

National Aeronautics and Space Administration



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

March 3, 2022

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

Attn: Mr. Mark Beason

**Subject:** Section 106 Consultation for Building 55 Pipeline Excavation Project at NASA Ames Research Center, Moffett Field, Santa Clara County, California

Dear Ms. Polanco:

The National Aeronautics and Space Administration (NASA) requests initiation of consultation under Section 106 of the National Historic Preservation Act (NHPA) for the Building 55 Pipeline Excavation Project (project or undertaking) located at Ames Research Center (ARC) at Moffett Field, Santa Clara County, California. The U.S. Navy proposes remedial activities to address environmental impacts associated with a release from the former Building 55 petroleum pipeline at the former NAS Moffett Field (now part of NASA ARC). NASA ARC is the lead Federal agency pursuant to 36 C.F.R. § 800.2(a)(2) under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (54 U.S.C. §306108), as amended, and its implementing regulations (36 C.F.R. Part 800). NASA ARC determined that this project constitutes an undertaking under the NHPA.

The project is located near the southeast corner of Hangar 2 (see attached, Appendix A). In 2018, petroleum hydrocarbons were discovered in soil and groundwater near the southeast corner of Hangar 2. The remedial activities include soil excavation and groundwater sampling to address petroleum constituents at a former Navy pipeline.

*Identification Efforts*

In support of NASA ARC's responsibilities under Section 106, professional consultants who meet the Secretary of the Interior's professional qualifications standards (48 Federal Register 44738) conducted a cultural resources study of the undertaking. The technical memo prepared by

AECOM, dated March 2, 2022, which includes a description of the undertaking, the Area of Potential Effects (APE), identification efforts, and an assessment of potential effects resulting from the undertaking, is enclosed for your review. For further details on the following summary, see the attached memorandum.

There are no known archaeological sites in the APE, and the APE is in an area with a low potential for deeply buried prehistoric sites. However, the proposed work is within an area of heightened sensitivity for near-surface prehistoric and historic-period archaeological sites due to historical mapping and archival research that identified shell mound sites and an agricultural building complex historically recorded in the area. In general, it can be assumed that the APE is in an area with a moderate potential to contain resources associated with prehistoric settlement and sparsely developed rural agricultural activities prior to 1931. The amount of prior disturbance appears high due to prior pipeline installation in the APE, although remediation excavation may extend below previously disturbed soils. In addition, redeposited prehistoric archaeological materials may be present in redeposited fill.

The APE is located in the Naval Air Station (NAS) Sunnyvale Historic District and has been previously surveyed for built environment resources. Although the APE boundary does not include the entirety of the historic district, effects on the district as a whole were considered. However, no contributing elements of the district are in the APE. The APE covers an area of concrete pavement and an underground pipeline that are not contributing to the district. The surface and texture of the concrete are not distinctive. The closest district contributors to the APE are Hangar 2, Hangar 3, and MF1002 – Aircraft Parking Apron.

#### *Effects Assessment*

Archaeological monitoring, including preparation of a brief archaeological monitoring plan, will be conducted. Should the project uncover previously unknown subsurface archaeological resources, including when the monitor is present, 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. Through implementation of mitigation measures outlined in the standard operating procedure for unanticipated discoveries, the undertaking would have no adverse effect on archaeological historic properties.

The project would be limited to a portion of concrete pavement that does not contribute to the significance of the NAS Sunnyvale Historic District. Due to the scale and nature of the project, no effects on the district or its closest contributors, Hangar 2, Hangar 3, or MF 1002, are anticipated.

#### *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, a

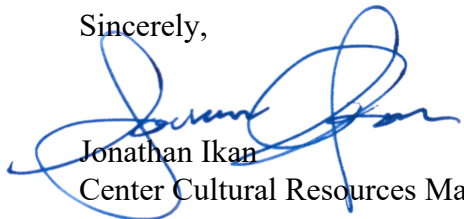
Sacred Lands File search and a list of Native American tribes and representatives with a known interest in the area was requested from the Native American Heritage Commission (NAHC). The NAHC responded on July 28, 2021, indicating that the Sacred Lands File search was negative and providing a list of 11 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, 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.

The U.S. Navy 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 to 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 at (650) 604-6859 with any questions.

Sincerely,



Jonathan Ikan  
Center Cultural Resources Manager



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cc:

HQ/EMD/Dr. Rebecca Klein, Ph.D., RPA

**Enclosures**

Memorandum on the Building 55 Pipeline Excavation Project, dated March 2, 2022 (AECOM)