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April 23, 2018

VIA E-MAIL

Ms. Diana Wood
Section of Environmental Analysis
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423

Re: STB Finance Docket No. 34284, Southwest Gulf Railroad Company

Dear Ms. Wood:

Please find attached a Resolution Plan status report prepared pursuant to the Final Resolution Plan for the Southwest Gulf Railroad.

Also please find attached a vegetative buffer plan for Southwest Gulf Railroad submitted for review by the Board and the Texas Historic Commission.

We look forward to any comments or questions that you might have on these submissions.

Sincerely,

A handwritten signature in blue ink, which appears to read 'David H. Coburn', is written over a horizontal line.

David H. Coburn
Cynthia Taub
Attorneys for Southwest Gulf Railroad
Company

cc: Bill Martin, THC
Casey Hanson, THC
Sara Luduena, THC

**Southwest Gulf Railroad Company Construction and
Operation of the Proposed Single-Track Railroad
Resolution Plan Status: April 19, 2018.**

Medina County, Texas

By

Megan Koszarek, MSc

**Principal Investigator
Clayton M. Tinsley**

STB Finance Docket No. 34284

Prepared For:

**SOUTHWEST GULF —
—— RAILROAD CO.**

Prepared By:



**17111 Preston Road, Suite 300
Dallas, TX 75248**

April 2018

The final draft of the *Resolution Plan to Resolve Adverse Effects to Historic Properties for the Southwest Gulf Railroad Company (SGR) Construction and Operation of Proposed Single-Track Railroad project in Medina County Texas (STB Finance Docket No. 34284)* (Resolution Plan), was completed on August 28, 2017. In the Resolution Plan, four archaeological sites and seven historic properties were determined to be potentially adversely affected by the proposed project, and mitigation of these effects was required by the Resolution Plan (Table 1).

Table 1. Adversely and Potentially Adversely Affected Cultural Resources

Site/Field Survey #	*Parcel/Address	Comments
41ME262	R3311	41ME262 partially surveyed, SHPO concurred surveyed portion was not eligible for the NRHP; unsurveyed portion of Parcel R3311 was presumed NRHP eligible
41ME261	R36257	41ME261 partially surveyed, NRHP eligibility testing needed; unsurveyed portion of Parcel R36257 was presumed NRHP eligible
41ME260	R58431	41ME260 partially surveyed, NRHP eligibility testing needed; unsurveyed portion of Parcel R58431 was presumed NRHP eligible
41ME264	R58364	41ME264 partially surveyed, SHPO determined Eligible for the NRHP; unsurveyed portion of Parcel R58364 was presumed NRHP eligible
HDR-AR-02	1253 CR 353	Structures 190–530 ft from Centerline; SHPO concurred adverse effect
HDR-AR-03	1040 CR 353	Structures 900–1,200 ft from Centerline; not surveyed; presumed NRHP eligible; likely no adverse effect
HDR-AR-04	881 CR 353	Structures 700–1,000 ft from Centerline; SHPO concurred adverse effect
HDR-AR-05	6005 FM 2676	Structures 675–815 ft from Centerline; SHPO concurred adverse effect
HDR-AR-06	FM 2676	Structures 90–170 ft from Centerline; SHPO concurred adverse effect
HDR-AR-10	944 CR 4643	Structures 340–730 ft from Centerline; not surveyed; presumed NRHP eligible; possible adverse effect
HDR-AR-11	830 CR 4643	Structures 750–770 ft from Centerline; not surveyed; presumed NRHP eligible; likely no adverse effect

*Note: Parcel IDs are denoted by the "R" numbers used by the Medina County Tax Assessor to identify parcels.

