

HEI-26134

TEXAS HISTORICAL COMMISSION
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June 29, 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, Draft Resolution Plan, Southwest Gulf Railroad, Medina County, Texas (STB/106, THC #201707114) (See also THC Track #201704530)*

Ms. Wood:

On May 30, 2017, we received the *Draft Resolution Plan for the Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad*, in accordance with the December 2015 Programmatic Agreement for the project. 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, Justin Kockritz and Sara Ludueña, has completed its review of the Draft Resolution Plan which lays out proposed minimization and mitigation efforts for the proposed rail line. As per the Programmatic Agreement for this undertaking, if a finding of adverse effect is made, a resolution plan is to be created in consultation with the signatories and consulting parties. It is our understanding that there are 11 historic or cultural resources that may be adversely impacted by the proposed rail line. (In a letter dated March 21, 2017, we concurred with a finding of adverse effect with regard to these historic resources within the Area of Potential Effect).

The Archeology review staff, led by Casey Hanson, concurs with the proposed resolutions of adverse effects to sites 41ME262, 41ME261, 41ME260, and 41ME264. However, the Draft Resolution Plan contains two typos that need to be corrected. In the comments section in the first row of Table 1 (pg. 2) site 41ME262 is incorrectly identified as site 41ME260. A similar typo is present on page 10 where site 41ME264 is identified as 41ME 260.

The Division of Architecture review staff, led by Sara Ludueña, has noted that the Draft Resolution Plan suggests minor realignment of sections of the proposed rail route to minimize impacts to individual historic resources. The plan also proposes four major strategies to mitigate adverse effects which we have commented on below. The four strategies are:

1. Design and implementation of landscape/vegetative buffers between historic structures and the proposed rail line;
2. Creation and publication of a booklet on the Upper Quihi Rural Historic District;
3. Development of a historic context related specifically to the architecture and landscape of the Alsatian immigrants to this region; and
4. Development of an interpretive display on the area's Alsatian settlers and history.

While we concur that adjusting the path of the rail line to pull it further away from historic resources will help minimize impacts to those individual resources, we have the following comments regarding the proposed mitigation. The use of landscape and vegetative buffers will provide some visual separation, but will not necessarily alleviate concerns about vibration. The natural landscape in this area is fairly low-lying plants and trees and the proposed buffers should be designed to blend in with the natural environment. Consideration should also be given to any efforts that may help dampen vibratory effects. We look forward to reviewing the proposed landscape plans in more detail as they become available.

With regard to the more interpretive and research-based mitigation ideas, these three strategies seem closely interrelated. The proposed context document, for example, will look closely at early Alsatian communities and development, which will relate to New Fountain as well as the Quihi and Upper Quihi Rural Historic Districts.



If information on New Fountain or Quihi is compiled for the context document or the exhibit, it seems logical to include it in the booklet as well. In terms of curation and dissemination of these materials, the Draft Resolution Plan mentions special interest groups. Have specific Alsatian settler organizations been identified as potential partners? If so, please list them in the final resolution plan and provide some indication as to whether they have been consulted about these efforts. Similarly, the Steinbach House in Castroville is identified as a possible repository for the interpretive exhibit. Have they agreed to house this information? We understand that their capabilities to accept additional objects and artifacts may be limited. Perhaps a mobile or traveling exhibit could be created instead. This could be used in area schools and libraries.

We also noted that there is no mention of efforts to document the historic resources in the Area of Potential Effect (APE). Photodocumentation of the structures, particularly those that lie within the APE should be carried out prior to construction. For guidance as to an appropriate level of photodocumentation, we recommend referring to the Historic American Buildings Survey (HABS) Photography Guidelines published by the National Park Service. These photographs may also be incorporated into the interpretive mitigation strategies described above.

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.luduenia@thc.texas.gov; or, if you have any questions concerning our comments on archeological resources, please contact Casey Hanson at 512-463-5915 or casey.hanson@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
Dr. and Mrs. Fitzgerald, Medina County Environmental Action Association (e-mail)

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