



#EO-3018

SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

July 20, 2018

Charlene Dwin Vaughn, Assistant Director
Sarah Stokely, Program Analyst
Federal Permitting, Licensing and Assistance Section
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington DC 20001-2637

**Re: STB Docket No. FD 34284—Southwest Gulf Railroad Company—
Construction and Operation Exemption—In Medina County, Texas; no
historic properties affected determination for three archaeological sites and
project update on architectural properties**

Dear Ms. Vaughn and Ms. Stokely:

Pursuant to the terms of the Amended Programmatic Agreement (PA) approved August 12, 2016 and the Final Resolution Plan approved September 7, 2017, I am writing to (1) notify you and the Section 106 consulting parties of a recent determination OEA has made regarding three archaeological sites and (2) provide you and the consulting parties with an update on SGR's compliance with requirements in the Final Resolution Plan pertaining to seven National Register-eligible architectural properties.

Archaeological Sites

Under the terms of the PA and the Final Resolution Plan, the Surface Transportation Board's (STB or Board) Office of Environmental Analysis (OEA), in consultation with the Texas Historic Commission (State Historic Preservation Office or SHPO), has reviewed the June 2018 revised confidential¹ report entitled *Phase II Testing of Sites 41 ME 260, 41 ME 261 and 41 ME 264 for the Southwest Gulf Railroad Company Construction and Operation of the Proposed*

¹ The Report contains sensitive site location information. Therefore, pursuant to 36 CFR § 800.11(c) and Texas Government Code § 442.07, the Report was restricted for review to the SHPO, Federal Tribes and Dr. Thomas Hester, PhD and Professor of Anthropology emeritus at the University of Texas at Austin.

Single-Track Railroad (Report) prepared by HDR, Inc. (HDR) on behalf of Southwest Gulf Railroad Company (SGR). Based on the attached consultation with the SHPO, Federal Tribes and Dr. Thomas Hester, we have determined that these sites are not eligible for listing on the National Register and that the above referenced rail line project would have no effect on these three archaeological sites pursuant to 36 C.F.R. § 800.4(d)(1).² OEA's *No Historic Properties Affected* determination is based on all available information to date, including the findings of the Report as part of the documentation efforts pursuant to 36 C.F.R. § 800.11(d), and the following condition (**STIPULATION 1**) from the SHPO's July 2018 concurrence email:

If buried cultural materials are encountered during construction or disturbance activities, work should cease in the immediate area; work can continue where no cultural materials are present. Please contact the SHPO's Archaeology Division at 512-463-6096 to consult on further actions that may be necessary to protect the cultural remains.

As background, these sites, as well as parcel 3311 at site 41 ME 262, were either unsurveyed or partially surveyed when the Final Resolution Plan was approved, and thus presumed to be National Register eligible. SGR was instructed to conduct the additional testing. However, for site 41 ME 262, only the unsurveyed portion on parcel 3311 was presumed National Register eligible, and SGR has since indicated that it does not own and will not disturb this parcel. Therefore, no further testing is required at this location.

HDR conducted a Phase I Cultural Resources survey of the direct effects area of potential effects (APE), which consists of a 600-foot-wide corridor (300 feet on either side of the rail centerline) along the 12.04-mile proposed railroad route. HDR completed the Phase I cultural resources survey of the proposed direct effects APE on all parcels where property access was granted between 2016 and 2017, resulting in the identification of 15 archaeological sites, of which three (41ME260, 41ME261, and 41ME264) required additional testing to establish National Register eligibility within the proposed direct effects APE (see attached map showing site locations). Upon completion of the fieldwork, SGR intends to curate all donated artifacts, field forms, and photographs at the Center for Archaeological Studies (CAS) at Texas State University in San Marcos, Texas. A summary of the phase II testing results follows.

Summary of Phase II Testing

The Phase I and II investigations of Site 41 ME260 revealed a large prehistoric open campsite dating from possibly as early as the Paleoindian period to the Late Prehistoric period. HDR excavated 57 units and found 18,597 artifacts, predominantly within two concentrated areas. Artifacts included lithic debitage, informal tools, bifaces, preforms, cores, tested cobbles, and projectile points, as well as mussel, shell, animal bone, charcoal, and one piece of ochre. The soils at this location exhibited deep vertisol cracking in all excavated units and terminated at a limestone gravel bed between 16 and 24 inches below the surface. Two artifact concentrations

² No comments were received during the 42-day comment period other than those from the SHPO.

with dense deposits of chipped stone debitage, tools, and fire-cracked rock were observed and recorded. In both cases, the artifact deposits terminated at the top a dense bed of limestone gravels. As a result of soil movement and intermixing, the artifacts are no longer intact, particularly those from the Archaic to Late Prehistoric, making it difficult to draw conclusions about the prehistory of the Central Texas region. Based on the Report and the SHPO's field visits to the site, OEA has determined, and the SHPO concurs, that site 41 ME260 is not eligible for inclusion in the National Register within the current direct effects APE. No further testing is required at site 41ME260 unless cultural materials are encountered and the SHPO determines that testing is warranted in accordance with STIPULATION 1.

Site 41ME261 was recorded as a multicomponent large prehistoric open campsite with a small early to mid-twentieth century domestic component related to the Saathoff farmstead. Chipped stone debitage and tools were observed throughout the site. The historic component included wire nails and glass and was limited to the areas near the Saathoff farmstead. The prehistoric component was more widely spread and extremely diffuse. Two diagnostic projectile points were recovered, both in the northernmost extent of the site area. Similar to the deposits in site 41 ME260, the associated soils had clay cracking from the vertical movement that resulted in intermixing the archaeological deposits across time periods. The lack of intact archaeological materials or features and the diffuse nature of the prehistoric and historic deposits make it difficult to further the understanding of the prehistory of the region. Based on the Report and the SHPO's field visits to the site, OEA has determined, and the SHPO concurs, that the site is not eligible for inclusion in the National Register. No further testing is required at site 41ME261 unless cultural materials are encountered and the SHPO determines that testing is warranted in accordance with STIPULATION 1.

Site 41 ME 264 was originally recorded as a lithic scatter during the Phase I survey of the project. Phase II testing revealed the presence of non-diagnostic lithic materials sparsely scattered throughout the site. The lack of diagnostic artifacts and intact features indicates that this site is unlikely to yield information valuable to the understanding of the prehistory of Central Texas. Based on the Report and the SHPO's field visits to the site, OEA has determined, and the SHPO concurs, that site 41ME264 is not eligible for inclusion in the National Register. No further testing is required at site 41ME264 unless cultural materials are encountered and the SHPO determines that testing is warranted in accordance with STIPULATION 1.

Architectural Properties

As required by the Final Resolution Plan, SGR has informed STB and SHPO in writing that it started site construction on September 1, 2017. SGR is required to implement the following measures that avoid, minimize or mitigate effects on the seven National Register eligible properties and submit the following:

1. Within 12 months of initiating site construction, SGR shall submit to STB, ACHP and SHPO Historic American Building Survey (HABS)-like Level II documentation for sites

HDR-AR-02, HDR-AR-04, HDR-AR-05, and HDR-AR-06.