HDR undertook the initial mitigation of these resources in September 2017 (Table 2). The mitigation began with the Phase II National Register of Historic Places (NRHP) eligibility testing of archaeological sites 41ME260, 41ME261, and 41ME264. A visit from the Texas Historical Commission (THC) was arranged to observe fieldwork, during which the THC officials concurred that the aforementioned sites are Not Eligible for inclusion in the NRHP. These results were presented in the *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* (Letter Report). In November 2017, HDR received written concurrence with the finding that sites 41ME 260, 41ME261, and 41ME264 are Not Eligible for inclusion in the NRHP with the stipulation that a full report that complies with the *Council of Texas Archeologists Guidelines for Cultural Resources Management Reports* standards be submitted. The full format report (*Revised Draft Phase II Testing of Sites 41ME260, 41ME261, and*

41ME264 for the Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad) was submitted to the THC and Surface Transportation Board (STB) for review on March 21, 2018.

One archaeological site (41ME262) was not tested as part of the mitigation procedures for the project. The site was surveyed within the rail corridor where parcel access had been obtained. This part of the site was determined Not Eligible for inclusion in the NRHP, but the potential extension of site 41ME262 within parcel R3311 was not surveyed. Without a survey on that parcel, the THC assumed the possible extension of site 41ME262 is eligible for listing in the NRHP until a survey can prove otherwise. As such, the Resolution Plan recommends that all construction activities avoid parcel R3311. SGR does not own parcel R3311 and will be completely avoiding the parcel, in compliance with the Resolution Plan.

Table 2. Status of Mitigation Measures for All Potentially Adversely Affected Resources.

Property	Mitigation Measure	Status
41ME262	Possible portion of site on property R3311 should be avoided	Parcel R3311 will be avoided; SGR does not own this parcel and will not be developing it
41ME261	Phase II eligibility testing should be conducted	Testing complete for portion of site within Project area, report* submitted 3/21/2018
41ME260	Phase II eligibility testing should be conducted	Testing complete for portion of site within Project area, report* submitted 3/21/2018
41ME264	Phase II eligibility testing should be conducted	Testing complete, report* submitted 3/21/2018
HDR-AR-02	1) UQRHD exhibition and educational materials 2) HABS-like Level II Documentation of the primary dwelling (A) a. Elevation drawings by experienced preservation architect b. Large-format photographs c. Written history and description 3) Vibration monitoring 4) Vegetative buffer	1) Ready for printing and set up (pending library scheduling) 2) --- a. Complete b. On-site photography completed 4/12/18, will be developed by the end of April c. Complete 3) Seismic sensors in place 4) In progress
HDR-AR-03	UQRHD exhibition, exhibit guide, and educational materials	Ready for printing and set up (pending library scheduling)
HDR-AR-04	1) UQRHD exhibition and educational materials 2) HABS-like Level II Documentation of the primary dwelling (A) a. Elevation drawings by experienced preservation architect	1) Ready for printing and set up (pending library scheduling) 2) --- a. Complete

	b. Large-format photographs	b. On-site photography completed 4/12/18, will be developed by the end of April
	c. Written history and description	c. Complete
	3) Vegetative buffer	3) In progress
HDR-AR-05	1) UQRHD exhibition and educational materials	1) Ready for printing and set up (pending library scheduling)
	2) HABS-like Level II Documentation of the primary dwelling (A)	2) ---
	a. Elevation drawings by experienced preservation architect	a. Complete
	b. Large-format photographs	b. On-site photography completed 4/12/18, will be developed by the end of April
	c. Written history and description	c. Complete
HDR-AR-06	1) UQRHD exhibition and educational materials	1) Ready for printing and set up (pending library scheduling)
	2) HABS-like Level II Documentation of the primary dwelling (A)	2) ---
	a. Elevation drawings by experienced preservation architect	a. Complete
	b. Large-format photographs	b. On-site photography completed 4/12/18, will be developed by the end of April
	c. Written history and description	c. Complete
	3) Vibration monitoring	3) Seismic sensors in place
	4) Structural assessment and preservation plan	4) Assessed as structurally unsound
HDR-AR-10	1) UQRHD exhibition and educational materials	1) Ready for printing and set up (pending library scheduling)
	2) Vegetative buffer	2) In progress
HDR-AR-11	1) UQRHD exhibition and educational materials	3) Ready for printing and set up (pending library scheduling)
	2) Vegetative buffer	4) In progress

