



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

Armando Quintero, 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](http://www.ohp.parks.ca.gov)

August 25, 2022

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 February 1, 2022, letter continuing 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 December 28, 2021. Both the letter and report provide responses to comments from the SHPO submitted in a letter dated March 2, 2021. NASA also submitted a draft Memorandum of Agreement.

**Undertaking:**

The proposed undertaking, as previously 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. Preparation work includes demolition of several features in the area, including Building 69, 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.

**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 (NAHC) and Sacred Land Files searches and consultation with non-federally recognized Tribes identified by the NAHC 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.

- NASA evaluated Building 69 and found it not individually eligible, but it is eligible as a contributor to the expanded NAS Sunnyvale Historic District. NASA requests the SHPO's concurrence with this determination.
- 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. NASA requests the SHPO's concurrence with this determination.
- 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. NASA requests the SHPO's concurrence with this determination.
- 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. NASA requests the SHPO's concurrence with this determination.

**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 and responses to previous SHPO comments, the SHPO offers the following comments.

- Identification and evaluation efforts are sufficient.
  - The SHPO concurs that Building 69 is not individually eligible for listing in the NRHP, but is eligible as a contributor to the NAS Sunnyvale Historic District.
  - The SHPO concurs that Moffett Field Golf Course is not individually eligible for listing in the NRHP, nor is it eligible as a contributor to the NAS Sunnyvale Historic District.
  - The SHPO concurs that Weapons Station (Building 511; constructed in 1968) is not individually eligible for listing in the NRHP, nor is it eligible as a contributor to the NAS Sunnyvale Historic District.
  - The SHPO concurs that the remnants of the 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) are 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.
- The SHPO concurs that the undertaking constitutes an Adverse Effect to the NAS Sunnyvale Historic District resulting from demolition of contributing resources and construction of new facilities.
- In the February 1 letter, NASA included analysis of cumulative effects from this undertaking and others planned in the vicinity, including demolition of Hangar 3. NASA stated, “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.”
  - Retaining the ability to convey its historic significance does not preclude adverse effects or adverse cumulative effects. Adverse effects result “...when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or

association.” (36 CFR 800.5.a.1)

- Although the Shenandoah Plaza portion of the district would remain intact following this and other planned undertakings, the SHPO believes that changes (demolition and introduction of new features) to the eastern airfield portion of the NAS Sunnyvale Historic District constitute adverse cumulative effects.
- Please see the attached document for the SHPO’s comments on the draft Memorandum of Agreement.

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