2. Within 12 months of initiating construction, SGR shall submit landscaping plans to STB and SHPO showing details of the plant material that will be installed in the vegetative buffers at sites HDR-AR-02, HDR-AR-04, HDR-AR-10, and HDR-AR-11.
3. Prior to initiating construction at site HDR-AR-06, SGR shall submit to STB and SHPO an impact assessment prepared by a Secretary of Interior-qualified historic architect and structural engineer that includes a vibration assessment and recommendations.
4. Within 12 months of initiating site construction, SGR shall submit its plans for a Upper Quihi Rural Historic District (UQRHD) exhibition and submit the exhibit guide and education materials to STB and SHPO for sites HDR-AR-02, HDR-AR-03, HDR-AR-04, HDR-AR-05, HDR-AR-06, HDR-AR-10, and HDR-AR-11. SGR shall implement this type of outreach within one month of approval. Format and location(s) to be determined but could include Beyond Texas web site and various local libraries and repositories.

To date, stipulation VI.B of the PA requires that SGR submit semi-annual summary reports detailing work undertaken pursuant to the terms of the PA, and specifically, the Final Resolution Plan. The attached report from April 2018 includes a vegetative buffer plan for architectural sites HDR-AR-02, HDR-AR-04, HDR-AR-10, and HDR-AR-11. SGR does not own sites HDR-AR-10 or HDR-AR-11 and intends to locate the planned buffer for these sites, as well as for HDR-AR-02 and HDR-AR-04, on SGR-owned property. The buffers will serve to insulate the historic properties as much as possible from the visual and audible effects of the project. SGR plans to use mature ashe juniper trees or another species native to Medina County, and specifically to the Hondo area. The trees will be a minimum of 6-8 feet high and planted approximately 4 feet apart measuring from tree centerlines. Two off-set rows will be planted approximately 4 feet apart using an estimated total of 1,350 trees, depending on the number of existing trees. In areas with established tree cover, SGR will add native trees to the existing vegetation to augment any visible gaps. In the attached letter dated May 11, 2018, the SHPO signified its approved of SGR's landscape buffer schematic.

Additionally, in the attached April 24, 2018 letter, SGR indicates that it developed a preliminary tree inventory in 2017 prior to initiating construction and will conduct additional tree survey work once construction nears completion to determine the number of replacement needed following rail line construction. SGR will then finalize its tree replacement plan, purchase the necessary trees according to the required ratios, and begin planting replacement trees. As SGR notes, and we agree, tree replacement is best undertaken after the major construction activity has been completed and during the right seasons, generally Fall, to increase successful survival rates

As for the remaining action items, SGR indicates that the UQRHD library exhibit is complete and pending display at the Hondo Public Library once the HABS-like Level II documentation is prepared. The HABS-like Level II documentation for structures HDR-AR-02,

HDR-AR-04, HDR-AR-05, and HDR-AR-06 is underway. For the HABS-like Level II documentation the elevation drawings, written history, and description are complete, and the large-format photographs will be ready shortly. Vibration monitoring for the Project is currently underway and will continue to be monitored. The structural integrity of HDR-AR-06 has been assessed as unsound and a preservation plan cannot be developed. Lastly and as previously stated, the vegetation plan for the vegetative buffers has been completed and SGR will install the buffers once it is determined that the construction of the line will not cause any harm to the installed buffers.

Thank you for your assistance and participation in this matter. If you have additional questions, please contact me or Diana Wood of my staff by telephone at 202-245-0302 or by email at diana.wood@stb.gov.

Sincerely,



Victoria Rutson
Director
Office of Environmental Analysis

Enclosures (4)

- (1) SGR's Phase II Report (report sent to ACHP, SHPO, Tribes, and Dr. Hester)
- (2) Email to consulting party Federal Tribes and Dr. Hester (April 2018) requesting comments on the phase II Report
- (3) SHPO's Concurrence Letters (Dec 2017; Jan 2018; April 2018; May 2018 and July 2018)
- (4) SGR's April 2018 Semi-Annual Resolution Plan Status Report, Vegetative Buffer Plan and SHPO's Concurrence Letter (May 2018)

cc: Mark Wolfe, State Historic Preservation Officer, THC
Justin Kockritz, THC
Sara Luduena, THC
Casey Hanson, THC
Bill Martin, THC
David Coburn, Attorney for SGR
Erik Remmert, Vice President, SGR
Consulting Parties

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April 23, 2018

VIA E-MAIL

Ms. Diana Wood
Section of Environmental Analysis
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423

Re: STB Finance Docket No. 34284, Southwest Gulf Railroad Company

Dear Ms. Wood:

Please find attached a Resolution Plan status report prepared pursuant to the Final Resolution Plan for the Southwest Gulf Railroad.

Also please find attached a vegetative buffer plan for Southwest Gulf Railroad submitted for review by the Board and the Texas Historic Commission.

We look forward to any comments or questions that you might have on these submissions.

Sincerely,

David H. Coburn
Cynthia Taub
Attorneys for Southwest Gulf Railroad
Company

cc: Bill Martin, THC
Casey Hanson, THC
Sara Luduena, THC

**Southwest Gulf Railroad Company Construction and
Operation of the Proposed Single-Track Railroad
Resolution Plan Status: April 19, 2018.**

Medina County, Texas

By

Megan Koszarek, MSc

**Principal Investigator
Clayton M. Tinsley**

STB Finance Docket No. 34284

Prepared For:

**SOUTHWEST GULF ———
————— RAILROAD CO.**

Prepared By:



**17111 Preston Road, Suite 300
Dallas, TX 75248**

April 2018

The final draft of the *Resolution Plan to Resolve Adverse Effects to Historic Properties for the Southwest Gulf Railroad Company (SGR) Construction and Operation of Proposed Single-Track Railroad project in Medina County Texas (STB Finance Docket No. 34284)* (Resolution Plan), was completed on August 28, 2017. In the Resolution Plan, four archaeological sites and seven historic properties were determined to be potentially adversely affected by the proposed project, and mitigation of these effects was required by the Resolution Plan (Table 1).

Table 1. Adversely and Potentially Adversely Affected Cultural Resources

Site/Field Survey #	*Parcel/Address	Comments
41ME262	R3311	41ME262 partially surveyed, SHPO concurred surveyed portion was not eligible for the NRHP; unsurveyed portion of Parcel R3311 was presumed NRHP eligible
41ME261	R36257	41ME261 partially surveyed, NRHP eligibility testing needed; unsurveyed portion of Parcel R36257 was presumed NRHP eligible
41ME260	R58431	41ME260 partially surveyed, NRHP eligibility testing needed; unsurveyed portion of Parcel R58431 was presumed NRHP eligible
41ME264	R58364	41ME264 partially surveyed, SHPO determined Eligible for the NRHP; unsurveyed portion of Parcel R58364 was presumed NRHP eligible
HDR-AR-02	1253 CR 353	Structures 190–530 ft from Centerline; SHPO concurred adverse effect
HDR-AR-03	1040 CR 353	Structures 900–1,200 ft from Centerline; not surveyed; presumed NRHP eligible; likely no adverse effect
HDR-AR-04	881 CR 353	Structures 700–1,000 ft from Centerline; SHPO concurred adverse effect
HDR-AR-05	6005 FM 2676	Structures 675–815 ft from Centerline; SHPO concurred adverse effect
HDR-AR-06	FM 2676	Structures 90–170 ft from Centerline; SHPO concurred adverse effect
HDR-AR-10	944 CR 4643	Structures 340–730 ft from Centerline; not surveyed; presumed NRHP eligible; possible adverse effect
HDR-AR-11	830 CR 4643	Structures 750–770 ft from Centerline; not surveyed; presumed NRHP eligible; likely no adverse effect

*Note: Parcel IDs are denoted by the "R" numbers used by the Medina County Tax Assessor to identify parcels.

HDR undertook the initial mitigation of these resources in September 2017 (Table 2). The mitigation began with the Phase II National Register of Historic Places (NRHP) eligibility testing of archaeological sites 41ME260, 41ME261, and 41ME264. A visit from the Texas Historical Commission (THC) was arranged to observe fieldwork, during which the THC officials concurred that the aforementioned sites are Not Eligible for inclusion in the NRHP. These results were presented in the *Letter Report for the Phase II Testing of Sites 41ME260, 41ME261, and 41ME264 for the Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad* (Letter Report). In November 2017, HDR received written concurrence with the finding that sites 41ME 260, 41ME261, and 41ME264 are Not Eligible for inclusion in the NRHP with the stipulation that a full report that complies with the *Council of Texas Archeologists Guidelines for Cultural Resources Management Reports* standards be submitted. The full format report (*Revised Draft Phase II Testing of Sites 41ME260, 41ME261, and*

41ME264 for the Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad) was submitted to the THC and Surface Transportation Board (STB) for review on March 21, 2018.

One archaeological site (41ME262) was not tested as part of the mitigation procedures for the project. The site was surveyed within the rail corridor where parcel access had been obtained. This part of the site was determined Not Eligible for inclusion in the NRHP, but the potential extension of site 41ME262 within parcel R3311 was not surveyed. Without a survey on that parcel, the THC assumed the possible extension of site 41ME262 is eligible for listing in the NRHP until a survey can prove otherwise. As such, the Resolution Plan recommends that all construction activities avoid parcel R3311. SGR does not own parcel R3311 and will be completely avoiding the parcel, in compliance with the Resolution Plan.

Table 2. Status of Mitigation Measures for All Potentially Adversely Affected Resources.

Property	Mitigation Measure	Status
41ME262	Possible portion of site on property R3311 should be avoided	Parcel R3311 will be avoided; SGR does not own this parcel and will not be developing it
41ME261	Phase II eligibility testing should be conducted	Testing complete for portion of site within Project area, report* submitted 3/21/2018
41ME260	Phase II eligibility testing should be conducted	Testing complete for portion of site within Project area, report* submitted 3/21/2018
41ME264	Phase II eligibility testing should be conducted	Testing complete, report* submitted 3/21/2018
HDR-AR-02	1) UQRHD exhibition and educational materials 2) HABS-like Level II Documentation of the primary dwelling (A) a. Elevation drawings by experienced preservation architect b. Large-format photographs c. Written history and description 3) Vibration monitoring 4) Vegetative buffer	1) Ready for printing and set up (pending library scheduling) 2) --- a. Complete b. On-site photography completed 4/12/18, will be developed by the end of April c. Complete 3) Seismic sensors in place 4) In progress
HDR-AR-03	UQRHD exhibition, exhibit guide, and educational materials	Ready for printing and set up (pending library scheduling)
HDR-AR-04	1) UQRHD exhibition and educational materials 2) HABS-like Level II Documentation of the primary dwelling (A) a. Elevation drawings by experienced preservation architect	1) Ready for printing and set up (pending library scheduling) 2) --- a. Complete

	b. Large-format photographs	b. On-site photography completed 4/12/18, will be developed by the end of April
	c. Written history and description	c. Complete
	3) Vegetative buffer	3) In progress
HDR-AR-05	1) UQRHD exhibition and educational materials	1) Ready for printing and set up (pending library scheduling)
	2) HABS-like Level II Documentation of the primary dwelling (A)	2) ---
	a. Elevation drawings by experienced preservation architect	a. Complete
	b. Large-format photographs	b. On-site photography completed 4/12/18, will be developed by the end of April
	c. Written history and description	c. Complete
HDR-AR-06	1) UQRHD exhibition and educational materials	1) Ready for printing and set up (pending library scheduling)
	2) HABS-like Level II Documentation of the primary dwelling (A)	2) ---
	a. Elevation drawings by experienced preservation architect	a. Complete
	b. Large-format photographs	b. On-site photography completed 4/12/18, will be developed by the end of April
	c. Written history and description	c. Complete
	3) Vibration monitoring	3) Seismic sensors in place
	4) Structural assessment and preservation plan	4) Assessed as structurally unsound
HDR-AR-10	1) UQRHD exhibition and educational materials	1) Ready for printing and set up (pending library scheduling)
	2) Vegetative buffer	2) In progress
HDR-AR-11	1) UQRHD exhibition and educational materials	3) Ready for printing and set up (pending library scheduling)
	2) Vegetative buffer	4) In progress

* Revised Draft Phase II Testing of Sites 41ME260, 41ME261, and 41ME264 for the Southwest Gulf Railroad Company
Construction and Operation of the Proposed Single-Track Railroad

In compliance with the recommendations set forth in the Resolution Plan for all the adversely-affected architectural resources (HDR-AR-02, HDR-AR-03, HDR-AR-04, HDR-AR-05, HDR-AR-06, HDR-AR-10, and HDR-AR-11), a temporary exhibit for the Upper Quihi Rural Historic District (UQRHD) has been prepared by Architectural Historian Kristin Morgan for display at the Hondo Public Library (pending scheduling). The exhibit will be accompanied by the relevant research completed for the project, large format photography, and HABS drawings.

Architectural resources HDR-AR-02, HDR-AR-04, HDR-AR-05, and HDR-AR-06 are recommended for HABS-like Level II documentation, which includes elevation drawings, large-format photographs, and a written history and description for each resource. The elevation drawings were completed on March 27, 2018, by Quimby McCoy Preservation Architecture, LLC. Furthermore, the written descriptions for each resource are included in the survey report, *Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad* (Fullerton et al. 2016). The large-format photographs are being prepared by Photographer Paul Chaplo. Other mitigation measures for these resources include vibration monitoring, which is currently being conducted by Sauls Seismic, LLC for HDR-AR-02 and HDR-AR-06. Resources HDR-AR-02 and HDR-AR-04 also require the installation of a vegetative buffer within 12 months of the start of construction. The plans for the vegetative buffer have been completed and are being shared with the STB and THC. Installation of the vegetative buffers is pending. In addition, the structural integrity of architectural resource HDR-AR-06 has been assessed as structurally unsound, precluding the development of a preservation plan for the resource. The STB and THC were notified in November 2017.

