

DRAFT — FOR CIRCULATION TO RESTORATION ADVISORY BOARD
MEMBERS ONLY

TO: Laurence Hopkins, NASA Office of Inspector General
FROM: Moffett Field Restoration Advisory Board
SUBJECT: Comments on “NASA’s Hangar One Re-Siding Project”
DATE: July 5, 2011 draft

Members of the communities near Moffett Field are deeply disappointed with the June 22, 2011 OIG report “NASA’s Hangar One Re-Siding Project.” The report understated the historical significance of the hangar, its nearly unique architectural value, and the vast depth and breadth, across all political boundaries, of community support for hangar preservation.

There has never been any question that making Hangar One watertight is insufficient for reuse. Additional improvements are necessary, but exactly what those will be depends upon the ultimate reuse purpose. Preparation of a warm shell for a museum/education center would be significantly different than making the building suitable for airship construction and maintenance.

The Ames Development Plan, which received broad public support for its proposed uses, did specify a museum reuse, but the SpaceWorld project lost steam once the Navy proposed demolition. In our view, it is not realistic to expect anyone to commit to funding improvements and reuse until the survival of the hangar, as a watertight structure, is ensured.

The OIG report introduced two alternatives that do not encompass NASA’s re-siding of Hangar One. Its finding that *Demolition* would comply with the requirements of the National Historic Preservation Act (NHPA) makes a mockery of that statute and ignores years of discussion among the local community and government agencies. If preservation were unsafe or impractical, it would have been possible to comply with the law by erecting a “tombstone” and writing an “obituary,” but the preservation obligation does not disappear simply because there are other projects that the responsible agency needs to fund.

The Advisory Council on Historic Preservation (ACHP), which is responsible for interpreting the Preservation Act, explained, “CERCLA [the Superfund law] 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 is the NHPA.” This is the basis for the federal responsibility for funding restoration. While many in our community believed the Navy responsible for funding restoration, the White House resolved the dispute between federal agencies and held NASA responsible.

In our view, Demolition of what remains a Superfund site would require a re-opening of the CERCLA process for Hangar One. If approved, it would turn much of the Navy's projected \$26 million disassembly expenditure into financial waste. The Report seemed to suggest that Demolition would be cost-free. Based upon the Navy's Engineering Evaluation/Cost Analysis, we estimate that Demolition after the Navy completes removal would still cost NASA upwards of \$11 million—and it would end up with a large chunk of bare concrete with commensurate destruction of the value and uniqueness of the Moffett Historic District.

Furthermore, the Report ignored NASA's responsibility, before taking any management action to further erode the historic integrity of the Hangar, to engage in consultation with the State Historic Preservation Office, ACHP, and the public under the procedures set out in the Section 106 regulations: 36 CFR 800.

In other words, government agencies and the public have gone through years of review, under the Superfund law and the National Historic Preservation Act, to develop the current plan for preserving Hangar One. NASA cannot simply overturn that plan without re-opening reviews under both statutes.

The potential *Transfer* of the Hangar to another government agency may make more sense, particularly in comparison with Demolition. However, we believe NASA and the nation would benefit more, at this time, from continuing federal ownership. Hangar One is not only a unique icon of the past. It is a valuable asset capable of accommodating many uses directly related to NASA's mission.

While there are potential advantages to Transfer, the Transfer process of federal Superfund property typically takes years under the best of circumstances. Again, even in the best of circumstances, such an approach would delay re-siding, ignoring the ACHP's warning: "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."

In summary, *Restoration* of Hangar One by NASA is the best preservation policy; it would avoid the waste of federal dollars, creating value in the process; and it would provide the greatest opportunity for reuse. This is why there is universal support in surrounding communities for the budget item that would carry out the White House decision to split the costs of cleanup, removal, and re-siding the Hangar between the Navy and NASA. We are confident that this remarkable structure will attract one or more activities, capable of funding improvements, which serve the national and local interest. However, there is no way to prove our assertion until the federal government commits to re-siding the hangar.

We urge the Inspector General's Office to re-consider its recommendations, and we urge NASA to continue to seek funds in FY2012 for re-siding of Moffett Field's historic Hangar One.