



TEXAS
HISTORICAL
COMMISSION

The State Agency for Historic Preservation

RICK PERRY, GOVERNOR

JOHN L. NAU, III, CHAIRMAN

F. LAWRENCE OAKS, EXECUTIVE DIRECTOR

#E1-312
R9

October 29, 2003

Ms. Victoria Rutson
Office of Economics, Environmental Analysis and Administration
Surface Transportation Board
Washington, D.C. 20423

FD 34224

Re: *Project review under Section 106 of the National Historic Preservation Act of 1966
Proposed Railway Preliminary Cultural Resources Assessment Report, Medina County.
(STB)*

Dear Ms. Rutson:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Pam Opiela, has completed its review of the project documentation provided. We agree with the conclusion that more surveys are needed to identify cultural resources within the area of potential effect. It is clear from this documentation that there are eligible properties within the area of effect. A thorough survey of historic structures in the area should include the following on every property more than 45 years old:

- More specific location maps of the surveyed properties
- Addresses and dates of construction for each structure
- Clear photographic documentation of front and rear elevations and streetscapes

In addition, a thorough survey of archaeological sites in the area should be conducted. It is likely that significant archaeological deposits are present along all of the proposed routes. We recommend that the routes be intensively surveyed by archaeologists who meet the Secretary of the Interior's Professional Qualifications Standards.

We are concerned about the lack of thoroughness and good scholarship in this preliminary document. Very few references are cited, and many of those included are outdated, and some citations in the text are not listed in the bibliography. Some obvious mistakes should be corrected: Mexico gained its independence from Spain in 1821, not 1812 (p. 14), and the Civil War took place from 1861 to 1865, so settlers arriving after the Civil War would not be building distinctive homes by the 1850s (p. 15).

Consultation with tribes per Section 106 of the National Historic Preservation Act of 1966: The regulations require contacting Indian tribes that may attach religious and cultural significance to

historic properties. The report states that the Iowa were contacted. We are unaware of any record of the Iowa living in Texas. Notably missing from the list of tribes that may have an interest in the undertaking are the Tonkawa (who clearly occupied Central Texas), the Apaches, the Wichita, and the Kiowa.

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 review or if we can be of further assistance, please contact Bill Martin in our Archaeology Division at 512/463-5867 or Pam Opiela in the Division of Architecture at 512/463-6218.**

Yours truly,



for: F. Lawrence Oaks, State Historic Preservation Officer

cc. Robert N. Hancock, Medina County Historical Commission
Cynthia Lindsey, Quihi and New Fountain Historical Society
Dr. Robert Fitzgerald, Medina Environmental Action Association
Hannah Vaughan, THC History Programs Division

FLO/PO