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

AUG 0 1 2008

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

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)

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As stated

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