



TEXAS HISTORICAL COMMISSION

The State Agency for Historic Preservation

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E1-144
R91

March 31, 2005

Ms. Victoria Ruston
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20402-0001

Re: Project review under Section 106 of the National Historic Preservation Act of 1966,
Southwest Gulf Railroad, STB Finance Docket No. 34248, Proposed seven-mile railroad,
Medina Co., Texas (STB)

Dear Ms Ruston:

This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

Texas Historical Commission staff reviewed the draft document titled Work Plan for Conducting Rural Historic Landscape Analysis for STB Finance Docket 34284, prepared for the Surface Transportation Board by URS Corporation in March 2005. The plan outlined in the proposal is sound, and is based on a knowledge of relevant National Register nominations in Texas and National Park Service guidelines for analyzing rural historic landscapes.

The Texas Historical Commission offers the following recommendations to strengthen the proposal:

Boundary Definition and Evaluating Significance

- As proposed, the boundary definition would be based largely on a physical survey of the area. While such a survey is essential, it must not be conducted in the absence of preliminary research regarding the history of the area that is necessary to develop historic contexts. The boundary should encompass the area of containing a good concentration of historic properties, but should be determined only with an understanding of historic settlement and land use patterns.

Documentation

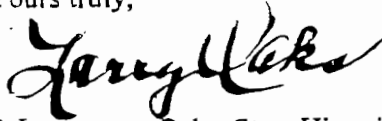
- Since analysis of the landscape requires an understanding of the historic contexts, we likewise suggest that the Section IV of the documentation should be inverted, to begin with an analysis of historic events and/or individuals, and culminate with the overview of design in the district. ALL the following should be included:
 - Historic events and/or individuals
 - Cultural traditions
 - Response to the natural environment
 - Spatial Patterns

- Land use activities
- Design
- The "Description of Resources" should include ALL of categories listed.

Finally, we strongly urge the applicant to hire qualified consultants in the State of Texas that have a good understanding of vernacular landscapes in rural Texas, as their experience in the field would allow for the most effective and efficient analysis of historic resources in the Quihi area. Please contact the Texas Historical Commission if you need assistance in finding a qualified preservation consultant in Texas to perform the work on this project.

Thank you for your cooperation in this federal review process.

Yours truly,



F. Lawrence Oaks, State Historic Preservation Officer

cc: John Nau, III, Chair, Texas Historical Commission
John Fowler, Advisory Council on Historic Preservation
Albert Hausser, Texas Historical Commission
Rini Ghosh, Surface Transportation Board
David H. Coburn, Steptoe & Johnson, LLP, 1330 Connecticut Avenue, NW, Washington, DC

DRAFT

**WORK PLAN FOR CONDUCTING
RURAL HISTORIC LANDSCAPE ANALYSIS FOR
STB FINANCE DOCKET 34284
SOUTHWEST GULF RAILROAD COMPANY
CONSTRUCTION AND OPERATION EXEMPTION
MEDINA COUNTY, TEXAS**

Prepared For:

**Surface Transportation Board
Section of Environmental Analysis**

Prepared By:

URS Corporation

March 2005

INTRODUCTION

This document is a work plan for conducting an analysis of the potential rural historic landscape associated with the Southwest Gulf Railroad (SGR) rail project in Medina County, Texas. SGR has filed a petition with the Surface Transportation Board (STB) for authority to construct and operate a rail line, and the STB's Section of Environmental Analysis (SEA) is assessing the impact of the proposed project on cultural resources as part of environmental impact studies. This work plan is designed to assist the STB in compliance with the requirements of the National Historic Preservation Act of 1966, as amended, and the Advisory Council on Historic Preservation (ACHP) regulations on the "Protection of Historic Properties" (36 CFR 800, as revised).

