

#E1. 26175

TEXAS HISTORICAL COMMISSION
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August 15, 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, Proposed Final Resolution Plan, Southwest Gulf Railroad, Medina County, Texas*
STB/106, THC #201709149 (See also THC Track #201707114, #201704530)

Dear Ms. Wood:

On July 2017, we received and commented on 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, we have now been provided with Final Resolution Plan to Resolve Adverse Effects to Historic Properties. 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 Final Resolution Plan which lays out proposed minimization and mitigation efforts for the proposed rail line. As per the Programmatic Agreement for this undertaking, this Resolution Plan was created in response to a finding of adverse and potentially adverse effect to several of the cultural resources in the Area of Potential Effect (APE) associated with the Upper Quihi Rural Historic District (UQRHD).

The Archeology review staff, led by Casey Hanson, requires more information regarding the demolition activities at 41ME261 reported by the Medina County Environmental Action Association (MCEAA) to the Surface Transportation Board (STB) on August 11, 2017.

The Architecture review staff, led by Sara Ludueña, has completed its review of the Final Resolution Plan and has the following comments. In general, several of the proposed mitigation measures require additional clarification.

1. HABS Photographic Documentation: If HABS level photo-documentation is to be produced, what level of documentation is intended? In order to meet any of the three HABS level requirements, some level of drawing as well as a written component will be required for submittal along with the proposed photographs. Is this intended to be submitted for inclusion in the special collection at the Library of Congress?
2. UQRHD Document: The idea of creating a document to be housed in various repositories in South Texas is appropriate, but clarification as to what this document will actually look like will be useful. The plan states that it will include photographs and research—will there also be a narrative component to help put the UQRHD into context for a layperson who visits one of these archives? What sort of project professional will create this type of document? Will that person/firm meet the Secretary of the Interior's Qualification Standards?
3. Traveling Exhibit: Similarly, the idea of a traveling educational exhibit, which we mentioned in our response to the Draft Resolution Plan, will require some additional planning. We appreciate that several potential interest groups have been identified, but have any of them been contacted to gauge their interest or capacity to assist with such an exhibit? In the list of interest groups, the Quihi and New Fountain Historical Society should also be included. We would like to see a clearer direction in terms of housing such an exhibit. The Hondo Public Library, being located in the Medina County Seat, seems appropriate, but prior to finalization of this plan, they should be contacted to determine whether they are willing to participate. This planning will help avoid potentially foreseeable road blocks and delays down the line to ensure that this measure is carried out.

4. Vegetative Buffer: While a vegetative buffer will help minimize the visual impact of the proposed rail line on these historic properties, we have yet to see what the proposed buffer will look like. It should be compatible with the landscape so as not to call too much attention to itself, but needs to have a certain amount of density and height to perform its intended function.
5. "Mitigation Measure Related to SGR-Owned Architectural Resources" (page 20): The idea of providing "proposed modifications and periodic integrity status reports" to the THC for review is proposed in this section. This requires additional explanation. Would all future changes to these properties require review by our agency? For an indefinite period of time? If so, we should discuss whether to formalize this process in some way. And what is meant by "periodic integrity status reports"? Will a qualified professional perform a visual inspection of these buildings at set intervals? If so, what information will be gleaned and what format will that information take? Will the THC expect to receive a report on each property every six months, for example? While this does appear to be an appropriate potential mitigation measure, we would like to have a better understanding of our possible role.

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
Robert Hancock, Chair, Medina County Historical Commission
Dr. and Mrs. Fitzgerald, Medina County Environmental Action Association
Charlene Vaughn, Advisory Council on Historic Preservation

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