



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 129TH RESCUE WING (ACC)
MOFFETT AIR NATIONAL GUARD BASE CALIFORNIA



25 Aug 2018

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

FROM: 129 Rescue Wing, Moffett Air National Guard Base, California

SUBJECT: Section 106 Consultation for California Air National Guard Facilities Relocation and
Improvements at 129th Rescue Wing Cantonment Area, Moffett Air National Guard
Base (ANGB), Moffett Federal Airfield, Santa Clara County, California

1. The California Air National Guard (CA ANG) proposes to construct new facilities at its 111-acre 129th Rescue Wing (RQW) cantonment area located at Moffett ANGB at Moffett Federal Airfield, Santa Clara County, California (Attachment A, Figures 1 and 2). The cantonment area is permitted by the National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) to the U.S. Air Force on behalf of CA ANG. NASA ARC and the 129th RQW have agreed that CA ANG will serve as the lead Federal agency pursuant to 36 C.F.R. § 800.2(a)(2) under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (54 U.S.C. §306108), as amended, and its implementing regulations (36 CFR Part 800) to initiate and conduct Section 106 consultation for CA ANG's undertakings at ARC (Attachment B). CA ANG has determined that the proposed construction activities constitute an undertaking, and requests initiation of Section 106 consultation with the State Historic Preservation Officer (SHPO), SHPO concurrence with its eligibility determinations for nine resources located at ARC, and SHPO concurrence with its finding that the undertaking will result in No Adverse Effect on historic properties.

2. Description of the Undertaking

CA ANG proposes to construct new permanent facilities at the 129th RQW cantonment area in conjunction with the 129th RQW Long Range Development Plan and the Facility Exchange Agreement between the National Guard Bureau and Planetary Ventures, LLC (PV). The 129th RQW Long Range Development Plan identified CA ANG's objectives to consolidate its remote activities located in Temporary Use Areas in other areas of ARC into the 129th RQW cantonment area. Concurrently, NASA ARC has leased portions of Moffett Federal Airfield to PV which encompass CA ANG's Temporary Use Areas. In support of its lease, PV and the National Guard Bureau have established a Facility Exchange Agreement, pursuant to which CA ANG will vacate its Temporary Use Areas within the PV lease area, and PV will construct new CA ANG facilities and associated site improvements within the 129th RQW cantonment in exchange. CA ANG will also construct new permanent facilities in the 129th RQW cantonment area as part of the overall effort to relocate and upgrade its facilities. CA ANG and PV propose construction activities to relocate and improve the 129th RQW cantonment area that are herein collectively addressed as a single undertaking for Section 106 consultation.

The undertaking involves the construction of new infrastructure and new facilities at various locations within the 129th RQW cantonment area to support the consolidation of CA ANG operations with permanent facilities. The multi-phased development involves the construction of new facilities and infrastructure, including roads, parking lots, landscaped areas, and new utilities. Project facilities and improvements will occupy approximately 43.6 acres within the cantonment area. The exact depth of disturbance will vary depending on each facility's location and design; the range is expected to be between 12 inches and 8 feet below grade.

In support of CA ANG's responsibilities under Section 106, CA ANG and PV have retained professional consultants from AECOM, Page & Turnbull, and William Self Associates (WSA) who meet the Secretary of the Interior's professional qualifications standards to conduct cultural resources studies related to the undertaking, including the evaluation of resources for eligibility to the National Register of Historic Places (NRHP). PV is the proponent of the majority of design and construction activities related to the undertaking, and retained Page & Turnbull and WSA to conduct its cultural resources studies (Attachment C). CA ANG is the proponent for two construction elements related to the undertaking and retained AECOM to conduct its cultural resources studies (Attachments D and E). These cultural resources studies provide the basis for CA ANG's determinations.

Table 1 summarizes the development activities included in this undertaking and lists the associated proponent (CA ANG or PV) and related cultural resources technical study for each component.

