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December 22, 2016

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-1

Dear Mr. Ulvestad:

We have reviewed 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 from this and previous submissions, 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. According to the submitted information, five (5) case alternatives are being considered by the EIS. These include:

- Continued NSF investment for science-focused operations (No-Action Alternative)
- 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

Also included in this submission is a Cultural Resources Evaluation, which includes a survey, documentation, and evaluation for National Register of Historic Places eligibility of the built resources at the Green Bank Observatory. We concur with the recommendation that the area of potential effects (APE) should be defined as the property boundary for GBO because this will encompass all of the buildings and structures associated with the observatory. We find that the Reber Radio Telescope (NR# 72001291), which was listed in the National Register of Historic Places in 1972 and was named a National Historic Landmark in 1986, remains historically significant. In addition, we concur with the recommendations that four (4) additional telescopes are individually eligible for the National Register. These include:

- 1) the Interferometer Range: Howard E. Tatel Telescope (85'-1) and 85' 1-1 control building; 85'-2 Telescope; 85'-3 Telescope; and the Interferometer control building (eligible under Criterion A);
- 2) 40-foot Telescope and control building (eligible under Criterion A);
- 3) 43-meter Telescope (eligible under Criteria A and C);
- 4) Robert C. Byrd Green Bank Telescope (GBT) (eligible under Criteria A and C and Criterion Consideration G because it is less than 50 years of age);

However, while it appears likely that the GBO is eligible for the National Register of Historic Places as a historic district because the collection of buildings, structures, and scientific instrumentation represents the early history of radio astronomy while illustrating the continued development of the field, we will require more details before we can officially concur with this recommendation. The Cultural Resources Evaluation identified 44 resources within the APE as being recommended as contributing to the GBO historic district, but it provides no evidence or documentation to support this assessment.

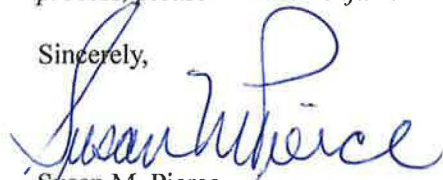
At this time, we request the completion of a Historic Property Inventory (HPI) form for each resource at least forty-five (45) years of age located at the GBO, as well as any resource less than forty-five (45) years of age that may contribute to the potential historic district. If additional guidance regarding which resources warrant this level of documentation, a representative from our office will be glad to attend a site visit to assist in determining which resources should be documented with HPI forms. The HPI form is available, along with instructions to fill it out, at www.wvculture.org/shpo/forms.html. Please be sure to indicate the original date of construction as well as details about any changes, additions, and/or alterations each facility has experienced. Each HPI form should include two (2) color photographs of each of the documented resources. Your photographs need to be keyed to a USGS topographic or aerial map and should accurately depict from various angles any architectural resources, building or structural details, and outbuildings. Please contact Historian, Michael Burdette (Michael.A.Burdette@wv.gov), to obtain an HPI Site numbers for the newly-documented resources. We will provide further comments after the submission of the HPI forms and as the NEPA analysis and EIS for the GBO progresses. We look forward to participating in the continuation of the Section 106 process of identifying historic resources with the NSF, which will be supported by the completion of these HPI forms.

Public Comments:

Federal regulations in 36 CFR §§ 800.2(c-d), 800.3(e-f), and 800.6(a)(4) all stress the importance of involving the general public, local government representatives, and organizations that have a demonstrated interest in historic preservation or the undertaking in the Section 106 review process. If you have already completed this aspect of the requirements under Section 106, please provide written documentation along with any comments you have received, or any that you receive in the future, to this office. If you have not already done so, please consider forwarding a copy of the submitted information for the above-mentioned project to the Pocahontas County Historical Society and the Preservation Alliance of West Virginia to request their comments or opinions on the matter. Please forward any comments that you receive to this office. If you receive no comments within thirty (30) days, please indicate that *in writing* to this office. Also according to an earlier submittal, an all-day scoping meeting was planned for November 9, 2016, and we request that any correspondence or comments generated during this meeting be included with the next submittal regarding the GBO to assist with our continuation of 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