



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

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

June 4, 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 April 13, 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 report entitled *USGS M2M Lab Building, NASA ARC Parcel 15 Section 106 Technical Report*, prepared by SmithGroup and Gray & Pape, and dated April 5, 2021, that provides the Section 106 analysis, project maps, and photographs.

The proposed undertaking, as described, 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 would feature 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 would be comprised of two wings, one of which would be two stories and the other one story with high bay space. The project would include above-grade work as well as ground disturbance for the building foundation and site development. The depth of disturbance would be approximately seven 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 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.

The project would provide upgraded parking and access to the site, including restriping and area lighting, accessible parking spaces, and accessible paths of travel. There would be new paving, grading, landscaping, and site utilities integrated into the project. 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 disturbed during construction of new utilities that support the project would 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 would include new landscaping with a bio-swale to improve the areas water ecology.

NASA identified the Area of Potential Effects (APE) for the undertaking encompassing the project footprint and the first tier of adjacent buildings. NASA also defined the APE for archaeological resources as the limits of the project area with a maximum limited excavation depth of eight feet, including areas of temporary staging and construction ground disturbance.

Through previous survey in 2017, NASA characterized archaeological sensitivity throughout NASA Ames Research Center. Project locations for this undertaking are in areas evaluated as having low archaeological sensitivity for Prehistoric-era and Historic-era resources, with no known archaeological sites located within the APE.

The APE is located within the boundaries of NAS Sunnyvale Historic District, which was listed in the National Register of Historic Properties (NRHP) in 1994 and resurveyed with an expanded period of significance and additional contributing resources in 2013. Twelve individual potential historic properties were identified in the APE. All 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, while treating the utilitarian extensions projecting from the northwest and southwest elevations of Building 006 as non-contributing.

NASA does not anticipate that archaeological resources will be encountered or affected as a result of this undertaking.

NASA finds that the proposed design of the new laboratory building would minimally alter the setting of the district, its contributors, and potential contributors within the APE. The new building would be 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 would be in keeping with the setting of adjacent historic properties within the district. The proposed use of the new laboratory building, dedicated to geological research, would be an appropriate function that complements the historic research functions of other facilities at NASA ARC. The construction of the laboratory building would have no effect 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, which NASA finds to be a potential contributor to the district, would be altered with the removal of subsequent non-contributing additions, but NASA finds that this would not diminish its potential significance as a contributor to the district.

Based upon this analysis, NASA ARC has made 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.
 - However, the letter and supporting report are inconsistent regarding the project description. The letter states that the project would include installation of precast driven piles, which would be driven approximately 50 feet below the ground surface, but the report omits this detail.
 - Please clarify if this is part of the undertaking.
- The APE does not appear to be sufficient to take direct and indirect effects of the undertaking into account.
 - If it is accurate that precast driven piles would be driven 50 feet below the ground surface, then the vertical APE should include that depth. As defined in the letter, the depth of disturbance would not exceed eight feet deep.
 - The SHPO recommends that NASA clarify the scope of work on this detail and adjust the vertical APE accordingly.
- The SHPO finds identification and evaluation efforts to be insufficient based upon the information submitted.

- The purpose of treating previously evaluated properties as eligible for this consultation as described in the Section 106 Technical Report is unclear.
 - It is inconsistent with good Section 106 practice to treat properties or portions of properties as ineligible, especially when those portions will be demolished.
 - The analysis of Building 6 is inconsistent between the letter and technical report. The letter states that it has been previously evaluated and determined ineligible individually and not a contributor to the NAS Sunnyvale Historic District. The technical report recommends treating Building 6 as eligible, but only the portion of the building constructed in 1933.
 - Furthermore, in the technical report, no dates of construction for extensions to Building 6 are given, no period of significance is defined, and no National Register criteria are specified under which the building could be considered as a significant contributor the historic district.
 - The technical report concludes that the two extensions to the building (proposed for demolition in this undertaking) should not be treated as eligible despite providing no dates of construction for the extensions to demonstrate that they were built after the period of significance for the historic district (1930-1961).
 - Without a full and conclusive evaluation that covers all of Building 6, the SHPO is unable to comment on potential effects from the undertaking.
- Until these points regarding the definition of the undertaking and identification and evaluation of historic properties are resolved, the SHPO is unable to comment assessment of adverse effects.

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