

National Aeronautics and Space Administration

**Ames Research Center**  
Moffett Field, California 94035



April 13, 2021

Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation  
Department of Parks & Recreation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816

Attn: Mark A. Beason

Subject: Section 106 Consultation for the USGS M2M Lab Building Project, Parcel 15, NASA Ames Research Center, Moffett Field, Santa Clara County, California

Dear Ms. Polanco:

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) requests Section 106 consultation on the new United States Geological Survey (USGS) M2M Lab Building Project (project or undertaking). USGS proposes to construct a new Laboratory Building within Parcel 15 at the NASA Ames Research Park at NASA ARC, Moffett Field, Santa Clara County, California. The project site is located within the U.S. Naval Air Station Sunnyvale, California Historic District (district), which is listed in the National Register of Historic Places (NRHP). As the lead Federal agency, NASA ARC has determined that this project constitutes an undertaking under Section 106 of the National Historic Preservation Act of 1966 (54 United States Code §306108), as amended.

*Description of the Undertaking*

The project involves construction of a new laboratory building of approximately 50,000 sq ft that will house a multidisciplinary group of programs and users. The new facility will house approximately 30,000 net square feet of usable lab space including wet chemistry type labs along with light industrial dry labs and shops. The proposed lab building is comprised of two wings, one of which is two stories and the other is one story with high bay space. The project will include above-grade work as well as ground disturbance for the building foundation and site development. The depth of disturbance would be approximately 7 feet below grade for the installation of the building foundations, except for the installation of precast driven piles, which would be driven approximately 50 feet below the ground surface.

The project site is currently occupied by asphalt and gravel parking areas, a maintenance facility shed, Building 6 (Mixed Use Warehouse), and Building 5 (Water Tower), which is no longer in use. The project will remove the maintenance facility shed, will alter Building 6 with the

removal of additions to the structure while maintaining the original 1933 portion of the building, and will leave Building 5 unaltered in place.

The project will provide upgraded parking and access to the site, including restriping and area lighting, accessible parking spaces, and accessible paths of travel. There will be new paving, grading, landscaping, and site utilities integrated into the project as well. Existing but abandoned subsurface utility lines that are present below the pavement will be reused where possible; an existing abandoned steam tunnel and existing water pipes will be removed. Any existing paving outside of the footprint of Parcel 15 that is disturbed due to the installation of new utilities that support the project will be patched in-kind. The new design includes an entrance oriented to South Akron Road, with new sidewalks and plantings that encourage pedestrian access from the west portion of the NAS Sunnyvale Historic District to the building. The entry plaza will include new landscaping with a bio-swale to improve the areas water ecology. A self-guided rock garden exhibiting some of the USGS research work will complement this new landscaping.

#### *Area of Potential Effects (APE)*

The APE is defined to address both direct and indirect impacts on potential historic properties and encompasses areas that may be affected by both temporary and permanent construction activities. The APE was defined to encompass the first tier of buildings adjacent to the project's footprint. The APE overlaps the district; therefore, the entire district is considered as a historic property within the APE. For archaeological resources, the APE was defined as the limits of the project area with a maximum limited excavation depth of 8 feet, including areas of temporary staging and construction ground disturbance. The APE as defined in the Section 106 Technical Report is inclusive of Parcel 15 and the buildings that surround it, all of which are set within the district (see Figure 5 in the attached Section 106 Technical Report).

#### *Identification Efforts*

USGS retained SmithGroup and Gray & Pape to conduct a technical study for this project. The study was conducted by cultural resources professionals who meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738). The Section 106 Technical Report prepared by SmithGroup and Gray & Pape, dated April 5, 2021, which includes a description of the undertaking, the APE, identification efforts, a description of the affected historic properties, and an assessment of potential effects resulting from the undertaking, is attached for your review.

No archaeological resources have been previously identified in the APE; furthermore, there is low potential for more deeply buried prehistoric archaeological resources across ARC, because the proposed work is located in an area of low prehistoric or historic archaeological sensitivity. Previous and recent Native American Heritage Commission and Sacred Land Files searches have not indicated any known cultural properties in the APE. It is unlikely that the APE contains archaeological historic properties and an archaeological survey was not performed.

The NRHP-listed district (NRIS #94000045) in its entirety is considered as a historic property in the APE. Twelve individual potential historic properties were identified in the APE. All of the properties were previously evaluated for NRHP eligibility. Hangar 1 and Buildings 5 and 10 are listed in the NRHP as contributors to the district. Hangar 1 is also individually eligible. Buildings

10A, 503, 510, 567, and 570 are not eligible and do not contribute to the district. Buildings 3, 6, 45 and 126 are not individually eligible and were previously identified as non-contributing to the district; however, based on the current study, NASA proposes to treat these resources as potential contributors to the district for the purposes of this Section 106 consultation.

