

NATIONAL SCIENCE FOUNDATION  
4201 Wilson Boulevard  
Arlington, Virginia 22230



OFFICE OF THE  
GENERAL COUNSEL

June 29, 2017

Ms. Barbara Zook, Architectural Projects Reviewer  
New Mexico Department of Cultural Affairs, Historic Preservation Division  
407 Galisteo Street, Suite 236  
Santa Fe, New Mexico 87501

RE: Section 106 Consultation for the Proposed Changes to Operations at the Sacramento Peak Observatory, Sunspot, Otero County, New Mexico – Revised Area of Potential Effects, Revised Historic District Boundary, and Treatment of the Helicopter Landing Area

HPD Log Nos.: 103900, 104236, 105254 and 105751

Dear Ms. Zook:

The National Science Foundation (NSF) initiated Section 106 consultation with the New Mexico Historic Preservation Division (HPD) on August 24, 2016, regarding the proposed changes to operations at the Sacramento Peak Observatory in Sunspot, Otero County, New Mexico. Consultation has been ongoing to determine the area of potential effects (APE) and the level of documentation required. With this letter, NSF is transmitting a copy of the revised APE and a revised Sacramento Peak Observatory historic district boundary based on the HPD's comments. NSF requests agreement from your office on the revised APE, the revised historic district boundary, and the suggested treatment for documenting the helicopter landing area.

In response to the HPD's letter dated May 18, 2017, NSF has agreed to use the "Compound Area" boundary, also referred to as the overall property limits, as the APE. In the same letter, the HPD stated that the historic district boundary should include the helicopter landing area associated with the Sacramento Peak Observatory. NSF has redrawn the historic district boundary to include the footprint of the former helicopter landing area. Also per HPD's request, the "Compound Area" (or overall property limits), which is now defined as the APE, is larger than the historic district to account for the effects of the undertaking on the larger setting. The figure showing the revised APE is enclosed (Enclosure 1).

The HPD also advised NSF to prepare a Historic Cultural Property Inventory Form to document the helicopter landing area. Further investigation by NSF determined that the helicopter landing area, which was constructed in 1955, is a cleared strip of land covered with grass; no pavement or other structures remain extant. Given that no built environment elements remain, the resource is more akin to a historic archaeological site than a built environment resource. As stated in NSF's letter to the HPD on May 4, 2017, and as agreed by HPD during a phone conversation with you and Andrew Zink on April 27, 2017, no additional survey work or survey forms need to be completed at this phase of the consultation process; historic archaeological sites will be discussed in an expanded historical context. As you requested during the April phone conversation, photographs of historic archaeological sites,

such as the helicopter landing area and assorted building foundations in the main Observatory area, will be included with the expanded historical context if they are available, but no further field work or surveys will be conducted at this time.

After the revised APE and historic district boundaries are approved, an assessment of effects that addresses the expanded historical context will be drafted and submitted to the HPD. The assessment of effects will contain a description of the historic context and the historic district, including any design, landscape, or historic archaeology features, and a finding of effect for the proposed project Alternative.

NSF requests your agreement with the revised APE, the revised Sacramento Peak Observatory historic district boundary, and the approach for documenting the helicopter landing area. Please respond within 30 days from receipt of this letter to:

Ms. Elizabeth Pentecost  
National Science Foundation  
Division of Astronomical Sciences  
4201 Wilson Blvd, Suite 1045  
Arlington, Virginia 22230  
[epenteco@nsf.gov](mailto:epenteco@nsf.gov)

If you have any questions, please do not hesitate to contact me by phone at 703-292-4592 or by email at [cblanco@nsf.gov](mailto:cblanco@nsf.gov). We look forward to your response.