For architectural resources HDR-AR-10 and HDR-AR-11, SGR does not own the parcels on which the resources are located. In order to mitigate the adverse effect, these resources are included in the temporary UQRHD library exhibit discussed above. In addition, planned vegetative buffers (mentioned above) include buffers within SGR property that will serve to insulate the historic property as much as possible from the visual and audible effects of the Project.

In summary, the majority of the mitigation measures laid out in the Resolution Plan are complete, and the remaining few are underway. Overall, the Resolution Plan is approximately 80 percent complete. Site 41ME262 on parcel R3311 is being avoided. The NRHP-eligibility testing of sites 41ME261, 41ME260, and 41ME264 is complete and the THC concurs that all three sites are Not Eligible for inclusion in the NRHP. As for the architectural resources, the UQRHD library exhibit is complete and pending display at the Hondo Public Library once the HABS-like Level II documentation is prepared. The HABS-like Level II documentation for structures HDR-AR-02, HDR-AR-04, HDR-AR-05, and HDR-AR-06 is underway. For the HABS-like Level II documentation the elevation drawings, written history, and description are complete, and the large-format photographs will be ready by the end of April. Vibration monitoring for the Project is currently underway and will continue to be monitored. The structural integrity of HDR-AR-06 has been assessed as unsound and a preservation plan cannot be developed. Lastly, the vegetation plan for the vegetative buffers has been completed and SGR will install the buffers once it is determined that the construction of the line will not cause any harm to the installed buffers.

**Southwest Gulf Railroad Company Construction and
Operation of the Proposed Single-Track Railroad
Resolution Plan: Vegetative Buffers.**

Medina County, Texas

By

Megan Koszarek, MSc

**Principal Investigator
Clayton M. Tinsley**

STB Finance Docket No. 34284

Prepared For:

**SOUTHWEST GULF ———
————— RAILROAD CO.**

Prepared By:



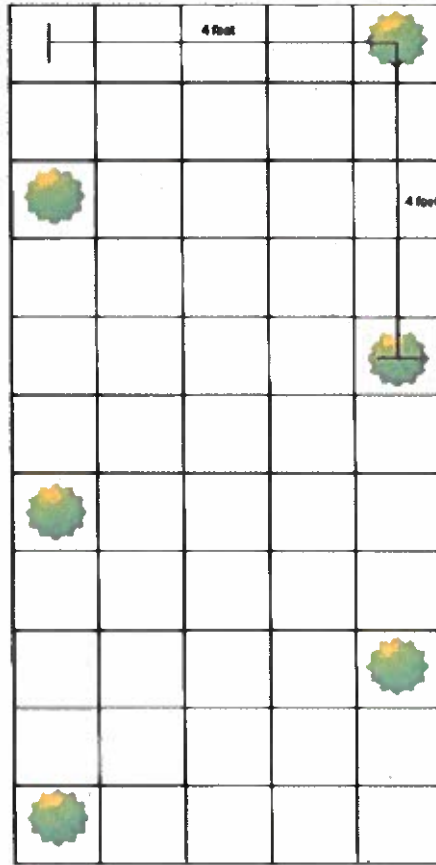
**17111 Preston Road, Suite 300
Dallas, TX 75248**

April 2018

In compliance with the *Resolution Plan to Resolve Adverse Effects to Historic Properties for the Southwest Gulf Railroad Company (SGR) Construction and Operation of Proposed Single-Track Railroad project in Medina County Texas (STB Finance Docket No. 34284)*, HDR has compiled the following Vegetation Plan for the proposed vegetative buffers for the architectural resources HDR-AR-02, HDR-AR-04, HDR-AR-10, and HDR-AR-11. The vegetative buffers will be constructed within SGR property to serve to insulate the historic properties as much as possible from the visual and audible effects of the project.

Mature Ashe juniper trees (*Juniperus ashei*) or another species native to Medina County will be planted to create the vegetative buffers. Tree types will be selected based on being native to the Hondo area and to provide good coverage for viewshed protection. The trees should be a minimum of 6-8 feet high and should be planted approximately 4 feet apart measuring from tree centerlines. Two off-set rows will be planted approximately 4 feet apart (Figure 1). This calls for an estimated total of 1,350 trees, depending on the number of existing trees. In areas with established tree cover, native trees will be added to the existing vegetation in order to fill in any visible gaps. The calculated vegetative buffer length and estimated number of trees are listed below (Table 1), although the final numbers will vary based on site conditions and existing trees. The buffer dimensions and locations are displayed on Figures 2 through 5 below.

Figure 1. Proposed Tree Placement within the Vegetative Buffers.



Scale: 1 foot
Key: Tree

Table 1. Vegetative Buffer Dimensions for Each Resource.

SITE	BUFFER LENGTH (FT)	ESTIMATED TREES
HDR-AR-02	596	298
HDR-AR-04	867	434
HDR-AR-10/HDR-AR-11	1237	619
TOTAL	2700	1350

Figure 2. Vegetation Buffer for Architectural Resource HDR-AR-02.