* Revised Draft Phase II Testing of Sites 41ME260, 41ME261, and 41ME264 for the Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad

In compliance with the recommendations set forth in the Resolution Plan for all the adversely-affected architectural resources (HDR-AR-02, HDR-AR-03, HDR-AR-04, HDR-AR-05, HDR-AR-06, HDR-AR-10, and HDR-AR-11), a temporary exhibit for the Upper Quihi Rural Historic District (UQRHD) has been prepared by Architectural Historian Kristin Morgan for display at the Hondo Public Library (pending scheduling). The exhibit will be accompanied by the relevant research completed for the project, large format photography, and HABS drawings.

Architectural resources HDR-AR-02, HDR-AR-04, HDR-AR-05, and HDR-AR-06 are recommended for HABS-like Level II documentation, which includes elevation drawings, large-format photographs, and a written history and description for each resource. The elevation drawings were completed on March 27, 2018, by Quimby McCoy Preservation Architecture, LLC. Furthermore, the written descriptions for each resource are included in the survey report, *Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad* (Fullerton et al. 2016). The large-format photographs are being prepared by Photographer Paul Chaplo. Other mitigation measures for these resources include vibration monitoring, which is currently being conducted by Sauls Seismic, LLC for HDR-AR-02 and HDR-AR-06. Resources HDR-AR-02 and HDR-AR-04 also require the installation of a vegetative buffer within 12 months of the start of construction. The plans for the vegetative buffer have been completed and are being shared with the STB and THC. Installation of the vegetative buffers is pending. In addition, the structural integrity of architectural resource HDR-AR-06 has been assessed as structurally unsound, precluding the development of a preservation plan for the resource. The STB and THC were notified in November 2017.

For architectural resources HDR-AR-10 and HDR-AR-11, SGR does not own the parcels on which the resources are located. In order to mitigate the adverse effect, these resources are included in the temporary UQRHD library exhibit discussed above. In addition, planned vegetative buffers (mentioned above) include buffers within SGR property that will serve to insulate the historic property as much as possible from the visual and audible effects of the Project.

In summary, the majority of the mitigation measures laid out in the Resolution Plan are complete, and the remaining few are underway. Overall, the Resolution Plan is approximately 80 percent complete. Site 41ME262 on parcel R3311 is being avoided. The NRHP-eligibility testing of sites 41ME261, 41ME260, and 41ME264 is complete and the THC concurs that all three sites are Not Eligible for inclusion in the NRHP. As for the architectural resources, the UQRHD library exhibit is complete and pending display at the Hondo Public Library once the HABS-like Level II documentation is prepared. The HABS-like Level II documentation for structures HDR-AR-02, HDR-AR-04, HDR-AR-05, and HDR-AR-06 is underway. For the HABS-like Level II documentation the elevation drawings, written history, and description are complete, and the large-format photographs will be ready by the end of April. Vibration monitoring for the Project is currently underway and will continue to be monitored. The structural integrity of HDR-AR-06 has been assessed as unsound and a preservation plan cannot be developed. Lastly, the vegetation plan for the vegetative buffers has been completed and SGR will install the buffers once it is determined that the construction of the line will not cause any harm to the installed buffers.