Sincerely,



*for* Caroline M. Blanco  
Federal Preservation Officer  
Assistant General Counsel  
Office of the General Counsel

Cc: B. Sapp, USFS  
M. Gutzman, USFS

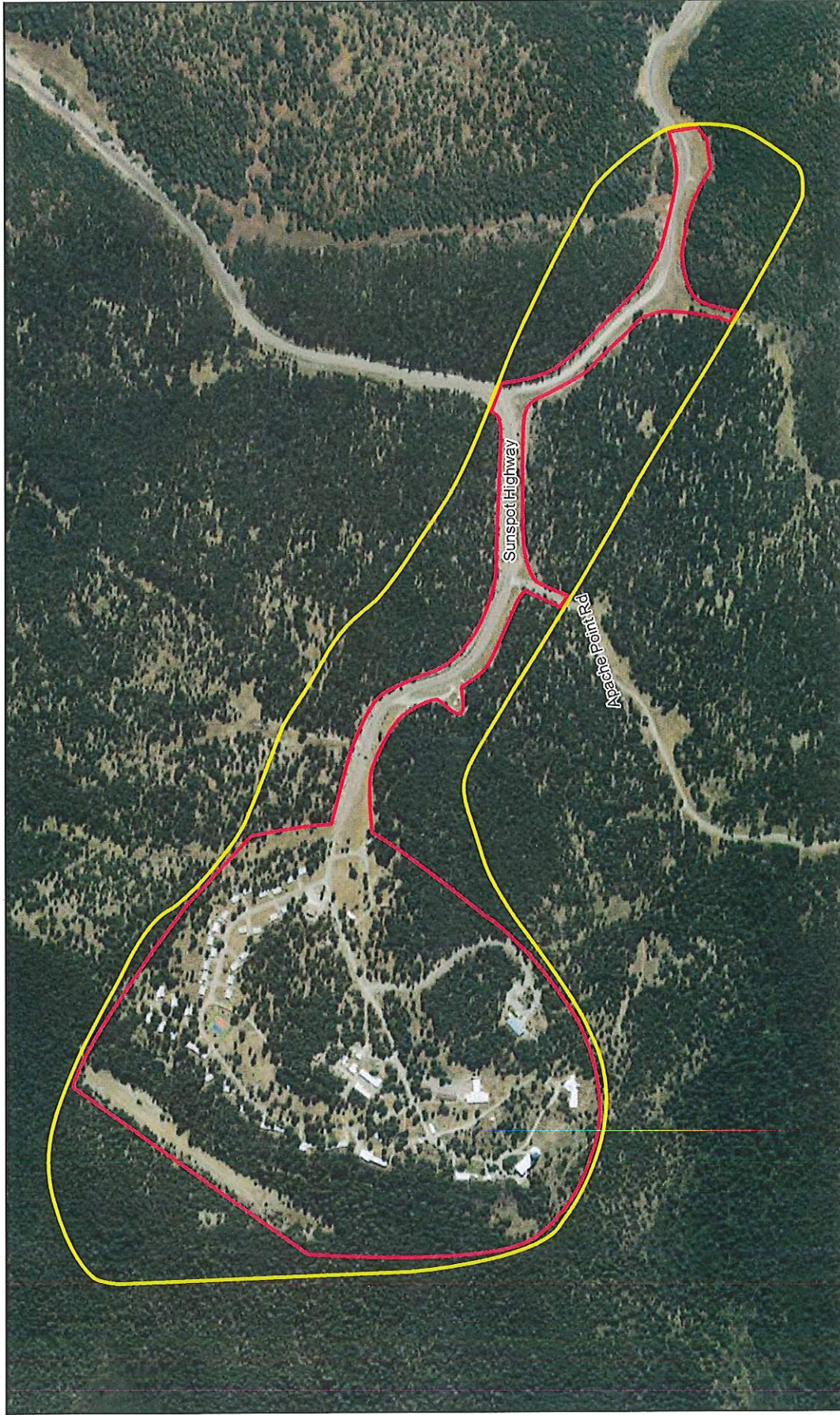
**Enclosure:**

1. Revised APE and Historic District Boundary

**Enclosure 1**

Revised APE and Historic District Boundary

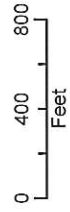




Aerial Source: National Agriculture Imagery Program (NAIP), 2016

**Legend**

- Sacramento Peak Observatory Historic District Boundary
- Area of Potential Effects (APE)



Sacramento Peak Observatory  
Sunspot, New Mexico