

TEXAS HISTORICAL COMMISSION
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#E1-26279

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.