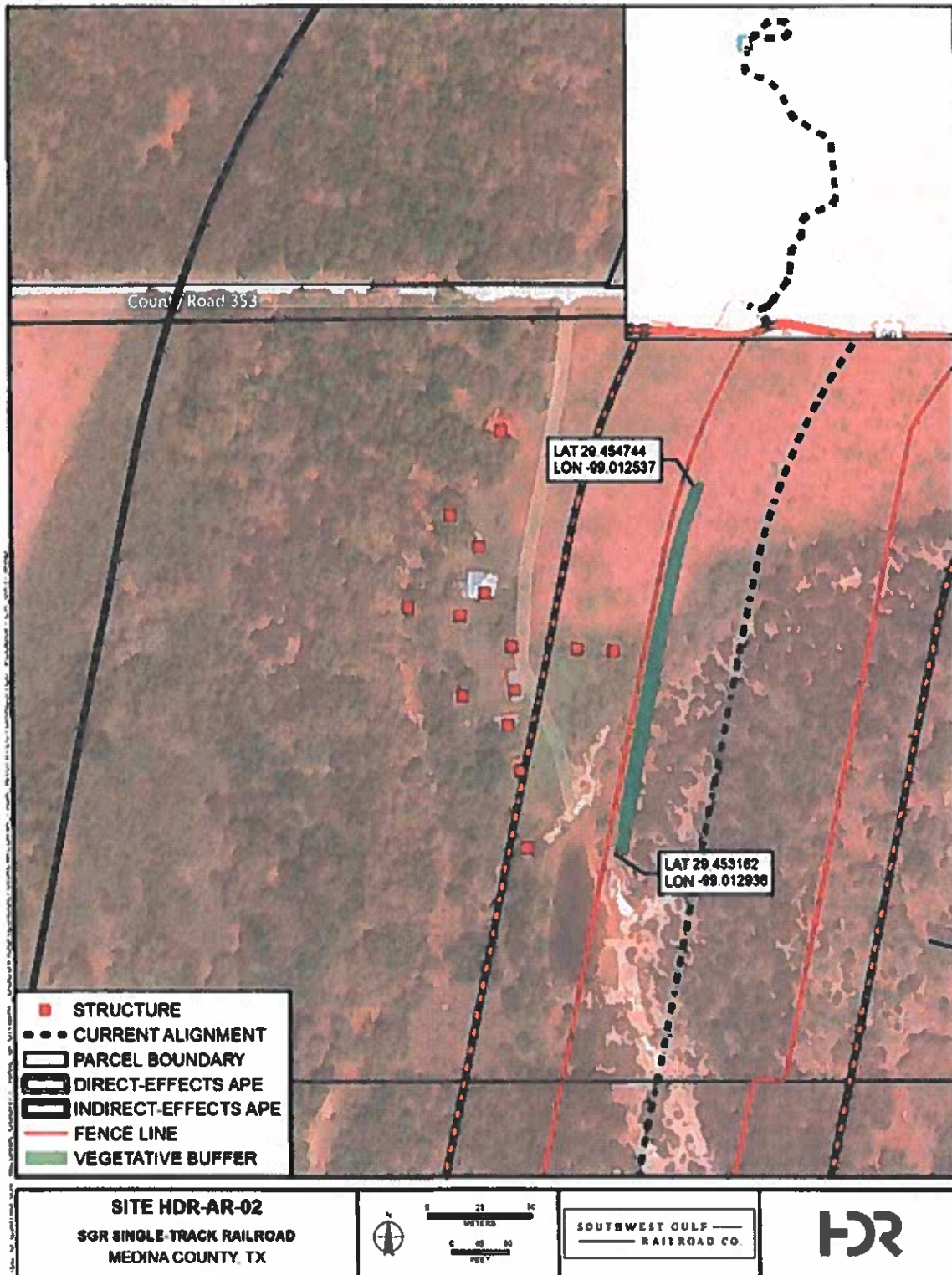


Figure 3. Vegetation Buffer for Architectural Resource HDR-AR-04.

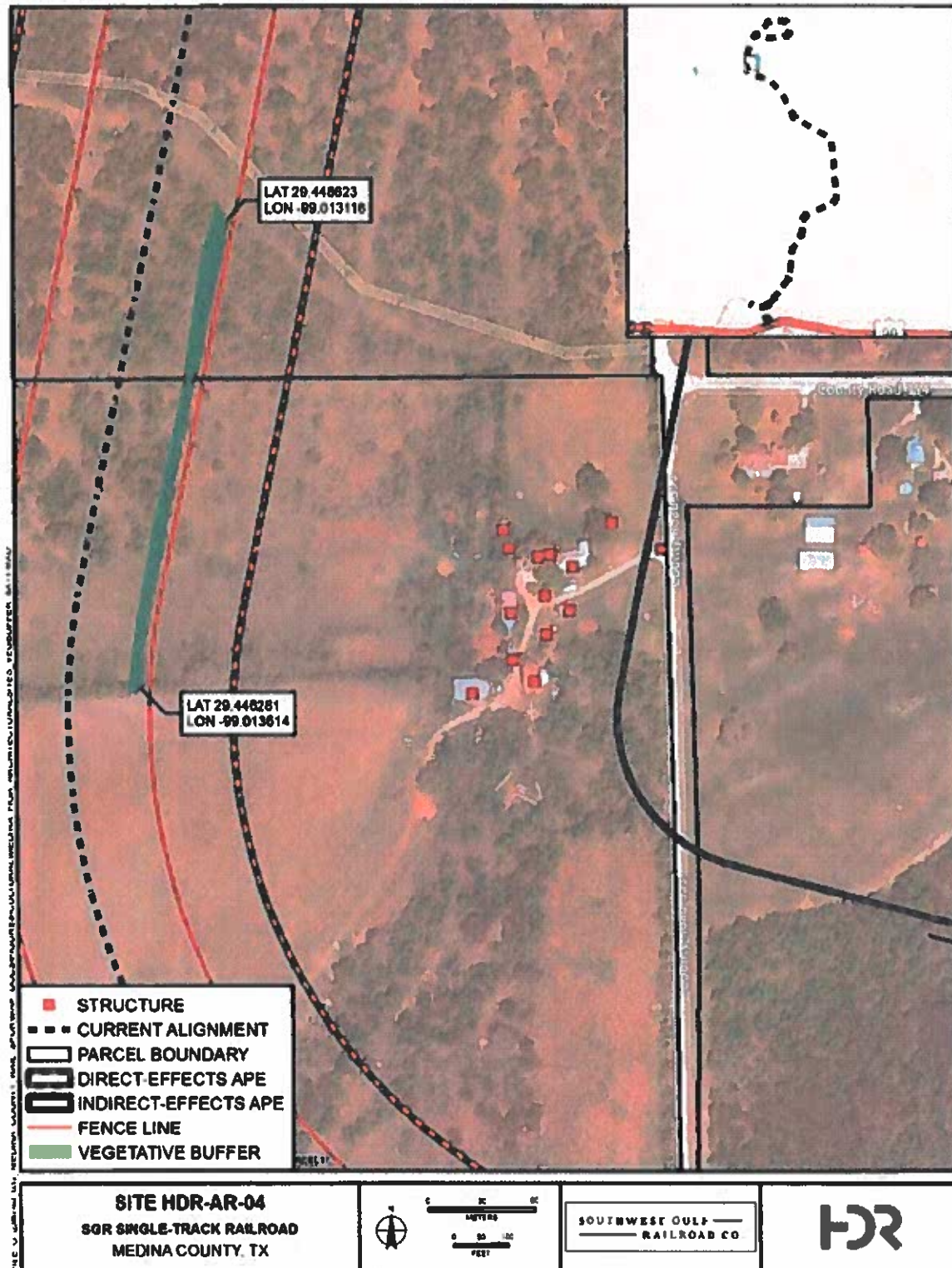


Figure 4. Vegetation Buffer for Architectural Resource HDR-AR-10.

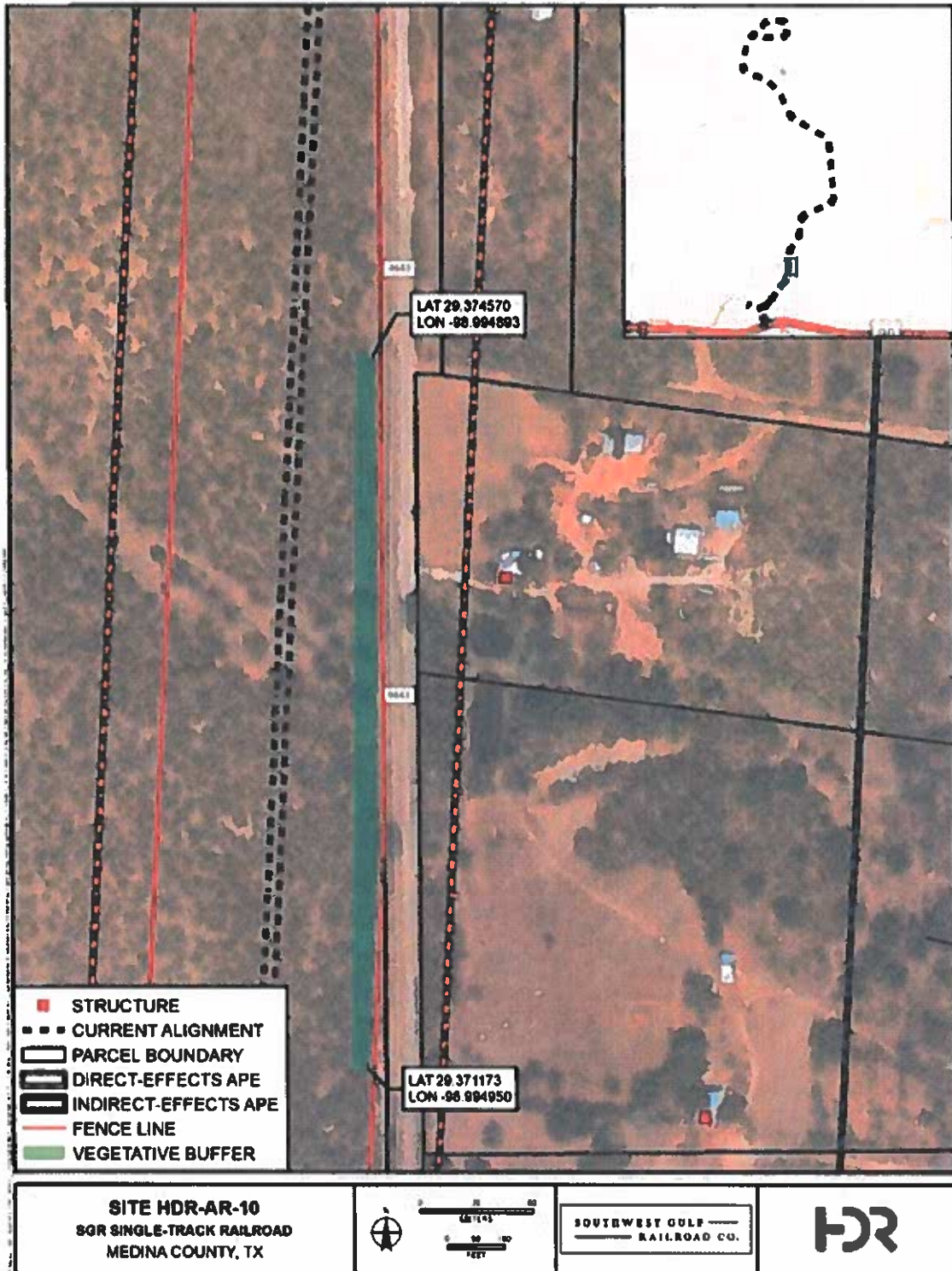
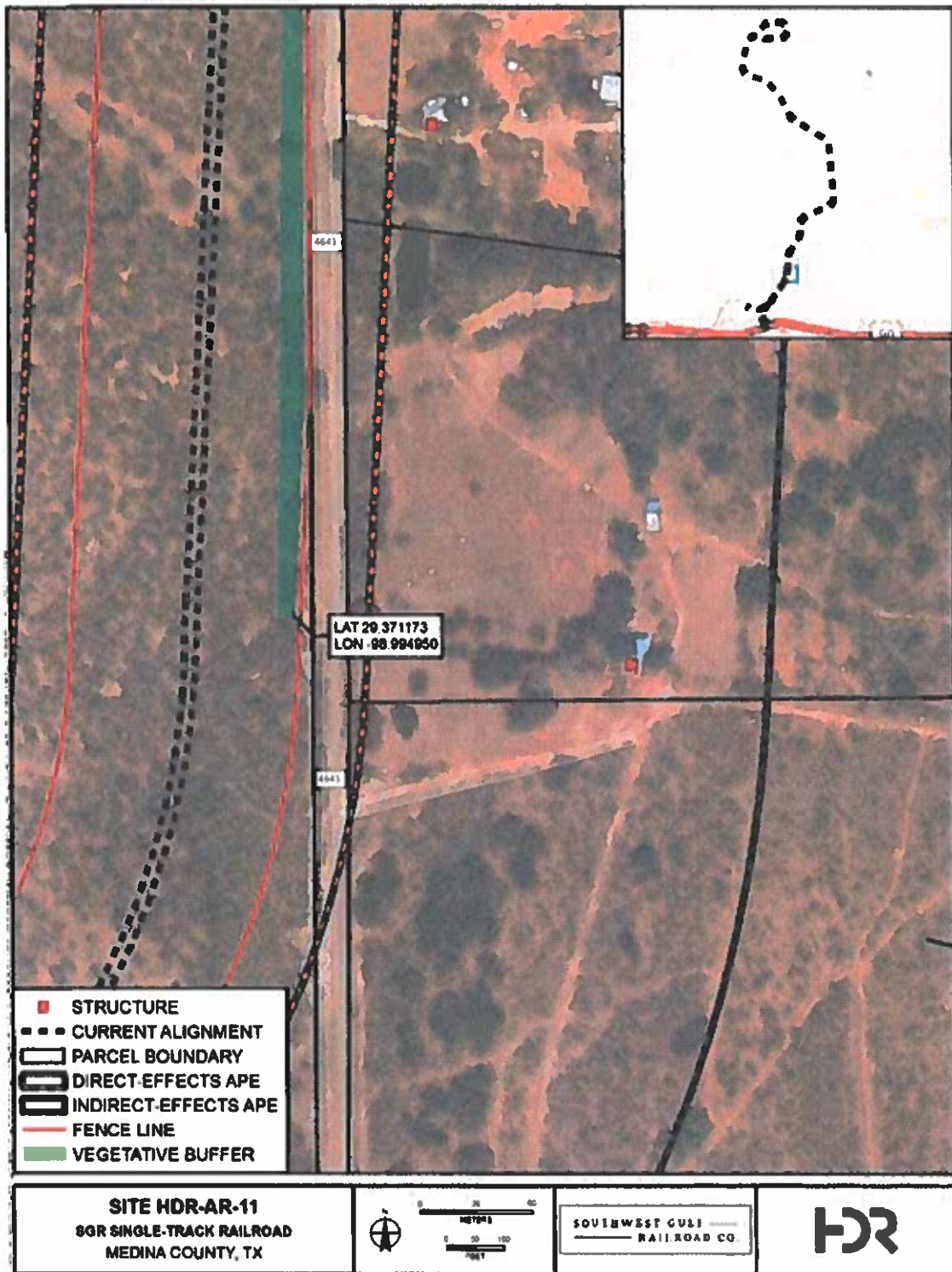


Figure 5. Vegetation Buffer for Architectural Resource HDR-AR-11.



TEXAS HISTORICAL COMMISSION
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May 11, 2018

Diana Wood
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: *Project Review under Section 106 of the National Historic Preservation Act, Mitigation Status Update and Vegetative Buffer, Southwest Gulf Railroad, Medina County, Texas*
(See also THC Track #201704530, #201707114)

Ms. Wood:

Thank you for the project information regarding the above-referenced project, which we received via email on April 23, 2018. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer (SHPO), the Executive Director of the Texas Historical Commission.