Table 1: Proposed Construction Activities

Construction Activity	Proponent	Report Prepared by
Demolition of 10 buildings (Facilities 651, 654, 655, 656, 657, 658, 659, 660, 661, 669)	PV	Page & Turnbull, WSA (Attachment C)
Aircraft Engine Inspection and Maintenance Shop	PV	Page & Turnbull, WSA (Attachment C)
Squadron Ops Facility	PV	Page & Turnbull, WSA (Attachment C)
Small Air Terminal and Deployment Center	PV	Page & Turnbull, WSA (Attachment C)
Fuel Cell Corrosion Control Hangar	PV	Page & Turnbull, WSA (Attachment C)
Aircraft Supply Equipment Shop	PV	Page & Turnbull, WSA (Attachment C)
Pararescue Storage Facility	PV	Page & Turnbull, WSA (Attachment C)
Cryogenics Storage and Canopy	PV	Page & Turnbull, WSA (Attachment C)
New site infrastructure	PV	Page & Turnbull, WSA (Attachment C)

Construction Activity	Proponent	Report Prepared by
Parking expansion	PV	Page & Turnbull, WSA (Attachment C)
Munitions Storage Area	PV	Page & Turnbull, WSA (Attachment C)
Vehicle Maintenance Facility	CA ANG	AECOM (Attachments D and E)
Backup Gate	CA ANG	AECOM (Attachments D and E)

3. Area of Potential Effects

CA ANG has delineated the Area of Potential Effects (APE) to address both direct and indirect potential impacts on historic properties. The 129th RQW cantonment area is located within an eligible district expansion of the NRHP-listed Naval Air Station (NAS) Sunnyvale (“Shenandoah Plaza”) Historic District.

For archaeological resources, the APE is defined as the limits of disturbance, including areas of temporary staging and construction ground disturbance, including utilities trenching and grading. The vertical APE for the project varies between 12 in. and 8 ft. below grade at the facilities sites to account for grading, compaction of soil, and trenching for utilities.

The APE also includes adjacent areas where potential historic properties could be indirectly affected by the project by aboveground facilities. The APE encompasses the limits of the expanded boundary of the NAS Sunnyvale Historic District, as determined eligible in 2013 with SHPO concurrence (AECOM 2013) (see Attachment C, Appendix A, Figure A-3). Taking into consideration the function, height, and nature of buildings in the immediate vicinity of the undertaking, CA ANG has determined that this is an adequate APE to address any potential effects on historic properties.

4. Identification of Historic Properties Summary

The 129th RQW cantonment area is developed with utilitarian buildings and structures that support CA ANG’s mission at Moffett ANGB. The facilities range in age dating from the 1940s to the 2000s. The area includes both paved and open ground surfaces. Pedestrian surveys for archaeological and architectural resources within the 129th RQW cantonment area were completed. In addition, a subsurface archaeological investigation was completed in an archaeologically sensitive area. The details of the archaeological and architectural surveys and the archaeological testing are located in the technical reports prepared by AECOM, Page & Turnbull, and WSA (Attachments C, D and E).

The studies reviewed a comprehensive records search conducted at the Northwest Information Center at Sonoma State University. No previously recorded archaeological sites are located directly within the proposed undertaking.



Pedestrian archaeological survey identified very sparse cultural constituents within the proposed soil surcharge area

Archaeological testing included six mechanical test pits in the vehicle maintenance facility site excavated with a backhoe fitted with a 2-foot-wide, flat blade bucket. Trenches were 20 feet in length; the maximum depth excavated was 6.5 feet below ground surface, approximately the maximum depth of impacts in the vehicle maintenance facility area. No significant archaeological features or deposits were identified as a result of the archaeological survey and subsurface investigation.

The undertaking is located within the expanded boundary of the NAS Sunnyvale Historic District. The district includes Shenandoah Plaza and Moffett Field. Several facilities and features contribute to the district, including Hangars 1, 2, and 3, the runways and taxiways, and other airfield-related buildings. Within the 129th RQW cantonment area, 17 resources were previously identified and evaluated as not eligible for the NRHP under a Cold War context (Cole 1999). Eight additional resources were identified in the area. Based on the construction dates of the facilities, nine resources (Buildings 654, 655, 656, 657, 658, 659, 660, 661 and 669) required evaluation for NRHP-eligibility and were found not eligible (Page & Turnbull 2017) (see Attachment C, Appendix C for Department of Parks and Recreation 523 forms). No significant resources, contributing resources to the NAS Sunnyvale Historic District, or other significant architectural or above-ground features were identified in the 129th RQW cantonment area as a result of the architectural survey.

