



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

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In reply, refer to: NASA_2018_0621_001

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

Subject: Seismic Retrofit and Rehabilitation of Building 2, NASA Ames Research Center, Santa Clara County, CA

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the June 19, 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. The letter submitted documentation intended to address all four steps of the Section 106 process.

Along with the letter, NASA submitted the following documents:

- Memorandum from Trina Meiser, Senior Architectural Historian for AECOM, dated June 19, 2018, which included:
 - Draft report for reuse guidelines prepared by Architectural Resources Group (ARG) in January 2004
 - Architectural drawings for the proposed work
- Draft Memorandum of Agreement dated June 19, 2018

The proposed undertaking, as described, involves seismic retrofit and rehabilitation of Building 2 to accommodate a future lease for use as either a research or a recreation facility. Specific components of the undertaking as described in the letter and AECOM memo include:

- Demolition of the east addition, including all structural and foundation elements;
- Demolition of the west addition, including all structural and foundation elements;
- Demolition of associated Building 480, including all structural and foundation elements;

- Patch and repair areas where east and west additions will be removed to match surrounding historic profiles and materials;
- Identify original stucco colors and repaint entire building to match those colors;
- “Refurbish” historic windows and doors, including replacing non-historic and deteriorated windows and doors to match historic windows and doors;
- Replace all glazing in windows and doors throughout the building;
- Brace and strengthen the building’s structure with additional support, modified steel truss members, strut-ties, and shear connections;
- Repair and enhance concrete spandrels above exit routes using bonded glass fiber-reinforced polymer sheets and containment steel plates;
- Repair cracks in concrete spandrels (90% of building spandrels) using epoxy injection methods that will be determined by additional structural analysis;
- Remove interior basketball court flooring, hoops, backboards, and other apparatuses;
- Remove and replace existing landscaping, planting, irrigation systems, and soil to a maximum depth of 12 inches;
- Adjust grading for improved drainage;
- Install fill for planting that will be level with adjacent grade; and
- Remove and replace concrete walkways, pedestrian crossings; paving, striping, curbs, and other related hardscape furnishings.

NASA defined an Area of Potential Effect (APE) for this undertaking that encompasses Building 2 and its additions, Building 480, surrounding areas that will be disturbed, adjacent buildings on the south side of Bushnell Road with direct view of the project activities (Buildings 12 and 29), and extending to a maximum depth of five feet where storm drains and other lines will be installed below grade.

The National Register nomination for the NAS Sunnyvale Historic District did not identify Building 12 and 29 as contributors, but Building 2, including the two wings proposed for demolition, is a contributor. The nomination is silent about Building 480, which the AECOM memo notes was constructed sometime before 1983. The nomination also states that interior spaces within the historic district (which is significant under Criteria A and C) do not contribute to the district’s significance. However, the ARG report from 2004 defines the character defining features of Building 2, including interior features such as the basketball court and related recreation features proposed for removal. NASA has not submitted the ARG report to the SHPO for concurrence prior to this consultation.

The AECOM report also noted that the project area has not been subject to previous archaeological survey, so a survey was conducted on May 8, 2018, that did not identify any cultural resources in unpaved areas.

NASA applied the criteria for adverse effect to the undertaking and find it will adversely affect Building 2 because of the removal of the east and west wings. NASA's analysis concluded that all the other work would meet the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Based upon this analysis, NASA requests concurrence with a Finding of Adverse Effect and submitted a draft Memorandum of Agreement (MOA) to resolve the adverse effect. The only mitigation measure included in the MOA is archival documentation of the building prior to commencement of construction activities that will include sketch plans, digital photography, and a written historic narrative of the building using the short form Historic American Building Survey (HABS) format. NASA proposes to submit the documentation to the SHPO and any other consulting parties and to make it available to the public on the NASA ARC website.

After reviewing the information submitted, the SHPO offers the following comments.

- This project qualifies as an undertaking with the potential to affect historic properties.
- In response to this letter, please provide more information regarding the following components of the undertaking:
 - Describe is the typical condition of the spandrels where the epoxy treatment is proposed. In some cases where cracks in concrete are extensive and wide, the epoxy treatment might not be an appropriate long-term solution.
 - Provide the reason for removal and replacement of window and door glazing throughout the building.
 - Provide a description for the proposed interior finishes after demolition and construction work and how it will compare to the existing finishes.
- The APE appears to be sufficient to take direct effects of the undertaking into account.
 - However, as Building 2 is a contributor to the NAS Sunnyvale Historic District, it would be appropriate to expand the APE to include the district's boundaries.
 - At the least, the APE should include the buildings north, northeast, and northwest of Building 2 across Bushnell Road to account for visual effects.
- While the status of Buildings 2, 12, and 29 are clear, identification and evaluation efforts are not sufficient as presented. Please provide further information regarding the following resources.

- Clarify the National Register status for Building 480 and the buildings to the north, northeast, and northwest of Building 2 across Bushnell Road.
 - Clarify the National Register status of landscaping and hardscaping around Building 2, including plantings, pathways, and curbs.
 - Clarify if NASA supports the ARG list of character defining features for Building 2. Many of the features on the list are proposed for removal and need to be accounted for in the assessment of effect.
- While the removal of the east and west wings of Building 2 would constitute adverse effects, at this time, the SHPO has insufficient information to offer formal concurrence with the proposed Finding of Adverse Effect. Please provide the information requested above, as well as the following:
 - Clarify why NASA finds the proposed seismic retrofit would not adversely affect Building 2.
 - Once the character defining features of Building 2 have been clarified and agreed upon, the assessment of effect may need to be revisited to account for removal of other features such as the basketball court.
 - Please note that review of an MOA to resolve adverse effects resulting from this undertaking will likely require multiple reviews prior to execution.
 - In addition, the SHPO encourages federal agencies to include creative mitigation measures with a clear public benefit. Typically, archival documentation alone is not a sufficient mitigation measure to resolve adverse effects.

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