In 2003 and 2004, research conducted by consultants for SEA indicated that the proposed project may have an effect on a potential rural historic landscape. Although definitive boundaries have not yet been established, and the significance of this resource has not been evaluated, this potential landscape generally encompasses the 19th- and 20th-century communities of Quihi and Upper Quihi, which include numerous Germanic-Alsatian stone houses and house ruins, as well as several Victorian frame homes. In addition to the 18 Germanic-Alsatian structures inventoried near the proposed rail alignments, there are many more located to the south and west toward New Fountain and along Quihi Creek. There are indications that the road network and the layout of pasture, cropland, and woodland maintain substantial continuity with historic patterns, and many descendants of the original settlers still live in the community.

SEA has had ongoing consultations with the Texas Historical Commission (THC) during the course of the environmental review process. After SEA issued the Draft Environmental Impact Statement for public review and comment, SEA had additional discussions with THC and ACHP in an effort to resolve concerns of THC regarding the sufficiency of the Programmatic Agreement that had been developed earlier in the process. On January 28, 2005, THC and ACHP recommended to SEA that additional information on the potential rural historic landscape was needed before they could provide more definitive comments concerning cultural resources impacts associated with the proposed rail project. This work plan was then prepared to outline the scope of studies that will be done to address the recommendations of the THC and the ACHP.

BACKGROUND ON RURAL HISTORIC LANDSCAPE STUDIES

A rural historic landscape is one of the categories of properties that can qualify for listing in the National Register of Historic Places (NRHP) as a historic district. The National Park Service (NPS) defines a rural historic landscape as:

a geographical area that historically has been used by people, or shaped or modified by human activity, occupancy, or intervention, and that possesses a significant concentration, linkage, or continuity of areas of land use, vegetation, buildings and structures, roads and waterways, and natural features. Rural landscapes commonly reflect the day-to-day occupational activities of people engaged in traditional work such as mining, fishing, and various types of agriculture. Large acreage and a

proportionately small number of buildings and structures differentiate rural historic landscapes from other kinds of historic properties (NPS 1989:1).

A number of sources are available for guidance concerning the identification and evaluation of historic landscapes within the context of NRHP requirements, and these sources will help guide the Quihi study. The seminal work is Melnick's *Cultural Landscapes: Rural Historic Districts in the National Park System*, published by the National Park Service (NPS) in 1984. In 1989, the NPS National Register program issued Bulletin #30, *Guidelines for Evaluating and Documenting Rural Historic Landscapes* (later updated in 1999), and in 1992, the Preservation Forum of the National Trust for Historic Preservation published their *Focus on Landscape Preservation* issue. In 1994 the NPS issued Preservation Brief No. 36, *Protecting Cultural Landscapes*, and in 1999, the California Department of Transportation synthesized all of these sources into their *General Guidelines for Identifying and Evaluating Historic Landscapes (1999 Guidelines)*.

Existing NRHP nominations for rural historic districts and landscapes in Texas will also need to be consulted, such as the San Antonio River Valley Rural Historic District (1995 – 27,000 acres, 58 buildings, 103 structures, and 5 objects) and the Westphalia Rural Historic District (1996 – 5,500 acres, 188 buildings, 50 structures, 2 objects). (Although it is situated in the central Texas region of Falls County, the latter example may be particularly useful since it is focused on a late 19th- and early 20th- century German immigrant farming community.) In addition, the work of the late cultural geographer Terry Jordan (UT-Austin) concerning German immigrants in Texas will provide important background, as will more recent research on Germanic house forms in Fredericksburg by Kenneth Hafertepe of Baylor University.

OUTLINE OF RESEARCH STEPS TO BE COMPLETED

To evaluate the National Register eligibility of the potential Quihi rural historic landscape, the proposed study will delineate boundaries, define significance, and assess historic integrity. This research will then be documented with a report and detailed mapping.

