12/8/92

John,

I think that we can meet the intent of the NHPA, section 106, by assessing the effect of our "undertaking" on the Ross site, reporting that process to the SHPO, and providing him with an opportunity to comment. I don't think we need to determine eligibility for National Register as part of this process.* In support of this position I would reference part B of 36 CFR Part 800.3(b)

Good Luck,

Frank.

* For purposes of this decision we can assume that the Ross site is eligible.