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Governor

STATE OF NEW MEXICO  
**DEPARTMENT OF CULTURAL AFFAIRS**  
**HISTORIC PRESERVATION DIVISION**

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Ms. Elizabeth Pentecost  
National Science Foundation  
Division of Astronomical Sciences  
4201 Wilson Blvd, Suite 1045  
Arlingotn, Virginia 22230

RE: NEPA Analysis for Proposed Changes in Operation at Sacramento Peak Observatory  
Operations, Sunspot New Mexico, Telephone Conference Call Summary

Dear Ms. Pentecost,

Thank you for the opportunity to discuss the Historic Cultural Properties Inventory (HCPI) forms, the APE, the proposed historic context, and the additional work needed to inventory and assess the historic properties associated with the Sacramento Peak Observatory (SPO). This discussion was initiated as part of the continuing NEPA analysis requiring Section 106 (NHPA) documentation due to potential changes in the SPO facility operations by the NSF. The following is a summary of the points addressed by the Historic Preservation Division (HPD) during the telephone conference on February 15, 2017:

1. HPD views this as initial consultation with requirements for further development of Section 106 documentation for consultation on effects, which include a Section 106 Report with the resources and undertaking adequately defined. CH2M was to consult with the LNF archaeologists on additional information for HCPI Forms and on how to account for possible historic archaeology. This report will include a historic context which is currently underway by CH2M.
2. HPD recommends the APE be the same as the Compound Area identified in the Land Use Agreement since this is the area of NSF responsibility agreed to in the Land Use Agreement. No further archaeological survey would be required by HPD. The smaller APE was agreed to in September 2016. Following this, HPD Architectural Historian Steven Moffson and Archaeologist Andrew Zink made a site visit which resulted in a clearer understanding of the extent of the cultural resources involved. The land use agreement was only recently provided to HPD and includes the previously established boundary to what constitutes the SPO Compound... This Compound Area seems to be a reasonable APE since it includes all the facilities associated with the previous transfer of use.

3. The proposed context development for this historic district should be consistent with information required to complete a National Register Nomination which includes the scientific equipment, living quarters, and landscape features, such as roads, curbs, foundations, the air field, playground, etc.
4. Mothballing should be considered before demolition, or “deconstruction”.
5. This site is nationally significance in the area of science. A Memorandum of Agreement for adverse effects of the undertaking will be required. Mitigation measure will be based on the undertaking, which will be the alternative that is selected. Reduction of funding is not considered an undertaking. The undertaking for Section 106 will be the alternative that is selected under the NEPA process. HPD can preliminarily comment on the effect of the proposed alternatives but final consultation will be based on the final undertaking.

It may not be possible to complete the Memorandum of Agreement (MOA) prior to the final EIS if the undertaking has not been sufficiently determined. The MOA or Programmatic Agreement (PA) must be in place for the ROD or FONSI to be signed. NHPA has to be completed before NEPA is complete. If the effects cannot be determined, then the MOA has to have provisions for consultation on effect. At that point a PA maybe considered more appropriate.

HPD looks forward to further consultation for this property which is eligible for inclusion in the National Register of Historic Places and potentially eligible to become a National Historic Landmark.

Sincerely,



Barbara Zook, R.A.  
Architectural Projects Reviewer



Steven Moffson  
Architectural Historian

Andrew Zink, Archaeologist  
Archaeological Projects Reviewer

HPD LOG #: 105254

Cc: Bill Sapp, PhD, Lincoln National Forest, USFS