



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

Lisa Ann L. Mangat, *Director*

Julianne Polanco, State Historic Preservation Officer
1725 23rd Street, Suite 100, Sacramento, CA 95816-7100
Telephone: (916) 445-7000 FAX: (916) 445-7053
calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

April 6, 2018

In reply, reference to: NASA_2017_0605_001

Mr. Jonathan Ikan
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. Ikan:

The California State Historic Preservation Officer (SHPO) has received NASA's February 12, 2018, letter continuing consultation regarding an undertaking at NASA Ames Research Center (ARC). NASA is consulting with the 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 revised Section 106 Technical Report (Page & Turnbull, February 2018).

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 February 12 letter, NASA responded to comments submitted by the SHPO in a letter dated November 20, 2017. After reviewing all information submitted, the SHPO offers the following comments.

- The information submitted does not mention Native American consultation. The Archaeological Resources Study (AECOM 2017) prepared for this consultation included an NAHC Sacred Lands File Search, which was negative, and provided a list of Native American representatives with interest in the area. None of these tribes is federally recognized. However, by registering on this list, these individuals / groups have indicated that they have an interest in being involved in undertakings that occur within their traditional lands, and can still be considered interested parties in the Section 106 process under 36 CFR 800.2(c)(5) and §800.3(f). I recommend that NASA consult with these individuals/groups on the proposed data recovery plan to ensure the appropriate treatment of any culturally significant items that may be impacted by the undertaking. Please summarize these efforts in the next submittal.
- The Area of Potential Effect (APE) appears to be sufficient to take direct and indirect effects into account.
- Identification efforts for built environment and archaeological resources are sufficient.
 - I do not object to treating sites CA-SCL-17 and CA-SCL-20 as eligible for listing on the NRHP for the purposes of Section 106 for this undertaking.
 - I concur with NASA's determination that site CA-SCL-19 is eligible for listing on the National Register under Criterion D, pursuant to 36 CFR 800.4(c)(2).
- Assessment of Effects pursuant to 36 CFR 800.5(b):
 - I concur that the resources that contribute to the NAS Sunnyvale Historic District will not be adversely affected by the undertaking.
 - Directional drilling will allow NASA to avoid disturbing historic taxiways.
 - In some areas, ground disturbance will occur outside paved areas, but these will be restored to their previous appearance following project implementation.

- Replacement of non-historic airfield navigation features will introduce new features, but these will be sympathetic to the ongoing use and aesthetic of the airfield and historic district.
 - Non-historic runway lighting will be replaced with contemporary lighting and in-kind light fixtures.
- I concur that the undertaking will have no adverse effect on CA-SCL-17 and CA-SCL-20. Based on the testing results it appears that the undertaking will not affect any deposits that would contribute to the eligibility of these sites, and ESA fencing will be installed at the limits of the APE within the previously recorded site boundaries in order to prevent potential ground disturbance.
- I concur with NASA's conclusion that the undertaking will have an adverse effect on site CA-SCL-19, due to the direct physical alteration of information bearing deposits.

The SHPO agrees with previous NASA comments that preparation of a Memorandum of Agreement (MOA) to resolve the adverse effects would be appropriate. Please submit an electronic version of a draft MOA to continue consultation and plan on including the Archaeological Data Recovery Plan as an attachment to the MOA.

If you have any questions or concerns, please contact Mark Beason, State Historian, at (916) 445-4047 or mark.beason@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer