

National Aeronautics and Space Administration

Ames Research Center
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Subject: Continued Section 106 consultation for the construction of the Navigational Aids, Airfield Lighting, and Signage Replacement Project (NAVAIDS project) at the NASA Ames Research Center, Moffett Federal Airfield, Santa Clara County, CA.

Dear Ms. Polanco,

The purpose of this letter is to continue consultation regarding the proposed NAVAIDS project under Section 106 of the National Historic Preservation Act of 1966, as amended, which was initiated by my letter dated May 31, 2017. We received your response letter in July 2017, which concurred that the proposed project qualifies as an Undertaking and was assigned the SHPO reference number, NASA_2017_0605_001.

As stated in the May 31, 2017 initiation letter, the design team was to prepare documentation related to the details of the Undertaking, including an Section 106 Technical Report, Archaeological Testing Report, and supporting appendices. The design team has since concluded investigations and prepared such documentation for this Undertaking, which was delivered in-person to your office on August 31, 2017. Specifically, these materials included:

MFA Navigational Aids, Airfield Lighting, and Signage Replacement Project Section 106 Technical Report, 2017.

- a. Section 106 Technical Report (Page & Turnbull, 2017)
- b. Appendix A, Maps
- c. Appendix B, Cultural Resources Assessment Report (WSA, 2017)
- d. Appendix C, Existing Conditions Photographs
- e. Appendix D, Selected Drawings

In Appendix B, the Archaeology Testing Report (WSA, 2017) contains sensitive information that pertains to the location of known archaeological sites. As such, two copies have been provided: one (1) copy with the

complete archaeology report, and one (1) copy with the sensitive information redacted. Also in Appendix B is a Draft Memorandum of Agreement, which includes stipulations that the measures detailed in the Data Recovery Plan will resolve the adverse effect to archaeological site P-43-000039/CA-SCL-19 associated with the Undertaking.

The Section 106 Technical Report outlines the project description, delineates the Area of Potential Effects (APE), and discusses whether historic properties are located within the APE. Previously identified above-ground historic properties within the APE include buildings that are individually eligible for listing in the National Register of Historic Places (NRHP) in addition to contributors to the expanded Naval Air Station, Sunnyvale National Register Historic District. Additionally, given that work associated with the Undertaking will occur below grade, the identification of historic properties involved investigations to determine the presence or absence of archaeological materials within the project area. The archaeological investigation included a pedestrian survey as well as core testing, which was conducted with the involvement of a Native American monitor. During the pedestrian survey, cultural materials were observed on the ground surface within the Undertaking area, including at the locations of two previously recorded prehistoric archaeological sites. Core testing was conducted within and near the proposed location of the Undertaking, in areas with archaeological sensitivity as well as within the mapped boundaries of the two previously recorded archaeological sites, in order to determine the presence or absence of subsurface cultural materials.

Using the results of the pedestrian survey and core testing, the archaeological investigation evaluated whether any archaeological site within the Undertaking area is eligible for listing in the NRHP. One of the previously recorded sites, P-43-000039/CA-SCL-19, was subsequently determined to be eligible for listing in the NRHP, and is therefore considered a historic property for the purposes of Section 106 review. Further details regarding the methodology and results of the archaeological investigation, as well as the evaluation of the two archaeological sites for listing in the NRHP, are included in Appendix B, Cultural Resources Assessment Report.

The Technical Report also provides an assessment of the proposed Undertaking under the Criteria of Adverse Effects. Based on the analysis in the Technical Report, NASA has made a finding of adverse effect for the proposed Undertaking, which will involve ground disturbing activities occurring in the location of the prehistoric archaeological site that has been determined to be a historic property. The analysis provided in the Technical Report finds that the Undertaking would result in No Adverse Effect to above-ground historic properties.

NASA invites consultation with the SHPO regarding efforts to mitigate the adverse effect of the Undertaking. An Archaeological Data Recovery Plan has been prepared and is attached to the Cultural Resources Assessment Report in order to expedite the Section 106 review process. The Archaeological Data Recovery Plan proposes measures including mechanical trenching, controlled excavation units, and additional field methods in areas where ground disturbance is proposed within the Undertaking site. Analysis of artifacts recovered during the field investigation will inform a comprehensive report and updated Department of Parks and Recreation 523 forms for archaeological site P-43-000039/CA-SCL-19. Following the data recovery and analysis efforts, any recovered artifacts that may be found will be transferred to a curatorial facility. A Draft Memorandum of Agreement is included in Appendix B: Cultural Resources Assessment Report, which includes stipulations that the measures detailed in the Data Recovery Plan will resolve the adverse effect associated with the Undertaking.

NASA is seeking the SHPO's concurrence with NASA's findings that the APE contains historic properties, that the proposed Undertaking will have no adverse effect on built historic resources but will have an adverse effect on prehistoric archaeological site P-43-000039/CA-SCL-19, and that measures specified in the Data Recovery Plan will resolve the adverse effect of the Undertaking. NASA requests the SHPO's comments on the Draft Memorandum of Agreement, which will be considered prior to the final agreement's execution by NASA and the SHPO.

Additionally, prior to making any disclosures pursuant to any California Public Records Act requests related to this Section 106 consultation for the construction of the NAVAIDS project, we request that the Office of Historic Preservation provide me (and the individuals copied on this letter) with notice of such requests. Thank you for your continued participation and for your attention to our enclosed request.

Sincerely,



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Enclosures