



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

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In reply, reference to: NASA_2018_0306_001

Mr. Jonathan Ikan
Historic Preservation Officer
Facilities Engineering Branch
NASA Ames Research Center
Mail Stop 213-8
Moffett Field, CA 94035

Subject: Accessibility Improvements and HVAC Upgrades, Building 158, NASA Ames Research Center, Santa Clara County, CA

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the February 28, 2018, letter initiating consultation regarding an undertaking at NASA Ames Research Center (ARC). NASA is consulting with the State Historic Preservation Officer (SHPO) in order 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 your letter, NASA submitted an undated report entitled "Building 158 Renovations Project, Section 106 Technical Report" prepared by Page & Turnbull and dated March 2018.

The proposed undertaking, as described, involves construction of accessibility upgrades at the primary entrance and publicly accessible interior spaces and improvements to existing HVAC equipment at Building 158. NASA intends to construct a U-shaped accessibility ramp at the primary (west) entrance within an existing landscaped space south of and adjacent to the existing primary concrete walkway and stairs. The south third of the concrete entry stairs will be demolished and replaced with a new concrete base and landing for the ramp. The new landing will be directly aligned with the existing sidelite of the main entrance and will not obstruct the pathway leading to the center portion of the stair and main entry door. No alterations to the building's envelope will result from construction of the ramp. Non-contributing site features (trash receptacle and ash disposal) will be relocated to new locations. Existing plantings that contribute to the building's significance will be trimmed back to accommodate ramp construction and "those that are in line with the proposed structure's footprint will be removed."

NASA plans to upgrade an existing unisex restroom on the first floor by removing existing interior features (except for the floor tile) and reinstalling them to meet water

efficiency and accessibility standards. The door will be removed and rehung to swing the opposite way and new lever-style hardware will be installed.

Finally, NASA proposes HVAC upgrades that will replace 26 existing window-mounted air conditioning units at the west and east facades; install nine new window units; remove one unit without replacement; install two new condenser units on the east side of the building; install convection wall heaters in select rooms; and abandon the existing steam boiler in place and cap all associated utility connections.

Replacement window air conditioning units will be approximately two inches taller, six inches wider, and six inches longer than the existing units. Installation of these window units in the first floor windows will require removal of existing window putty and steel support plates to accommodate the larger size, as well as new angles and steel support plates. The windows on the second floor are smaller and installation will require cutting through the metal window frame to the concrete header, removal of window putty and existing steel support plates, and installation of new angles and steel support plates. Installation on both floors will align with the top portion of the frame, leaving the bottom lites of the windows operable and unaffected.

NASA defined an Area of Potential Effect (APE) for this undertaking that encompasses an area with a 1,000-foot radius from the center of Building 158. The vertical APE extends approximately 20 inches to account for the accessible ramp footings and grading.

No known archaeological sites are located in the vicinity and the area was classified as having low archaeological sensitivity in the 2017 Archaeological Resources Study (previously submitted to and reviewed and approved by the SHPO).

NASA identified Building 158 (constructed in 1954) as a contributor to the NAS Sunnyvale National Historic Register District as part of a 2013 evaluation that proposed an expansion of the district boundary to include Moffett Federal Airfield and modification of the period of significance to 1930 to 1960. According to the Section 106 Technical Report submitted for this undertaking, NASA has not obtained formal SHPO concurrence on this determination of eligibility, so it intends to assume eligibility under Criterion A (which is the same as the district) and the expanded period of significance. The technical report also identified character defining features for Building 158, which include the following that the undertaking would affect: original window patterns; three-lite windows with central awning lite arranged individually or in ribbons of two or three; ribbons of windows on the second story of the east façade; protruding window sills with lower drip edge; and low lying shrubs and lawns at the west façade.

As described and supported by the technical report, NASA applied the criteria for

adverse effect to this undertaking and proposed a Finding of No Adverse Effect for the following reasons:

- First floor restroom: None of the finishes in the first floor restroom is historic or contributing to the building's significance. The restroom is a secondary space and has been modified over time.
- Window air conditioners and wall heaters, interior effects: Installation of window air conditioners and wall heaters will occur within secondary interior spaces (offices) that do not contribute to the building's significance.
- Accessibility ramp:
 - The landscaped area where the ramp will be installed is of secondary significance.
 - The majority of the shrubs and turfed area will remain in their existing condition.
 - The ramp will be set away from the building's façade.
 - Selective demolition of the southern portion of the stairs is unavoidable, but two-thirds of the historic stairs will remain.
 - The ramp will not affect the historic entry progression.
 - Placement, height, and use of rolled metal and cable guardrails will not obstruct character-defining portions of Building 158 from view and will be compatible but differentiated from the building's design.
 - If the ramp were removed in the future, the southern portion of the stair could be reconstructed to match the existing portions in-kind.
- Window air conditioning units and window frames, exterior effects:
 - The character of the windows will be retained in spite of the removal of material, which will be limited to the dimensions of the proposed units.
 - The majority of the frames will remain in their existing condition and all operable portions of the windows will remain operable.
 - Regarding the increase in size for the new air conditioning units, "The slight change in depth will not detract from the building's historical qualities to a point where it no longer retains character..."

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 appears to be sufficient to take effects of the undertaking into account.

- Identification and evaluation efforts appear to be sufficient.
- Based upon the information submitted, the SHPO has no objection to the proposed Finding of No Adverse Effect for this undertaking.
- Please note that the Section 106 Technical Report contained some questionable analysis of effects. In particular, the quotation noted above states that the changes to the building are not adverse because they will not affect the building “to a point where it no longer retains character.”
 - The regulatory criteria for adverse effects under Section 106, as described at 36 CFR 800.5(a)(1), are based upon the undertaking *altering* the property’s characteristics “in a manner that would *diminish* the integrity,” rather than in a manner that *eliminates* the property’s integrity or character. Fortunately, the analysis in other portions of the Technical Report properly address alteration and diminishment of integrity and character.
- 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.

Thank you for considering historic properties in your project planning efforts. If you have any questions or concerns, please contact Mark Beason, State Historian, at (916) 445-4047 or mark.beason@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer