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MOFFETT FIELD
SSIC NO. 5090.3.A

September 27, 2007

Scott Gromko
U.S. Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108

**Re: Internal Working Draft Engineering Evaluation/Cost Analysis Revision 1, Site 29,
Hangar 1, Former Naval Air Station Moffett Field, Moffett Field, California**

Dear Mr Gromko:

Thank you for the opportunity to provide you with my informal and general comments on your 11 September 2007 *Internal Working Draft Engineering Evaluation/Cost Analysis Revision 1, Site 29, Hangar 1, Former Naval Air Station Moffett Field, Moffett Field, California* (Working Draft EE/CA). I appreciate your continuing efforts to address the adverse effect to Hangar 1 and comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation at 36 CFR Part 800 as it applies to the CERCLA removal action. You extended me the opportunity to comment on the Working Draft EE/CA during our 23 August 2007 conference call concerning the CERCLA removal action for Hangar 1. At that time, I agreed that, within a ten-day period, I would review the Working Draft EE/CA and comment on any fundamental points of concern. I have done this to the extent possible given the time frame; my comments are below.

In general, I am encouraged that Navy has apparently considered concerns expressed previously by myself and other interested parties and has moved away from an earlier position that the demolition of Hangar 1 was the necessary conclusion of the removal action. Yet, I am equally discouraged because I do not believe that the Navy has gone far enough in its analysis of the building and in its accounting for the unparalleled importance of Hangar 1.

All too often in our daily goings-on we get caught up in our processes and positions, in our regulations and bureaucratic nuance, in our expediencies and exigencies, and we lose sight of that which is important and that which is right: Hangar 1 is a singular building and unlike any other building in the nation; it is the necessity and ingenuity of an era made manifest and it's like will never be built again. Preserving this building should not be considered merely an "alternative"; it should be regarded as a responsibility and an obligation. I look forward to continuing our consultation so that, together with the Advisory Council and other consulting parties, we may honor this commitment.

Sincerely,

/s/MILFORD WAYNE DONALDSON

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

General Comments on the *Internal Working Draft Engineering Evaluation/Cost Analysis Revision 1, Site 29, Hangar 1, Former Naval Air Station Moffett Field, Moffett Field, California* (September 2007):

1. In general, considering the EE/CC and the removal action as it relates to compliance with 36 CFR 800, it is my opinion that the Navy has too narrowly defined the undertaking to only include the remediation of PCBs and in doing so has not provided a reasonable consideration for the preservation of the building intact. I would therefore suggest that the Navy should carefully and seriously consider refining its undertaking.
2. The Navy has identified the Area of Potential Effects (APE) as including the entire NAS Sunnyvale Historic District, which I believe that is appropriate. However, none of the mitigation measures appear to account for the adverse effect on the Historic District if Hangar 1 is demolished or left as a metal structure without being re-skinned to meet the Secretary of the Interior's Standard for the Treatment of Historic Properties. It is my opinion that under either alternative, absent Hangar 1, a viable, defensible, historic district would no longer exist. How does the Navy intend to account for the adverse effect to the NAS Sunnyvale Historic District?
3. If Hangar 1 is left as a metal structure, as it would be under Alternative 10, are there any specific FAA regulations that will require additional changes, e.g., painting the metal structure red and white, adding additional lighting, and so forth? If so, how does the Navy intend to take these alterations into account as part of the adverse effect under 36 CFR § 800.5?
4. I am concerned because Alternative 10 gives the false impression that Hangar 1 will be "saved." However, I believe there is the real potential that this alternative will ultimately lead to the slow destruction of the structure if NASA or some other third party does not come forward with funding to re-skin the building. Additionally, although the doubt has been articulated, there have been no studies to address the structural integrity of the metal frame without the skin. I find no convincing evidence that the structure can stand for an extended period absent the siding, especially given the marine environment and corrosion due to salt laden air.
5. I still do not understand why sandblasting the metal frame is not an option so as to remove the greatest amount of contamination prior to coating. This method has been successful on large structures, such as long span metal bridges, as I noted during the site visit on September 13, 2007. If the frame is to be pressure washed and the water captured and disposed of as a hazardous waste, how is there any difference between the use of sand for sandblasting and the water for the pressure wash? What is the acceptable level of PCB in the atmosphere, soil, and groundwater that is not considered a health risk, and would that level be achieved by sandblasting followed by the protective coating. This would perhaps remove any lingering doubts regarding the hanger as a health risk if the metal frame were to be left in place.
6. The Navy has estimated the cost for mitigating the adverse effects equally for all alternatives. As you know, under 36 CFR § 800.6, the Navy is obligated to seek ways to avoid, minimize, or mitigate adverse effects to historic properties. I am not convinced that all alternatives would require the same level of mitigation. For example, the re-skinning in Alternative 6 or a modified version Alternative 10 could result in a no adverse effect determination, per 36 CFR § 800.5, which could preclude the need for mitigation measures.

7. Page numbers in the table of contents do not match up with the topics in the document.
8. Cost estimate questions that simply have not been answered in the level of detail we requested:
 - a. Alternatives 4 & 6 have a cost of \$15,390,000 for coating of interior components. What is this charge? There is no mention of interior coating in the discussion. I thought from our site visit that the Navy would not do anything to the interior if the exterior was treated; much as was done the last time the exterior was coated.
 - b. Alternatives 4 & 6 have a cost of \$15,390,000 for coating of interior components and Alternative 10 has a cost of \$3,732,000 for coating of the steel with paint/primer. Why is the interior coating treatment for Alternatives 4 & 6 approximately four times the cost of the interior treatment in Alternative 10?
 - c. What is the difference in costs for the RPM Siding/Roof Demolition for Alternative 10 (\$5,000,000) and Alternative 11 (\$3,736,000)?
 - d. If re-skinning resulted in a saving of some or all the O&M cost, could these funds be applied toward the total cost of re-skinning?