The review staff, led by Casey Hanson, Justin Kockritz and Sara Ludueña, has completed its review of the information regarding the required mitigation agreed to by the parties involved in this undertaking as well as the schematic proposed vegetative buffer. We appreciate you providing an update on the status of the various mitigation measures and we look forward to reviewing the exhibit and educational materials when a draft is complete. In terms of the vegetative buffer, we agree that the approach of planting two staggered rows of low trees is appropriate, and the species described will create a sufficient visual buffer between the historic resources and the rail line.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our comments on the potential effects of the project on historic properties, please contact Sara Ludueña at 512-463-8952 or sara.luduen@thc.texas.gov.

Sincerely,



Sara Ludueña, South Texas Project Reviewer
For: Mark Wolfe, State Historic Preservation Officer

cc: David H. Coburn, Steptoe & Johnson, LLP (e-mail)
Robert Hancock, Chair, Medina County Historical Commission

MW/sl



From: Coburn, David
To: [Wood, Diana](#)
Cc: [Taub, Cynthia](#)
Subject: FW: Project Review: 201810837
Date: Sunday, July 15, 2018 8:36:36 AM

Diana – In case you didn't see this. David

From: noreply@thc.state.tx.us [mailto:noreply@thc.state.tx.us]
Sent: Tuesday, July 10, 2018 12:16 PM
To: Koszarek, Megan <Megan.Koszarek@hdrinc.com>; reviews@thc.state.tx.us
Subject: Project Review: 201810837



Re: Project Review under Section 106 of the National Historic Preservation Act and/or the Antiquities Code of Texas
201810837
Phase II Testing of Sites 41ME260, 41ME261, and 41ME264 for the Southwest Gulf Railroad Company Cons
North of the US-90 and CR4643, Dunlay
Hondo, TX

Dear Megan Koszarek:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff led by Casey Hanson and Caitlin Brashear has completed its review and has made the following determinations based on the information submitted for review:

Archeology Comments

- No historic properties present or affected. However, if buried cultural materials are encountered during construction or disturbance activities, work should cease in the immediate area; work can continue where no cultural materials are present. Please contact the THC's Archeology Division at 512-463-6096 to consult on further actions that may be necessary to protect the cultural remains.
- THC/SHPO concurs with information provided
- Draft report acceptable. Please submit another copy as a final report along with shapefiles showing the area where the archeological work was conducted. Shapefiles should be submitted electronically to Archeological_projects@thc.texas.gov.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: casey.hanson@thc.texas.gov, caitlin.brashear@thc.texas.gov.

Sincerely,



For Mark Wolfe, State Historic Preservation Officer
Executive Director, Texas Historical Commission

Please do not respond to this email.

TEXAS HISTORICAL COMMISSION
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#E1-26300.

May 11, 2018

Diana Wood
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: *Project Review under Section 106 of the National Historic Preservation Act, Mitigation Status Update and Vegetative Buffer, Southwest Gulf Railroad, Medina County, Texas*
(See also THC Track #201704530, #201707114)

Ms. Wood:

Thank you for the project information regarding the above-referenced project, which we received via email on April 23, 2018. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer (SHPO), the Executive Director of the Texas Historical Commission.

The review staff, led by Casey Hanson, Justin Kockritz and Sara Ludueña, has completed its review of the information regarding the required mitigation agreed to by the parties involved in this undertaking as well as the schematic proposed vegetative buffer. We appreciate you providing an update on the status of the various mitigation measures and we look forward to reviewing the exhibit and educational materials when a draft is complete. In terms of the vegetative buffer, we agree that the approach of planting two staggered rows of low trees is appropriate, and the species described will create a sufficient visual buffer between the historic resources and the rail line.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our comments on the potential effects of the project on historic properties, please contact Sara Ludueña at 512-463-8952 or sara.luduenaa@thc.texas.gov.

Sincerely,



Sara Ludueña, South Texas Project Reviewer
For: Mark Wolfe, State Historic Preservation Officer

cc: David H. Coburn, Steptoe & Johnson, LLP (e-mail)
Robert Hancock, Chair, Medina County Historical Commission

MW/sl



TEXAS HISTORICAL COMMISSION
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April 13, 2018

Diana Wood
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington DC 20423

Re: Project review under Section 106 of the National Historic Preservation Act of 1966
Revised Draft Report: *Phase II Testing of Sites 41ME260, 41ME261 and 41ME264 for the Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad, Medina County, Texas* (STB)

Dear Ms. Wood:

Thank you for submitting the revised draft report mentioned above. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC).

The review staff, led by Casey Hanson, has completed our review of the revised draft report. Although we find the revised draft improved, it does not adequately address our recommendations included in our letter dated January 25, 2018. Please see the comments in the enclosure.

Although we find the revised draft report to be deficient we believe the report is acceptable pending the correction of the attached comments. Please make these corrections and submit a final report along with a tagged PDF and project shapefiles. The latter should be emailed directly to the following address:
archeological_projects@thc.texas.gov.

Thank you for your cooperation in this state review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Casey Hanson at 512.463.5915.**

Sincerely,



for
Mark Wolfe, State Historic Preservation Officer

MW/cjh



Comments on the Revised Draft Report: *Phase II Testing of Sites 41ME260, 41ME261 and 41ME264 for the Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad, Medina County, Texas* (STB).

Although HDR added information to the environmental background section as requested, the requested geomorphology section is limited to a summation of the relevant soil taxonomic classes. HDR's site evaluations for 41ME260 and 41ME261 are primarily based on the geomorphological conditions at the sites, so it is necessary that the reader understand the landforms' history and the conditions that affect site formation. We are not requesting a detailed geomorphological study, but instead we are recommending that the report include basic background information such as the types of landforms present, the approximate age of the landforms, and the hydrologic and climatic conditions that have may have been significant in the evolution of the landforms or that may have affected site formation.

Please include improved maps depicting relevant background information including geologic and soils maps of each site (the scales of Figures 2-1 and 2-2 make them illegible), the site locations overlaid onto a USGS quad maps, and any other maps that may assist the reader in interpreting the sites' settings.

Because HDR's site evaluations are based on their conclusion that Vertisols compromised the vertical contexts at 41ME260 and 41ME261 we previously recommended that the previous investigations section should include a discussion of other sites in the region where vertic action has compromised site integrity. Please address this comment.

Similar to the first comment, the site descriptions are less than what is expected for testing report. Please add additional information regarding the sites' settings and conditions.

Please revise Figures 5-1 and 5-6. The scales make the figures illegible. Please consider making multiple full-sized figures that highlight Concentrations 1 and 2 as opposed to the small cut-outs currently utilized.

Please add a background to the Artifact Density maps (currently Figure 5-6), preferably a USGS quad map.

Please revise/re-scale Figure 5-19 to make it legible. Multiple figures may be a better option.

Please replace Figures 5-23 and 5-24 with better photos.

Please add a second symbol denoting the second Uvalde Point to Figure 5-25.

