

TEXAS HISTORICAL COMMISSION
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#EI-26276

November 27, 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

