

National Aeronautics and Space Administration



Ames Research Center
Moffett Field, California 94035

February 1, 2022

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 (NASA_2021_0122_001)

Dear Ms. Polanco:

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) received your letter dated March 2, 2021, containing comments on NASA ARC's determinations of eligibility and finding of effect for the Moffett Federal Airfield (MFA) Eastside Improvements Project (project or undertaking) at Moffett Field, Santa Clara County, California. NASA ARC has prepared responses to the State Historic Preservation Officer (SHPO) comments for continuing Section 106 consultation. Stantec prepared a revised technical report, *MFA Eastside Airfield Improvements Project Section 106 Technical Report*, dated December 28, 2021 (attached), to capture project design changes and to clarify several issues identified in your letter. The NASA ARC responses to the SHPO's comments requesting additional information are provided below.

SHPO comment:

- *At this time, NASA has not provided sufficient information to conclude that identification and evaluation efforts are complete.*
 - o *Because the most recent Sacred Lands File search at NAHC is from 2016, the SHPO recommends an updated search.*
 - o *The SHPO recommends that NASA conduct outreach to the non-federally recognized Native American representatives for this undertaking.*

NASA ARC response: On July 15, 2021, NASA ARC requested a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) for the entirety of the ARC property, including the project footprint. On July 28, 2021, the NAHC responded that the SLF search was negative. The NAHC also provided a list of 11 non-federally recognized Native American tribal representatives who may have knowledge of cultural resources in the project area.

In 2019 and 2020, NASA ARC consulted with representatives on the Mountain View Housing Ventures LLC Housing Project (NASA_2021_0428_001), which has an APE that overlaps the subject project APE and the potential to affect cultural resources at known sites and in areas with high sensitivity for archaeological resources. The representatives have not provided any additional information regarding known sacred lands or expressed concerns with any other resources or potential resources (e.g., specific habitats, plant communities, landscapes, etc.) within the ARC, other than documented prehistoric archaeological resources.

Because of the disturbed nature, lack of known archaeological sites, and the low archaeological sensitivity in the project footprint where limited ground disturbance will occur, the project has low potential to affect archaeological resources. The project's impacts are limited to the built environment, which would not reasonably be considered sacred lands or Tribal Cultural Properties. Therefore, NASA ARC has not re-consulted with the non-federally recognized Native American representatives on this specific undertaking. In the unlikely event that an inadvertent discovery of prehistoric archaeological resources, human remains of Native American origin, or other items of potential cultural patrimony are encountered, per Standard Operating Procedure NASA ARC will consult with these representatives.

SHPO comment:

- *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.*

NASA ARC response: Page & Turnbull, Inc. evaluated Building 69 for National Register of Historic Places (NRHP)-eligibility and recorded it on Department of Parks and Recreation (DPR) 523 forms in 2017 (see Appendix C – DPR 523 forms of attached technical report). Based on that evaluation, NASA ARC has determined that Building 69 is eligible for listing in the NRHP as a contributor to the eligible expanded Naval Air Station (NAS) Sunnyvale Historic District under NRHP Criterion A for its association with the expansion and transition of the airfield to Naval jet operations between 1943 and 1961 and its role in supporting the air station's significant jet operations of the Korean War era. It is not individually eligible for NRHP listing.

SHPO comment:

- *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.*

NASA ARC response: Stantec corrected this discrepancy in the DPR 523 forms (see Appendix C – DPR 523 forms of attached technical report) to reflect that the golf course itself is not a character-defining landscape feature of the Naval Storage Depot or, in turn, of the District in association

with its NRHP significance. Rather, the limited, low-density development surrounding the Naval Storage Depot that created a safety buffer zone around munitions magazines is the character-defining landscape feature. The golf course is neither individually eligible for the NRHP nor as a contributor to the expanded NAS Sunnyvale Historic District.

SHPO comment:

- *Please include analysis of cumulative effects in the assessment of effects, especially given the proposed demolition of Hangar 3.*

NASA ARC response: A discussion of potential cumulative effects, specifically addressing the potential effects on the NAS Sunnyvale Historic District, is included in Section 6.3 of the attached Stantec 2021 technical report.

Other foreseeable projects that would potentially affect the District include the Hangar 1 Rehabilitation Project (NASA_2020_1206_001), the USGS M2M Lab Building Project (NASA_2021_0419_001), and the Hangar 3 Hazard Remediation (Demolition) Project (NASA_2019_1216_001). NASA ARC found that both the Hangar 1 and USGS M2M Lab projects would result in No Adverse Effects on historic properties and, therefore, would not contribute to cumulative effects on the NAS Sunnyvale Historic District. Demolition of Hangar 3 would result in an adverse effect due to the loss of a major contributor to the District. The subject undertaking will result in the loss of one additional contributor – Building 69, alterations to the circulation and spatial relationships, and infill construction of several new facilities and site improvements. However, the resulting visual effects and alterations to the spatial organization to the district will be concentrated at the northeast corner, leaving the original Shenandoah Plaza portion and much of the airfield in its existing condition. Ultimately, despite the combined adverse effects of the Hangar 3 project and the current undertaking, the District would still retain enough of its essential physical features and historic integrity to convey its significance.

Determination of Eligibility

Based on additional information provided in the revised technical study for the project, NASA ARC has determined that Building 69 is not individually eligible for the NRHP but is an eligible contributor to the NAS Sunnyvale Historic District. NASA ARC has also determined that the Moffett Field Golf Course is not individually eligible for the NRHP or as a contributor to the District.

Finding of Effect

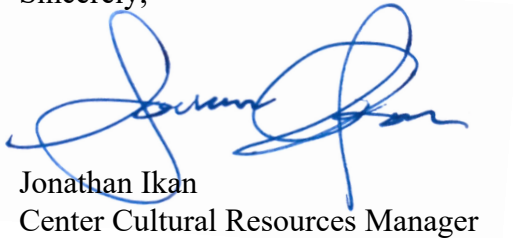
Based on the assessment conducted by qualified cultural resources professionals, NASA ARC has made a finding of Adverse Effect for this undertaking. NASA ARC intends to enter into a Memorandum of Agreement (MOA) with the SHPO and any consulting parties to resolve adverse effects pursuant 36 Code of Federal Regulations (CFR) 800.6. Attached is a draft MOA that presents NASA ARC's proposed mitigation for the undertaking for your review.

NASA ARC requests SHPO's concurrence on the NASA ARC's determinations of eligibility pursuant to 36 CFR 800.4(c)(2), and NASA ARC's finding of Adverse Effect for this undertaking pursuant to 36 CFR 800.5(d)(2). We also request your comments on the draft MOA.

We will notify the Advisory Council on Historic Preservation once concurrence is reached on the finding of effect.

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



cc:

HQ/EMD/Rebecca Klein, Ph.D., RPA

Attachments

MFA Eastside Airfield Improvements Project Section 106 Technical Report, Stantec, revised December 28, 2021

Draft Memorandum of Agreement dated December 28, 2021