January 14, 2021

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
Department of Parks & Recreation
1725 23rd Street, Suite 100
Sacramento, CA 95816
Attn: Mr. Mark Beason

Subject: Section 106 Consultation for Moffett Helitack Support and Barracks Trailers Project at Ames Research Center, Moffett Field, Santa Clara County, California

Dear Ms. Polanco:

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) requests Section 106 consultation on the Moffett Helitack Support and Barracks Trailers Project (project or undertaking) at ARC, Moffett Field, Santa Clara County, California. The California Department of Forestry and Fire Protection (CAL FIRE) proposes to install four modular buildings—two helicopter crew support buildings (support trailers) and two barracks-type modular buildings (barracks trailers)—at two separate locations at ARC.

NASA ARC has determined that this project constitutes an undertaking under Section 106 of the National Historic Preservation Act of 1966 (54 United States Code §306108), as amended. In support of its responsibilities under Section 106, NASA ARC is providing a description of the undertaking, the Area of Potential Effects (APE), identification efforts, a description of the affected historic properties, and an assessment of potential effects resulting from the undertaking for your review. Enclosed is the Cultural Resources Technical Report, Moffett Helitack Project, Installation of Support and Barracks Trailers by CAL FIRE (Mikesell Historical Consulting 2020) with additional information for your review.
Project Location

The project location for the support trailers is on the Ames Campus, northeast of the intersection of Warner Road and Mark Avenue and adjacent to the NASA Ames Wind Tunnel Historic District, which is listed in the National Register of Historic Places (NRHP). The project location for the barracks trailers is in the NASA Research Park along McCord Avenue and between North Akron and Bushnell Streets within the Naval Air Station (NAS) Sunnyvale Historic District, which is also listed in the NRHP. See figures in the enclosed report, Attachment 1 – Area of Potential Effects Map (APE Map) and Attachment 2 – Sheets A2 and A4.

Description of the Undertaking

The proposed undertaking consists of the installation of four prefabricated, modular trailers: two support trailers between Buildings N211 and N240 on the Ames Campus, in the same location as two existing temporary modular buildings, Buildings T6C and T6D, which will be removed; and two barracks trailers between Buildings 13 and 37 in the NASA Research Park. The trailers are anticipated to remain at this location for approximately 10 years. However, these trailers will need to be easily removed since the land lease will have a 30-day lease termination agreement.

The first support trailer will be 24 ft. x 60 ft. and 14 ft. high with a flat roof and will house offices. The second support trailer will be 35 ft. x 60 ft. and 14 ft. high with a flat roof and will house a training room, kitchen, laundry, and bathroom. Both barracks trailers will be 27 ft.-8 in. x 68 ft. and 14 ft. high with a flat roof. See enclosed report, Attachment 2 – Exhibit A for conceptual design plans and elevations.

The foundation system for the trailers will use a pier and ground anchor support system. The manufactured steel piers will be placed on pads that will be placed on top of the existing asphaltic concrete to support the dead load of the structures. Auger-type ground anchors will be used along the perimeter of the structures to resist uplift and overturning forces. Steel straps will be wrapped around the chassis beams and fastened to ground anchors. Therefore, excavating for the foundation of each trailer is not anticipated.

The trailers will require connections to existing utilities, both above and below grade. It is anticipated that existing pavement will be removed for the underground utilities, including limited trenching to remove and replace existing pipes and to install a new concrete vault for an electrical switch and new conduit.

Area of Potential Effects

The APE is defined to address both direct and indirect impacts on potential historic properties and encompasses areas that may be affected by both temporary and permanent construction activities (see enclosed report, Attachment 1 – APE Map). For archaeological resources, the APE is limited to the direct impact portion of the APE, or the Area of Direct Impacts (ADI), and
includes the limits of the project area, including areas of temporary staging and construction
ground disturbance. The APE for construction of the new building extends to a vertical depth of
2 to 5 ft. below surface for utility work. Above-ground activities include temporary staging,
which is unlikely to have indirect impacts on historic properties, and installation of the four
trailers, which have the potential to create visible, auditory, or atmospheric changes in the
settings of adjacent historic properties; therefore, the APE includes the first tier of buildings
adjacent to the project’s footprint.

Identification Efforts

CAL FIRE retained Stephen Mikesell of Mikesell Historical Consulting and Benjamin Harris,
M.A., Associate State Archaeologist for CAL FIRE to conduct a cultural resources investigation
and effects assessment for the project. The study was conducted by cultural resources
professionals who meet the Secretary of the Interior’s Professional Qualifications Standards (48
Federal Register 44738).

The APE has been previously surveyed for archaeological and architectural resources, and
architectural resources have been previously evaluated for NRHP eligibility. Previous studies
were reviewed to identify potential historic properties. For more details on the study’s
methodology, please see the enclosed report.

Archaeological Resources

No previously recorded archaeological cultural resources are present within the ADI for the
support and barrack trailers, and no unrecorded cultural resources were identified during the field
review/inspection. The nearest previously recorded archaeological resources are approximately
2,000 ft. south and east of the ADI for the barracks trailers. In review of the archival analysis
provided in the previous *NASA Ames Research Center Archaeological Resources Study*
(prepared by AECOM in 2017), the ADI falls within areas documented as having low sensitivity
for historic-era cultural resources, near surface prehistoric cultural resources and buried
prehistoric cultural resources. The ADI for the support and barrack trailers is in a “Low
Archaeological Sensitivity” zone. Due to the nature of the undertaking, negative field review and
background research findings, and a low potential for encountering buried cultural resources, the
undertaking has no potential to affect archaeological resources.