5. Affected Historic Properties

The NAS Sunnyvale Historic District was listed in the NRHP in 1994 under Criteria A and C in the areas of Architecture and Engineering/Military with a period of significance of 1930–1935 and 1942–1946 (Urban Programmers 1994). The NAS Sunnyvale airfield (now known as Moffett Federal Airfield), including runways, taxiways, and other features, was excluded from the original district boundary, but was found eligible in the 2013 Airfield study as a contributor to the NAS Sunnyvale Historic District (AECOM 2013). The evaluation found that the airfield and its contributing elements were nationally significant under Criterion A as the central core facility of aviation-related research programs. The expanded district boundaries encompass the airfield and adjacent aviation-related buildings and landscape features. The reevaluation also recommended that the period of significance be revised to 1930–1961 to include early 1950s jet operations, as well as the National Advisory Committee for Aeronautics and early NASA missions during the Cold War (AECOM 2013). The SHPO concurred on June 6, 2013, that the airfield contributed to the significance of the NAS Sunnyvale Historic District. No contributing features of the historic district are located in the immediate vicinity of the undertaking.

6. Assessment of Effects

The Criteria of Adverse Effect pursuant to 36 CFR 800.5(a)(1) were applied to assess effects of the undertaking on historic properties within the APE. The undertaking does not propose to alter any contributing features of the NAS Sunnyvale Historic District or any other known historic properties. Due to the scale, visual relationships, and operations within the historic district, it is unlikely that any indirect visual or atmospheric effects on the district will compromise the ability of the NAS Sunnyvale Historic District to convey its historical associations that make it eligible for the NRHP.

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). To address that potential, CA ANG will follow its standard operating procedure for unanticipated discoveries at ARC as outlined in NASA ARC's 2014 *Draft Integrated Cultural Resources Management Plan* (AECOM 2014). In such cases, implementation of the established procedures for unanticipated discoveries would result in no adverse effect on historic properties. In addition, CA ANG proposes monitoring in highly sensitive archaeological areas (WSA 2017).

7. Public Participation

Pursuant to 36 CFR 800.5(c), CA ANG will make its finding of No Adverse Effect for this undertaking available to the public and any consulting parties, as specified in 36 CFR 800.11(e). Currently, no federally recognized Native American Tribes are associated with the location of the APE (AECOM 2017a).

8. Conclusions

Based on the cultural resources studies (AECOM 2017b and 2017c, Page & Turnbull 2017, and WSA 2017), CA ANG has determined that nine buildings located in the 129th RQW cantonment area (Buildings 654, 655, 656, 657, 658, 659, 660, 661 and 669) are not eligible for listing in the NRHP as individual properties or as significant contributing features of the NAS Sunnyvale Historic District. CA ANG is seeking the SHPO's concurrence with these determinations.

CA ANG, in applying the Criteria of Adverse Effect on the proposed undertaking, has 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.

CA ANG has determined that a finding of No Adverse Effect is appropriate for this undertaking. NASA is seeking the SHPO's concurrence with this determination. NASA requests the SHPO's concurrence within 30 days of receipt of this letter, as specified in 36 CFR 800.5(c).

Please contact me at 650-417-1874 or at 650-603-9191 with your comments or questions.

**FERGUSON.ANDREW.
GLENN.1042839856**

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FERGUSON.ANDREW.GLENN.1042839856
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI,
ou=USAF, cn=FERGUSON.ANDREW.GLENN.1042839856
Date: 2017.08.25 16:16:00 -07'00'

ANDREW FERGUSON, Lt Col, CA ANG
Commander, 129 Mission Support Group

cc:

NASA ARC/D/Ms. Ladwig
 NASA ARC/JCE/Mr. Venter
 NASA ARC/JCE/Mr. Ikan
 NASA HQ/LD/Dr. Klein
 CA ANG/Lt. Col. Ferguson
 CA ANG/Maj. Marulanda

Attachments

- A. Maps
- B. Delegation of Section 106 Responsibilities from NASA to CA ANG
- C. Page & Turnbull 2017 (including WSA 2017 in Appendix B)
- D. AECOM 2017b
- E. AECOM 2017c

References

AECOM Technical Services, Inc.

2013 *Historic Property Survey Report for the Airfield at NASA Ames Research Center, Moffett Field, California.* On file at ARC.

2014 *Draft Integrated Cultural Resources Management Plan for NASA Ames Research Center, Moffett Field, California.* On file at ARC.

2017a *Ames Research Center Archaeological Resources Study.* On file at ARC.

