

National Aeronautics and Space Administration

Ames Research Center
Moffett Field, California 94035



June 24, 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
(NASA_2021_0419_001)

Dear Ms. Polanco:

In response to your letter dated June 4, 2021, the National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) requests continuing consultation on the new United States Geological Survey (USGS) M2M Lab Building Project (project or undertaking) in compliance with Section 106 of the National Historic Preservation Act of 1966 (54 United States Code §306108), as amended.

Attached is the revised technical study entitled *USGS M2M Lab Building, NASA ARC Parcel 15 Section 106 Technical Report*, prepared by SmithGroup and Gray & Pape, revised June 14, 2021, that provides additional Section 106 analysis of the project. The revised technical study provides information in response to the State Historic Preservation Officer's (SHPO's) comments:

SHPO Comment: 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.*

NASA ARC Response: Piles are included as part of the undertaking; clarification provided in the updated project description in the revised technical study, specifically in Section 2.3 Ground Disturbing Activities (page 6).

SHPO Comment: 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.*

NASA ARC Response: The APE was revised to extend to a depth of 65 feet, the maximum depth of the piles; clarification provided in the revised technical study, specifically in Section 3.0 Area of Potential Effects (page 8).

SHPO Comment: 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.*

NASA ARC Response: An evaluation of Building 6 was conducted to update its eligibility for listing in the National Register of Historic Places (NRHP). It was previously identified as non-contributing to the NAS Sunnyvale Historic District in the 1994 NRHP nomination. The new evaluation conducted by Gray & Pape 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. The summary of the Building 6 evaluation is provided the revised technical study, specifically in Section 4.3 Architectural Resources Assessment (pages 18 to 19); for the detailed evaluation prepared by Gray & Pape, see the DPR 523 forms for Building 6 provided in Appendix J of the revised technical study.

SHPO Comment: 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

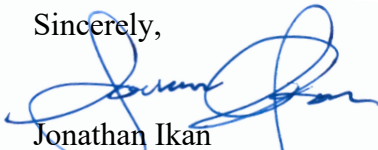
adverse effects.

NASA ARC Response: Additional project details and efforts to evaluate Building 6 are discussed in the revised technical report, which is attached for your review. NASA requests continuing Section 106 review of this undertaking based on this additional information.

NASA ARC requests the SHPO's concurrence on the revised 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 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, revised June 14, 2021.