



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

Lisa Ann L. Mangat, *Director*

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November 20, 2017

In reply, reference to: NASA\_2017\_0605\_001

Mr. Keith Venter  
Historic Preservation Officer  
Facilities Engineering Branch  
NASA Ames Research Center  
Mail Stop 213-8  
Moffett Field, CA 94035

Subject: Navigational Aids, Airfield Lighting, and Signage Replacement Project, Moffett Federal Airfield, NASA Ames Research Center, Santa Clara County, CA

Dear Mr. Venter:

The California State Historic Preservation Officer (SHPO) has received NASA's September 12, 2017, letter continuing consultation regarding an undertaking at NASA Ames Research Center (ARC). NASA is consulting with the State Historic Preservation Officer (SHPO) in order 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 Section 106 Technical Report (Page & Turnbull, 2017), maps, a Cultural Resources Assessment Report (WSA, 2017), existing conditions photographs, and selected drawings.

The proposed undertaking, as previously described, involves replacing and upgrading the existing NAVAIDS system alongside Runway 14L-32R and in adjacent turfed areas. These components include runway lighting, navigational instrumentation, utility pathways and connections, airfield traffic signage, computerized monitoring system equipment, electrical power distribution equipment, and paved access roads. Utility pathways will require construction of new duct banks and conduits using directional drilling to a maximum depth of eight feet where the alignment intersections with paved airfield taxiways, and trench excavation to a maximum depth of 48 inches below existing grade in turfed areas east of the runway. Part of the pathway requiring trenching will extend to the Sunnyvale Golf Course. Directional drilling will also be used under U.S. Highway 101 with a potential depth of 10 – 20 feet. New equipment and lighting will require electrical and data connections and new concrete foundations with varying depths of disturbance between 12 inches and eight feet below grade.

With the September 12 letter, NASA provided the results of an archaeological investigation involving core sampling and requests concurrence with resulting

determinations of National Register eligibility and with a proposed assessment of effect that archaeological properties will be adversely affected by the undertaking, but built environment resources would not be adversely affected.

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

- I request additional information in support of NASA's historic property identification efforts, pursuant to 36 CFR 800.4(b):
  - The report by WSA states that SCL-17 and SCL-19 were originally recorded as small habitation sites in 1912 and that their "dimensions and exact locations have not been confirmed through subsequent field studies," although a 1991 survey by Basin Research Associates did not identify any surface evidence of the sites. It's not clear how the site boundaries depicted on Figure 5 (WSA 2017:23) were defined and if they should be refined based on the evidence from the completed subsurface testing.
  - Although the method of subsurface testing seems appropriate, I question if enough tests were placed in areas that will be affected by the undertaking. The limited quantity of the subsurface tests does not seem adequate to determine fully the potential for subsurface deposits to occur in the locations where ground disturbance will take place for the undertaking. Additional information, such as a detailed archaeological sensitivity assessment or additional testing, would aid in better determining the effects of the undertaking on archaeological resources.
  - It is not clear if there is a potential to encounter deposits through horizontal directional drilling in the eastern part of the APE where drilling will occur beneath US-101 and extending into the Sunnyvale golf course. Please provide an archaeological sensitivity assessment for the areas of the APE where subsurface testing has not been conducted.
  - Please provide updated and any previous DPR 523 forms that have been completed for all sites in the APE.
  - No eligibility recommendation is made for site SCL-17. Please address whether or not this site is potentially extant and will be affected by the undertaking.
- I am unable to concur with the eligibility determinations made for CA-SCL-19 and CA-SCL-20, pursuant to 36 CFR 800.4(c)(2):

- The provided eligibility determinations for SCL-19 and SCL-20 are inadequate. Both evaluations provide broad statements that the sites do not meet Criteria A – C without providing any analysis to support this conclusion. In addition, the evaluations include the statement that consideration under Criterion C is “not appropriate” as the sites do not include built environment resources. Archaeological sites can and should be evaluated under all four National Register criteria. Please reference *National Register Bulletin 36: Guidelines for Evaluating and Registering Archeological Properties* for guidance. Native American consultation would aid in identifying potential cultural values that should be considered in a complete evaluation.
- The evaluations conclude that SCL-20 is not eligible and that SCL-19 is eligible for the National Register under Criterion D. Neither of these evaluations refers to a research design or context to explain how the sites do or do not have the potential to answer significant research questions. The evaluation for SCL-19 focuses on the integrity of the deposits, but significance needs to be established before integrity is considered.
- The Cultural Resources Assessment Report by WSA (2017:34) states that there may be intact subsurface deposits associated with SCL-20 located outside of the project area. The evaluation in the report is made based on limited testing of a portion of the site. There is not enough information to make an eligibility determination for the site as a whole.
- It may be appropriate to treat SCL-17 and SCL-20 as eligible for the purposes of Section 106 for this undertaking, if additional identification efforts determine that intact deposits associated with these sites will not be impacted by the proposed undertaking.

After NASA addresses these comments and provides the additional information requested as part of the identification and evaluation step of consultation, the SHPO will comment on the proposed assessment of effects. If you have any questions or concerns, please contact Mark Beason, State Historian, at (916) 445-4047 or [mark.beason@parks.ca.gov](mailto:mark.beason@parks.ca.gov).

Sincerely,



Julianne Polanco  
State Historic Preservation Officer