture. Only Building 19 would be physically affected by the project. According to the 1994 NRHP nomination for the NAS Sunnyvale Historic District, the interior of Building 19 does not retain integrity and does not contribute to the historic property.

#### *Effects Assessment*

The majority of the work will occur inside Building 19, and exterior alterations will be limited to the installation of an ADA-compliant ramps and entrances, security card readers and cameras, mechanical equipment, and antennae. The project activities are anticipated to alter character-defining features of Building 19, including the cement plaster surface of the exterior walls, certain double-hung metal sash windows, metal glazed exterior doors, lighting fixtures, and the arcaded loggia at the façade. The project activities were assessed and will adhere to the Secretary of the Interior's Standards for Rehabilitation.

Aside from alterations to Building 19, no other contributors to the NAS Sunnyvale Historic District within the APE will be physically impacted by this project. The only noticeable visual change to the setting of the district and the other contributors in the APE caused by the introduction of the ADA-compliant ramps and security measures would not be of a scale that

could diminish the integrity of significant historic features. No effects on Buildings 17, 20, 23, and 25 or the district as a whole are anticipated.

The criteria of adverse effect were applied to historic properties in the APE and unanticipated archaeological historic properties that may be present in the APE. 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.

*Finding of Effect*

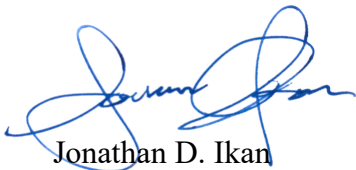
Based on the assessment conducted by qualified cultural resources professionals, NASA ARC has made a finding that the undertaking will result in No Adverse Effect.

*Consultation Efforts*

NASA ARC has not identified additional consulting parties for this Section 106 review but is making these findings available to the public via the NASA ARC Historic Preservation Office website (<https://historicproperties.arc.nasa.gov/section106.html>).

NASA ARC requests the State Historic Preservation Officer's concurrence on NASA's finding of No Adverse Effect for this undertaking pursuant to 36 CFR 800.5(b). Please provide a response within 30 days of receipt of this letter, as specified in 36 CFR 800.5(c).

Please feel free to contact me at [Jonathan.D.Ikan@nasa.gov](mailto:Jonathan.D.Ikan@nasa.gov) or (650) 604-6859 if you have any questions regarding this matter.



Jonathan D. Ikan

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Cc:

Dr. Rebecca Klein, NASA Deputy FPO Environmental Management Division NASA  
Headquarters  
300 E Street, SW Washington, DC 20546-0001

Enclosure: *Section 106 Technical Memorandum for the Building 19 First Floor Renovation Project*. Prepared by AECOM, dated September 22, 2022.