

#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
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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



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 A. Wolfe", written in a cursive style.

for
Mark Wolfe, State Historic Preservation Officer

MW/cjh

TEXAS HISTORICAL COMMISSION
real places telling real stories

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.