



December 4, 2017

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Ms. Caroline Blanco
Federal Preservation Officer
Division of Astronomical Sciences, National Science Foundation
4201 Wilson Boulevard
Arlington, Virginia 22230

RE: Changes to the Greenbank Observatory Operations, Pocahontas County
FR#: 17-49-PH-3

Dear Ms. Blanco:

We have reviewed the report titled *Proposed Changes to Green Bank Observatory Operations: Historic Properties Assessment Effect* that was prepared for the above-referenced project. 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) has assessed the potential effects of the five (5) case alternatives being considered for the Green Bank Observatory in Pocahontas County. These include:

- Collaboration with interested parties for science- and education-focused operations with reduced NSF-funded scope
- Collaboration with interested parties for operation as a technology and education park
- Mothballing of facilities (suspension of operations in a manner such that operations could resume efficiently at some future date)
- Deconstruction and site restoration
- Continued NSF investment for science-focused operations (No-Action Alternative)

The effects of all five case alternatives were evaluated because even after a preferred alternative is chosen, the future of the project is uncertain, and the NSF may have to alter their plans as the project progresses.

Architectural Resources:

Based on the submitted documentation, we concur that each of the proposed project alternatives, with the exception of the no-action alternative, will have an *adverse effect* on the Green Bank Observatory, which is considered eligible for the National Register of Historic Places. While the extent of these impacts is unknown and will vary in severity based on the alternative chosen, as well as by specific actions required for the chosen alternative, each alternative will likely result in at least some demolitions of resources contributing to the observatory district. As the project progresses and the specific details

December 4, 2017
Ms. Blanco
FR#: 17-49-PH-3
Page 2

regarding the preferred alternative are developed, we request you evaluate alternatives or modifications to the proposed project to *avoid, minimize, or mitigate* the adverse effects it will have to historic properties and then inform our office of those alternatives, modifications or mitigation efforts. We will provide additional comments upon receipt of the requested information.

Public Comments:

A public meeting regarding the draft Environmental Impact Statement (EIS) was held on the evening of November 30, 2017. The meeting was well attended, and over 50 concerned citizens, including a representative of the Pocahontas County Historical Society, spoke about their concerns regarding this project. In addition, we note that as instructed in 36 CFR 800.6(a), the NSF has sent a letter, dated November 28, 2017, to notify the Advisory Council on Historic Preservation (ACHP) of the project and its potential for adverse effects to the Green Bank Observatory. We understand that the NSF will notify our office regarding ACHP's response and to continue public involvement throughout the Section 106 process.

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