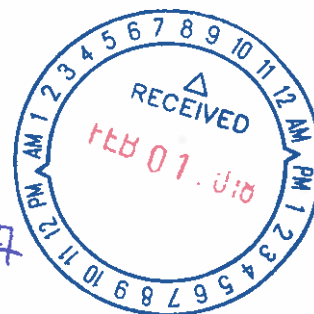


TEXAS HISTORICAL COMMISSION
real places telling real stories

January 25, 2018

#E1-2627



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
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:

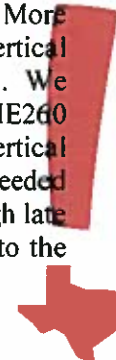
Thank you for submitting the draft report mentioned above. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC).

The review staff, led by Casey Hanson, has completed our review of the draft report, and in accordance with our previous review of the letter report on 11/27/2018, 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 we concur that these sites are not eligible for the NRHP, our concurrence is largely based on our site visit on September 26, 2017, and we find that the draft report does not adequately reflect the conditions we observed and discussed in the field. This report is the only documentation of these sites for this project, and the draft report fails to meet the standards for a testing report outlined in the *Council of Texas Archeologists (CTA) Guidelines for Cultural Resource Management Reports*.

Specifically, the environmental background section in the draft report is limited to a very brief description of the soils and geology at each site while CTA guidelines recommend "relevant information pertaining to the local climate, hydrology, geomorphology, surface geology, soils, vegetation and fauna." These data are required due to HDR's determination that Vertisols compromised the vertical contexts at 41ME260 and 41ME261. Please expand the background section to discuss regional geomorphology and climate and please add a discussion to the previous investigations section with examples where vertic action compromised the integrity of sites in Central Texas.

CTA Guidelines also recommend that reports for testing projects address "the intrasite provenience of artifacts and associated materials" and should include "illustrations of significant horizontal or vertical patterning in intrasite artifact distributions." The delineation of Concentration 1 and 2 at site 41ME260 and Figure 4-1 minimally address (presence/absence) the horizontal artifact distribution at the site, but further figures that illustrate the distribution of artifact types across the site would also be useful. More importantly, because HDR determined that 41ME260 and 41ME261 lack integrity due to the vertical movement of artifacts, illustrations depicting the vertical distribution of artifacts are recommended. We recognize that Table 4-6 and Figure 4-12 depict the vertical distribution of diagnostic tools at 41ME260 in tabular form, but we recommend additional representative illustrated profiles depicting the vertical distribution of various artifact types for site 41ME260 and 41ME261. This additional analysis is needed to strengthen the interpretation of the data from 41ME260, Concentration 2 where, only even though late prehistoric-age tools were recovered, it was determined that "the artifacts still lack context due to the effects of Vertisol cracking."



Diana Wood

Page -2-

Additionally, CTA guidelines recommend that “the data recovered from the testing should be synthesized on both an intrasite and intersite level of analysis.” HDR collected data from a number of sites during the pedestrian survey phase of this project that should be utilized along with the data collected during the testing phase for comparative analyses, more effective site evaluations, and/or recommendations for future studies in the region.

Please address the following comments and submit a revised draft for review. 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,

A handwritten signature in black ink, appearing to read "William R. Wolfe", written in a cursive style.

for
Mark Wolfe, State Historic Preservation Officer

MW/cjh