2017b *Archaeological Resources Identification and Evaluation Report for the California Air National Guard Vehicle Maintenance Facility and Backup Gate Project, Moffett Federal Airfield, Santa Clara County, California.* (Attachment D)

2017c *Memorandum on Architectural Resources Survey for the California Air National Guard Vehicle Maintenance Facility and Backup Gate Project, Moffett Federal Airfield, Santa Clara County, California.* (Attachment E)

Cole, Alexandra C.

1999 *Inventory and Evaluation of Cold War Era Historical Resources, Moffett Federal Airfield.* On file at ARC.

Page & Turnbull

2017 *CA ANG Relocation Project Section 106 Technical Report.* (Attachment C)

Urban Programmers

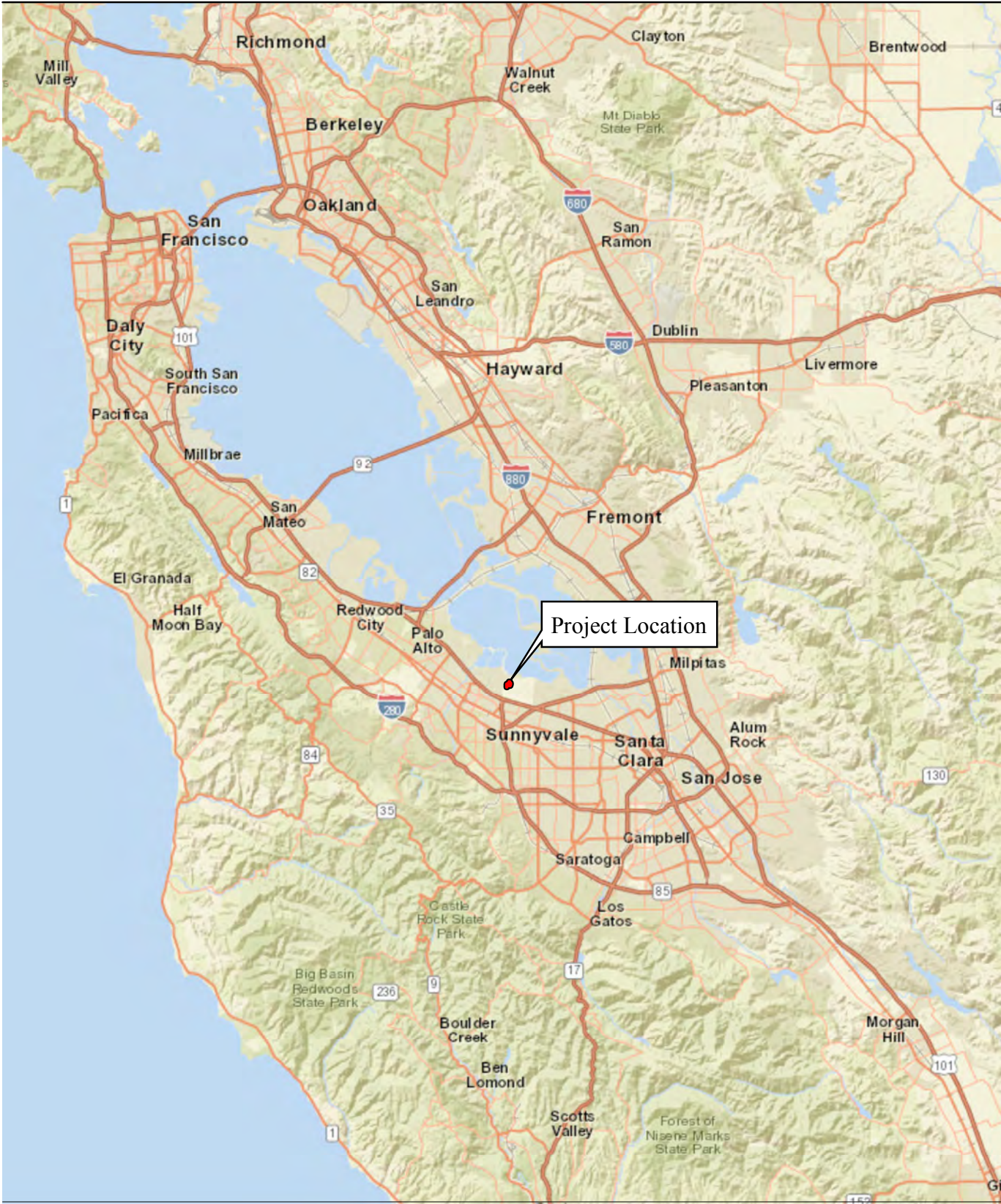
1994 *National Register of Historic Places District Nomination: US. Naval Air Station Sunnyvale, California Historic District.* Nomination prepared for National Park Service.

