

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

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June 30, 2016

Reply In Reference To: NASA_2016_0425_001

Keith Venter
Historic Preservation Officer
Facilities Engineering Branch
NASA Ames Research Center
Mail Stop 213-8
Moffett Field, CA 94035

RE: Defense Fuel Support Point Closure, NASA Ames Research Center, Moffett Field, CA

Dear Mr. Venter:

Thank you for your April 19, 2016, 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. Along with the letter, NASA also provided a report entitled "Historic Property Survey Report for the Defense Fuel Support Point Closure Project at Ames Research Center, Moffett Field, California" dated April 2016. In response to a request for more information from this office, NASA also provided further information and an updated project map.

The proposed undertaking, as described, involves permanently closing the Defense Fuel Support Point (DFSP) at Moffett Federal Airfield, which ceased operations in 2003. This is an undertaking proposed and to be funded by the Defense Logistics Agency (DLA), a federal agency that has designated NASA as the lead federal agency for Section 106 compliance.

The scope of work includes the following:

- Pipeline removal. The project includes 8,545 lineal feet of pipeline corridor. The total lineal feet of piping is more, totaling 18,180 feet, because some corridors have dual pipelines. Within the pipeline corridors, approximately 300 lineal feet of *aboveground* piping would be cleaned, abated, and demolished. 4,443 lineal feet of *underground* pipeline corridor would be closed by excavation and demolition. After excavation and removal, the area would be filled using excavated soil, to be supplemented by imported soil if necessary to match the surrounding grade. These areas would be compacted and vegetation restored to match surrounding areas.
- Pipelines closed in place. 4,102 lineal feet of *underground* pipeline corridor would be closed in place.
- Building 141 will be left in place, including associated pavement, pads, and curbing.

- At the fueling hydrants (MF1003), all above grade equipment would be cleaned, abated, and demolished. The below grade pipeline will be closed in place, and associated pavement, pads, and curbing would be left in place.
- Soil in the day tank area and fuel farm will be sampled and tested for contamination from fuel releases, and NASA expects that approximately 3,210 tons of petroleum-contaminated soil would be removed and disposed of at the Altamont Landfill in Livermore.

NASA defined the Area of Potential Effect (APE) to include the project footprint, including all areas of excavation, demolition, and abandonment of the DFSP fueling facility, as well as temporary staging and construction areas. The maximum disturbance and vertical APE is estimated to be ten feet deep, but will vary depending upon the portion of the DFSP being affected. A portion of Moffett Federal Airfield has also been included to account for indirect visual effects, including Hangars 2 and 3.

NASA conducted a pedestrian archaeological survey of the APE in March 2016, with the results contained in the report submitted with your letter. No intact archaeological resources were encountered, and previous surveys have not identified any sensitive areas within the APE. Ground disturbance will occur within previously excavated areas where pipelines and tanks were installed and in areas with imported fill.

The APE overlaps with the NAS Sunnyvale Historic District. Contributing resources within NASA's APE are Hangars 2 and 3, Building 55, the aircraft parking apron (MF1002), and the aircraft taxiway (MF1016). NASA evaluated other properties within the APE, with the following determinations of eligibility (DOEs) for listing in the National Register of Historic Places (NRHP):

- Building 69 – inert ammunition storage building, constructed in 1943. In 2013, NASA found this building to be a potential character defining feature (CDF) of the NAS Sunnyvale Historic District as a component of the airfield. In the 2016 report, NASA finds the building is not individually eligible for listing in the NRHP. Although the building dates to the airfield's period of significance, NASA finds it does not have significant association with the core aircraft, transport, research, maintenance, and training mission, and therefore is not a contributor or CDF of the historic district.
- Building 439 – Aircraft Wash Rack, constructed in 1942. In 2013, NASA found this building to be a potential character defining feature (CDF) of the NAS Sunnyvale Historic District as a component of the airfield. According to the 2016 report, Building 439 was "rebuilt in recent decades and does not retain any discernable period features." Therefore, it is not eligible for listing in the NRHP, individually or as a contributor to the historic district.
- Jet Fueling Facility (DFSP) – constructed between 1952 and 1955. NASA finds the entire facility to be ineligible for listing in the NRHP, either as an individual resource or as a contributor to the NAS Sunnyvale Historic District. In 2013, NASA found that two components of the facility, Building 141 and MF1003, were potential character defining features of the historic district, but further research in 2016 revealed that both have been modified significantly over time and do not retain historic integrity. The facility consists of the following components:

- Bulk storage tank area (including Buildings 137 – 140);
- Day tank area (including Building 953);
- Building 141, the truck filling rack;
- Four high-speed aircraft fueling hydrants (referred to as MF1003);
- Two ten-inch diameter underground fuel dock pipelines in a 3,010-foot long corridor;
- One eight-inch diameter underground day tank pipeline in a 2,100-foot long corridor;
- Two six-inch diameter underground truck filling rack pipelines in a 1,165-foot long corridor; and
- Two underground fuel hydrant pipelines in a 2,270-foot long corridor.

Based on these surveys and evaluations, NASA proposes a Finding of No Adverse Effect for this undertaking. After reviewing the information submitted to my office, the SHPO offers the following comments:

- The project as described constitutes an undertaking.
- The proposed APE appears sufficient to take direct and indirect effects into account. However, including the entire airfield and its contributing features would allow NASA to take cumulative effects into account more effectively.
- The SHPO concurs that Building 69 is not individually eligible, but NASA has not provided sufficient information to demonstrate that it is not a contributor to the NAS Sunnyvale Historic District. However, it will not be adversely affected by the undertaking, so continuing to treat it as eligible per the 2013 evaluation is appropriate.
- The SHPO concurs that Building 439 is not individually eligible and is not eligible as a contributor to the NAS Sunnyvale Historic District.
- The SHPO concurs that the Jet Fueling Facility (DFSP) is not individually eligible and is not eligible as a contributor to the NAS Sunnyvale Historic District.
- The SHPO has no objection to the proposed Finding of No Adverse Effects for the undertaking as described.
- Please be advised that under certain circumstances, such as unanticipated discovery or a change in project description, FEMA may have additional future responsibilities for this undertaking under 36 CFR Part 800.

Thank you for seeking the SHPO's comments and considering historic properties as part of your project planning. 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