

National Aeronautics and Space Administration

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



September 1, 2022

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 (NASA\_2021\_0428\_001)

Dear Ms. Polanco:

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) received your letter dated March 11, 2022, containing comments on the supplemental information provided to support NASA ARC's determinations of eligibility and Finding of No Adverse Effect for the proposed Mountain View Housing Ventures LLC (MVHV) Housing Project (project or undertaking) at Moffett Field, Santa Clara County, California. The NASA ARC responses to the SHPO's comments in the March 11, 2022, letter requesting additional information are provided below.

SHPO comment:

- *The [Area of Potential Effects (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.*

NASA responses:

- The APE map includes all depths of ground disturbance, with the vertical APE extending from approximately 15 feet deep where demolition of buildings is expected in the Main Housing Project Area, to a maximum depth of 75 feet where potential soil improvements, such as grouted columns and/or piers, may be required within the new foundation footprints. 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.
- The sufficiency of the identification efforts is noted.
- NASA ARC appreciates the SHPO's proposal of a Finding of No Adverse Effect with Conditions outlined in the SHPO's March 11, 2022, letter but proposes instead to further project design consultation to reach consensus on a Finding of No Adverse Effect by submitting the attached "SHPO 40-50% Design Submission" drawings for the first phase of the project design that are representative of the architectural language, and typology of the entire project. For your consideration, the attached drawings show progressive plans and elevations for the buildings that will be developed on Parcels 1 and 7, which are the westernmost parcels of the Main Housing Project Area (see D1 Site Plan, Sheet A001, attached). The remaining parcels will be developed sharing the same architectural language, and typology as illustrated for Parcels 1 and 7. The primary difference between Parcels 1 and 7 and the remaining parcels will be the height of the development, as it may elevate from west to east from approximately 60 to 135 feet high. This graduated difference in height has been previously discussed in consultation and will not compound any impacts of the design aesthetic. The project design for permanent improvements, which will be restricted to the same architectural language, and typology as presented in the attached drawings, will not have indirect visual effects on the adjacent Naval Air Station (NAS) Sunnyvale Historic District (District) and will not result in adverse effects on any historic properties. Further consultation with the SHPO may 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.

### *Effects Assessment*

No built environment historic properties are in the project area; therefore, no direct impacts on historic properties 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 airfield and gigantic 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. Based on the “SHPO 40-50% Design Submission” drawings for the first phase of the project design (see attached), 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.

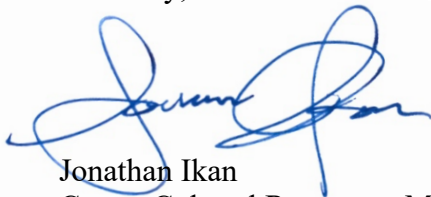
*Finding of Effect*

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

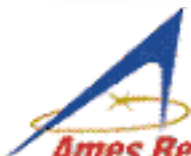
NASA ARC requests SHPO’s concurrence on the NASA finding of No Adverse Effect pursuant to 36 CFR 800.5(b). NASA ARC requests the SHPO’s response within 30 days of receipt of this letter, as specified in 36 C.F.R. 800.5(c).

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**

Drawings for MVHV Project Phase I Parcels 1 and 7, Torti, Gallas + Partners (dated 12/18/2020)