TEXAS HISTORICAL COMMISSION

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January 25, 2018

Diana Wood
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington DC 20423

Re: Project review under Section 106 of the National Historic Preservation Act of 1966
Draft Report: *Phase II Testing of Sites 41ME260, 41ME261 and 41ME264 for the Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad, Medina County, Texas* (STB)

Dear Ms. Wood:

Thank you for submitting the draft report mentioned above. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC).

The review staff, led by Casey Hanson, has completed our review of the draft report, and in accordance with our previous review of the letter report on 11/27/2018, we concur with HDR's recommendations that sites 41ME260, 41ME261 and 41ME264 are not eligible for listing on the National Register of Historic Places (NRHP) and no further work is required at these sites.

Although we concur that these sites are not eligible for the NRHP, our concurrence is largely based on our site visit on September 26, 2017, and we find that the draft report does not adequately reflect the conditions we observed and discussed in the field. This report is the only documentation of these sites for this project, and the draft report fails to meet the standards for a testing report outlined in the *Council of Texas Archeologists (CTA) Guidelines for Cultural Resource Management Reports*.

Specifically, the environmental background section in the draft report is limited to a very brief description of the soils and geology at each site while CTA guidelines recommend "relevant information pertaining to the local climate, hydrology, geomorphology, surface geology, soils, vegetation and fauna." These data are required due to HDR's determination that Vertisols compromised the vertical contexts at 41ME260 and 41ME261. Please expand the background section to discuss regional geomorphology and climate and please add a discussion to the previous investigations section with examples where vertic action compromised the integrity of sites in Central Texas.

CTA Guidelines also recommend that reports for testing projects address "the intrasite provenience of artifacts and associated materials" and should include "illustrations of significant horizontal or vertical patterning in intrasite artifact distributions." The delineation of Concentration 1 and 2 at site 41ME260 and Figure 4-1 minimally address (presence/absence) the horizontal artifact distribution at the site, but further figures that illustrate the distribution of artifact types across the site would also be useful. More importantly, because HDR determined that 41ME260 and 41ME261 lack integrity due to the vertical movement of artifacts, illustrations depicting the vertical distribution of artifacts are recommended. We recognize that Table 4-6 and Figure 4-12 depict the vertical distribution of diagnostic tools at 41ME260 in tabular form, but we recommend additional representative illustrated profiles depicting the vertical distribution of various artifact types for site 41ME260 and 41ME261. This additional analysis is needed to strengthen the interpretation of the data from 41ME260, Concentration 2 where, only even though late prehistoric-age tools were recovered, it was determined that "the artifacts still lack context due to the effects of Vertisol cracking."

Diana Wood

Page -2-

Additionally, CTA guidelines recommend that "the data recovered from the testing should be synthesized on both an intrasite and intersite level of analysis." HDR collected data from a number of sites during the pedestrian survey phase of this project that should be utilized along with the data collected during the testing phase for comparative analyses, more effective site evaluations, and/or recommendations for future studies in the region.

Please address the following comments and submit a revised draft for review. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Casey Hanson at 512.463.5915.**

Sincerely,

A handwritten signature in black ink, appearing to read "William D. Wolfe", with a stylized, flowing script.

for
Mark Wolfe, State Historic Preservation Officer

MW/cjh

TEXAS HISTORICAL COMMISSION
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December 1, 2017

Diana Wood
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington DC 20423

Re: Project review under Section 106 of the National Historic Preservation Act of 1966
Letter Report: *Letter Report for the Phase II Testing of Sites 41ME260, 41ME261 and 41ME264 for the Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad, Medina County, Texas (STB)*

Dear Ms. Wood:

Thank you for submitting the letter report mentioned above. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC).

The review staff, led by Casey Hanson, has completed our review of the aforementioned draft letter report. Based on the information provided in the letter report in addition to the THC's site visit on September 26, 2017, we concur with HDR's recommendations that sites 41ME260, 41ME261 and 41ME264 are not eligible for listing on the National Register of Historic Places (NRHP) and no further work is required at these sites.

Although the letter report submitted for our review does address the minimum requirements outlined in the Resolution Plan, it does not meet the standards for a testing report outlined in the *Council of Texas Archeologists (CTA) Guidelines for Cultural Resource Management Reports*. The THC looks forward to reviewing a complete report that meets the CTA Guidelines and fully addresses the depositional contexts of each site and spatial distribution of artifacts at each site, as well as a much more detailed artifact analysis for the materials recovered. These topics were discussed in length during the September site visit and these data indicate that the sites have very little integrity. These observations in combination with the absence of intact features and lack of datable materials at the sites are the reasons why the sites do not meet NRHP-listing criteria and need to be discussed in length in the draft report.

Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Casey Hanson at 512.463.5915.**

Sincerely,



for
Mark Wolfe, State Historic Preservation Officer

MW/cjh



#EO-2991

Wood, Diana

From: Wood, Diana
Sent: Thursday, April 19, 2018 7:26 AM
To: 'secocreek17@gmail.com'; 'Holly@mathpo.org'; 'Gary.mcadams@wichitatribe.com'
Subject: FD 34284 Southwest Gulf Railroad in Medina County TX - Confidential Phase II Report for Sites 41ME260, 41ME261 and 41ME264
Attachments: Medina_Ph II Full ReportMarch2018.pdf; SHPO Comments on Revised Report 1-25-18 GR Phase II Testing 41ME260 41ME261 and 41ME264 SHPO Response.pdf; SHPO Comments R3 SGR Phase II Testing Revised Draft 41ME260 41ME261 and 41ME264 SHPO Response (002).pdf; SHPO Comments on Revised Phase II Report April 2018.pdf

Dear Consulting Parties (Federal Tribes and Dr. Hester),

Attached please find the phase II report for the above referenced railroad construction project. According to the Texas Historical Commission (State Historic Preservation Office or SHPO), and pursuant to Texas Government Code § 442.07, the report contains sensitive site location data that is restricted. Only the signatory parties to the PA, as well as consulting Federal Tribes and Dr. Hester. PhD and Professor of Anthropology emeritus at the University of Texas at Austin, may review the Report.

Please provide comments to the address below, by mail or email, by May 31, 2018.

I've also attached copies of the SHPO's comments as an FYI.

Thanks much.

Sincerely,

Diana Wood

Report mailed to Jim Anterberry,
Comanche Nation and
Bridgette Satepeahtaw,
Kiowa Tribe of Oklahoma

Diana F Wood
Office of Environmental Analysis
US Surface Transportation Board
395 E Street SW, Room 1110
Washington DC 20423
202-245-0302
Diana.Wood@stb.gov

TEXAS HISTORICAL COMMISSION
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December 1, 2017

Diana Wood
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington DC 20423

Re: Project review under Section 106 of the National Historic Preservation Act of 1966
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Sincerely,



for
Mark Wolfe, State Historic Preservation Officer

MW/cjh



TEXAS HISTORICAL COMMISSION
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January 25, 2018

Diana Wood
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for

Mark Wolfe, State Historic Preservation Officer

MW/cjh

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April 13, 2018

Diana Wood
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington DC 20423

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