**Southwest Gulf Railroad Company Construction and
Operation of the Proposed Single-Track Railroad
Resolution Plan: Vegetative Buffers.**

Medina County, Texas

By

Megan Koszarek, MSc

**Principal Investigator
Clayton M. Tinsley**

STB Finance Docket No. 34284

Prepared For:

**SOUTHWEST GULF —
— RAILROAD CO.**

Prepared By:



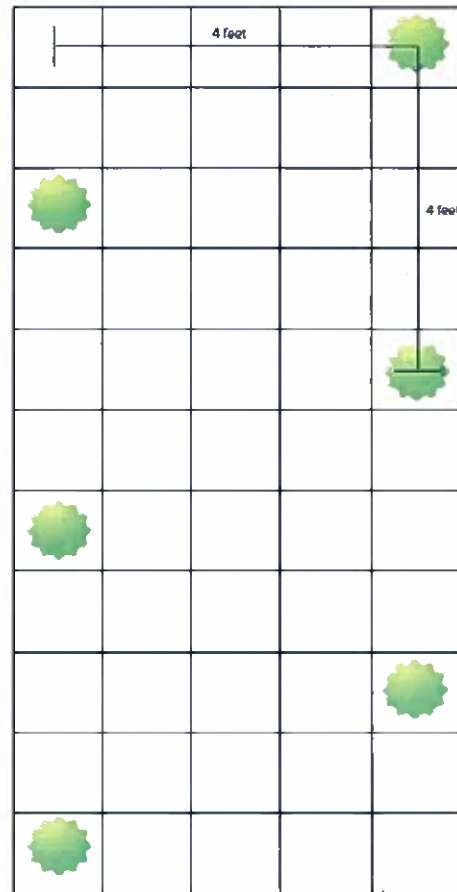
**17111 Preston Road, Suite 300
Dallas, TX 75248**

April 2018

In compliance with the *Resolution Plan to Resolve Adverse Effects to Historic Properties for the Southwest Gulf Railroad Company (SGR) Construction and Operation of Proposed Single-Track Railroad project in Medina County Texas (STB Finance Docket No. 34284)*, HDR has compiled the following Vegetation Plan for the proposed vegetative buffers for the architectural resources HDR-AR-02, HDR-AR-04, HDR-AR-10, and HDR-AR-11. The vegetative buffers will be constructed within SGR property to serve to insulate the historic properties as much as possible from the visual and audible effects of the project.

Mature Ashe juniper trees (*Juniperus ashei*) or another species native to Medina County will be planted to create the vegetative buffers. Tree types will be selected based on being native to the Hondo area and to provide good coverage for viewshed protection. The trees should be a minimum of 6-8 feet high and should be planted approximately 4 feet apart measuring from tree centerlines. Two off-set rows will be planted approximately 4 feet apart (Figure 1). This calls for an estimated total of 1,350 trees, depending on the number of existing trees. In areas with established tree cover, native trees will be added to the existing vegetation in order to fill in any visible gaps. The calculated vegetative buffer length and estimated number of trees are listed below (Table 1), although the final numbers will vary based on site conditions and existing trees. The buffer dimensions and locations are displayed on Figures 2 through 5 below.

Figure 1. Proposed Tree Placement within the Vegetative Buffers.