WSA

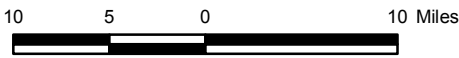
2017 *Cultural Resources Assessment Report California Air National Guard 129th Rescue Wing Relocation Project, Santa Clara County, California.* (Attachment C, App B)

ATTACHMENT A

Maps

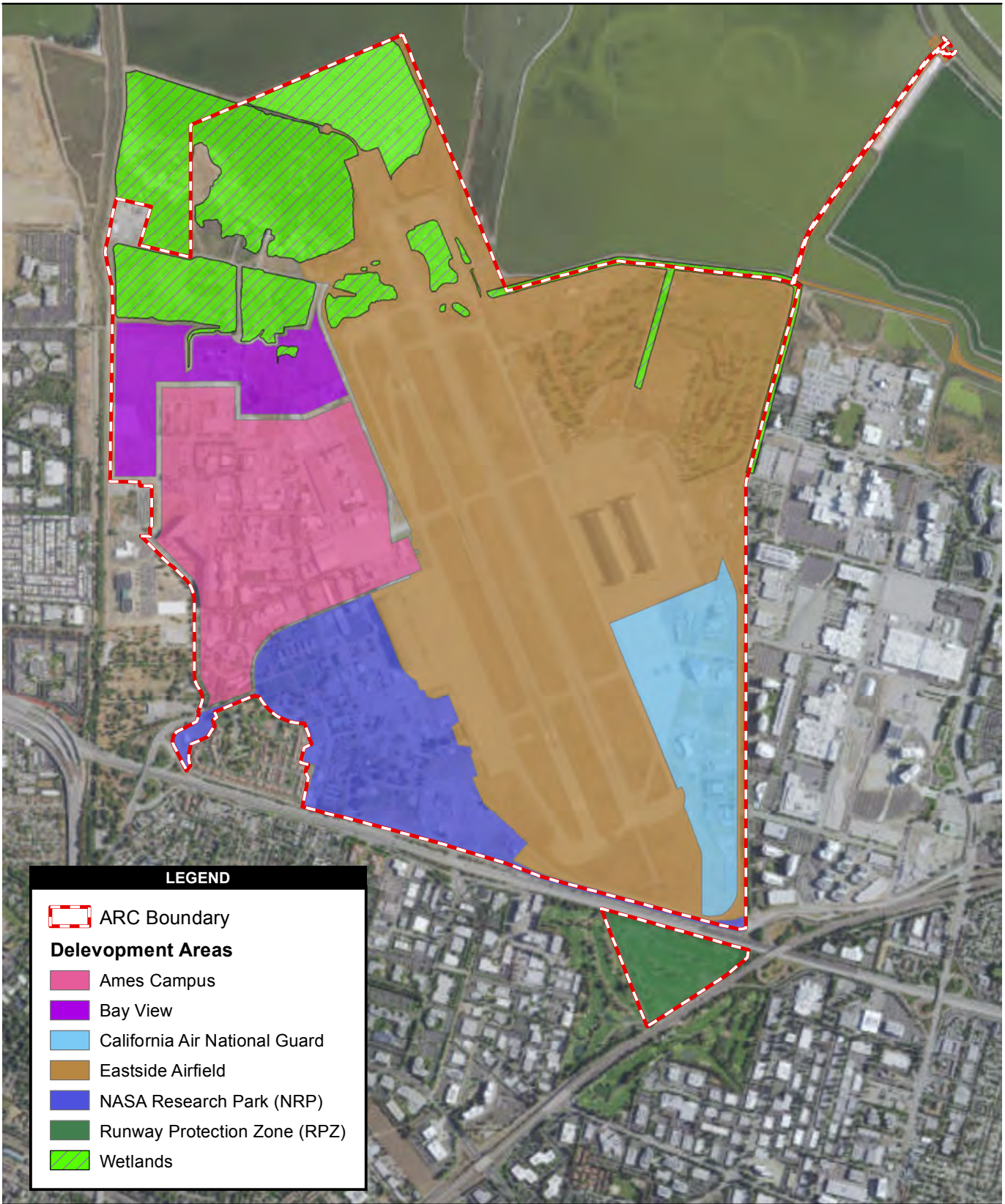


Source: ESRI 2014

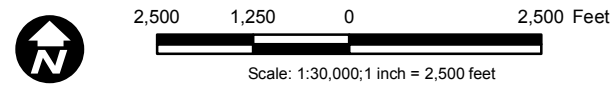


Scale: 1:633,300; 1 inch = 10 miles

Location Map



Source: ESRI 2014; Bing 2014



Development Areas

ATTACHMENT B

Delegation of Section 106 Responsibilities from NASA to CA ANG

National Aeronautics and
Space Administration
Ames Research Center
Moffett Field, CA 94035-1000



August 22, 2017

Reply to Attn of DL: 202A-4

Colonel Taft O. Aujero
Commander, 129th Rescue Wing
California Air National Guard
680 Macon Road
Moffett ANGB, CA 94040

Dear Col. Aujero:

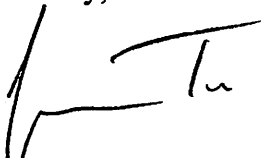
This letter memorializes that NASA Ames Research Center (ARC) and the 129th Rescue Wing of the California Air National Guard (CA ANG) have agreed that CA ANG will serve as the lead Federal agency pursuant to 36 C.F.R. § 800.2(a)(2) to initiate and conduct Section 106 consultation for CA ANG's undertakings within Moffett Air National Guard Base (ANGB) at Moffett Field, Santa Clara County, California (herein referred to as the "Premises") (see "California Air National Guard" area highlighted in blue in Figure 2). Although CA ANG will serve as the lead Federal agency to conduct Section 106 consultation, NASA, as the landlord, will retain ultimate responsibility for ensuring the CA ANG determinations and findings comply with Section 106.

