



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

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March 1, 2024

VIA Email

In reply, refer to: NASA_2024_0125_001

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

Subject: Moffett Federal Airfield (MFA) 115kV Main Substation Refurbishment Project,
NASA Ames Research Center, Moffett Field, Santa Clara County, California

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the January 25, 2024, 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 a memorandum containing Section 106 analysis prepared by AECOM and dated January 25, 2024.

The proposed undertaking, as described, involves NASA making improvements to the 115kV Main Substation (Building 591). Work would consist of replacing the existing 115kV breaker and adding redundancy/resiliency with a second breaker to prevent disturbance to these critical facilities. The project will install new concrete footings, a concrete slab, and a duct bank, which will require ground disturbance and modification of the existing substation yard.

NASA identified an Area of Potential Effects (APE) for the undertaking that encompasses the 115kV Main Substation complex. The vertical APE extends approximately 3' maximum depth for duct banks and 6' for new concrete slabs and footings. The current substation is supported on a grid of drilled piers that extend to a depth of 12' below grade.

No previously recorded archaeological resources are documented within or adjacent to the APE for this undertaking. A 2017 ARC study identified areas of near-surface historical and precontact archaeological sensitivity based on the locations of documented archaeological sites and features on historical maps. The

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geoarchaeological assessment, which included a review of soils maps and prior geoarchaeological studies in the vicinity, concluded that there is low potential for more deeply buried precontact archaeological resources.

The 115kV Main Substation (Building 591), constructed in 1985, is not a contributor to the NAS Sunnyvale Historic District and is not individually eligible for listing in the NRHP.

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 for this consultation.
- The SHPO has no objection to the proposed Finding of No Adverse Effect.
- 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