

National Aeronautics and Space Administration

Ames Research Center
Moffett Field, California 94035



February 2, 2022

Julianne Polanco
State Historic Preservation Officer
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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 (NASA_2021_0428_001)

Dear Ms. Polanco:

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) received your letter dated July 1, 2021, containing comments on NASA ARC's determinations of eligibility and finding of effect for the proposed Mountain View Housing Ventures LLC (MVHV) Housing Project (project or undertaking) at Moffett Field, Santa Clara County, California. ASM Affiliates, Inc. prepared a revised technical report, *Cultural Resources Technical Report for the Mountain View Housing Ventures LLC Housing Project, NASA Ames Research Center, Moffett Field, Santa Clara County, California*, dated December 22, 2021, to capture project design changes and to clarify several issues identified in your letter. The NASA ARC responses to the SHPO's comments requesting additional information are provided below.

SHPO comment:

- *This project qualifies as an undertaking with the potential to affect historic properties.*
 - o *However, the letter and report do not specify what will happen to the existing buildings and structures within the project footprint.*
 - o *Please clarify the scope of work in this regard, particularly if total or partial demolition of all buildings and structures is proposed.*
 - o *If demolition is proposed, please specify the potential locations and depths of disturbance.*

NASA response: The Main Housing Project Area (see Figure 2 in the attached technical report) contains a variety of buildings that serve a mix of residential, commercial, and related uses. All buildings and structures in the Main Housing Project Area will be demolished prior to construction of multiple new buildings. Ground disturbance for the demolition of these buildings

is expected to be approximately 15 feet deep. Potential soil improvements, such as grouted columns and/or piers, may be required within the new foundation footprints that could reach a maximum depth of 75 feet. In most locations where open cut and cover trenching for subterranean utilities will occur, the depth of disturbance will typically be to 4 to 6 feet, with storm and sanitary sewer trenching potentially reaching up to 20 feet.

SHPO comment:

- *Additionally, it is unclear from the submitted documents and letter whether the project design was able to be refined to avoid the areas where CA-SCL-15 and CA-SCL-16 are suspected to be located. Please clarify and provide additional information regarding the latest project design, especially in relation to these two resources. If project design cannot avoid these areas, the SHPO recommends additional consultation on the feasibility and merit of additional subsurface archaeological testing.*

NASA response: The project design has been refined to avoid the suspected locations of CA-SCL-15 and CA-SCL-16. The previously proposed utility corridor that crossed the airfield and bisected the mapped location of CA-SCL-16 and ran north of the mapped location of CA-SCL-15 has since been eliminated from consideration due to the archaeological sensitivity of the area. See Appendix E – Confidential Prehistoric Sites and Sensitivity Map in the attached technical report for revised utilities corridor locations.

SHPO comment:

- *NASA stated that comments received during consultation with tribal representatives included a request for a copy of the technical report. Please verify that this request was granted, whether there was any follow up correspondence, and whether any additional comments were received.*

NASA response: A copy of the original technical report was transmitted to Andrew Galvan of The Ohlone Indian Tribe on November 5, 2020. No additional correspondence was received.

SHPO comment:

- *Because the properties potentially affected by the undertaking includes the NAS Sunnyvale Historic District and known archaeological sites, it would be appropriate to include the entire district and the entire site boundaries, as well as the project footprint, in the APE.*

NASA response: The Area of Potential Effects (APE) map has been revised to include the expanded NAS Sunnyvale Historic District, which encompasses the potentially affected archaeological sites, with the exception of the portion of CA-SCL-20/H that extends south of U.S. Highway 101 at the southern perimeter of NASA ARC. Although not entirely included in the APE boundary, effects on the entire site were considered. See Figure 3 – APE Map and Appendix E – Confidential Prehistoric Sites and Sensitivity Map in the attached technical report.

