John L. Nau, III
Chairman

Susan S. Barnes
Vice Chairman

John M. Fowler
Executive Director

Preserving America's Heritage

October 6, 2008

Honorable David C. Winter
Secretary of the Navy
1000 Navy Pentagon
Washington, DC 20350-1000

Dear Secretary Winter:

In accordance with Section 106 of the National Historic Preservation Act (NHPA), I am writing to convey to you the final comments of the Advisory Council on Historic Preservation (ACHP) on the proposed Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action at Installation Restoration Program Site 29 (Hangar 1) at the former Naval Air Station Moffett Field, California.

Background

Pursuant to CERCLA, the Navy is proposing a Non-Time Critical Removal Action at Hangar 1. The siding on Hangar 1 is commercially known as Robertson Protected Metal and contains polychlorinated biphenyls (PCBs), the regulatory driver for this clean up action, and asbestos. The siding is believed to be a source of contamination in the Moffett stormwater settling basin. Asbestos and lead are also present in interior and exterior Hangar 1 building materials. In its Engineering Evaluation/Cost Analysis (EE/CA), dated July 2008, the Navy considers several removal alternatives to achieve its CERCLA responsibility and recommends the preferred removal action alternative as Alternative #10, removing the panels containing the hazardous substances and coating the exposed surfaces of the structure. This removal action would include the demolition of interior rooms within the hangar, removal of the corrugated metal siding and roof material from the hangar, and application of an epoxy coating on the remaining steel frame.

Hangar 1 is individually eligible for listing on the National Register of Historic Places (NRHP) under Criterion A for its association with a significant episode in the development of naval aviation prior to World War II and Criterion C as an example of early twentieth-century military planning, engineering, and construction in the Streamline Moderne architectural style. Hangar 1 is also a contributing element to the United States Naval Air Station Sunnyvale, California- Historic District, which is a nationally significant historic property listed on the NRHP in 1994. The historic district is significant under Criterion A for its association with the Lighter-than-Air program and the contributions that program made to history under the themes

of coastal defense and naval technology, and Criterion C for its distinctive master plan, construction, and architecture, including a landscaped "commons," massive airship hangars, and its regional examples of Spanish Colonial Revival design.

CERCLA removal actions must comply to the extent practicable with the applicable or relevant and appropriate requirements of certain other environmental laws. Because of the historic property located at this CERCLA site, one of the location-specific applicable requirements identified in this case is the NHPA. Under CERCLA, the applicable requirements of the NHPA include those that are substantive, rather than those portions of the law that are procedural or administrative.

The ACHP first became involved in consultation on this undertaking in July 2006, in response to the Navy's notification to our office of the adverse effects of its originally proposed removal action alternative (demolition and off-site disposal of the hangar) on the historic property. The Navy subsequently changed its preferred removal action. Since 2006, ACHP staff has provided comments on two versions of the EE/CA (dated May 2006 and internal working draft dated September 2007) and participated in semi-regular conference calls with the Navy, California Office of Historic Preservation (SHPO), and other parties.

To conclude the consultation process, the Navy requested the final comments of the ACHP on their proposed CERCLA action. In response to our request, the Navy extended the time period in which we could provide our comments to October 6, 2008.

I appointed a panel of ACHP members to consider this case. The panel consisted of Susan Barnes, John G. Williams III, and Stephen T. Ayers. On September 17, 2008, the ACHP members met with representatives of the Navy, the National Aeronautics and Space Administration (NASA), the U.S. Environmental Protection Agency (EPA), the California SHPO, and the California Regional Water Quality Control Board, San Francisco Bay Region, and visited Hangar 1. That evening the panel members conducted a public meeting and received comments from concerned public officials, organizations, and individuals. I would like to thank members of the Navy team, Ms. Laura Duchnak, Mr. John Hill, Mr. Darren Newton, Mr. Marvin Norman, Ms. Carolyn Hunter, and Dr. Jay Thomas for their valuable assistance in providing information to the panel members and making these meetings and site visit successful. The comments and recommendations that follow are based on consideration by ACHP of the facts in this case and the review and deliberations of this member panel.

Findings

Hangar 1 is an important historic resource due to its use and association with a significant episode in the development of naval aviation prior to World War II, and its architectural design as an example of early twentieth century military planning, engineering, and construction in the Streamline Moderne style. According to the NRHP Registration Form (1994; sec. 7, pg. 5) for the United States Naval Air Station Sunnyvale, California- Historic District, Hangar 1 "is without question the most significant building both architecturally and historically" of the other buildings at Moffett Field, "one of the major buildings of Northern California, and has been recognized as an Engineering Landmark by the American Society of

Civil Engineers." The NRHP Registration Form (1994; sec. 8) also notes that Hangar 1 has been designated as a Naval Historical Monument. We recognize Hangar 1's significance not only as an individual property, but also as a contributing element to the historic district.

Hangar 1 is extremely significant to the community. As we learned from the many public comments we received, this building is an icon to residents. It is an identifiable landmark in the Silicon Valley and a symbol of American pride. Visible from many locations, it makes an enormous impression on the landscape. Many people have strong personal and emotional associations with this building. There is tremendous public interest in restoring this historic resource to a useable facility. We also acknowledge the continued congressional interest in the fate of Hangar 1, as evidenced by letters to you dated June 16, 2006 and September 17, 2008. We recognize the Navy's responsibilities to address the contamination of Hangar 1. Under CERCLA, the Navy is obligated to remediate Hangar 1 to protect human health and the environment. We fully support the Navy's work to do so; however, we also emphasize the suitability of Hangar 1 for a wide variety of potential reuses. We commend the Navy for reconsidering its original proposed removal action of demolition and off-site disposal of the hangar, and for its work to analyze multiple options to achieve its environmental remediation responsibilities.

We understand NASA has begun to gather information toward identifying an appropriate reuse of the building. In addition, NASA is seeking input from the local community on ideas for potential future uses of Hangar 1 and has expressed its commitment to seeking private partners to collaborate and assist in the restoration effort.

The overarching goal of this effort among the federal agencies is to remediate the environmental contamination and return a viable and relevant use to Hangar 1. Without a specific commitment to re-skin the hangar, should the Navy elect to move forward with its preferred Alternative #10, the remaining exposed frame will no longer be considered a building. Exposed to the elements, this frame will surely begin to deteriorate and eventually become unsuitable for reuse. With the passage of time, we fear that demolition will be the likely outcome.

Recommendations

Section 110(a)(2)(B) of the NHPA requires each federal agency to establish a preservation program to ensure that historic properties under its jurisdiction or control "are managed and maintained in a way that considers the preservation of their historic, archaeological, architectural, and cultural values in compliance with section 106 of this Act and gives special consideration to the preservation of such values in the case of properties designated as having National significance." Further, Executive Order 13287, Section 1, notes "the policy of the Federal Government to provide leadership in preserving America's heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the Federal Government, and by promoting intergovernmental cooperation and partnerships for the preservation and use of historic properties." In light of the national significance of the United States Naval Air Station Sunnyvale, California- Historic District and Hangar 1's contribution to the district, the Navy's long history of ownership and control as well as the

interest it still maintains in the hangar, the Navy should actively pursue a course of action in regard to this undertaking that supports NASA's long term responsibility to preserve and reuse the hangar in accordance with the Section 110 of the NHPA and Executive Order 13287.

We are encouraged by the work the Navy has done thus far to establish productive working relationships with NASA and other federal and state agencies. We recommend the Navy develop a formal partnership with NASA to develop a single coordinated delivery schedule to re-skin the hangar and find a viable reuse for the building. We urge the Navy to apply additional funds to this effort and to work with NASA and its potential public-private partners whom also may provide funding to return Hangar 1 to a viable, reusable building. Under such an integrated approach, the Navy could coordinate the timing of its undertaking with NASA and ensure a seamless transition from removal action to active reuse with little to no time where the frame is left without siding or roof. We realize ongoing monitoring of the existing asphalt emulsion will be required to determine the continued effectiveness of that Time-Critical Removal Action.

We commend the Navy for undertaking Level 1 Historic American Engineer Record documentation. We also support the Navy's proposed development of oral histories, virtual Hangar 1 interactive CD, and the inventory-catalogue of the Hangar 1 collections contained in the Moffett Field Museum. We strongly encourage the Navy to engage local communities both in the creation of these products as well as in their distribution. By establishing a working relationship with the local school districts, for instance, the Navy can ensure the incorporation of this valuable information and history in school curricula.

We urge the Navy, however, to focus its time and efforts to mitigate the adverse effects of its preferred removal action alternative on an enhanced collaboration with NASA to ensure the long-term survival and reuse of this historic property. Combining further information gathering and documentation efforts with reuse discussions would add efficiency to this process. These efforts would appropriately resolve the adverse effects to the historic district.

In accordance with Section 106, you must take into account these comments of the ACHP. In accordance with Section 110(l) of the NHPA and the Section 106 implementing regulations, this responsibility cannot be delegated. A similar letter (copy enclosed) will be sent to NASA Administrator Michael Griffin, forwarding these comments.

Sincerely,

John L. Nau, III
Chairman

Enclosure

cc:

NASA Administrator Michael Griffin
EPA Administrator Stephen L. Johnson
California State Historic Preservation Officer
California Regional Water Quality Control Board, San Francisco Bay Region