



**The Culture Center**  
1900 Kanawha Blvd., E.  
Charleston, WV 25305-0300

**Randall Reid-Smith, Commissioner**

Phone 304.558.0220 • www.wvculture.org  
Fax 304.558.2779 • TDD 304.558.3562

EEO/AA Employer

June 12, 2017

Mr. James Ulvestad  
Division Director, Division of Astronomical Sciences  
National Science Foundation  
4201 Wilson Boulevard  
Arlington, Virginia 22230

RE: NEPA Analysis for Changes to Green Bank Observatory Operations  
FR#: 17-49-PH-2

Dear Mr. Ulvestad:

We have reviewed the additional information submitted for the above-mentioned project to determine its effects to cultural resources. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

According to submitted information, the National Science Foundation (NSF) plans to complete an Environmental Impact Statement (EIS) to evaluate potential effects of proposed operational changes at the Green Bank Observatory (GBO) in Pocahontas County, West Virginia. This additional information was prepared in response to our request in a letter dated December 22, 2016,

Architectural Resources:

As stated in our December 22, 2016 letter, our office agreed that the area of potential (APE) for this project was defined as the property boundary of the GBO. We also concurred that four (4) of the telescopes at GBO were individually eligible for the National Register of Historic Places, and the Reber Radio Telescope (NR# 72001291), which was listed in the National Register in 1972 and as a National Historic Landmark in 1986, retained its historical significance. While we felt that the GBO, as a whole, may represent a National Register-eligible historic district, we requested additional documentation and evaluation of all resources older than 45 years of age within the property boundary of the GBO to confirm this conclusion.

Thank you for the submission of the Historic Property Inventory forms. We have reviewed the submitted documentation and concur with the NSF that the GBO is eligible as a historic district under Criteria A for its significant contribution to radio astronomy and under Criteria C for its various unique instruments engineered to study the universe, as well as an excellent example of a scientific campus. Of the 48 documented resources over 45 years of age on the GBO, we agree that four resources, barns (PH-0918–PH-920) and the orchard cellar building (PH-0921) do not contribute to the National Register-eligible GBO historic district and are not individually eligible for the National Register because they were never used for anything beyond random storage for the GBO and lack individual significance. However, because these resources are associated with agriculture, it is possible that additional survey, outside the scope of this project, could reveal that these resources contribute to an agricultural historic district within the region.

We concur that the remaining 44 resources contribute to the National Register-eligible GBO historic district. This includes the four telescopes previously determined to be individually eligible for the National Register (PH-0948–PH-0950 and PH-0952), as well as the Reber Radio Telescope (NR# 72001291; PH-0953). The remaining

June 12, 2017  
Mr. Ulvestad  
FR#: 17-49-PH-2  
Page 2

contributing resources (PH-0331; PH-0907–PH-0917; PH-0922–PH-0947; and PH-0952) include 24 residential buildings, eight administrative/operational buildings, two horn antennas, one telescope, a replica antenna, an airstrip, a water tower, and a recreational area. We agree that none of these remaining contributing resources are individually eligible for the National Register.

Because a preferred alternative for the GBO project has not yet been chosen, an assessment of potential effects resulting from the proposed project cannot be completed at this point. As the EIS process continues and a preferred alternative is developed, please provide our office an assessment of the potential effects to the National Register-eligible GBO, as well as any of the individually eligible or listed resources, resulting from the preferred alternative. We look forward to continuing our participation in the Section 106 process and will provide additional comments once we receive the details regarding the NSF's preferred alternative and the assessment of effects.

Public Comments:

We note that the NSF received an email from the Oneida Nation of Wisconsin on November 9, 2016 indicating that they are not interested in becoming a consulting party. Also, we note that your office sent letters on December 12, 2016 about the proposed project to the 15 Native American tribes identified by our office with historical ties to West Virginia. No response has been received from these tribes. During the November 9, 2016 NEPA public scoping meeting, three individuals (Daryl and Deana White and Grayg Ralphsnyder) confirmed their desire to be included as consulting parties.

The Pocahontas County Historical Landmarks Commission (PCHLC), the Pocahontas County Historical Society (PCHS), and the Preservation Alliance of West Virginia (PAWV) were also notified about the project. On December 30, 2016, Robert A. Sheets, designated representative of the PCHLC, notified NSF via email of his organization's interest in being included as a consulting party. On February 3, 2017, the PAWV sent a letter to the NSF to indicate that the PAWV would like to continue as a consulting party for this project. In addition, several public comments regarding the cultural and historical significance of the GBO were received during the public comment period, which NSF included with this submittal. No other responses had been received by the NSF at the time of submittal. We understand that any further correspondence or comments will be sent to our office.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Benjamin M. Riggle, Structural Historian, at (304) 558-0240.*

Sincerely,



Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/BMR