



DEPARTMENT OF THE NAVY  
THE ASSISTANT SECRETARY OF THE NAVY  
(INSTALLATIONS AND ENVIRONMENT)  
1000 NAVY PENTAGON  
WASHINGTON, D.C. 20350-1000

John L. Nau, III  
Chairman  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue, NW Suite 809  
Washington, DC 20004

AUG 01 2008

Dear Chairman Nau:

The Department of the Navy is planning to conduct a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action at Installation Restoration Program (IRP) Site 29 (Hangar 1) at the former NAS Moffett Field. Hangar 1 is individually eligible for the National Register of Historic Places. The enclosed Engineering Evaluation/Cost Analysis (EE/CA) documents an evaluation of several proposed removal action alternatives and the Navy's recommendation to proceed with "Alternative 10". Alternative 10 would include removing panels containing hazardous substances and coating exposed surfaces of the structure. The Navy is requesting Advisory Council on Historic Preservation's (ACHP) final comments on the Navy's proposed CERCLA action, as described in the EE/CA. In addition to the EE/CA, we have enclosed an assessment of adverse effects on the United States Naval Air Station Sunnyvale Historic District.

The Site 29 removal action has been controversial. Many interested parties have expressed concern over the adverse effects from the removal action. As you are aware, the California State Historic Preservation Officer wrote you a letter on November 5, 2007 requesting your help "saving Hangar 1." The Navy has been sensitive to these concerns throughout the CERCLA process and we have carefully considered numerous mitigation measures in an effort to minimize adverse effects to historic properties.

A CERCLA removal action is necessary to control the release of hazardous substances, specifically polychlorinated biphenyls, from Hangar 1 to the environment through source elimination or containment, thereby reducing the potential risks to human health and the environment. Because all of the various CERCLA actions evaluated by the Navy have the potential to impact historic properties, the Navy has integrated cultural resource considerations into its CERCLA planning process. Even though Navy is not subject to the procedural requirements of Section 106 of the National Historic Preservation Act (NHPA) when conducting CERCLA response actions, the Navy has determined that substantive portions of NHPA require the Navy to take into account the effect the CERCLA action would have on historic properties, and to solicit the comments of ACHP as well as of other stakeholders. Accordingly, the Navy has actively sought input from the California State Historic Preservation Officer (SHPO) / Office of Historic

Preservation (OHP), ACHP staff, other stakeholders and the public throughout the process of planning this removal action. This input was received through presentations and discussions at numerous Restoration Advisory Board meetings, stakeholder meetings, open houses, briefs to political aides, letters, information updates, telephone calls, and opportunities to review and comment on documents. These communication opportunities included consultation related to the assessment and resolution of adverse effects on Hangar 1 and the Historic District.

Prior discussions with OHP and ACHP staff have been valuable to the Navy in its consideration of the removal action. Several removal action alternatives and recommended mitigation measures were suggested by stakeholders. The EE/CA identifies a broad range of 13 removal action alternatives, and includes detailed evaluation of these alternatives in terms of their implementability and effectiveness. Five of the 13 alternatives are evaluated further, focusing on a comparative analysis to assess implementability, effectiveness, and cost of the alternatives relative to one another. These five alternatives include:

- Coating the existing siding with an acrylic coating,
- Covering the existing siding with rubberized material,
- Covering the existing siding with a new visually similar siding,
- Removal of siding and coating of exposed surfaces, and
- Demolition and removal of the hangar.

Alternative 10, removal of siding and coating of exposed surfaces, has been identified in the EE/CA as the Navy's preferred alternative.

Past and present versions of the EE/CA have included an assessment of adverse effects of the undertaking on Hangar 1. In addition to the EE/CA, the Navy has prepared the enclosed separate assessment of adverse effects on the United States Naval Air Station Sunnyvale Historic District. The evaluation applies criteria of adverse effect from the implementation of the Navy's preferred removal action alternative to the Historic District. The EE/CA and assessment of adverse effects conclude that the preferred alternative would result in an adverse effect not only to Hangar 1, but also to the Historic District.

As mitigation for the adverse effects to Hangar 1 and the Historic District, the Navy has considered and recommends the following measures:

- Level I Historic American Engineering Record documentation,
- Oral histories of individuals who worked in the hangar during different eras,

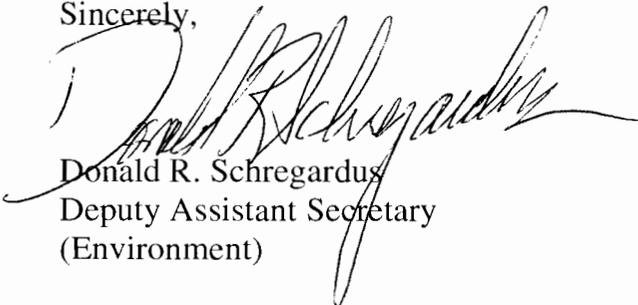
- Virtual Hangar 1 interactive documentation on compact disk,
- Inventory-catalogue of Hangar 1 collections,
- Preservation of Hangar 1 man-cranes, and
- Coating the exposed steel frame with protective coating similar in color to the former siding.

It should be noted that the Navy's responsibilities for conducting the CERCLA response action at Hangar 1 overlap with some responsibilities or potential future actions of NASA. Generally, NASA is responsible for cultural resource management and reuse of the property while the Navy is responsible for the CERCLA response action. Thus, the Navy has attempted to consider NASA's interest in the potential reuse of the hangar in its evaluation of alternatives.

We request ACHP's final comments regarding this undertaking within 45 days. Concurrently with this letter, the EE/CA has been publicly released for comment for the same amount of time. The Navy will also host a public meeting during the public review period, to provide all interested parties an opportunity to make formal comments on the EE/CA. The Navy has not yet made its final selection of the removal action alternative. The Navy will take ACHP's comments into account in arriving at its final decision on the removal action alternative. The final decision selecting the removal action alternative will be documented in the Action Memorandum anticipated in early 2009. Responses to your comments on the EE/CA, as well as those of other stakeholder and the public, will be attached as an appendix to the Action Memorandum.

I would like to thank you and the ACHP staff for your interest in this CERCLA removal action, and for your assistance in navigating this unique intersection between CERCLA and NHPA. We look forward to working with you and your staff on future projects.

Sincerely,



Donald R. Schregardus  
Deputy Assistant Secretary  
(Environment)

Enclosures:  
As stated

Copy to: (w/encl (2)):

Milford Wayne Donaldson  
State Historic Preservation Officer  
Office of Historic Preservation  
Department of Parks and Recreation  
P.O. Box 942896  
Sacramento, CA 94296-0001

Susan K. Stratton, Ph.D.  
Supervisor, Project Review unit  
Sr. State Archeologist  
Office of Historic Preservation  
1416 9<sup>th</sup> Street, Rm 1442  
P.O. Box 942896  
Sacramento, CA 95814

David Byrd  
Office of Historic Preservation  
1416 9th Street, Room 1442-7  
Sacramento, CA 95814

Kelly E. Yasaitis, JD  
Historic Preservation Specialist  
Office of Federal Agency Programs  
Advisory Council on Historic Preservation  
1100 Pennsylvania Ave., NW, Suite 809  
Washington, DC 20004

Sandy Olliges  
Environmental Services Division (QE)  
NASA Ames Research Center  
Moffett Field, CA 94035-1000

Dr. Ann Clarke  
Chief, Environmental Division  
NASA Ames Research Center, M/S 218-1  
Bldg. 218, Room 203  
Moffett Field, CA 94035-1000

Keith Venter  
Historic Preservation Officer  
NASA Ames Research Center  
Moffett Field, CA 94035-1000  
Copy to: (w/o encls)

James Wright  
Deputy Assistant Administrator  
NASA (LD000)  
Mail Stop: 4G74  
Washington, DC 20546

Daniel Seby  
Director  
California State Military Museum  
State Military Department  
1119 Second Street  
Sacramento, CA 95814-3203

Lenny Siegel  
Center for Public Environmental Oversight  
c/o PSC, 278-A Hope Street  
Mountain View, CA 94041

Alison Hacks  
Mountain View Preservation Alliance  
530 Showers Drive, Suite 7, PMB 127  
Mountain View, CA 94040-1457

Carl Honaker  
Director of County Airports  
County of Santa Clara  
2500 Cunningham Avenue  
San Jose, CA 95148

Moffett Field Museum  
P.O. Box 16  
Moffett Field, CA 94035-0016

Cindy Heitzman  
California Preservation Trust  
5 Third Street, Suite 24  
San Francisco, CA 94103

Anthea Hartig  
National Trust for Historic Preservation  
8 California Street, Suite 400  
San Francisco, CA 94111-4828

Joe Huber  
Lighter-Than-Air-Society  
526 South Main Street, Suite 532  
Akron, OH 44311

Robert Zafran

Nancy Conrad  
Board Member  
SpaceWorld Foundation  
6301 Princeville Circle  
Huntington Beach, CA 92648

Cliff Jernagen  
Chair Person  
Space World Foundation  
6301 Princeville Circle  
Huntington Beach, CA 92648

Seth Shostak  
SETI Institute  
515 North Whisman Road  
Mountain View, CA 94043

David Hoyt  
Friends of the CASC  
20785 Meadow Oak Road  
Saratoga, CA 95070

Blind copy to (without enclosures):

L. Duchnak  
L. Lansdale  
J. Hill  
S. Moore  
P.McCay  
D. Newton  
M. Walden