



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

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September 27, 2021

VIA Email

In reply, refer to: NASA_2021_0419_001

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

Subject: USGS M2M Lab Building Project, Parcel 15, NASA Ames Research Center, Moffett Field, Santa Clara County, California

Dear Mr. Ikan:

The California State Historic Preservation Officer (SHPO) has received the August 17, 2021, email and figures continuing 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 email, NASA submitted figures illustrating the construction and demolition included in the project.

As previously described, the proposed undertaking, involves construction of a new laboratory building of approximately 50,000 sq ft that will house a multidisciplinary group of programs and users. The project would remove the maintenance facility shed, alter Building 6 with the removal of additions to the structure while maintaining the original 1933 portion of the building, and leave Building 5 unaltered in place.

In response to NASA's initiation letter (dated April 13, 2021), the SHPO returned a letter dated June 4 requesting requested further information regarding several aspects of the undertaking. NASA responded with a second letter dated June 24, and the SHPO responded with an email dated August 17. The current NASA email and figures provides the most recent response to the SHPO's inquiries.

- NASA clarified that the project description *does* include precast driven piles, which would be driven approximately 50 feet below the ground surface.
- NASA revised the Area of Potential Effect (APE) as extending to a depth of 65

feet, the maximum depth of the piles.

- The SHPO's June 4 letter contained concerns regarding identification efforts, especially regarding evaluation efforts for Building 6. In particular, the SHPO finds it inappropriate to treat a portion of a building as eligible for listing in the National Register while treating additions to that building as ineligible and proposing demolition.
 - The response clarified that NASA evaluated Building 6 to update its eligibility for listing in the National Register of Historic Places (NRHP). It was previously identified as noncontributing to the NAS Sunnyvale Historic District in the 1994 NRHP nomination. The new evaluation provided an assessment of Building 6's historical significance and integrity, including an assessment of its additions, and concluded that Building 6 is eligible as a contributor to the NAS Sunnyvale Historic District, but that its additions either do not date to the period of significance or do not retain integrity.

Along with the June 24 letter, NASA provided an updated and revised technical report. After reviewing NASA's responses to comments and the revised report, the SHPO offered additional questions for clarification in the July 26 email, and NASA responded with the August 17 email.

- The SHPO asked NASA to clarify an error in the technical report by confirming that the NAS Sunnyvale Historic District's period of significance is 1930-1961.
 - NASA confirmed that this is correct.
- The SHPO asked NASA to confirm that the agency agrees with the technical report that Building 0006 is eligible as a contributor to the NAS Sunnyvale Historic District formally.
 - NASA responded that, based on the significance identified in the 2021 technical report, NASA has determined that Building 6 is not individually eligible for listing in the National Register, but is eligible as a contributor to the NAS Sunnyvale Historic District.
- The SHPO asked NASA to clarify the technical report's assertion that the 1947 extension of Building 006 is significant but does not retain integrity to express its historic significance. No specific integrity issues were described that would preclude this portion of Building 006 from contributing to its significance.

- NASA responded by pointing out that the portion of the 1944 addition to Building 006 that housed the engine test stand was removed when the ca. 1967 addition was constructed.
- The ca. 1947 extension represents a continuation of Building 006's motor/engine test function, which was an important activity at US NAS Sunnyvale during the original and expanded periods of significance. However, the loss of the engine test stand and modifications to fenestration and siding over the years have compromised the extension's ability to convey this historical function.
- NASA also restated the conclusion that the ca. 1967 northwest extension to Building 006 was constructed outside of the original and expanded periods of significance for the US NAS Sunnyvale Historic District, and as such does not support the historical significance of Building 006 as a contributing resource.
- The SHPO requested that NASA confirm that the scope of work had not changed to include full demolition of Building 006 as figure D-18 on page 57 of the revised technical report seemed to indicate.
 - NASA confirmed that the project description only includes partial demolition of Building 006 (the 1947 and 1967 additions).
- Finally, the SHPO stated that given the depth of ground disturbance, which seems likely to exceed previous disturbance, archaeological monitoring seems appropriate.
 - NASA responded that USGS has committed to archaeological monitoring during ground-disturbing activities.

Based upon these exchanges of requests and clarification, the SHPO offers the following comments.

- As stated in the SHPO's June 4 letter, this project qualifies as an undertaking with the potential to affect historic properties.
- After revision and clarification by NASA, the APE appears to be sufficient.
- After revision and clarification by NASA, identification and evaluations efforts are sufficient.
- The SHPO concurs that Building 006 is not individually eligible for listing in the

National Register.

- The SHPO also concurs that Building 006 contributes to the significance of the NAS Sunnyvale Historic District. The SHPO concurs that the two additions to the building do not contribute to its significance because one does not date to the period of significance and the other does not retain integrity.
- Based upon this information, 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.
- Finally, the SHPO recommends that NASA make it clear in future consultations about evaluation statuses and what is being asked of the SHPO with regard to identification efforts. It would also be useful if NASA completed a formal update to the NAS Sunnyvale Historic District nomination to include the revised period of significance and contributors, which would eliminate the confusion other parties and consultants seem to have about these details about the historic district.

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