



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

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VIA Email

In reply, refer to: NASA_2023_1205_001

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

Subject: Fall Protection Project, NASA Ames Research Center, Moffett Field, Santa Clara County, California

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the December 5, 2023, 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 memorandum containing Section 106 analysis prepared by AECOM and dated December 4, 2023.

The proposed undertaking, as described, involves NASA installing fall protection guardrails for life-safety requirements on the roofs of eight buildings: Buildings N203, N210, N215, N220, N230, N238, N239A, and N260. New fixed guardrails would be attached to the inside of the roof parapets at Buildings N203, N210, N215, N220, N230, and N260. The fixed guardrails consist of metal pipe top rails and midrails spaced a maximum of 19" apart. The guardrails would be attached to metal pipe railing posts that vary in height between 39" to 45" above the roof surface and are placed at 8' maximum intervals. At Buildings N238 and N239, a non-permanent ballasted railing system would be installed on the roof that uses weighted bases instead of mounting plates. The ballasted railing system has the same height criteria as the fixed systems and vary in height between 39" to 45" above the roof surface. This style of fall protection guardrails was selected for Buildings N238 and N239 because NASA deemed it structurally infeasible to attach railing systems to the roof parapets of these buildings.

NASA identified a discontinuous Area of Potential Effects (APE) for the undertaking that focuses on each building where the guardrails would be installed and includes a 50' buffer around each building footprint to encompass any associated buildings. No

below-grade activities are proposed for this project, so consideration of archaeological resources is not included.

The APE contains the National Register of Historic Places (NRHP)-listed NASA Ames Wind Tunnel, including Buildings N215 and N220; the NRHP-listed Arc Jet Complex, including Buildings N234 and N238 and the SVS; and the potentially NRHP-eligible NACA District, including N203, N210, N215, and N220. Building N260 is less than 50 years old and does not meet Criteria Consideration G for exceptional significance; therefore, it is not eligible for the NRHP. Three buildings in the APE, Buildings N230, N239, and N239A, have not been formally evaluated. NASA ARC proposes to treat these buildings as eligible for the purposes of this consultation.

NASA determined that the installation of the proposed fall protection guardrails is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and the proposed project will not result in any adverse effects, including cumulative, on historic properties. Therefore, NASA proposes a Finding of No Adverse Effect for this undertaking. 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 is sufficient to take direct and indirect effects of the undertaking into account.
- Identification and evaluation efforts are sufficient for this consultation.
- The SHPO has no objection to the proposed Finding of No Adverse Effect.
- Please be advised that under certain circumstances, such as unanticipated discovery or a change in project description, NASA may have additional future responsibilities for this undertaking under 36 CFR Part 800.

If there are any questions or concerns, please contact State Historian Mark Beason, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer