

National Aeronautics and Space Administration



**Ames Research Center**  
Moffett Field, California 94035

September 28, 2022

Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation  
Department of Parks & Recreation  
1725 23<sup>rd</sup> Street, Suite 100  
Sacramento, CA 95816

Attn: Mr. Mark Beason

Subject: Section 106 Consultation for the Moffett Federal Airfield Fleet Maintenance Facility Project, Santa Clara County, CA

Dear Ms. Polanco,

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) requests Section 106 consultation on the Moffett Federal Airfield (MFA) Fleet Maintenance Facility Project (FMF, project or Undertaking) at NASA Ames Research Center, Moffett Field, Santa Clara County, California. Planetary Ventures (PV) is proposing a limited set of improvements at the eastern portion of the Eastside Airfield area of MFA. These improvements involve an expanded maintenance facility for the Google bus fleet, consisting of new tents and trailers similar to the existing tents and trailers on the site, as well as associated parking enhancements and utility upgrades. The FMF requires permit approval from NASA ARC. Therefore, NASA ARC has determined that the FMF constitutes an Undertaking under Section 106 of the National Historic Preservation Act.

Stantec Consulting Services, Inc. prepared the *MFA Fleet Maintenance Facility Project Section 106 Technical Report* (Technical Report). The Technical Report provides detailed descriptions of the Undertaking and the Area of Potential Effects (APE), identifies the historic properties in the APE, and provides an analysis of the Undertaking's effects on historic properties under the Criteria of Adverse Effects per 36 CFR Section 800.5(a)(1). The Technical Report is attached your review.

*Description of the Undertaking*

The project site currently includes four maintenance tents and office trailers installed in 2018. NASA consulted with the State Historic Preservation Officer (SHPO) on the installation of these features in 2016 (see MFA Bus Maintenance Facility Project, OHP reference: NASA\_2016\_0531\_001), and the SHPO concurred on NASA's finding of No Adverse Effect on December 12, 2017. The FMF will add four new maintenance tents near the existing bus surface parking lot, a prefabricated bus washing building, an expanded trailer complex, expanded bus and private vehicle parking, and utility connections. Overall, the new tents will be utilitarian and functional in design and will be the same as the existing maintenance tents directly to the north. The existing tents and office trailers may also be retrofitted as part of the FMF for seismic load and utilities connections. Installation of these features will include limited ground disturbance.

This Undertaking is separate and distinct from the Eastside Airfield Improvements Project (EAIP) (OHP reference: NASA\_2021\_0122\_001), which is currently undergoing Section 106 review. The FMF is an

interim, reduced-scope, and removable version of the permanent bus maintenance facility proposed by the EAIP (which also proposes other improvements as part of its development plan for the site, including expansion of a private aircraft hangar, administrative space for hangar support services, and construction of a new aircraft apron). The current FMF does not depend on the future EAIP and is being proposed for development now regardless of whether the EAIP is developed. Similarly, the EAIP does not depend on the FMF, and if the EAIP is developed, it is possible that a substantial portion of the FMF would be removed.

#### *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 Technical Report). The APE includes the project footprint in the Eastside Airfield area and encompasses the expanded NAS Sunnyvale Historic District and additional areas. The area with the potential for direct physical effects is limited to the project footprint, defined by the area where work is occurring, specifically at the proposed location of the FMF. The vertical APE extends approximately 8 feet below grade, which accounts for any utility upgrades in the project footprint.

#### *Affected Historic Properties*

The APE has been previously surveyed and evaluated to identify historic properties, most recently for the EAIP, which is a separate undertaking that covers the same area as the current APE. No known archaeological resources are in the project footprint; however, a small portion of the project footprint to the northeast is within an area of heightened historic-era archaeological sensitivity. The APE contains several contributors to the NRHP-listed U.S. Naval Air Station Sunnyvale, California (NAS Sunnyvale) Historic District, including East MF 1002 (Aircraft Parking Apron), which is in the project footprint, and others within the immediate vicinity of the FMF, including Hangar 3 (individually eligible) and Building 69.

#### *Effects Assessment*

The Criteria of Adverse Effect were applied to assess the Undertaking's potential effects on the historic properties in the APE. The Technical Report explains that the Undertaking will result in some minimal alterations to East MF1002 (Aircraft Parking Apron), including installation of utilities and painting of striping for the expanded parking. The Technical Report further explains that disturbance from utility installation will be restored to match pre-project conditions upon completion of construction, that the painted striping would not physically alter the gridded surface of MF1002, and that the minor alterations caused by the Undertaking would not affect the historic character or integrity of MF1002 or the spatial or visual relationships among the contributing elements to the NAS Sunnyvale Historic District. The components of the FMF are removable, and the current Undertaking is an extension of the previous MFA Bus Maintenance Facility Project (Finding of No Adverse Effect with SHPO concurrence dated December 12, 2017), with the same type of prefabricated, removable structures.

Furthermore, no archaeological resources are known to exist in the APE. Although this area is extensively disturbed and previously surveyed with no evidence of cultural materials or sites, it is acknowledged that potential materials may be extant and an archaeology monitor will be present during construction activities in the areas that overlap with, and are adjacent to, the identified area of archaeological sensitivity. If any materials are discovered during construction, all work will cease and the NASA ARC Inadvertent Discovery Policy, Standard Operating Procedure 8 in the ICRMP, will be followed.

As noted above, the EAIP is a separate undertaking that overlaps the APE with its own Section 106 process. NASA ARC made a finding of Adverse Effect for the EAIP, and development of a Memorandum of Agreement (MOA) is in progress. In addition to the EAIP, the Hangar 3 Hazard Remediation (Demolition) Project is a separate undertaking that overlaps the APE with its own Section 106 process (OHP reference: NASA\_2019\_1216\_001); NASA ARC made a finding of Adverse Effect, and development of a separate MOA is in progress. These MOAs will resolve the adverse effects on historic properties, including cumulative effects resulting from these projects that will collectively demolish Building 69 and Hangar 3, alter East MF1002 with new construction, and alter the setting of Hangar 2, Building 55, and other contributors to the NAS Sunnyvale Historic District. In contrast to these two

separate undertakings, the FMF will not have any adverse effects on historic properties and will not cause or contribute to any cumulative effects.

*Finding of Effect*

Based on the assessment conducted by qualified cultural resources professionals, NASA ARC has made a finding that the undertaking will result in No Adverse Effect.

*Consultation Efforts*

NASA ARC has not identified additional consulting parties for this Section 106 review but is 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 SHPO's concurrence on NASA's finding of No Adverse Effect for this undertaking pursuant to 36 CFR 800.5(b). Please provide a response within 30 days of receipt of this letter, as specified in 36 CFR 800.5(c).

Please contact me at [jennifer.a.groman@nasa.gov](mailto:jennifer.a.groman@nasa.gov) or at (202) 309-4380 with your comments or questions.

Sincerely,

9/28/2022

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Signed by: cards

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Attachment: *MFA Fleet Maintenance Facility Project Section 106 Technical Report* (Stantec Consulting Services, Inc.)