December 16, 2011

Office of Strategic Infrastructure

TO: Assistant Inspector General for Audits

FROM: Assistant Administrator for Strategic Infrastructure

SUBJECT: NASA’s Hangar One Re-Siding Project (Assignment No. A-11-008-00)

Pursuant to the Agency’s response on the subject draft report dated June 17, 2011, the Mission Support Directorate (MSD) and the Office of Strategic Infrastructure (OSI) have provided the Condition Assessment and Rehabilitation Plan (CARP) for Hanger One. The four-volume CARP addresses three of the five alternatives proposed by the OIG. The CARP is a technical assessment of what would be required to pursue the analyzed alternatives and does not constitute a recommendation of any given alternative. Alternatives four and five were not included in the CARP as they were outside the purview of the engineering firm conducting the study.

The fourth and fifth alternatives listed by the OIG refer to carrying out historic preservation mitigation actions with regard to demolishing Hangar One or transferring it to another government entity. These alternatives were evaluated by NASA staff and included here for your review.

**Historic Preservation Mitigation for Demolition**

Historic Preservation mitigation for demolition is a complex issue that follows compliance with both National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). To determine the appropriate mitigation, NASA would have to engage the California State Historic Preservation Officer and the Advisory Council on Historic Preservation as well as interested parties from the public and consult with them on the appropriate mitigation. It is not known what the appropriate mitigation would be at this stage.

NASA and the Navy have already completed measured drawings which might comprise a part of a mitigation package, but it is likely that compliance negotiations would result in additional mitigation for a proposed demolition of the hangar. It is estimated that the process would take a minimum of two years to complete and might require an Environmental Impact Statement because it would be a significant impact to the historic structure. Based on experience from similar projects across the government, it could cost NASA at least 1 million dollars for the NHPA mitigation and associated NEPA compliance.
**Transfer to Another Government Entity**

Once a property is deemed excess to the Agency's mission, under 51 U.S.C. §20117, excessing the Hangar may occur after the Agency formally informs Congress of its intent. After 30 days have passed following Congressional notification, the Agency may provide a report of excess to the General Services Administration (GSA), who would then coordinate the disposition of the site. GSA exercises its authority under the Federal Property and Administrative Services Act of 1949 (Property Act) to disposition the property.

Once GSA accepts the report of excess, GSA takes the lead role in the disposition process and handles inquiries relating to the disposition of the property. During this period NASA would be required to maintain and safeguard the property at a minimally acceptable level. NASA also would be responsible for the identification of historic resources within the Report of Excess and the management of those resources until the property is dispositioned. GSA would be responsible for NEPA compliance and the requirements of Section 106 of the National Historic Preservation Act. GSA may also consider the Historic Surplus Property Program which enables state, county, and local governments (municipalities) to obtain historic buildings once used by the Federal Government.

Should you have questions regarding historic preservation mitigation for disposal or transfer of federal ownership, please contact Ms. Jennifer Groman, NASA's Historic Preservation Officer at 202-358-0455 or Mr. Calvin Williams, Acting Director of Technical Capabilities and Real Property at 202-358-2322 respectively.

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