SHPO comment:

- *The SHPO finds identification and evaluation efforts to be insufficient based upon the information submitted.*
 - o *The technical report noted that 16 properties covered in a 1994 survey and recommended as not eligible for listing in the National Register could not be re-located and were presumed to have been demolished. (Refer to Table 6. Demolished Properties)*
 - *NASA should confirm this information from the technical report and revise the DPR 523 forms with a definitive conclusion rather than the consultant having to presume demolition.*
 - *This situation, along with restricted access during the survey, gives the impression that the consultant did not have NASA's cooperation in preparing the technical document.*

NASA response: The consultant has revised the technical report to reflect changes in the APE and provide additional information about the survey. The consultant had NASA ARC's full cooperation in preparing the technical study but referred to outdated information to establish the survey pool of buildings and structures for evaluation. Upon review, of the original 16 buildings listed in the technical report, only 14 had been previously recorded. Two resources, Building 343 and 367, had not been recorded prior to their demolition and information was available about these buildings, so they were removed from the survey list in the revised technical report. NASA ARC verified that the 14 buildings and structures described in the revised technical report are no longer extant, and the consultant revised the DPR 523 forms with additional context and evaluation to address these comments. See Appendix D – California Department of Parks and Recreation 523 Forms in the attached technical report.

SHPO comment:

- o *The technical report noted 38 properties covered during a 1998/1999 survey of Cold War-era resources at Moffett Federal Airfield that were found ineligible for listing under Criteria Consideration G as properties less than 50 years old. (Refer to Table 4. Properties Previously Evaluated Under Criteria Consideration G)*
 - *The 1998 DPR 523 forms provided no historic context for the 38 properties beyond stating that they were support buildings found at Naval installations regardless of mission.*
 - *The current report provided update DPR 523 forms for most of these properties and concluded that none of the 30 properties that have become 50 or more years old are eligible. However, the update forms also provided no historic context beyond noting the properties are support buildings. In many cases, the original use of the building was not provided.*
 - *The update forms were also not clear if they were addressing individual eligibility or NAS Sunnyvale Historic District contributor status for these resources.*
 - *While the SHPO acknowledges that support buildings are unlikely to be found significant at Ames Research Center, these 30 update evaluations do not provide enough information to support their conclusions. It should*

be noted that some of these properties date to the updated period of significance for NAS Sunnyvale Historic District (1930 – 1961).

- *For the eight properties that are still less than 50 years old (or were when the evaluations were done), the update forms have the same issues. It is likely that the ineligible conclusion is accurate for these properties, but the forms do not provide enough information to support their conclusions.*

NASA response: The consultant revised the DPR 523 forms with additional context and evaluation to address these comments. See Appendix D – California Department of Parks and Recreation 523 Forms in the attached technical report.

SHPO comment:

- *Please note that the SHPO is unlikely to agree to the proposed condition that no further consultation with the SHPO is necessary while NASA and MVHV proceed with project design.*

NASA response: The Conceptual Plans for the Housing Project (see Appendix A – Conceptual Plans and Heigh Exhibit of the attached technical report) have now been included in the project description for this undertaking. The site plan for the project illustrates the approximate layout of the proposed buildings on individual parcels. Exhibits of residential building façade styles and precedents provided are representative of the design intent and proposed materials. The proposed construction activities and conceptual parameters for the project design and permanent improvements have been assessed under the criteria of adverse effect (see Section 4.2 – Built Environment Resources in the attached technical report). The project design for permanent improvements, which will be restricted to the building dimensions and design intent as presented in the Conceptual Plans, will not have indirect visual effects on the adjacent NAS Sunnyvale Historic District and will not result in adverse effects on any historic properties. Further consultation with the SHPO will not be necessary, unless the project design is modified in a manner that will no longer meet the design intent or could further affect historic properties, in which case NASA ARC will request continuing Section 106 review.

SHPO comment:

- *The SHPO is also unlikely to agree to the proposed conditions regarding archaeological resources that treat unevaluated sites as eligible while also affecting them. It is not good Section 106 practice to resolve effects without an agreement that implements measures to reduce the level of adverse effects, which is a common approach under CEQA.*

NASA response: The revised project design eliminates the proposed utilities corridor and potential ground disturbance in proximity to CA-SCL-15 and CA-SCL-16 and avoids all direct effects within known archaeological site boundaries. No adverse effects on archaeological resources are anticipated due to the project design change. However, the project occurs in areas of heightened prehistoric- and historic-era archaeological sensitivity; therefore, monitoring will be implemented in the sensitive areas. See Section 5 – Conditions Imposed to Avoid an Adverse Effect in the attached technical report for further information.

