January 26, 2022

VIA Email

In reply, refer to: NASA_2021_1213_001

Mr. Jonathan Ikan
Center Cultural Resources Manager
NASA Ames Research Center
Mail Stop 213-8
Moffett Field, CA 94035

Subject: Moffett Field Site 28 Vapor Intrusion Project, NASA Ames Research Center, Santa Clara County, CA

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the December 10, 2021, letter initiating consultation regarding an undertaking at NASA Ames Research Center (ARC). NASA is consulting with the State Historic Preservation Officer (SHPO) 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 Memorandum, prepared by Kleinfelder, dated September 30, 2021, that provides the Section 106 analysis, project maps, and photographs.

Naval Facilities Engineering Command – Southwest (NAVFAC) proposes Vapor Intrusion Remediation at Site 28 within ARC. Site 28 is comprised of Buildings 3, 10, 45, 126, N239, and N239A. In 1994, the United States Navy (USN) transferred Moffett Field and its associated buildings to the National Aeronautics and Space Administration (NASA). NASA serves as the lead consulting federal agency for Section 106.

The proposed undertaking, as described, involves mitigation of vapor intrusion (VI), most of which is planned for interior spaces. Minimal changes are planned for exterior elements. No excavation is anticipated to go deeper than 6 inches below any slab. Work planned for each building is summarized below.

- Building 3: Sealing preferential pathways of VI in the slab and subfloor from air flow, install a sub-membrane depressurization (SMD) system within the crawlspace and install a subslab depressurization (SSD) below the slab foundation.
• Building 10: remove temporary VI mitigation measures installed in 2012 and 2013. Asbestos abatement of 70 linear feet (LF) of inactive steam lines, VI coating along the finished tunnel and utility trench floors, drain removal in Room 103, installation of an SSD system, the placement of fill in a utility trench, large crack sealing, and construction of a concrete cut off wall.
• Building 45: seal preferential pathways by crack sealing and installing an SSD system.
• Building 126: seal preferential pathways by crack sealing along concrete seam lines and cracks and installing an SSD system.
• Building N239: seal preferential pathways by making HVAC modifications and plugging sealing pipe and conduit penetrations in the floor of Room 52.
• Building N239A: seal preferential pathways by making HVAC modifications and plugging the sealing pipe, conduit penetrations, and floor drains. A 1 SF louvered vent will be installed near the bottom of the exterior wall between the fifth and eighth pier on the western elevation.

NASA identified the Area of Potential Effects (APE) for the undertaking limited to the building footprints of Buildings 3, 10, 45, 126, N239, and N239A, while the vertical APE extends 6 inches below the surface of the buildings’ foundations where limited ground disturbance is expected.

The APE includes the NAS Sunnyvale Historic District. Building 10 is listed in the National Register as a contributor to the historic district. NASA proposes to treat the remaining project buildings as eligible for the purposes of this consultation.

During a record search at the Northwest Information Center, no previously recorded archaeological resources were identified in the APE. Contacted the Native American Heritage Commission (NAHC) to request a Sacred Land File search, which was negative. The NAHC also sent a list of 11 Native American representatives geographically associated with the project area. These representatives were not contacted for additional information because of the nature of the undertaking. The APE is entirely disturbed, and NASA determined that further archaeological survey or testing related to the undertaking is not necessary.

NASA determined that the project would minimally alter Buildings 3, 10, 45, 126, N239, and N239A. The majority of the project work would be limited to interior and utilitarian/mechanical areas of the buildings, which do not contribute to the significance of the NAS Sunnyvale Historic District or the potential significance of Buildings N239 and N239A. Exterior work will be limited to installation of PVC piping and louvered vents for ventilation in discreet areas. The project will not alter, directly or indirectly, any of the characteristics of the historic properties in the APE that may qualify them for inclusion in the NRHP in a manner that would diminish the integrity of the properties' location, design, setting, materials, workmanship, feeling, or association. The project will not
result in any adverse effects, including cumulative, to the NAS Sunnyvale Historic District (Buildings 3, 10, 45, and 126) or Buildings N239 and N239A. Therefore, NASA proposes a Finding of No Adverse Effect for this undertaking.

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

- This project qualifies as an undertaking with the potential to affect historic properties.
- The APE is sufficient to take direct and indirect effects of the undertaking into account.
- Identification and evaluation efforts are sufficient.
- Based upon the information submitted, the SHPO has no objection to the proposed Finding of No Adverse Effect for this undertaking.
- Please be advised that under certain circumstances, such as unanticipated discovery or a change in project description, NASA may have additional future responsibilities for this undertaking under 36 CFR Part 800.

If there are any questions or concerns, please contact State Historian Mark Beason, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

[Signature]

Julianne Polanco  
State Historic Preservation Officer