June 3, 2022

VIA Email

In reply, refer to: NASA_2022_0420_001

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

Subject: Building 20 Rehabilitation Project at Ames Research Center, Moffett Field, Santa Clara County, California

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the April 19, 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 project maps and a memorandum dated April 19, 2022, prepared by AECOM that provides Section 106 consultation information.

NASA proposes to rehabilitate Building 20, a vacant former dormitory, for use with a mix of dormitory and office space. The project includes abatement measures to remove asbestos insulation and tile and lead paint, including lead paint on windows. Alterations to Building 20 to prepare it for occupancy include primarily interior mechanical, electrical, security, control, and plumbing upgrades; renovated bathrooms; and privacy enhancements between dorm rooms. Limited exterior work will include new or modified utility connections, mechanical and electrical equipment replacement, new Americans with Disabilities Act (ADA)-compliant ramps and entrances, and repair or limited in-kind replacement of windows.

NASA identified the Area of Potential Effects (APE) for the undertaking that includes limits of staging and construction for the undertaking and encompasses Shenandoah Plaza and the five major contributors surrounding the plaza, as well as Buildings 21 and 22, which are located south and directly behind Building 20. Below-grade activities are limited to the excavation areas for the project with a vertical APE of up to 5 deep for installation of the new fire department connection line and potential new HVAC connection.
NASA identified Building 20 (constructed in 1933) as a contributor to the NAS Sunnyvale National Historic Register District. Based upon the 2017 AECOM archaeological 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.

NASA determined the undertaking would not adversely affect Building 20, finding that the proposed work meets the Secretary of the Interior’s Standards for the Treatment of Historic Properties. NASA also found that the work would not adversely affect the other nearby contributors to the historic district. 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.
- 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.

Sincerely,

Julianne Polanco
State Historic Preservation Officer