

US EPA ARCHIVE DOCUMENT

TEXAS HISTORICAL COMMISSION

real places telling real stories

27 January 2014

Jeff Robinson
Chief, Air Permits Section
Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: *Project review under Section 106 of the National Historic Preservation Act of 1966, U.S. Environmental Protection Agency, Proposed Prevention of Significant Deterioration (PSD) Permit to Apex Bethel Energy Center for a New Compressed Air Energy Storage Facility near Tennessee Colony, Anderson County, Texas (SHPO Track #201403750)*

Dear Mr. Robinson:

Thank you for your recent submission on the above-referenced project which we received on December 27, 2013. This letter serves as official comment from the State Historic Preservation Officer (SHPO), the Executive Director of the Texas Historical Commission (THC).

The THC Archeology Division review staff, led by William Martin, concurs with the authors' assessment that historic archeological site 41AN194 is unlikely to yield information important to history and is therefore ineligible for inclusion in the National Register of Historic Places (NRHP). We also concur with the assessment that historic archeological sites 41AN103/104 are ineligible due to lack of integrity. Finally, historic archeological site 41AN189 is located 250 ft. outside of the APE and thus, will not be affected by the undertaking. Therefore, no further archeological investigations are warranted at any of these sites as a result of this undertaking.

The THC History Programs Division review staff, led by Sarah K. Birtchet, has reviewed the architectural resources component of the provided documentation. At this time we are unable to concur entirely with the eligibility recommendations as presented in the report. Therefore we do not concur that Section 106 consultation is concluded and/or complete.

At this time and based on the information provided, we do not concur with the recommendation that the area is not eligible for listing in the NRHP as a rural historic district. The condition of the buildings, their current use or lack of use, or whether the buildings are visible from the public right-of-way, is not pertinent to the evaluation of historic significance of a potential rural historic district and should not be considered a basis for rendering the area not eligible for listing in the NRHP. We do not concur with the author's assessment that the African American rural farming community is compromised by the intrusion of oil and gas facilities on the landscape. Additionally, we consider the nature of a rural African American farming community to not be defined by community planning or physical development of the area, nor would it include buildings of a specific architectural design or type. Therefore, we do not concur with the author's assessments otherwise.

To further assist us in our review to evaluate the eligibility of a potential rural district please submit any historic and current maps used for research. The report noted that land grant maps, and parcel boundary maps were obtained to conduct deed research, but were not included in the survey report. In order to make a formal determination for the potential boundaries of a rural historic district and eligibility determinations, please provide these maps which will allow a better understanding of how the area was historically settled and the evolution of the development of the area.

Thank you for your cooperation in this federal review process. We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. **If you have any questions regarding our review or if we can be of further assistance, please contact William Martin, Archeologist, at bill.martin@thc.state.tx.us or 512/463.5867; or Sarah K. Birtchet, Historian, Federal Programs at sarah.birtchet@thc.state.tx.us or 512/936.7403.**

Best Regards,


Sarah K. Birtchet, Historian, Federal Programs
For: Mark Wolfe, State Historic Preservation Officer

CC: Bonnie Braganza, Air Permits Section (6PD-R)

