

**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**Lisa Ann L. Mangat, *Director*

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

March 2, 2021

VIA Email

In reply, refer to: NASA\_2021\_0122\_001

Mr. Jonathan Ikan  
Center Cultural Resources Manager  
NASA Ames Research Center  
Mail Stop 213-8  
Moffett Field, CA 94035

Subject: Eastside Airfield Improvements, Moffett Federal Airfield, NASA Ames Research Center, Santa Clara County, CA

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the January 21, 2020, letter initiating consultation regarding an undertaking at NASA Ames Research Center (ARC). NASA is consulting with the State Historic Preservation Officer (SHPO) 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 submitted a technical Section 106 report prepared by Stantec dated January 15, 2020, that provides the Section 106 analysis, project maps, photographs, massing studies, and DPR 523 forms.

**Undertaking:**

The proposed undertaking, as described, involves construction of three new facilities, 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.

The Bus Maintenance Facility would 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 would 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 two to three feet below grade. Where footings are required for the solar panel canopy, disturbance depth will

be approximately 15 feet. 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 would include four approximately 45,000 square foot aircraft hangars and an approximately 350,000 square foot aircraft apron. Work would include demolition of the former High-Speed Aircraft Fueling Pits (MF1003), the Ground Equipment Storage Building (Building 684), the Parachute Repair Building (Building 686), and the Weapons Station (Building 511). A portion of the Moffett Field Golf Course would also be demolished and the course reconfigured. Associated site upgrades would include automobile parking, golf course parking, aircraft parking, and utility upgrades. Depth of disturbance associated with the complex is undetermined but would likely exceed 15 feet below grade. The disturbance depth of the apron would vary between approximately two to five feet below grade.

The Office Building would be five stories with approximately 240,000 square feet 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 feet below grade. NASA is exploring two alternatives for locations of the Office Building.

ATCC camera arrays would 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 six to 15 feet below grade. New utility lines would be installed via horizontal directional drilling at a typical depth of approximately six feet 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 eight feet below grade via four- to six-foot-wide trenches to accommodate potential conduits of two to three feet wide; and installing two approximately 50- to 72-foot diameter aboveground water tanks.

**Area of Potential Effect:**

NASA identified an Area of Potential Effect (APE) that encompasses 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, including staging and ground disturbance of the project area. The vertical APE extends to varying depths, with an anticipated depth of 15 feet below grade at the proposed facilities and two to eight feet below grade at other site upgrade locations. 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 and Evaluation of Historic Properties:**

Following a search of NASA records and pedestrian survey, NASA found no previously identified archaeological resources within the APE. Recent Native American Heritage Commission and Sacred Land Files searches have not indicated any known cultural properties in the APE. However, portions of the undertaking are in areas identified as having heightened archaeological sensitivity.

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 includes a small portion of the NRHP-eligible Alviso Salt Pond Historic Landscape. The APE also includes portions of the Lockheed Martin Missile and Space Division (LMSD) campus, which was inaccessible for a survey because of 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.

For the properties listed in the project description above as being altered or demolished for the undertaking, NASA provided the following evaluation information.

- Building 69 and other temporary structures and fencing. Unevaluated, so NASA proposes to treat this property as a contributor to the expanded NAS Sunnyvale Historic District.
- Former High-Speed Aircraft Fueling Pits (MF1003). In a previous consultation from 2016, the SHPO concurred with NASA that fuel storage tanks, elements of the fuel farm facility, MF1003, and Building 141 were all ineligible for the NRHP.
- Ground Equipment Storage Building (Building 684; constructed 1984). NASA evaluated this building for the current consultation and found it ineligible for listing in the NRHP because it is less than 50 years old.
- Parachute Repair Building (Building 686; constructed 1984). NASA evaluated this building for the current consultation and found it ineligible for listing in the NRHP because it is less than 50 years old.

- Weapons Station (Building 511; constructed in 1968). NASA evaluated this building for the current consultation and found it not individually significant and, because it was constructed after the period of significance for the NAS Sunnyvale Historic District, not eligible as a district contributor.
- Moffett Field Golf Course (constructed in 1959 as a nine-hole course; expanded to 18 holes in 1968). NASA evaluated this building for the current consultation and found it neither individually eligible for listing in the NRHP nor eligible as a contributor to NAS Sunnyvale Historic District. Although it was constructed during the period of significance (1930 – 1961), NASA determined that the golf course was not directly associated with the jet fighter mission (1956 – 1961) and, therefore, does not qualify as a contributor to the expanded NAS Sunnyvale Historic District.
- Naval Storage Depot (constructed during World War II; surrounded by construction of the nine-hole golf course in 1959; some features removed during expansion of golf course in 1968). NASA considers the remnants of the depot as a contributing landscape feature to the NRHP-eligible expanded NAS Sunnyvale Historic District for its association with mission operations at the airfield during the period of significance.

**Tribal Consultation:**

Based upon previous consultations with the Native American Heritage Commission (NAHC), no Federally Recognized Tribes are associated with the geographical boundaries of NASA ARC or this undertaking. The NAHC 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. Because of 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. If an inadvertent discovery of prehistoric archaeological resources or human remains of Native American origin are encountered, NASA ARC plans to consult with these representatives.

**Additional Interested Parties:**

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.

**Assessment of Effect:**

Because no known archaeological sites are within the APE, NASA proposes that there would be No Adverse Effect to archaeological resources. However, because of overlap with areas of heightened archaeological sensitivity, NASA states that “monitoring should be conducted by a qualified archaeologist where ground disturbing activities ... 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.”

The undertaking includes demolition of Building 69 and physical alterations to 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. Therefore, NASA determined the undertaking would have Adverse Effects to historic properties.

Finally, NASA plans to ensure that the design of the new Bus Maintenance Facility, Private Hangar Complex, and Office Building would adhere to the Secretary of the Interior’s Standards, thus avoiding further adverse effects from the visual intrusion of these new features.

**SHPO Comments:**

After reviewing the information submitted, the SHPO offers the following comments.

- This project qualifies as an undertaking with the potential to affect historic properties.
- The APE appears to be sufficient to take effects of the undertaking into account. Please note for future consultations that the term “Area of Direct Impact” is not found in the Section 106 regulations. Direct and indirect APE are the proper terms to form the basis of identification and evaluation of historic properties.
- At this time, NASA has not provided sufficient information to conclude that identification and evaluation efforts are complete.
  - Because the most recent Sacred Lands File search at NAHC is from 2016, the SHPO recommends an updated search.
  - The SHPO recommends that NASA conduct outreach to the non-federally recognized Native American representatives for this undertaking.
  - Because the undertaking would demolish Building 69, it should be fully

evaluated for NRHP eligibility, both individually and as a potential contributor to a historic district.

- Please clarify the NRHP evaluation of the Moffett Field Golf Course and the Safety Buffer Zone within the NAS Sunnyvale Historic District. In the DPR 523 forms, the golf course, as a part of the Safety Buffer Zone, is called a character-defining landscape feature of the expanded NAS Sunnyvale Historic District.
- Please note that new construction that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties does not mean the construction automatically avoids adverse effects.
- Please include analysis of cumulative effects in the assessment of effects, especially given the proposed demolition of Hangar 3.

Until NASA responds by addressing these points, the SHPO is unable to comment further on identification efforts and assessment of effects. If you have any questions or concerns, please contact State Historian Mark Beason, at (916) 445-7047 or [mark.beason@parks.ca.gov](mailto:mark.beason@parks.ca.gov).

Sincerely,



Julianne Polanco  
State Historic Preservation Officer