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Quihi & New Fountain Historical Society

April 25, 2007

Ms Victoria Rutson, Chief
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Mr. F. Lawrence Oaks
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Ms. Charlene Dwin-Vaughn
 Ms. Katry Harris
 Advisory Council on Historic Preservation
 1100 Pennsylvania Ave.
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Re: STB Finance Docket 34284 Medina County TX
 Proposed Rail Line

Dear Ms. Rutson, Mr. Oaks, Ms. Dwin-Vaughn and Ms. Harris:

Thank you so much for holding the teleconference on the Section 106 proceedings on Friday, April 20. As a result of that meeting, and at the request of Ms. Rutson, I am submitting in writing for your records the answers to the four specific questions asked, on behalf of the Quihi and New Fountain Historical Society.

1. What is your overall reaction to SGR's modified proposal?

My overall reaction is that SGR offered no real solutions. Also, the true effect of the Proposed route on the cultural landscape was never acknowledged by SGR.

2. Does the modified proposal address the issues that you raised during the meeting held Monday, March 26, 2007?

No it does not. Actually it only brings up more unanswered questions.

4. What would be needed for you to find the Proposed Route acceptable?

3. *If not, why not? Where specifically does the mitigation fall short?*

There is no mitigation possible. In addition to aesthetic effects, the Proposed Route would have a tremendous effect on the Quihi Rural Historic Landscape by the earth-moving (cuts and fills) that will be required for the construction of this route, even though there may be less earth-moving for the Proposed route than for other routes. The LOCATION of the earth moving is in the Quihi Rural Historic District, and that is critical. That is an important factor.

Consider, for instance, the Proposed rail route cutting through the historic old rock wall on the Lindsey property. Vulcan/SGR's original plan was to cut through the center of this wall with a 40 foot deep cut into the earth. Vulcan/SGR now proposes to move that route to the East end of the rock wall, with a 19 foot deep cut. That would not be any better. That would not be a solution. Avoiding the historic area is a solution, and that is possible and feasible, as already proven by the Sea's SDEIS.

There is also the matter of crossing historic CR 4512 (the Quihi-Bader Road, established August 13, 1888) north of the Lindsey property, by the Proposed route. SGR proposes to cross this road with a 5 foot deep cut. We strongly object to the defacing of this site. This area is particularly historically and archeologically sensitive.

Another instance in which the landscape would be drastically changed is at the crossing of CR 4516 (General Woll's Road, circa 1842), and the area north and south of that crossing. Vulcan/SGR proposes to construct an 8ft high berm across this road, extending to an 11 ft berm to the south, in a marshy area. What effect will this ill-conceived plan have on the aesthetics of the QRHD, flooding, and vehicle safety at this dangerous location?

A further example to the disruption of the landscape is Vulcan/SGR's new proposal to *relocate a historic county road, CR 365*, at the Quihi Creek crossing. This adversely affects the rural historic landscape district. Mr. Daniel Cassidy writes in his study submitted for the SDEIS, Vol II, Appendix F-1, page 28:

"The National Park Service has identified a number of impacts that may adversely affect rural historic landscape districts. Potential impacts relevant to the proposed rail project include:

- realignment of roadways,
- widening and resurfacing of historic roadways,
- changes in land use and management that alter vegetation, change the size and shape of fields, erase boundary demarcations, and flatten the contours of land
- introduction of non-historic land uses
- loss of vegetation related to significant land uses
- construction of new buildings, structures, or landscape features
- loss of boundary demarcations and small-scale features (fences, walls, ponds, and paving stones)

Such impacts can adversely affect the qualities of design, setting, and feeling – three of the seven qualities that make a district eligible for the MRHP." And this proposed route through Quihi will adversely affect the area in that manner.

4. *What would be needed for you to find the Proposed Route acceptable?*

There is nothing that can make the proposed route acceptable. The very presence of the rail line through Quihi, with all the associated earth-moving, and the related baggage the rail line would bring in, would render the area ineligible for recognition as a district.

I cannot believe that after all the research conducted on the cultural landscapes in the area, that this study and the SDEIS would be ignored. Thank you for your diligence and attention in this matter.

Sincerely,
Alyne Fitzgerald