Identification Efforts

The APE has been revised to reflect project design changes, including the elimination of the utilities corridor across the airfield (see Figure 3 – APE Map in the attached technical report). To address the SHPO’s comments on the DPR 523 forms and to account for recent eligibility evaluations conducted concurrently with the subject project, the built environment resources survey results have been slightly modified.

Seventy potential built environment resources were investigated in the APE. Twenty-nine are contributing resources to the NRHP-listed NAS Sunnyvale Historic District (including individually eligible Hangar 1); 34 were previously evaluated and are not eligible for the NRHP; and seven properties were evaluated for this project and are not eligible for the NRHP. See Section 2.5.2 of the attached technical report for revised details about the survey results.

The SHPO previously concurred with the eligibility of 26 District contributors in the July 1, 2021, comment letter and the ineligibility of the remaining resources. Three additional resources in the APE (Buildings 126, 158, and 454) have assumed eligibility under separate Section 106 consultations. NASA ARC determined Building 6 eligible for the NRHP as a contributor to the District with SHPO concurrence in a letter dated September 27, 2021 (NASA_2021_0419_001). Buildings 158 and 454 have previously been treated with assumed eligibility for other undertakings with SHPO approval (NASA_2018_0306_001 [Building 158] and NASA_2016_1227_001 [Building 454]). NASA ARC proposes ongoing treatment of Buildings 158 and 454 as eligible contributors to the District for the purposes of this undertaking. No impacts to these resources are expected.

Effects Assessment

For archaeological resources, the project will no longer include ground disturbance at or near CA-SCL-15 and CA-SCL-16. Archaeological sites CA-SCL-20/H, CA-SCL-21, and CA-SCL-24 have been documented as potentially existing within or adjacent to portions of the project area. Testing within the mapped portion of CA-SCL-20/H that falls within the current proposed project area has shown that there are no elements of that site remaining in that location. Further, other remnant portions of the site north of the proposed project area and within the airfield have been recommended as not eligible for inclusion in the NRHP. Testing has also been conducted within the mapped location of CA-SCL-24, revealing no intact cultural deposits that might make the site eligible for the NRHP. While systematic testing was not conducted within the mapped location of CA-SCL-21, no evidence of the site was found during surface survey in 1980. Further, there are no records of any discoveries, other than the Berry Court site, associated with the ca. 2005-2006 housing development that encompasses the area within which CA-SCL-21 and CA-SCL-24 were documented. As such, no impacts to these sites are expected.

For architectural resources, two historic properties were identified in the APE: the NAS Sunnyvale Historic District and Hangar 1. No built environment historic properties are in the project area; therefore, no direct impacts on the District or Hangar 1 are anticipated. The project will construct new mixed-use commercial and residential buildings, billboards, and a fence adjacent to the District. The significant historic features of the District’s setting include its Spanish Colonial Revival-style architecture, function-specific Cold-war era architecture, the engineering technology of the hangars, its campus-like site plan organized around Shenandoah Plaza, and views across Shenandoah Plaza toward the contributing resources surrounding the

plaza. Although the project will change the character of physical features within the District's setting, including the buildings and structures in the Main Housing Project Area that will be demolished, none contribute to its historic significance. Views from U.S. Highway 101 toward the individually eligible Hangar 1 are among its significant historic features. Although the project will be visible from Hangar 1, the proposed housing, retail, and related facilities will be approximately 1,300 feet from the hangar and range from 60 to 135 feet in height. The project will not dominate the setting or attract attention away from Hangar 1 due to its distance from the hangar and its horizontal massing and scale. Therefore, the project will not compromise the integrity of the District or Hangar 1.

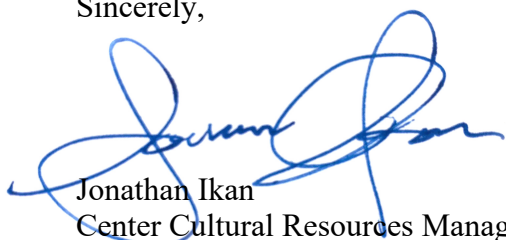
Finding of Effect

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

NASA ARC requests SHPO's concurrence on the NASA ARC's determinations of eligibility pursuant to 36 CFR 800.4(c)(2), and NASA ARC's finding of No Adverse Effect 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
Ames Research Center, MS 213-8
Moffett Field, California 94035

cc:
HQ/EMD/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. Revised December 22, 2021