

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

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June 19, 2017

In reply, refer to: NASA_2017_0516_001

Keith Venter
Historic Preservation Officer
Facilities Engineering Branch
NASA Ames Research Center
Mail Stop 213-8
Moffett Field, CA 94035

Subject: FY18 Modular Supercomputing Facility Project, NASA Ames Research Center, Moffett Field, CA

Dear Mr. Venter:

Thank you for your May 8, 2017, letter regarding the proposed undertaking in at NASA Ames Research Center (ARC). NASA is consulting with the State Historic Preservation Officer (SHPO) in order 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 also provided maps, photographs, and site plans.

The proposed undertaking, as described, involves installation of modular buildings to serve as supercomputing facilities to supplement the NASA Advanced Supercomputing Facility (N258). The new facility will be either a single large or multiple smaller one-story modular, prefabricated container buildings to house additional computing equipment at the intersection of De France Avenue and Allen Road. The site is a gravel lot currently housing several trailers, antennae, and other equipment. Site preparation will include adding engineered fill to create a level, 250-foot by 180-foot pad with various concrete foundations as necessary for installation of the modular buildings; ramps, access walkways, stairs, and a perimeter fire access road; trenching to install new utility ducts below Allen Road and Parsons Avenue; and moving the existing trailers, antennae, and other equipment to a currently vacant site nearby. Ground disturbance will range from six to 12 inches for the fill pad and 14 feet for utility ducts, which will be within existing road and buried utility footprints.

NASA defined an Area of Potential Effect (APE) that includes the location of the new facilities, the location of the relocated equipment, access routes, depth of disturbance, and area from which the new facility will be visible.

Based upon previous surveys of the APE and a records search for this undertaking, NASA finds no archaeological sensitivity within the areas of ground disturbance. Three existing buildings are within the APE: N254 (constructed in 1980); N255 (1978); and N260 (1987). In the letter, NASA states that because these buildings are less than 50 years old and do not exhibit the potential for exceptional significance, they were not evaluated and are not considered eligible for listing in the National Register of Historic Places (NRHP). In addition, seven trailers, antennae, and other equipment currently occupies the project site, but NASA found that they are not 50 years old, not historically or architecturally significant, and therefore are not included in the assessment.

Based upon these conclusions, NASA proposes a finding of No Historic Properties Affected for this undertaking.

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

- The project as described constitutes an undertaking with the potential to affect historic properties.
- The proposed APE appears sufficient to take direct and indirect effects into account.
- Identification efforts for archaeological resources are sufficient.
- Identification efforts for built environment resources resulted in a conclusion from NASA that three buildings less than 50 years old are not considered eligible and a decision not to evaluate the other existing resources within the APE.
 - Information submitted by NASA is not sufficient for the SHPO to concur that buildings N254, N255, and N260 are ineligible for listing in the NRHP.
 - Without a formal determination of evaluation and SHPO concurrence, NASA must treat unevaluated properties as eligible.
 - NASA did not evaluate any of the other equipment currently located at the project site and proposed for relocation. At the SHPO's request, NASA provided dates of construction / installation for these features, all of which occurred in 1988 or later.
- The SHPO cannot concur with the proposed Finding of No Historic Properties Affected because identification information is not sufficient to demonstrate these properties are ineligible for listing on the National Register.
- However, because the three unevaluated buildings will not be affected by the undertaking, and the unevaluated equipment is being retained but relocated to another site at NASA ARC, the SHPO would have no objection to a finding of No Adverse Effect.
- Please be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, NPS may have future

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responsibilities for this undertaking under 36 CFR Part 800.

Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Julianne Polanco', with a long horizontal flourish extending to the right.

Julianne Polanco
State Historic Preservation Officer