The Premises are located at NASA Ames Research Center (herein referred to as the "Property") (Figures 1 and 2, enclosed) within Shenandoah Plaza National Historic District, which is listed in the National Register of Historic Places (NHPA). Archeological resources protected under the NHPA are also known to exist within the Property, including the Premises. So long as CA ANG is an occupant of historic property or proposes actions that may adversely affect protected historic and archeological resources, CA ANG must comply with the NHPA and work with the Advisory Council on Historic Preservation (ACHP) and the California State Historic Preservation Officer (SHPO) to ensure compliance with the NHPA, the Archeological Resources Protection Act, Native Graves Protection and Repatriation Act, and associated laws, regulations, and Executive Orders to ensure the preservation of the historic integrity of the Premises.

NASA ARC shall assist in such consultations as necessary for CA ANG to complete all required consultations and obtain any necessary approvals or concurrences from the SHPO.

If you have comments or questions, please contact Jonathan Ikan at (650) 604-6859 or via e-mail to jonathan.ikan@nasa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Tu', with a long horizontal stroke extending to the right.

Eugene L. Tu
Center Director

2 Enclosures

cc:

ARC/D/Ms. Ladwig
ARC/J/Ms. Aube-Warren
ARC/JCE/Mr. Venter
HQ/LD/Dr. Klein
CA ANG/Lt. Col. Ferguson
CA ANG/Maj. Marulanda