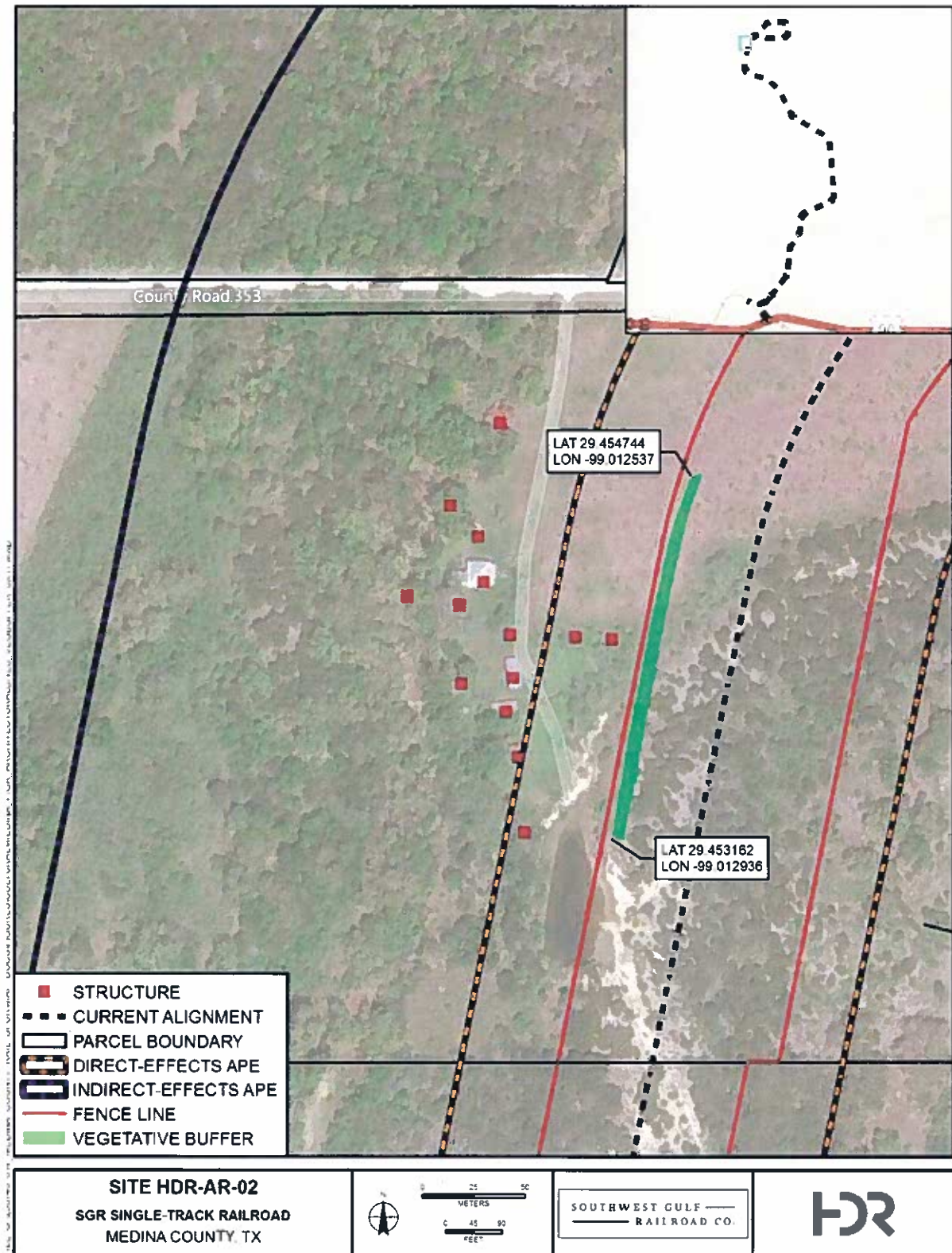
Scale: 1 foot

Key: Tree

Table 1. Vegetative Buffer Dimensions for Each Resource.

SITE	BUFFER LENGTH (FT)	ESTIMATED TREES
HDR-AR-02	596	298
HDR-AR-04	867	434
HDR-AR-10/HDR-AR-11	1237	619
TOTAL	2700	1350

Figure 2. Vegetation Buffer for Architectural Resource HDR-AR-02.



LEGEND

- STRUCTURE
- CURRENT ALIGNMENT
- PARCEL BOUNDARY
- DIRECT-EFFECTS APE
- INDIRECT-EFFECTS APE
- FENCE LINE
- VEGETATIVE BUFFER

SITE HDR-AR-04
SGR SINGLE-TRACK RAILROAD
MEDINA COUNTY, TX

SOUTHWEST GULF RAILROAD CO.

HDR

Figure 4. Vegetation Buffer for Architectural Resource HDR-AR-10.

