

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

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Reply In Reference To: USAF_2017_0830_001

Andrew Ferguson, Lt Col, CA ANG
Commander, 129 Mission Support Group
Department of the Air Force
Headquarters 129th Rescue Wing (ACC)
Moffett Air National Guard Base, CA

Re: Section 106 Consultation for Construction of Facilities, 129th Rescue Wing
Cantonment Area, Moffett Air National Guard Base, Moffett Federal Airfield, Santa Clara
County

Dear Lt Col Ferguson:

In compliance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800, the California Air National Guard (CA ANG) is initiating consultation with the State Historic Preservation Officer (SHPO). The project area is permitted to the United States Air Force on behalf of CA ANG by the National Aeronautics and Space Administration Ames Research Center (NASA ARC). NASA ARC has delegated consultation authority to the CA ANG, however NASA ARC remains responsible for CA ANG's section 106 determinations and findings for this consultation.

In order to consolidate mission activities, CA ANG is proposing to construct permanent facilities within the 110 acre 129th Rescue Wing Cantonment Area at Moffett Air National Guard Base. Proposed activities include construction of a vehicle maintenance facility, a backup south gate, three composite buildings, an equipment warehouse, a munitions storage area, utilities, parking, landscaping and the demolition of the following ten buildings constructed between 1943 and 1981: 651, 654, 655, 656, 657, 658, 659, 660, 661 and 669. Ground disturbance to a maximum depth of 8 feet will be required.

After evaluating nine of the ten buildings being proposed for demolition using National Register of Historic Places (NRHP) criteria, CA ANG determined that they do not meet NRHP eligibility requirements. The remaining building, identified as Building 651, was previously determined not eligible for NRHP inclusion through consensus with the SHPO. An archeological assessment of the project area confirmed the presence of four prehistoric sites within the APE. Of the four sites, CA-SCL-20 and CA-SCL-12/H are within the proposed backup south gate and vehicle maintenance facility areas and were subject to subsurface investigations, the

results of which were included in the CA ANG's supporting documentation for review (AECOM:2017).

The project area is located within the NAS Sunnyvale Historic District. Upon applying the criteria of adverse effect, CA ANG determined that "the undertaking's impact would result in No Adverse Effect due to its minimal impact on the ability of the NAS Sunnyvale Historic District to convey its historical associations that make it eligible for the NRHP." After reviewing the information provided by CA ANG in support of their finding of no adverse effect, the SHPO has the following comments:

- 1) Pursuant to 36 CFR Part 800.4(a)(1), the APE, defined as the entirety of the NAS Sunnyvale Historic District, appears sufficient to take the undertaking's effects on historic properties into account.
- 2) The SHPO concurs with the determination that Buildings 654, 655, 656, 657, 658, 659, 660, 661 and 669 do not meet NRHP eligibility requirements.
- 3) CA ANG's documentation explains that "the new construction will have a design aesthetic and material palette that is related to existing aviation-related buildings surrounding the airfield, and will be of an appropriate scale that does not detract for the visual dominance of Hangars 1, 2 and 3." (Page and Turnbull: 2017). The analysis of Rehabilitation Standard 9 provided by CA ANG is a useful narrative however the SHPO requests photographs of the buildings referenced as "surrounding the airfield" and representative renderings of proposed new construction accompanied by a comparative analysis of current and proposed materials and scale to supplement the analysis.
- 4) The SHPO requests documentation confirming CA ANG's public and Native American notification and consultation efforts.
- 5) The AECOM archaeological report states "the undertaking is not anticipated to have any adverse effects on historic properties, with the exception of the potential to affect unknown subsurface archaeological resources (the likelihood of which is anticipated to be low, based on analysis presented in AECOM 2017a)." However, the report pertains only to the proposed backup south gate and vehicle maintenance facility areas but not the remainder of the project area. While identification efforts appear reasonable for the two aforementioned locations, the SHPO requests justification as to why the remainder of the project area was not subject to a similar level of effort, especially as CA-SCL-14 was recorded as being at the northwestern edge of the proposed areas of work. To that end, the SHPO requests analysis of how proposed ground disturbing activities in this area may impact information-bearing archaeological deposits associated with CA-SCL-14.

- 6) The SHPO requests additional information regarding CA ANG's approach to ensuring their compliance with CFR Part 800.13(b).
- 7) The SHPO cannot concur with CA ANG's finding of no adverse effect to historic properties pursuant to 36 CFR Part 800.5 (d)(1) at this time but looks forward to receiving the information requested this letter in the interest of continuing this consultation.

If there are any questions or concerns, please contact SHPO Historian Ed Carroll at (916) 445-7006 or Ed.Carroll@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer