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File: Parking Lot 3, Bus Maintenance Facility
Section 106 Consultation | G-Bus
Electrical Charging Station

Date: August 27, 2019

Reference: Section 106 Technical Memorandum for the proposed G-Bus Electrical Charging Station

Stantec Consulting Services, Inc. (hereafter Stantec) has prepared this memorandum on the behalf of Planetary Ventures (PV), which has entered into an Adaptive Reuse Lease with the National Aeronautics and Space Administration (NASA) for the Ames Research Center Eastside/Airfield area at Moffett Federal Airfield (MFA). PV is proposing to install new G-Bus Electrical Charging Stations at the existing Bus Maintenance Facility and parking lot located on the northeastern side of MFA; all work associated with the proposed bus charging stations will be referred to as the “Undertaking.”

As the lead federal agency, NASA is responsible for compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA), which requires federal agencies to assess activity effects on historic properties.

This memorandum addresses the requirements of Section 106 of the NHPA, per 36 CFR Section 800, to assess the potential of adverse effects of the Undertaking on historic properties. It includes a description of the Undertaking, the establishment of an appropriate Area of Potential Effects (APE), the identification of all historic properties within the APE, and an analysis of potential adverse effects based upon the established Criteria of Adverse Effects. This memorandum was prepared by architectural historian Daniel Herrick and archaeologist John Nadolski who meet the Secretary of the Interior’s Professional Qualifications for architectural history and archaeology, respectively.

DESCRIPTION OF THE UNDERTAKING

The Undertaking involves installing five new 125kw Proterra electrical vehicle charging stations at the existing Bus Maintenance Facility and parking lot on the eastern side of MFA (see Appendix A, Figure 1). In an effort to reduce emissions, PV will introduce these charging stations for use by a select number of electrical buses. These charging stations will be located towards the eastern edge of the existing bus parking lot near the Macon Road entrance, adjacent to the Moffett Field Golf Course parking lot. The charging stations will tie into the newly installed/existing electrical system through existing manhole and feeder openings.

Each of the five Proterra charging stations involve a power control system (PCS) unit and floor-mounted dispenser unit. The PCS units are approximately 7’ tall, 2.6’ wide, and 2.3’ deep. The accompanying dispensers are simple boxes with plug-in attachments that will be attached to mounted posts. The dispensers will be 4.8’ high, 1.5’ wide and 1’ deep. Both the PCS and dispenser units will be installed on simple concrete pads that are 6’ wide, 3’ long, and have a below grade depth of 1’. The dispensers and PCS units will have a muted, utilitarian aesthetic typical of charging stations.

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A new transformer, selector switch, and distribution board will be installed on a raised concrete pad at the southeastern corner of the existing parking lot, directly south of the proposed charging stations. The proposed concrete pad will be located on the existing paved surface of the parking lot and will be approximately 37' long, 12' wide, and 1' above grade. The concrete pad will feature a raised 6" tall concrete curb around the perimeter, which will provide secondary containment around the electrical equipment. The transformer unit will have an industrial and utilitarian aesthetic and will be approximately 7' tall and, 7.5" wide. The transformer connections will connect with the selector switch and switch gear, which will have comparable dimensions to the transformer, and extend 2' below grade into new conduit to connect with the existing transformer on site opposite on Macon Road as well as the proposed charging stations.

New conduit construction will be via open trenching or horizontal drilling methods, which will traverse across a small section of the existing bus parking lot at an approximate depth of 3' below grade. Following the installation of the new conduit, all areas where material was removed will be recovered and repaved. Some simple road improvements will accompany the charging stations. At each of the five charging stations, two new protective bollards will be installed. The 6" diameter steel pipe bollards will be installed approximately 1' from the charging stations and spaced at 6.5' apart. The bollards will be 4' tall with 18" diameter concrete footings that extend 44" below grade. New concrete wheel stops will also be installed adjacent to each charging station and anchored through typical anchor pins at a maximum depth of 8" below grade. The adjacent pavement surrounding the charging stations will also be restriped.

Construction staging will occur on the adjacent paved areas of the existing asphalt parking lot.

AREA OF POTENTIAL EFFECTS

The APE is located within the expanded Naval Air Station (NAS) Sunnyvale Historic District on the northeast side of the airfield (see Appendix A, Figure 1). For the current Undertaking, the APE boundaries are defined by a horizontal radius of 750' from the center of the project site. A vertical APE of 4.5' below grade is included to account for the potential disturbance of any archaeological resources. The location and size of the APE accounts for both potential direct and indirect effects to any historic properties, particularly those within the boundaries of the expanded NAS Sunnyvale Historic District.

IDENTIFICATION OF HISTORIC PROPERTIES

Per 36 CFR Section 800.16(1)(1), "historic properties" may include any district, site, building, structure, or object that is listed, or eligible for listing, in the National Register of Historic Places (NRHP).

ARCHAEOLOGICAL

Ground disturbing activities are limited to Undertaking area at the eastern side of the existing bus facility parking lot, located at the eastern side of MFA. The Undertaking area is defined by the existing asphalt parking lot with no exposed ground surface available for investigation (See Appendix B for Existing Conditions – Site Photographs). Therefore, a field survey was deemed ineffective in identifying potential archaeological properties located within the area of ground disturbance. However, multiple existing archaeological studies that thoroughly investigate the entirety of the Undertaking area, the APE, and the surrounding environs, have been prepared in support of previous projects.

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Previous Studies

In February 2017, AECOM prepared the *NASA Ames Research Center Archaeological Resources Study* (ARS), which identified potential archaeological resources throughout the NASA Ames Research Center property, including MFA. The ARS is intended to support the NASA Ames Research Center's Integrated Cultural Resources Management Plan (ICRMP), which provides guidance for the treatment of cultural resources, both archaeological and built environment, on the NASA Ames property. The ARS, which was concurred upon by SHPO in June 2017, includes a thorough collection of previous archaeological and geotechnical studies, previously recorded resources, historical maps, Sacred Land Files searches from the Native American Heritage Commission (NAHC), and other forms of documentation, to outline and identify the potential for archaeological resources throughout the site. Based upon these records, an archaeological sensitivity map was created that illustrates particular areas where archaeological properties are more likely to be extant. The identified areas of sensitivity are organized into four categories:

- Heightened Historic-era Archaeological Sensitivity
- Heightened Prehistoric-era Archaeological Sensitivity
- Heightened Geoarchaeological Sensitivity
- Low Archaeological Sensitivity

According to the ARS, the Undertaking is predominantly located within an area of low archaeological sensitivity, meaning that there are no known archaeological resources in the area, and there is a notably low potential for any resources to be extant. However, it is noted that the northernmost portion of the proposed electrical conduit will be located within the periphery of an area identified as having Heightened Historic-Era Archaeological Sensitivity (See Appendix A, Figure 2). This area of sensitivity is attributed to a former historic-era homestead that, according to historical topographic maps of the area, was located to the northeast of the Undertaking area. The area of sensitivity was delineated by a 250' buffer from the approximate location of this former homestead to account for the demolition of the structures there and the material being prospectively spread throughout the area. The Undertaking area is located near the periphery of this area of sensitivity, thus reducing the potential resources to be extant.

The Undertaking area was subject to further studies in January and August 2017 as part of previous Section 106 submittals for the MFA Electrical-Telecommunications Infrastructure Project (SHPO #: NASA_2016_1227_001) and the MFA Temporary Bus Maintenance Facility Project (SHPO Reference # NASA_2016_0531_001), respectively. For the MFA Electrical-Telecommunications Infrastructure Project, William Self Associates (WSA, now PaleoWest Archaeology) conducted a records search and pedestrian survey of the proposed electrical and telecommunication alignments along Macon Road, a segment of which corresponds directly with the current Undertaking area. As outlined in WSA's *Archaeological Testing Report - MFA Electrical-Telecommunications Infrastructure Project, Santa Clara County, California* (January 2017), the pedestrian survey examined the shoulder areas along Macon Road where exposed soil is visible, directly adjacent to the Undertaking area, and determined there was no evidence of any archaeological materials in the area. Investigative coring was also conducted as part of this effort, including several locations within the current Undertaking APE; no archaeological materials were found (See Appendix A, Figure 3). The report stated that although no known archaeological properties are in the project area, construction should be halted and NASA officials, such as the Procurement Officer and Cultural Resource Manager, shall be notified immediately should there be an inadvertent discovery of archaeological materials following the appropriate procedures. In its March 13, 2017 letter, SHPO concurred with this assessment of No Adverse Effects for archaeological properties in the area.

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WSA also prepared the *Cultural Resources Assessment Report – MFA Bus Maintenance Facility, Santa Clara County, California* (August 2017), in support of the MFA Temporary Bus Maintenance Facility project, which involved the construction of temporary tent structure as well as a new electrical utility alignment, all located within the current Undertaking APE. This investigate effort includes a records search for potential archaeological resources and preliminary site visit of the area, which determined that the site is paved and inaccessible for further study. The records search was conducted within a quarter mile of the study area, which encapsulates the entirety of the current Undertaking APE. According to the report, no previously recorded site is located within this search area (See Appendix A, Figure 3).

Additionally, the report determined that there was no evidence of any archaeological materials in the area due in part to the paved nature of the site; a full pedestrian survey was deemed ineffective due to the paved nature of the site. The report also acknowledged that previous historic-era structures associated with the homestead near the present-day golf course may have been located in the vicinity, although no additional information was found regarding the exact location of these structures. Therefore, there is little likelihood of any remnants being extant given the developed nature of the area. As in the January 2017 report, the Temporary Bus Maintenance Facility report stated that although no known archaeological properties are in the project area, construction should be halted, and NASA officials shall be notified immediately upon an inadvertent discovery of archaeological materials. In its December 12, 2017 letter, SHPO concurred with this assessment of No Adverse Effects for archaeological properties in the area.

Summary

The combined findings of the ARS and both 2017 WSA studies cover the entirety of the current Undertaking area and recommends that the Undertaking is located in an area where there are no known archaeological resources. Although the Undertaking is in the periphery of an area of Heightened Historic-Era Sensitivity, there is low potential for any archaeological properties to be extant due to the location of the Undertaking at the periphery of the area of sensitivity, coupled with the extensively disturbed nature of the Undertaking area (see Appendix A, Figure 4¹). Therefore, there are no known archaeological properties located within the APE. However, the proximity of the Undertaking to an identified area of Heightened Historic-era Archaeological Sensitivity, suggest that there may be unknown resources in the area, and in the event of an inadvertent discovery, all construction work shall be halted, NASA Officials shall be notified, and all appropriate inadvertent discovery procedures outlined in the NASA Ames Research Center's *Integrated Cultural Resource Management Plan* Standard Procedure No.8: Inadvertent Discovery of Archaeological Resources, shall be followed (AECOM 2014).

BUILT ENVIRONMENT

Numerous studies of the historical significance of the built environment at MFA have been conducted. In 2013, AECOM prepared the *Historic Property Survey Report for the Airfield at NASA Ames Research Center, Moffett Field, California*, which identified the NRHP-eligible expanded NAS Sunnyvale Historic District that encompassed the entirety of MFA. The historic district was identified as significant under criteria A (events)

¹ Note: The 100' buffer included in Appendix A, Figure 4 is a Geographic Information Systems graphic restraint that illustrates the existing utilities within the Undertaking Area and 100' surrounding the project area only. The extent of the existing utilities throughout the site expands beyond this buffer, however, including the entirety of these elements beyond the 100' Buffer would create visual clutter not pertinent to the Undertaking. The 100' buffer is intended to focus on the existing utilities adjacent to the Undertaking only.

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and C (architecture) with a period of significance spanning from 1930-1961. While this identified district has not been formally concurred upon, California Office of Historic Preservation (OHP) staff and NASA have agreed upon recognizing the identified historic district and its contributors as historic properties for the purposes of Section 106 consultation.

The Undertaking APE is located within the boundaries of the expanded NAS Sunnyvale Historic District and includes several contributing properties. These include the following:

- **Hangar 3:** Constructed in 1943, Hangar 3 is a monumental structure that was originally designed to house Lighter-than-air dirigible airships as part of the broader U.S. coastal defense system during World War II. The building is almost identical to neighboring Hangar 2; both features parabolic roof lines with large sliding door systems at both the north and south ends. Hangar 3 is a contributor to the original NRHP-listed NAS Sunnyvale Historic District, as well as individually eligible for the NRHP and as a contributor the NRHP-eligible expanded NAS Sunnyvale Historic District. (constructed 1943)
- **Building 69 – Inert Munitions Shed:** Building 69 is a simple single-story structure located at the northeast corner of the East Aircraft Parking Apron. Constructed in 1943, Building 69 was design to store the inert munitions following their removal from aircraft. It is associated with the munitions operations at the airfield, which features a network of munitions storage magazines, located to the north in the present-day golf course, and airfield features like the parking apron and the ordnance handling pad. It features a square footprint, concrete loading docks and construction, and simple gable roof. It is identified as a contributor the NRHP-eligible expanded NAS Sunnyvale Historic District.
- **MF 1002 – East Aircraft Parking Apron:** The Parking Apron is an expansive, paved surface located on the eastside of the airfield that extends along the East Parallel Taxiway from the CAANG property northwards and surrounds the monumental Hangars 2 and 3. Originally constructed between 1942 and 1945 around Hangars 2 and 3 as a location for aircraft parking, the Parking Apron was expanded in following years to accommodate increased aircraft operations at MFA; the southern portion of the Parking Apron was expanded in the mid-1950s and the northern portion was expanded ca.1980.

Of these properties, none are located in the immediate project area and are not at risk of physical alterations and direct effects.

ASSESSMENT OF EFFECTS

Per 36 CFR 800.5(a)(1), the Criteria of Adverse Effects are applied to assess potential effects of the Undertaking on historic properties located within the associated APE:

- (1) Criteria of adverse effect. An Adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP. Adverse effects may include

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reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.²

Pursuant to 36 CFR 800.5(a)(2), adverse effects on historic properties are exemplified and analyzed under the following examples of activities that may result in adverse effects:

i) Physical destruction of or damage to all or part of the property

The Undertaking will not result in any physical destruction or damage to all or part of a historic property. All physical work is limited to the non-contributing areas of the existing bus parking lot and no historic properties are located in the project area (see Appendix A, Figure 1). Therefore, the Undertaking will not cause an adverse effect under this example.

ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 C.F.R. part 68) and applicable guidelines

This section includes an analysis of the Undertaking per the *Secretary of the Interior's Standards for Rehabilitation* (Rehabilitation Standards), which allow for the introduction of new elements and compatible uses while also retaining the historic character and features of a property.³ The analysis of the Undertaking per the ten Rehabilitation Standards is as follows:

1. *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*

The Undertaking will not introduce any new use to the site. Currently, the area is utilized as a surface parking lot for buses. The proposed electrical charging stations and associated electrical equipment will support and continue this use, including for electrical buses. These charging stations will be installed at the easternmost edge of the non-contributing area of the bus parking lot, far removed from Hangar 3, the East Aircraft Parking Apron, and Building 69, and will have no effect on any historic materials, features, or spaces. Also, the charging stations and supporting equipment will be small in scale and will have no effect on any spatial relationships of the historic district and its contributing properties. Therefore, the Undertaking will adhere to Rehabilitation Standard 1.

2. *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.*

The Undertaking will not involve the removal or alteration of any historic materials, features, or spaces associated with a historic property. The proposed charging stations will be located at the eastern-edge of the existing bus parking lot, which is a non-contributing area of the property. While the Undertaking does involve the installation of new utility lines in the area of the contributing East Aircraft Parking Apron, these lines will extend through existing conduits and feeders. As such, no portion of the historic paving will be altered as part of the Undertaking.

² U.S. Code of Federal Regulations, 36 CFR Section 800.5(a).

³ US Code of Federal Regulations, 36 CFR Section 68.3(b)

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As for spatial relationships, the proposed charging stations and associated equipment will be small in scale and set at the periphery of the airfield, far removed from the character-defining flat, paved, and open qualities of the East Aircraft Parking Apron. As such, the charging stations will have no effect on the relationship of the East Aircraft Parking Apron and Hangar 3. Similarly, the proposed charging stations will be located south of Building 69 and will not disrupt the spatial organization between it, the East Aircraft Parking Apron, and the other historic magazines located near the adjacent golf course.

Therefore, the Undertaking will adhere to Rehabilitation Standard 2.

3. *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features from other buildings, will not be undertaken.*

The Undertaking involves the installation of new electrical bus charging stations at the eastern periphery of the existing bus parking lot at the eastern side of the airfield. The equipment will be clearly contemporary and will not create a false sense of historical development that would detract from historic properties within the APE, including Hangar 3, the East Aircraft Parking Apron, and Buildings 69, all of which are located at a significant distance from these charging stations. Therefore, the Undertaking will adhere to Rehabilitation Standard 3.

4. *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

The Undertaking will not adversely affect any property that has gained historic significance in its own right. The project is largely limited to the existing, non-contributing bus parking lot located at the periphery of the airfield. This area is defined by contemporary paved surfaces and does not appear to exhibit any historic significance individually or associated with the expanded NAS Sunnyvale Historic District. Therefore, the Undertaking will adhere to Rehabilitation Standard 4.

5. *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.*

No distinctive features, finishes, construction techniques, or examples of craftsmanship will be affected by the Undertaking. All physical work is restricted to non-contributing areas, notably the eastern perimeter of the existing bus parking lot. None of the historic properties identified within the APE, namely the East Aircraft Parking Apron, Building 69, and Hangar 3, will have character-defining features and materials directly affected by the Undertaking and therefore will adhere to Rehabilitation Standard 5.

6. *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and, where possible, materials. Replacement of missing features shall be substantiated by documentary and physical evidence.*

The Undertaking will not involve the repair or any other physical treatment of deteriorated historic features. At the East Aircraft Parking Apron, existing feeders and conduits will be used for proposed electrical connections; no trenching or removal of historic pavement will be required. Neither Hangar 3 nor Building 69 will undergo any repair work as part of this Undertaking. Therefore, the Undertaking will adhere to Rehabilitation Standard 6.

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7. *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

The Undertaking will not involve harmful chemical or physical treatments of any historic materials or features belonging to a historic property. Therefore, the Undertaking will adhere to Rehabilitation Standard 7.

8. *Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

Previous archaeological studies identify this location as a low potential for buried resources. Furthermore, no archaeological resources are known to be located in the areas where below ground disturbances are planned, primarily along the proposed electrical alignment at the edge of the existing, non-contributing bus parking lot. If, however, archaeological materials are encountered during the Undertaking, construction will be halted, and NASA officials, including the Cultural Resource Manager, will be notified immediately. All efforts will be taken to comply with relevant NASA procedures. Under these conditions, the Undertaking will adhere to Rehabilitation Standard 8.

9. *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the historic integrity of the property and its environment.*

The Undertaking will not destroy any historic materials that characterize the property. The proposed charging stations and associated electrical equipment will be located at the eastern-most edge of the existing bus parking lot, which is non-contributing. While new utility connections will be installed under the historic East Aircraft Parking Apron, these connections will utilize existing conduits and feeders with no effect on the historic paving materials of the property. The only new conduits being installed are located at non-contributing areas of the existing bus parking lot.

The only above-ground components of the Undertaking are the charging stations themselves and slightly raised concrete podium with the supporting transformer and dispensers. Overall, this equipment will be clearly contemporary and differentiated from the adjacent historic properties. At the same time, the placement of this equipment at the far eastern periphery of the airfield and the pedestrian scale of the charging stations and support equipment, will be far removed and will not disrupt the significant visual corridors of the airfield, particularly between the east and west hangars, the prominent axial views along the runways to San Francisco Bay. Additionally, the placement of the chargers at the eastern edge of the non-contributing bus parking lot will not disrupt significant spatial organizations between the flat expanses of the East Aircraft Parking Apron and the monumentality of Hangar 3, nor between the East Aircraft Parking Apron and Building 69.

Aesthetically, all of the proposed equipment is contemporary by design and will not create a false sense of history. Simultaneously, the charging equipment has an industrial aesthetic, which is consistent within the overall utilitarian setting of the expanded NAS Sunnyvale Historic District and the nearby contributing properties as part of a working airfield. The raised concrete podium itself will reflect similar installations found throughout the airfield, namely the raised concrete loading dock at the nearby Building 69 and materiality of the East Aircraft Parking Apron. Also, the overall pedestrian scale of the chargers will reduce any visual intrusion to negligible levels, especially in relation to the monumentality of Hangar 3, as

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well as Building 69 and the East Aircraft Parking Apron. As such, the placement, scale, and utilitarian aesthetic of the charging stations are also compatible with the historic character of the historic district.

Therefore, the Undertaking will adhere to Rehabilitation Standard 9.

10. *New additions and adjacent or related new construction shall be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

The Undertaking will have no direct physical effects on any historic property; all identified historic properties will remain in their existing condition. As such, the future removal of any element associated with the Undertaking, namely the bus charging stations and electrical equipment, will not impair a historic property in any capacity. Furthermore, the charging stations could be removed without impairing the integrity of the historic property's environment because the charging stations could be removed, and the bus parking lot pavement could be repaired to its current condition. Therefore, the Undertaking will adhere to Rehabilitation Standard 10.

Summary

The Undertaking will adhere to the Standards for Rehabilitation, as described above. Therefore, the Undertaking will not cause an adverse effect under this example.

iii) Removal of the property from its historic locations

The Undertaking will not involve the removal of any historic property from its historic location. The Undertaking is limited to non-contributing bus parking lot, leaving all contributing properties to the expanded NAS Sunnyvale Historic District, specifically Hangar 3, the East Aircraft Parking Apron, and Building 69 in their existing conditions. Therefore, the Undertaking will not cause an adverse effect under this example.

iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance

The Undertaking will not result in any change to the property's existing use. The immediate area is non-contributing and already serves as a bus parking lot, which use will continue following installation of the bus charging stations. All other existing uses throughout historic district, namely those related to aviation, will be unchanged. Hangar 3, the East Aircraft Parking Apron, and Building 69 will not be directly affected by the Undertaking, nor will the Undertaking result in any change of use.

As described above, the proposed bus charging equipment will be limited in size and scale, and will be located at the periphery of the airfield, where previous alterations have occurred. The placement of this equipment will result in no direct effect on any of the contributing properties to the historic district and be far removed from Hangar 3, East Aircraft Parking Apron, Building 69, and the character-defining central portion of the airfield, leaving the integral view corridors throughout the airfield and surrounding Hangar 3 intact. Additionally, the small size and pedestrian scale of the charging stations will have no perceptible effect on the setting of the nearby Hangar 3, East Aircraft Parking Apron, and Building 69, which will remain in their existing condition as the primary defining features in the area.

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Therefore, the Undertaking will not cause an adverse effect under this example.

v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features.

Atmospheric and audible effects will be primarily associated with construction of the proposed electrical bus charging stations. These effects will be temporary and will not have any long-term effects beyond the construction period. In its existing condition, the area is already serving as a bus parking lot and the introduction of the proposed charging stations will not affect this use in a way that would depart from the existing atmospheric or audible conditions.

In terms of potential visual effects, much of the Undertaking is occurring below grade. The only visible elements include the charging stations themselves, the associated dispensers, the concrete pad with transformer, and the protective bollards and wheel stops. These elements are relatively small in size and will be located at the periphery of the existing non-contributing bus parking lot, several hundred feet from the historic East Aircraft Parking Apron, leaving the open, paved qualities of the apron in its existing condition. Additionally, the chargers will be far removed from Hangar 3, and their overall scale will be imperceptible in relation to the monumental size of the hangar. Similarly, the charging equipment is located several hundred feet to the south of Building 69, and the overall scale of the equipment is consistent with the more pedestrian, single-story character of the historic property. For all properties, as well as the expanded NAS Sunnyvale Historic District overall, the charging equipment will have a contemporary design aesthetic that will differentiate the Undertaking from the historic properties and not create a false sense history, while also exhibiting an industrial and utilitarian aesthetic that is consistent with the established vocabulary of the airfield. Therefore, the Undertaking will not cause an adverse effect to the use and character of historic properties under this example.

vi) Neglect of a property which cause deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization

The Undertaking will not involve the neglect of a property that causes its deterioration. All properties included within the APE, namely Hangar 3, Building 69, and the East Aircraft Parking Apron, will continue to be utilized in daily operations in their existing conditions. Therefore, the Undertaking will not cause an adverse effect under this example.

vii) Transfer, lease, or sale of a property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

The Undertaking will not involve the transfer, lease, or sale of Hangar 3, the East Aircraft Parking Apron, Building 69, nor any portion of the expanded NAS Sunnyvale Historic District included out of Federal ownership or control. Therefore, the Undertaking will not cause an adverse effect to historic properties under this example.

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CONCLUSION

The Undertaking, which involves the installation of new electrical charging stations and supporting equipment at the existing non-contributing bus parking lot, will not have the potential to directly or indirectly alter any of the characteristics that will affect a property's ability to convey historical significance and be listed in the NRHP. Following the analysis of the Undertaking using the Criteria of Adverse Effect, outlined in 36 CFR Part 800.5(b), it is determined that the Undertaking will result in no adverse effects on any historic properties. Therefore, Stantec recommends a finding of No Adverse Effects.



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Attachment: Appendix A: Undertaking Maps
Appendix B: Existing Conditions – Site Photographs
Appendix C: Select Drawings

c. Garret Root, Senior Architectural Historian
Michelle Cross, RPA, Cultural Resources Practice Leader

The following appendices were redacted from this public posting:

Appendix A: Undertaking Maps
Appendix B: Existing Conditions – Site Photographs
Appendix C: Select Drawings