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 the Moffett Federal Airfield Eastside Improvements 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 Federal Airfield (MFA) Eastside Improvements Project (project or undertaking) in accordance with 36 Code of Federal Regulations [CFR] 800. NASA ARC’s lessee Planetary Ventures, LLC (PV) proposes to construct three new facilities and associated site upgrades at MFA in Santa Clara County. The project sites are located within the boundary of the Naval Air Station (NAS) Sunnyvale Historic District, which is listed in the National Register of Historic Places (NRHP). 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 determinations under Section 106, NASA ARC is providing the attached report, _MFA Eastside Airfield Improvements Project Section 106 Technical Report_ prepared by Stantec (January 2021), which includes 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. The results are summarized below.

**Description of the Undertaking**

The undertaking involves construction of three new facilities and associated infrastructure, including a Bus Maintenance Facility, Private Hangar Complex, Office Building, and site
upgrades. The sites for the three facilities and site upgrades are primarily located on the east side of the airfield (near Hangar 3), with new Air Traffic Control Center (ATCC) camera arrays on the west side of the airfield (see Figure 1 in the attachment). Each of these facilities will provide functionality to key elements of the PV program within the leased area of MFA. At this time, designs for the proposed facilities are largely conceptual. However, the general design and performance criteria for the facilities have been established (see Preliminary Site Layouts in Appendix A of the attachment).

The Bus Maintenance Facility will include a new maintenance and operations building, a bus washing building, a fueling and service building, and a large network of solar panel canopy arrays across an expanded dedicated bus parking area. Work will include demolishing Building 69 and other temporary structures and fencing, and repaving and reconfiguring the existing bus parking lot. In general, the depth of disturbance for the facilities will not exceed the pre-existing built elements. Where new pavement is required, disturbance depth will be approximately 2’–3’ below grade. Where footings are required for the solar panel canopy, disturbance depth will be approximately 15’. The design of associated charging stations is still under development, although approximately 330 charging stations may be required to support bus fleet electrification.

The Private Hangar Complex will include four approximately 45,000 s.f. aircraft hangars and an approximately 350,000 s.f. aircraft apron. Work will include demolition of the former High-Speed Aircraft Fueling Pits (MF1003), the Ground Equipment Storage Building (Building 684), the Parachute Repair Building (Building 686), the Weapons Station (Building 511), and a portion of the Moffett Field Golf Course, which will be relocated and reconfigured. Associated site upgrades will include automobile parking, golf course parking, aircraft parking, and utility upgrades. Depth of disturbance associated with the complex is undetermined but will likely exceed 15’ below grade. The disturbance depth of the apron will vary between approximately 2’ to 5’ below grade.

The Office Building will be five stories with approximately 240,000 s.f. of dedicated offices, workstations, an open gathering space, storage, cafeteria, fitness center, meeting rooms, security, mechanical spaces, and other accessory and utility uses. The building will also house remote ATCC operations to replace the existing operations in Airfield Operations Building (Building 158). Depth of disturbance associated with the building will likely exceed 15’ below grade. Two location options for the Office Building are being explored.

ATCC camera arrays will be constructed on the western side of the airfield. Proposed locations for the end mast camera arrays are at the north and south end of the west runway, and potential locations for the center mast arrays are on top of Hangar 1 or slightly north of Hangar 1 and the West Aircraft Parking Apron (West MF 1002). The foundations for the mast towers may range from 6’ to 15’ below grade. New utility lines will be installed via horizontal directional drilling at a typical depth of approximately 6’ below grade, unless existing ductwork is in the vicinity and can be feasibly used in support of the arrays.

Additional site upgrades include reactivating fence gates at 11th Avenue and Enterprise Way and at the Bay Trail and North Patrol Road for bike and pedestrian use, including new signals, lighting, security, and signage, etc.; new utility alignments installed approximately 2.5’ to 8’ below grade via 4’ to 6’-wide trenches to accommodate potential conduits of 2’ to 3’ width; and installing two approximately 50’ to 72’-diameter aboveground water tanks.
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 Figure 2 in the attachment). For archaeological resources, the APE includes the limits of staging and ground disturbance of the project area, or the Area of Direct Impact (ADI). The vertical APE will vary throughout the ADI with an anticipated depth of 15’ below grade at the proposed facilities and 2’–8’ below grade at other site upgrade locations. For aboveground resources, direct impacts will occur within the ADI. To address visible, auditory, or atmospheric changes in the settings of adjacent historic properties, the APE also includes the entire NAS Sunnyvale Historic District and other adjacent areas in Sunnyvale to the east along Enterprise Avenue, including the Lockheed Martin Missile and Space Division (LMSD) campus. The APE is bounded by the levees along San Francisco Bay to the north, U.S. Highway 101 to the south, and adjacent areas to the airfield to the west.