#### *Affected Historic Properties*

Due to the scale and location of the project, three listed contributors and four potential contributors were specifically assessed for potential effects because of their proximity to the project site, including Buildings 1 (Hangar 1), 3, 5, 6, 10, 45 and 126. For full descriptions of these resources, please see the attached report. One potential contributor, Building 6, will be directly impacted by the project due to the removal of its non-contributing utilitarian additions.

#### *Effects Assessment*

It is not anticipated that archaeological resources will be encountered as a result of this undertaking. No potential effects on potentially significant archaeological resources are anticipated. Should the project uncover previously unknown subsurface archaeological resources, contractors will immediately halt construction, secure the site, and notify NASA of the unanticipated discovery. NASA will follow the Standard Operating Procedure for unanticipated discoveries as outlined in the Integrated Cultural Resources Management Plan for ARC.

For architectural resources, the criteria of adverse effect were applied. The proposed design of the new laboratory building will minimally alter the setting of the district, its contributors, and potential contributors within the APE. This new building is sufficiently differentiated from and compatible with adjacent historic properties related to its size, profile, setbacks and massing. Proposed landscaping and site design with shade trees, plantings and entrance plaza are in keeping with the setting of adjacent historic properties within the district. The proposed use of the new laboratory building, dedicated to geological research, is an appropriate function that complements the historic research functions of other facilities at NASA ARC. The construction of the laboratory building will have no impact on the integrity of location, design, materials, or workmanship of adjacent historic properties or the district, which is consistent with the Secretary of the Interior's Standards for Rehabilitation. Building 6, a potential contributor to the district, will be altered with the removal of subsequent non-contributing additions, which would not diminish its potential significance as a contributor to the district.

#### *Finding of Effect*

Based on the assessment conducted by qualified cultural resources professionals, NASA ARC has made a finding of No Adverse Effect for this undertaking.

#### *Consultation Efforts*

No Federally Recognized Tribes are associated with the geographical boundaries of NASA ARC or this undertaking. As part of a previous archaeological study of the entire ARC property, NASA Ames Research Center Archaeological Resources Study (AECOM 2017), a Sacred Lands File search and a list of Native American tribes and representatives with a known interest in the area was requested from the Native American Heritage Commission (NAHC). The NAHC responded on April 27, 2016, indicating that the Sacred Lands File search was negative and providing a list of non-federally recognized Native American representatives who may have

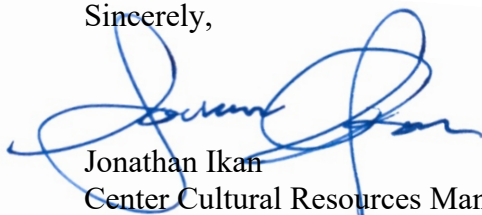
additional information regarding cultural resources in the vicinity of the ARC property. Since then, NASA ARC has consulted with these representatives on undertakings that have had the potential to affect cultural resources at known sites and in areas with high sensitivity for prehistoric archaeological resources. These representatives have not provided any additional information regarding known sacred lands or previously undocumented archaeological resources. Due to the highly disturbed nature of the project site and the low sensitivity for prehistoric archaeological resources, NASA ARC has not consulted with the non-federally recognized Native American representatives on this undertaking. In the event that an inadvertent discovery of prehistoric archaeological resources or human remains of Native American origin are encountered, NASA ARC will consult with these representatives.

USGS is a consulting party in this Section 106 review. NASA ARC has not identified additional consulting parties for this Section 106 review but is making these findings available to the public via the NASA ARC Historic Preservation Office website (<https://historicproperties.arc.nasa.gov/section106.html>).

The purpose of this letter is to request the initiation of Section 106 consultation and to request the State Historic Preservation Officer's concurrence on the APE, NASA's determinations of eligibility pursuant 36 CFR 800.4(c)(2), and NASA's finding of No Adverse Effect for this undertaking pursuant to 36 CFR 800.5(b). NASA ARC requests the SHPO's response within 30 days of receipt of this letter, as specified in 36 C.F.R. 800.5(c).

Please contact me at [Jonathan.D.Ikan@nasa.gov](mailto:Jonathan.D.Ikan@nasa.gov) or (650) 604-6859 if you have any questions regarding this matter.

Sincerely,



Jonathan Ikan  
Center Cultural Resources Manager



Ames Research Center, MS 213-8  
Moffett Field, California 94035

**cc:**  
HQ/EMD/Dr. Rebecca Klein, Ph.D., RPA

**Attachment**

*USGS M2M Lab Building, NASA ARC Parcel 15 Section 106 Technical Report, prepared by SmithGroup and Gray & Pape, dated April 5, 2021*