Architectural Resources

The APE for the support trailers includes the project site on the Ames Campus with existing
temporary Buildings T6-C and T6-D (trailers), the staging area, and Buildings N240 and N240A.
The APE does not overlap with the NASA Ames Wind Tunnel Historic District, which is at a
distance over 250 ft. across McCord Avenue. Building N240 (built 1965) and Building N240A
(built 1982) were previously evaluated for NRHP eligibility in the *Reconnaissance Survey of
NASA and NASA Buildings* (prepared by Page & Turnbull in 2005). Both buildings were
evaluated as “non-contributing” to a potential historic district and not individually eligible for listing in the NRHP. Department of Parks and Recreation (DPR) 523 forms were prepared for the buildings (see enclosed DPR 523 forms).

The APE for the barracks trailers is within the NAS Sunnyvale Historic District and includes the project site between Buildings 13 and 37; the staging area; and Buildings 12, 13, 14, 18, 19, 37, and 569. Buildings 18 and 19 are listed in the NRHP as contributors to the district. The other five buildings are non-contributing and were previously evaluated as not eligible for individual listing in the NRHP.

Previously evaluated buildings in the APE have had few alterations since previously recorded, and their significance and integrity remain the same.

Affected Historic Properties

The APE for the barracks trailers is within the NAS Sunnyvale Historic District (NR#9400045). The entire district is considered as a historic property in the APE; however, due to the scale and location of the proposed barracks trailers, two contributors consisting of Buildings 18 and 19 were specifically assessed for potential effects because of their proximity to the project site (see enclosed report for additional historic property details and photos on pages 9 and 10).

Effects Assessment

There are no known archaeological sites in the APE. The proposed work is not within any identified sensitive archaeological zones and would occur in previously disturbed areas with low potential for deeply buried prehistoric sites. Therefore, no effects on archaeological resources would occur as none are present in the APE. Should the project uncover previously unknown subsurface archaeological resources, contractors will immediately halt construction, secure the site, and notify NASA of the unanticipated discovery. NASA will follow the Standard Operating Procedure for unanticipated discoveries as outlined in the Integrated Cultural Resources Management Plan for ARC. With the exception of the potential to affect unknown subsurface archaeological resources, the project is not anticipated to have any direct effects on historic properties.

The project has the potential for indirect effects through visual and contextual changes that may alter the setting of the NAS Sunnyvale Historic District, particularly in relation to two of its contributors: Buildings 18 and 19. The assessment in the enclosed report concluded that the project would have minimal impact on the ability of the district or adjacent contributors to convey their historical and architectural associations that make them eligible for the NRHP and that the project would be consistent with the Secretary of the Interior’s Standards.

In summary, the proposed undertaking would not alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the NRHP. Furthermore, no
archaeological resources that may qualify as historic properties are known to exist in the APE, and the potential for unanticipated archaeological resources within the heavily disturbed vertical APE is low.

Determination of Effect

Based on the assessment conducted by qualified cultural resources professionals, NASA ARC has made a finding that the undertaking would have no adverse effects on historic properties pursuant to 36 Code of Federal Regulations (CFR) § 800.5(b).

Consultation Efforts

No Federally Recognized Tribes are associated with the geographical boundaries of NASA ARC or this undertaking. As part of the previous archaeological study of the entire ARC property, NASA Ames Research Center Archaeological Resources Study (prepared by AECOM in 2017), a Sacred Lands File search and a list of Native American tribes and representatives with a known interest in the area were requested from the Native American Heritage Commission (NAHC). The NAHC responded on April 27, 2016, indicating that the Sacred Lands File search was negative and providing a list of non-federally recognized Native American representatives who may have additional information regarding cultural resources in the vicinity of the ARC property. Since then, NASA ARC has consulted with these representatives on undertakings that have had the potential to affect cultural resources at known sites and in areas with high sensitivity for prehistoric archaeological resources. These representatives have not provided any additional information regarding known sacred lands or previously undocumented archaeological resources. Due to the highly disturbed nature of the current project site and the low sensitivity for prehistoric archaeological resources, NASA ARC has not consulted with the non-federally recognized Native American representatives on this undertaking. In the event that an inadvertent discovery of prehistoric archaeological resources or human remains of Native American origin are encountered, NASA ARC will consult with these representatives.

NASA ARC has not identified additional consulting parties for this Section 106 review but is making these findings available to the public via the NASA ARC Historic Preservation Office website (https://historicproperties.arc.nasa.gov/section106.html).

Pursuant to 36 CFR § 800.5(b), NASA ARC requests the State Historic Preservation Officer’s concurrence on its finding of No Adverse Effect for this undertaking. Please provide a response within 30 days of receipt of this letter, as specified in 36 CFR 800.5(c).

Please contact me at jonathan.d.ikan@nasa.gov or at (650) 604-6859 with your comments or questions.
Sincerely,

Jonathan Ikan
Center Cultural Resources Manager

Ames Research Center, MS 213-8
Moffett Field, California 94035

cc:
HQ/EMD/Dr. Rebecca Klein, Ph.D., RPA

Enclosures

DPR 523 Forms