



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

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October 10, 2023

VIA Email

In reply, refer to: NASA\_2022\_0923\_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 September 6, 2023, letter 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 letter, NASA submitted a supplemental Section 106 review memorandum prepared by AECOM and dated September 6, 2023.

As previously described, NASA proposes to rehabilitate Building 20, a vacant former dormitory, for use with a mix of dormitory and office space. In addition to the original scope of work, NASA added include security and HVAC improvements, including installation of [REDACTED] security cameras, [REDACTED] card readers [REDACTED], and two HVAC condensers in the courtyard between the south and west wings at the rear of the building.

NASA did not alter the Area of Potential Effects (APE) for the undertaking. Building 20 (constructed in 1933) is 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 Rehabilitation. NASA also found that the work would not adversely affect the other nearby contributors

to the historic district. The additional work will occur inside and outside Building 20, [REDACTED]

[REDACTED]. NASA does not anticipate that the project activities will alter character-defining features of Building 20. The security cameras and card readers will be installed in a manner that will not require the removal of distinctive materials and will be reversible. The condenser units will be installed at the rear of the building.

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 still qualifies as an undertaking with the potential to affect historic properties.
- The APE remains 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 revised undertaking.
- Under certain circumstances, such as an 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](mailto:mark.beason@parks.ca.gov)

Sincerely,



Julianne Polanco  
State Historic Preservation Officer