



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

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May 15, 2023

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, Buildings 15, 16, and 567, NASA Ames Research Center, Santa Clara County, CA

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the April 5, 2023, letter re-opening 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 Harris Environmental, Inc., dated June 2022, that provides the Section 106 analysis, project maps, and photographs.

As with the previous consultation for this undertaking, Naval Facilities Engineering Command – Southwest (NAVFAC) proposes Vapor Intrusion Remediation at Site 28 within ARC. For the previous consultation, NASA conducted mitigation of vapor intrusion (VI) in Buildings 3, 10, 45, 126, N239, and N239A. For the current undertaking, NASA and NAVFAC propose additional vapor intrusion remediation at Buildings 15, 16, and 567. 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 VI, which occurs when aerated chemical compounds enter buildings through preferential pathways, such as floor drains and utility trenches or tunnels. Most of the VI mitigation is planned for interior spaces and minimal changes are planned for exterior elements. No excavation is anticipated to go deeper than 12 inches below any slab. Work planned for each building is summarized below.

- **Building 15:** NAVFAC proposes to seal preferential pathways of VI in the slab and subfloor from air flow and install a sub-slab depressurization (SSD) system below the slab foundation. Part of the VI mitigation will be accomplished by sealing floor drains in kitchen and bathroom areas. Vent piping will be installed at the blowers and away from HVAC inlets and windows to prevent VI back into the building. As part of the diagnostic testing, 6-inch holes were drilled in the slab and 1 cubic foot of soil excavated near the perimeter footings. During installation of the SSD, fans will be mounted just below the ceiling and secured to an interior wall using a mounting kit. Four (4)-in schedule 40 PVC piping will be attached to the outlet of each fan and extend through a penetration in the roof so that the exhaust is expelled outdoors. The PVC piping will be secured to the interior walls using strut channel and pipe clamps. Where applicable, the strut channel will be fastened to the walls using anchor bolts or drywall screws.
- **Building 16:** NAVFAC proposes to seal preferential pathways by crack sealing along concrete seam lines and cracks and installing an SSD system. The SSD system will be similar to the SSD systems described for Building 15. The PVC risers will be installed in the interior and extend above the roof line and away from HVAC units. The SSD will be exhausted through the roof via 3-inch PVC pipe, 6 inches tall. Room 118 has a separate HVAC system not connected to the HVAC in the rest of the building. A gravity relief damper will be installed as part of modifications made to this HVAC system to provide fresh air intakes to prevent the buildup of negative pressures in Room 118.
- **Building 567:** NAVFAC proposes to seal preferential pathways by crack sealing along concrete seam lines and cracks and installing an SSD system. The SSD system will be similar to the SSD systems described for Buildings 15 and 16. The PVC risers will be installed in the interior and extend above the roof line and away from HVAC units. The SSD will be exhausted through the roof via 3-inch PVC pipe, 6 inches tall.

NASA identified the Area of Potential Effects (APE) for the undertaking limited to the building footprints of Buildings 15, 16, and 567, while the vertical APE extends 12 inches below the surface of the buildings' foundations where limited ground disturbance is expected.

The APE includes the NAS Sunnyvale Historic District. Buildings 15 and 16 are listed in the National Register as contributors to the historic district. In previous consultation, NASA found Building 567 (built in 1978) to be ineligible for listing in the National Register and the SHPO concurred.

During a record search at the Northwest Information Center, no previously recorded archaeological resources were identified in the APE. NASA concluded that there is low potential for more deeply buried prehistoric archaeological resources in the APE. The APE is entirely disturbed, and further archaeological survey or testing related to the undertaking is not necessary.

NASA determined that the project would minimally alter Buildings 15, 16, and 567. The majority of the project work will be limited to interior and utilitarian/mechanical areas of the buildings, which do not contribute to the significance of the NAS Sunnyvale Historic District. Exterior work will be limited to installation of PVC piping with struts and/or clamps on exterior walls and dampers in discreet existing wall openings. 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 15, and 16). 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,



Julianne Polanco
State Historic Preservation Officer