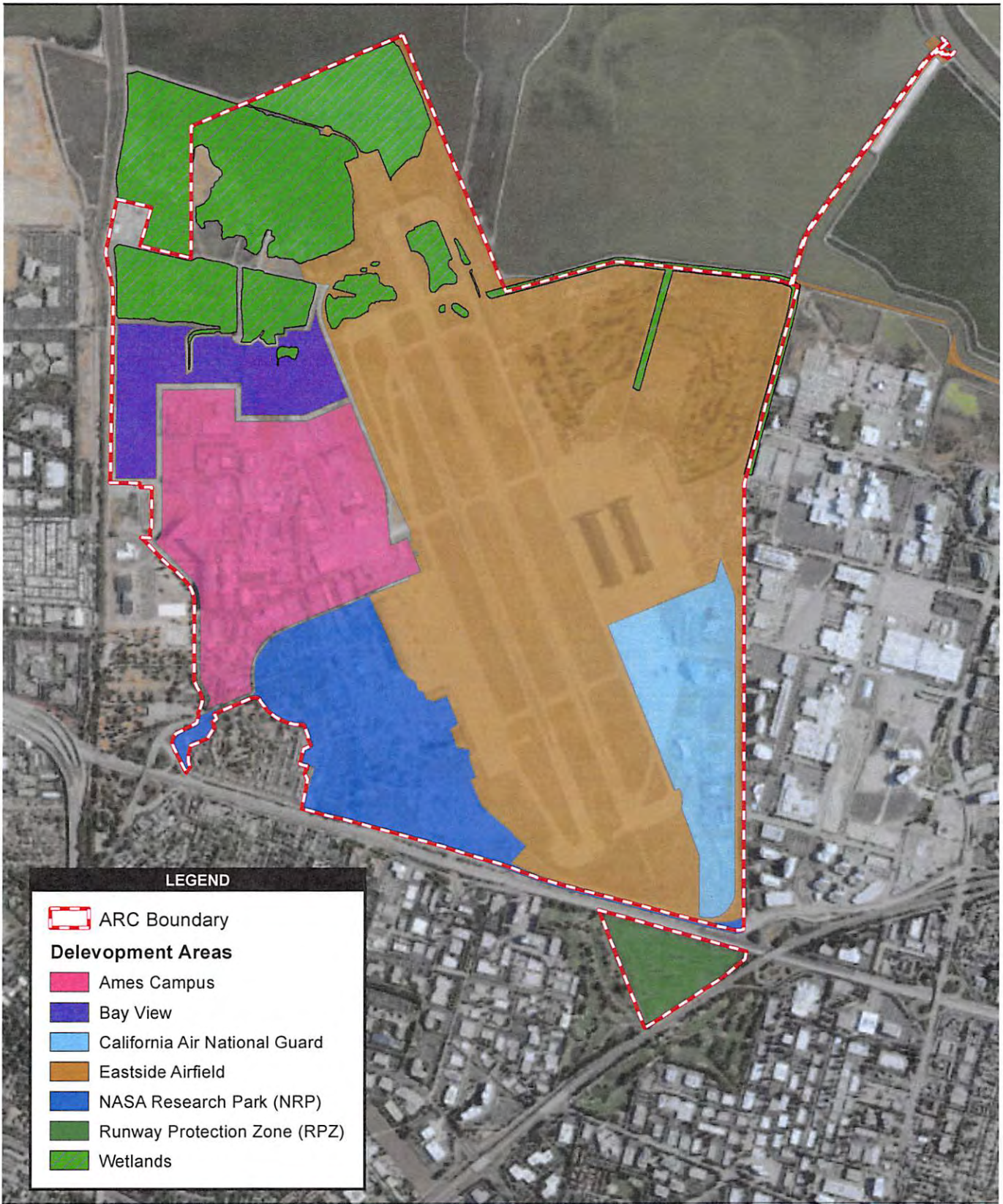


Source: ESRI 2014



Scale: 1:633,300; 1 inch = 10 miles

Location Map



LEGEND

-  ARC Boundary
- Development Areas**
-  Ames Campus
-  Bay View
-  California Air National Guard
-  Eastside Airfield
-  NASA Research Park (NRP)
-  Runway Protection Zone (RPZ)
-  Wetlands

Source: ESRI 2014; Bing 2014



2,500 1,250 0 2,500 Feet



Scale: 1:30,000; 1 inch = 2,500 feet

Development Areas

Removed from public posting

Attachment C: CA ANG Relocation Project Section 106 Technical Report (2017)

I. Introduction

- Purpose
- Project location
- Summary of findings

II. Project description

- Context
- Project description

III. Area of potential effects (APE)

- Defining the APE
- Boundaries

IV. Identification of historic properties within the APE

- Archaeological properties
- Above-ground historic properties
- Evaluation of properties

V. Application of the criteria of adverse effect

- Finding of effect

VII. Conclusion

Appendices

- A. Maps
- B. Archaeology testing report: WSA. "Cultural Resources Assessment Report: CA ANG Relocation Project, Moffett Federal Airfield, Santa Clara County, California" (July 2017).
- C. California Department of Parks and Recreation 523A and 523B forms
 - Building 654
 - Building 655
 - Building 656
 - Building 657
 - Building 658
 - Building 659
 - Building 660
 - Building 661
 - Building 669
- D. Selected Drawings

Attachment D: AECOM 2017b. "Archaeological Resources Identification and Evaluation for the California Air National Guard Vehicle Maintenance Facility and Backup Gate Project" (August 2017).

Attachment E: AECOM 2017e. Cover letter for Attachment D.