



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

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March 11, 2022

VIA Email

In reply, refer to: NASA_2021_0428_001

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

Subject: 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 Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the February 2, 2022, 2021, letter continuing 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 report entitled *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., and revised December 22, 2021.

The proposed undertaking, as previously described, involves 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, where MVHV will have the right to design, construct, manage, and operate new housing, retail, and related facilities.

The letter and report contain responses to comments submitted to NASA by the SHPO in a letter dated July 1, 2021.

SHPO Comment:

- This project qualifies as an undertaking with the potential to affect historic

properties.

- However, the letter and report do not specify what will happen to the existing buildings and structures within the project footprint.
- Please clarify the scope of work in this regard, particularly if total or partial demolition of all buildings and structures is proposed.
- If demolition is proposed, please specify the potential locations and depths of disturbance.
- 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-SCI-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 responded by clarifying that 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.

NASA refined the project design to avoid the suspected locations of CASCL-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 because of archaeological sensitivity of the area.

Through email correspondence, NASA further clarified the scope of work by stating that the parcels closest to those contributing resources are the two parcels for which the Conceptual Plans have the lowest height limits (60 feet); height limits rise from west to east with the west lowest at 60 feet and the east highest at 135 feet.

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 responded that it sent a copy of the original technical report was transmitted to Andrew Galvan of the Ohlone Indian Tribe on November 5, 2020. NASA received no

further correspondence.

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 [Area of Potential Effect].

NASA revised the APE 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.

SHPO Comment:

- The SHPO finds identification and evaluation efforts to be insufficient based upon the information submitted.
 - Based upon the technical report, NASA reaffirmed the status of 26 contributors to the NASA Sunnyvale Historic District. The SHPO concurs that these 26 properties retain their contributing status.
 - 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 clarified that 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, Buildings 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.

SHPO Comment, continued:

- 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 and the consultant revised the DPR 523 forms with additional context and evaluation to address these comments.

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 included the Conceptual Plans for the Housing Project in the project description for this undertaking and added a site plan for the project that illustrates the approximate layout of the proposed buildings on individual parcels. Based upon this submittal, NASA determined that 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 responded that 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 following 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.

Based upon the information submitted and responses to the SHPO's comments, NASA re-proposes a Finding of No Adverse Effect for this undertaking.

After reviewing the information submitted by NASA, the SHPO offers the following comments.

- This project still qualifies as an undertaking with the potential to affect historic properties.
- The APE appears to be sufficient if NASA includes the depth of disturbance as specified in the clarified scope of work.
- Identification efforts are sufficient.
- As stated in the previous comments, the SHPO does not agree that no further consultation regarding project design is necessary.
 - Rather than follow that approach and conclude Section 106 consultation with a Finding of No Adverse Effect, the SHPO proposes a Finding of No Adverse Effect with Conditions.
 - The SHPO proposes a further submittal of design documents at some point prior to final construction documents, possibly at 90 or 95%, for a 30-day comment period, when those drawings are available. This would allow the SHPO to verify that design continued according to the scope of work and conceptual design as presented in the consultation to date.
 - If NASA does not agree to these modified conditions, further consultation will be necessary to reach consensus on the assessment of effect.

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If NASA agrees with this Finding of No Adverse Effects with Conditions, please indicate the agency's consent by signing and returning the signature block at the end of this letter. If you disagree, please contact SHPO staff historian Mark Beason at (916) 445-7047 or Mark.Beason@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer

AGREED: _____ DATE: _____

Jonathan Ikan
Center Cultural Resources Manager
NASA, Ames Research Center