

National Aeronautics and Space Administration



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

April 29, 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 GCUST5783, MP 0.00 to 0.10 Strength Test 6-Inch Pipe 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 GCUST5783, MP 0.00 to 0.10 Strength Test 6-Inch Pipe Project (project or undertaking) located at Ames Research Center (ARC) at Moffett Field, Santa Clara County, California. The project is being proposed by Pacific Gas and Electric Company (PG&E) to conduct hydrostatic testing of a gas transmission pipeline within 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). The project also requires a U.S. Army Corps of Engineers (USACE) Rivers and Harbors Act Section 10 permit. NASA ARC determined that this project constitutes an undertaking under the NHPA.

The project is within NASA ARC along and north of Lindbergh Avenue and south of Jogel Slough (see Enclosure). PG&E would conduct hydrostatic testing on two locations that would serve as the test heads, or end points, of the approximately 0.1-mile strength test of T-1533, a natural gas pipeline. Hydrostatic testing is a California Public Utility Commission-mandated testing procedure that involves pressurizing a pipe with water to reveal potential weaknesses.

### *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 report prepared by SWCA Environmental Consultants (SWCA), dated October 2021, 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 technical report.

As part of the identification efforts, SWCA conducted a Sacred Lands File (SLF) search through the California Native American Heritage Commission (NAHC); Tribal outreach, including letters to local Tribes and follow-up calls to all Tribal contacts; a records search of the California Historical Resources Information System (CHRIS); a buried site sensitivity analysis; a review of historical aerials and relevant literature; and a pedestrian survey of the APE.

The SLF search was negative, and no comments were received from Tribes who were contacted (see below). No previously recorded cultural resources were identified within the APE and no new cultural resources were identified during the intensive pedestrian survey.

[REDACTED]

### *Effects Assessment*

No historic properties were identified in the APE during the identification efforts.

### *Finding of Effect*

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

### *Consultation Efforts*

No federally recognized Tribes are associated with the geographical boundaries of NASA ARC or this undertaking. PG&E conducted an SLF search and requested a list of Tribes and representatives with a known interest in the area from the NAHC. The NAHC responded on March 18, 2021, indicating that the SLF search was negative and providing a list of 9 non-federally recognized Tribal representatives who may have additional information regarding cultural resources in the vicinity of the ARC property.

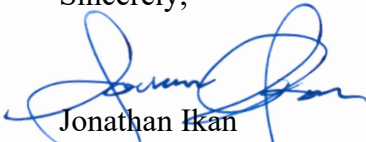
PG&E contacted these Tribal representatives on July 7, 2021. No responses were received. NASA ARC has historically consulted with these representatives on other undertakings that have had the potential to affect cultural resources. These representatives have not provided any additional information regarding known sacred lands or previously undocumented archaeological resources. Due to the highly disturbed nature of the project site, NASA ARC did not consult with the non-federally recognized Native American representatives on this undertaking. If an inadvertent discovery of prehistoric archaeological resources or human remains of Native American origin are encountered, NASA ARC will consult with these representatives.

The USACE and PG&E are consulting parties 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 Historic Properties Affected for this undertaking pursuant to 36 CFR 800.4(d). NASA ARC requests the SHPO's response within 30 days of receipt of this letter.

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



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

**cc:**

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

**Enclosures**

Cultural Resources Inventory Report for the GCUST5783, MP 0.00 to 0.10 Strength Test 6-Inch Pipe Project, dated October 2021 (SWCA)