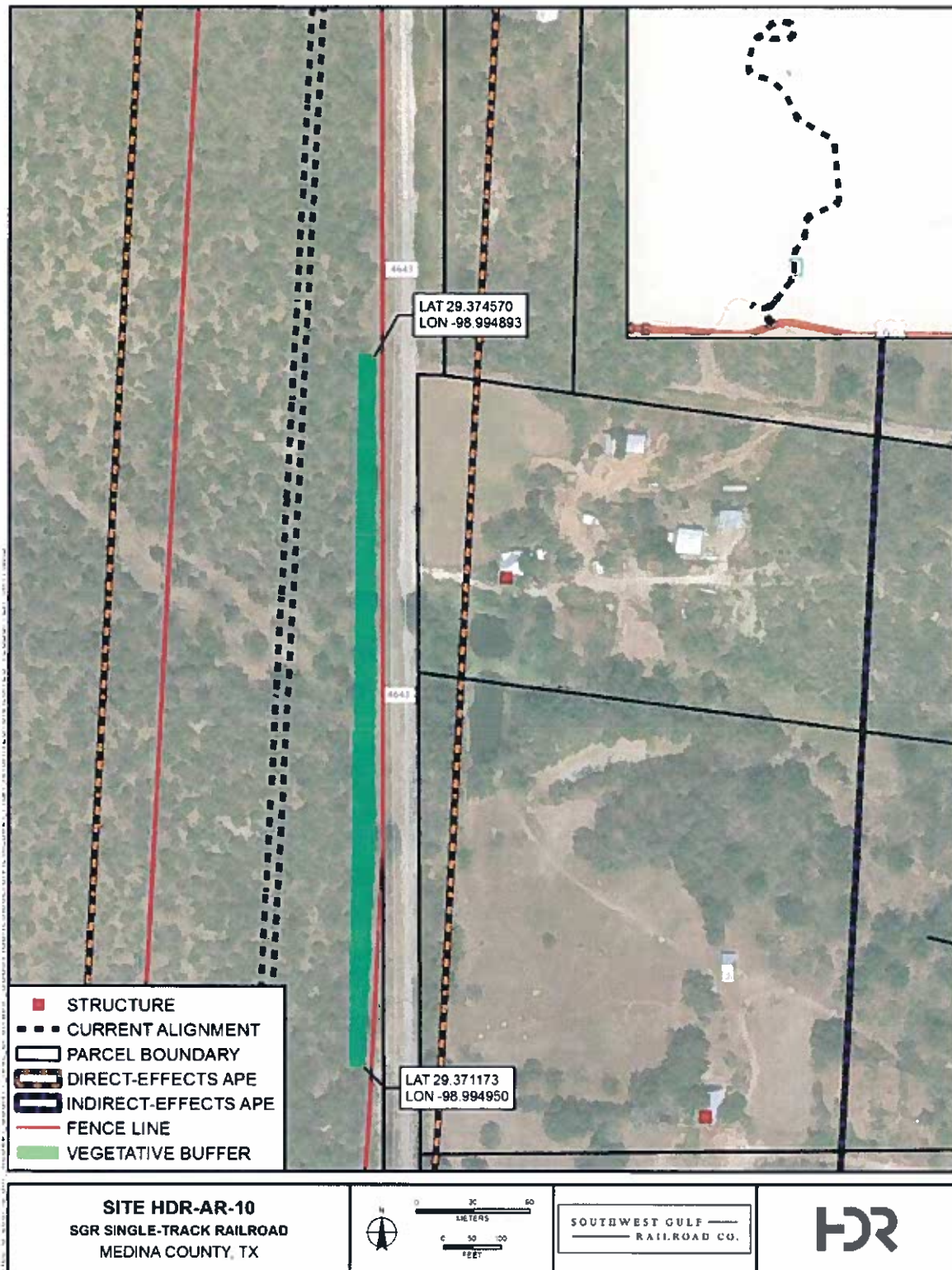


Figure 5. Vegetation Buffer for Architectural Resource HDR-AR-11.