Identification Efforts

PV retained Stantec to conduct a technical study for this project (see attachment). The study was conducted by cultural resources professionals who meet the Secretary of the Interior’s Professional Qualifications Standards (48 Federal Register 44738). Please refer to the attached Section 106 Technical Report for a full methodology and identification findings.

Archaeological Resources

Based on previous studies and additional pedestrian survey, no known archaeological resources are located within the ADI. Previous and recent Native American Heritage Commission and Sacred Land Files searches have not indicated any known cultural properties in the ADI. Despite the lack of known resources, portions of the undertaking are located in areas identified as having heightened archaeological sensitivity (see Figure 3 in the attachment).

Architectural Resources

The APE contains the NAS Sunnyvale Historic District, including the area listed in the National Register of Historic Places (NRHP) in 1994 and the expanded district identified as eligible for the NRHP in 2013. The APE also includes a small portion of the NRHP-eligible Alviso Salt Pond Historic Landscape. These previously evaluated buildings have had few alterations since previously recorded, and their significance and integrity remain the same since previously recorded.

The APE also includes portions of the LMSD campus, which was inaccessible for a survey due to its highly secure and confidential nature and could not be evaluated for NRHP eligibility; therefore, NASA ARC proposes to treat the resource as an eligible historic property for the purposes of this Section 106 review.

Two additional resources in the APE were identified and evaluated for NRHP eligibility. Based on previous evaluations and current conditions, NASA ARC has made the following determinations of eligibility for the two resources, pursuant 36 Code of Federal Regulations (CFR) 800.4(c)(2):
<table>
<thead>
<tr>
<th>Name</th>
<th>Determination of Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building 511</td>
<td>Not eligible</td>
</tr>
<tr>
<td>Moffett Field Golf Course</td>
<td>Not eligible</td>
</tr>
</tbody>
</table>

**Affected Historic Properties**

Historic properties that would be affected by the project include the NAS Sunnyvale Historic District (NRHP-listed), the Alviso Salt Pond Historic Landscape (NRHP-eligible), and the LMSD campus (presumed NRHP-eligible) would be affected. For full descriptions of these resources, refer to the attachment.

**Effects Assessment**

**Archaeological Resources**

No known archaeological sites are in the ADI. Despite the lack of known archaeological resources and extensively disturbed nature of the ADI, there is the potential for unknown archaeological materials to be extant. Cultural resource monitoring should be conducted by a qualified archaeologist where ground disturbing activities overlap with identified areas of heightened archaeological sensitivity, such as the areas around the Moffett Field Golf Course parking lot and the 11th Avenue/Enterprise Way gate reactivation. Additionally, cultural resource monitoring may be required at the potential locations of the ATCC camera arrays, particularly in the southern portion, which are in proximity to a heightened area of sensitivity. 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.

**Architectural Resources**

The project will demolish Building 69 and physically alter East MF 1002, two contributors to the NAS Sunnyvale Historic District, which will diminish the integrity of the district. Additionally, these changes along with construction of new facilities will visually alter the setting within the district. To avoid adverse effects related to the introduction of a visual intrusion from the new Bus Maintenance Facility, Private Hangar Complex, and Office Building, the design intent will adhere to the Secretary of the Interior’s Standards.

**Finding of Effect**

Based on the assessment conducted by qualified cultural resources professionals, NASA ARC has made a finding of Adverse Effect for this undertaking.

**Consultation Efforts**

No Federally Recognized Tribes are associated with the geographical boundaries of NASA ARC or this undertaking. As part of a previous archaeological study of the entire ARC property, NASA Ames Research Center Archaeological Resources Study (AECOM 2017), a Sacred Lands File search and a list of Native American tribes and representatives with a known interest in the area was 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 ADI 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 identified one potential additional consulting party for this Section 106 review, the Moffett Field Historical Society. NASA ARC has invited the Moffett Field Historical Society to participate in Section 106 consultation and is soliciting its input. NASA ARC is also making these findings available to the public via the NASA ARC Historic Preservation Office website (https://historicproperties.arc.nasa.gov/section106.html).

NASA ARC requests the State Historic Preservation Officer’s concurrence on the APE, NASA’s determinations of eligibility pursuant 36 CFR 800.4(c)(2), and NASA’s finding of Adverse Effect for this undertaking pursuant to 36 CFR 800.5(d)(2). NASA ARC intends to enter into a Memorandum of Agreement with the SHPO and any consulting parties to resolve adverse effects pursuant 36 CFR 800.6.

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

Attachment
MFA Eastside Airfield Improvements Project Section 106 Technical Report, prepared by Stantec, dated January 15, 2021