April 27, 2021

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

Attn: Mark A. Beason

Subject: Section 106 Consultation for the NASA Research Park Housing Lease and the Mountain View Housing Ventures LLC Housing Project, NASA Ames Research Center, Moffett Field, Santa Clara County, California

Dear Ms. Polanco:

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) requests Section 106 consultation on the proposed NASA Research Park Housing Lease, a long-term enhanced use lease between NASA as Landlord and Mountain View Housing Ventures LLC (MVHV) as Tenant for development of approximately 46 acres of land at NASA Ames Research Center (undertaking). Pursuant to the NRP Housing Lease, MVHV will have the right to design, construct, manage, and operate new housing, retail, and related facilities (Housing Project) at Moffett Field Santa Clara County, California. The Housing Project will be located on federal property. As the lead Federal agency, NASA ARC has determined that this project constitutes an undertaking under Section 106 of the National Historic Preservation Act of 1966 (54 United States Code §306108), as amended.

MVHV retained ASM Affiliates, Inc. to conduct a technical study for this project. The study was conducted by cultural resources professionals who meet the Secretary of the Interior’s Professional Qualifications Standards (48 Federal Register 44738). The technical report prepared by ASM Affiliates, Inc., dated March 26, 2021, which includes a description of the undertaking, the APE, identification efforts, a description of the affected historic properties, and an assessment of potential effects resulting from the undertaking, is attached for your review. For further details on the following summary, see the attached report.

**Description of the Undertaking**

The proposed undertaking is a long-term enhanced use lease, the NASA Research Park Housing Lease that allows for the Housing Project, which would develop housing ranging from a minimum of 1,900 dwelling units up to a maximum of 2,078 dwelling units. The project may
also include up to 250,000 square feet of ancillary uses and up to 100,000 square feet of retail, office, hospitality, and/or other non-residential uses. The project would include linear ground trenching for subterranean utilities that extend outside the housing area. Several billboards would be located along the southern edge and eastern edge of the Housing Project.

**Area of Potential Effects (APE)**

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. The APE includes the Housing Project footprint, linear utility corridors, and additional areas that may be affected visually. For archaeological resources, the APE was defined as the horizontal limits of the project area with a vertical APE of approximately 4 feet deep related to excavation for building foundations and 75 feet deep for closed boring or auguring for the Housing Project area, and a vertical APE typically 4 to 6 feet for trenching utility corridors and up to 20 feet for trenching sewers.

**Identification Efforts**

A Sacred Land File (SLF) search requested from the Native American Heritage Commission (NAHC) dated November 18, 2019, was negative. Six non-federally recognized tribal representatives identified by the NAHC were contacted for additional information; one response was received on November 24, 2019, requesting a copy of the technical report.

Five archaeological sites were previously identified that may intersect with the utility corridors in the APE: CA-SCL-15, CA-SCL-16, CA-SCL-20/H, CA-SCL-21, and CA-SCL-24. Previous testing efforts were conducted within CA-SCL-20/H and -24 that did not reveal any remaining or intact cultural deposits. Previous survey and excavation activities associated with CA-SCL-21 did not reveal any evidence of the site. ASM conducted a pedestrian archaeological survey of all areas within the project area with ground surface visibility; no evidence of archaeological materials was found. Based on the previous studies and survey, CA-SCL-20/H, -21 and -24 do not appear intact within the APE. The current condition of CA-SCL-15 and -16 is unknown; therefore, NASA ARC proposes to treat these sites as historic properties for the purposes of this Section 106 review.

Sixty-four extant built environment resources were previously identified in the APE, including 26 contributors to the NAS Sunnyvale Historic District and 38 other previously evaluated resources. ASM conducted an intensive built environment survey of the APE and identified seven additional built environment resources. ASM reevaluated all of the extant resources identified; the 26 district contributors were still eligible for listing in the NRHP and the remaining 45 resources were not eligible. See Tables 3, 4 and 5 and Appendix D in the attached report for survey details.

**Affected Historic Properties**

Two archaeological sites in the APE are being treating as historic properties for the purposes of this Section 106 review: CA-SCL-15 and -16. The APE overlaps a portion of the Naval Air Station (NAS) Sunnyvale Historic District (NRIS #94000045), but the entire district was considered as a historic property within the APE. However, due to the scale and location of the project, only the 26 listed contributors in the APE were specifically assessed for potential visual...
effects because of their proximity to the project site, including Hangar 1, which is also individually NRHP-eligible.

**Effects Assessment**
For archaeological resources, the Housing Project would include ground disturbance at CA-SCL-15 and CA-SCL-16. Therefore, there is a potential for adverse effects to previously documented and undocumented archaeological resources, which may qualify as historic properties, during construction. NASA will impose the conditions detailed on pp. 47–49 in Chapter 5 of the attached report to avoid adverse effects in accordance with 36 CFR 800.5(d)(2).

For architectural resources, the Housing Project poses the potential to cause adverse visual effects to the NAS Sunnyvale Historic District, specifically its contributors in the APE. Although there will be an impact to a character-defining view toward Hangar 1, that effect would not be adverse. NASA will impose the conditions detailed on p. 47 in Chapter 5 of the attached report to avoid adverse effects in accordance with 36 CFR 800.5(d)(2) as the design of the Housing Project is developed to ensure continued conformance with the Secretary of the Interior’s Standards. With implementation of conditions, the Housing Project will not result in any adverse effects, including cumulative, to the NAS Sunnyvale Historic District or Hangar 1.

**Finding of Effect**
Based on the assessment conducted by qualified cultural resources professionals, NASA ARC has made a finding of No Adverse Effect with conditions for this undertaking.

**Consultation Efforts**
No Federally Recognized Tribes are associated with the geographical boundaries of NASA ARC or this undertaking. However, NASA ARC consulted six non-federally recognized tribal representatives identified by the NAHC were contacted for additional information; one response was received on November 24, 2019, requesting a copy of the technical report. In the event that an inadvertent discovery of prehistoric archaeological resources or human remains of Native American origin are encountered, NASA ARC will consult with these representatives.

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).

The purpose of this letter is to request the initiation of Section 106 consultation and to request the State Historic Preservation Officer’s concurrence on the APE, NASA’s determinations of eligibility pursuant 36 CFR 800.4(c)(2), and NASA’s finding of No Adverse Effect with conditions for this undertaking pursuant to 36 CFR 800.5(b). NASA ARC requests the SHPO’s response within 30 days of receipt of this letter, as specified in 36 C.F.R. 800.5(c).

Please contact me at Jonathan.D.Ikan@nasa.gov or (650) 604-6859 if you have any questions regarding this matter.

Sincerely,
Jonathan Ikan
Center Cultural Resources Manager

Ames Research Center, MS 213-8
Moffett Field, California 94035

cc:
HQ/EMD/Dr. Rebecca Klein, Ph.D., RPA

Attachment
Cultural Resources Technical Report for the Mountain View Housing Ventures LLC Housing Project, NASA Ames Research Center, Moffett Field, Santa Clara County, California, prepared by ASM Affiliates, Inc., dated March 26, 2021