Boundary Definition

Delineation of the boundaries of the landscape will require that the historic landscape characteristics be identified. These characteristics include such items as land uses and activities, patterns of spatial organization, circulation networks, boundary demarcations, and vegetation related to land use (see Bulletin 30 for a more detailed description of the characteristics and the documentation required). Boundary delineation will include field research to inventory and document the landscape, with the goal being to create a detailed record of the landscape and its features as they exist at the present. Previous field reconnaissance studies conducted for the project will provide some of the documentation needed for the landscape study, but additional field survey will be required since a larger area with additional historic properties is now under consideration, and a qualified architectural historian has not yet examined the project. The field survey will be conducted via both windshield and pedestrian survey to cover all accessible roadways within the potential landscape,

and oral history and landowner interviews will be integrated into the field studies. Boundaries will be selected to encompass but not exceed the extent of the significant resources and land areas comprising the overall resource.

Evaluating Significance

Evaluating significance first requires development of more detailed historic contexts for Quihi. The proposed study will use the information gathered in the previous cultural resource studies as a starting point. In addition, the Quihi and New Fountain Historical Society has compiled a preliminary inventory of many of the standing resources in the area that will facilitate the current research. General historic research will be conducted to determine the overall development of the project area and, in particular, physical changes that have occurred to its landscape over time. Additional historical research will help identify the landscape's historic period(s) of ownership, occupancy and development, and allow a greater understanding of the associations and characteristics that make the landscape or history significant.

Potential information repositories include the Quihi and New Fountain Historical Society; the Medina County Courthouse; the Hondo and Castroville public libraries; the Center for American History at UT-Austin; the Texas State Library and Archives and the Texas Historical Commission in Austin; Special Collections at St. Mary's College in San Antonio; Special Collections at UT- San Antonio; and the Texana Collection at the San Antonio Public Library. In addition, oral history interviews with knowledgeable local residents and descendants of the 19th-century residents will be conducted.

Primary archival sources are likely to include historic plans, surveys, plats, tax maps, atlases, U.S. Geological Survey maps, soil profiles, aerial photographs, photographs, engravings, paintings, newspapers, journals, and personal correspondence. Secondary sources typically include monographs, published histories, theses, National Register forms, survey data, local preservation plans, state contexts, and scholarly articles. Contemporary documentary resources will also be consulted. These include items such as recent studies, plans, surveys, aerial photographs, and Soil Conservation Service (currently Natural Resources Conservation Service) soil maps.

Evaluation will also require assessing historic integrity. Information gathered through historic research and field survey will be related to the study area's historic contexts to determine the extent to which identified properties possess the characteristics of important rural property types. Significance and integrity depend upon the presence of tangible landscape features and the evidence of the processes, cultural and natural, that have shaped the landscape (Bulletin 30). The proposed study will apply the National Register qualities of integrity (location, design, setting, materials, workmanship, feeling, and association), identify changes and threats to integrity, classify contributing and noncontributing resources, and then weigh overall integrity.

Documentation

The report resulting from this study will follow the following format (1999 Guidelines):

I. SUMMARY OF FINDINGS

II. PROJECT DESCRIPTION

III. RESEARCH METHODS

IV. HISTORICAL OVERVIEW (including from the following, as appropriate)

- A. Design
- B. Land use activities
- C. Spatial patterns
- D. Response to the natural environment
- E. Cultural traditions
- F. Historic events or individuals

V. DESCRIPTION OF RESOURCES (description of the physical components of the landscape, both natural and built features, which will generally include many or all of the following categories)

- A. Spatial organization and land patterns
- B. Topography
- C. Vegetation
- D. Circulation
- E. Water features
- F. Buildings and structures
- G. Site furnishings and objects
- H. Visual character and intangible qualities

VI. STATEMENT OF SIGNIFICANCE (Specifically address the National Register criteria and the elements of integrity. If the landscape appears to be eligible, describe the boundaries, define the period of significance, and list contributing and noncontributing elements.)

VII. CONCLUSIONS

VIII. BIBLIOGRAPHY

IX. APPENDICES:

- A. Photographs [these may be integrated into the body of the report]
- B. Maps
- C. Inventory forms, if appropriate
- D. Other attachments (Include any additional pertinent documentation, such as copies of historic documents or correspondence.)

REFERENCES & PRELIMINARY SOURCES

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McClelland, Linda, J. Timothy Keller, Genevieve Keller, and Robert Melnick.

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