LCRA
ENERGY • WATER • COMMUNITY SERVICES

RECD NOV 0 2 2010

November 1, 2010

Mr. Mark Wolfe
State Historic Preservation Officer
Texas Historical Commission
P. O. Box 12276
Austin, Texas 78711

Attn: Mr. Mark Denton and Ms. Linda Henderson

Re: Section 106 Review under the National Historic Preservation Act for the Lower Colorado River Authority's Proposed T. C. Ferguson Power Plant Replacement Project, Llano County, Texas; TAC Blanket Permit #5528; LCRA Cultural Resource Review 55.10

Dear Mr. Wolfe:

The Lower Colorado River Authority (LCRA) is proposing to construct a new power plant on its existing T. C. Ferguson Power Plant property in Llano County, Texas. A cultural resource review to meet the requirements of LCRA's Memorandum of Understanding with the Texas Historical Commission is required since LCRA owns the land on which the new plant will be constructed. Additionally, because the proposed project will need a Federal Operations Permit from the Environmental Protection Agency (EPA) and is subject to a New Source Air Permit Review by EPA/Texas Commission on Environmental Quality (TCEQ), a review to meet the Section 106 requirements of the National Historic Preservation Act is needed.

The new power plant will replace the existing power plant that was constructed in the early 1970s. The new power plant will be constructed in the area immediately west of the existing plant and east of the fuel oil storage area (Figures 1 and 2). The new power plant construction area is bounded on the north by the intake structure and associated channel and on the south by the discharge channel. The construction area will cover an area measuring about 145 meters on a north-south line by 200 meters on an east-west line.

Other project components include two equipment laydown areas and the construction of a gas compression building and a temporary road (see Figure 2). One of the equipment laydown areas will be situated in and around the area of the previously mentioned fuel oil storage area immediately west of the new plant site. Prior to the use of this area for equipment laydown, the three existing fuel oil tanks will be dismantled and removed. Additionally, a small gas compression building will be constructed at the north end of this laydown area. The second equipment laydown area is a triangular area that is located further southward in the area south of the LCRA's existing electrical substation at the Ferguson property. In all, the two equipment laydown areas total about 29.9 acres. The temporary construction road will be located east of the existing main power plant road and it will connect the two equipment laydown areas (see Figure 2). It will have a length of approximately 256 meters.

A file search showed that there are no previously recorded cultural resource sites within the original and new proposed power plant project areas. A literature review also indicated that the original Ferguson Power Plant was constructed between 1970 and 1974, a time frame that slightly predates the era during which LCRA first began to coordinate state and federal level cultural resource reviews for its construction projects with the Texas Historical Commission (THC).

The file search also suggested that the immediate new power plant construction area would have originally had a moderate probability for prehistoric sites since it is situated adjacent to the head of a small tributary creek. Since all other affected areas consisting of the equipment laydown areas and the temporary construction access road are located further westward away from the tributary creek, they would have had a low probability for prehistoric sites. To assess the potential for historic period sites at the project area, a review of old USGS topographic maps was undertaken. Maps that were examined consist of the 1909 Burnet, Texas 30' USGS map, the 1931 Marble Falls, Texas 15' USGS map, and the later-dating 1967 Marble Falls, Texas and Dunman Mountain, Texas 7.5' USGS maps. These maps did not show any evidences of former structures within the construction area, the two laydown areas, or the temporary construction road area.

The construction of the original power plant involved massive earth moving activities over a large area. To determine if there is any potential that intact cultural resource sites might still be present in the one moderate probability area, the LCRA Archives photograph collection for the original power plant construction was examined. The photograph collection consists of numerous photographs that were taken over the entire construction period beginning in September 1970 and continuing through the completion of the construction in June 1974. Additionally, a plan view drawing showing previous construction within the currently proposed new power plant site was provided by LCRA Wholesale Services Engineering staff (Figure 3).

The review of photographs and previously mentioned construction drawing showed that early in the construction process in November 1970, a large trench called the Condenser Pit was excavated within the southeastern part of the new power plant area. This pit was approximately 125 feet wide and was excavated down through granite bedrock to a depth of 30 feet (Figures 4 and 5). Figure 5 also shows that beyond the edges of this Condenser Pit the land surface had also been cleared and graded. By early December 1970, an approximately 20 foot high backdirt pile from the excavation of the Condenser Pit existed between the south side of the pit and the north side of the future discharge channel (Figure 6). This backdirt pile must have later been used to backfill the Condenser Pit and it is probable that the creation and removal of this backdirt pile caused further damage to the original soil deposits in the southeast part of the currently proposed construction site.

Figure 7, which provides an aerial view looking southeastward at the original power plant construction area dated March 3, 1971, shows that by that date construction had greatly progressed. In the proposed power plant replacement area, the condenser pit appears to have been mostly backfilled although there are several linear rows of raised backdirt piles of dirt and/or blocks of granite bedrock within the area of interest. Additionally, a large dirt road appears to cut diagonally across the central and northwest portions of the power plant replacement area.

Approximately two years later, construction had further proceeded and the proposed power plant replacement area had been leveled for usage as an equipment laydown area (Figure 8) and as the site for temporary buildings (Figure 9). The oil tanks in the background of these two photographs are still present and serve as reference points indicating that the equipment laydown yard and temporary building covered the entire new power plant area.

Overall, the sequence of photographs verify the fact that the proposed new power plant construction area was thoroughly disturbed during the construction of the original power plant to the extent that any cultural

resource sites that would have been present were essentially destroyed. Figures 8 and 9 also show that the currently proposed equipment laydown area where the oil tanks are located was also heavily disturbed. An additional photograph, Figure 10, shows that that a sizeable portion of the southern equipment laydown area was also previously disturbed. Overall, the LCRA Cultural Resource staff does not feel that there is any potential for any cultural resource sites that may be eligible or potentially eligible for National Register or State Archeological Landmark listing to still be present. Therefore, the LCRA Cultural Resource staff does not feel that a cultural resource field survey is warranted.

In addition to an assessment of ground-disturbing activities, the file search included a review of maps, aerial photographs, and relevant literature to determine if the replacement project would have any visual impacts to any structures that are eligible or potentially eligible for listing within the National Register of Historic Places. The review indicated that a house structure is shown on the 1909 Burnet, Texas 30' USGS map at a location about 0.35 miles west of the project area. Otherwise, there are no other houses mapped anywhere in the vicinity of the project area. However, the 1931 Marble Falls, Texas 15' USGS map does not show a structure at the 1909 map location, and a review of modern aerial photographs provided no indication that this structure is still present. The only other structure anywhere in the vicinity of the project area on the 1931 Marble Falls map is a house that is situated about 0.7 mile northwest of the project area at an elevation that is now 15 feet under the conservation pool level of Lake LBJ.

Review of the later-dating 1967 Marble Falls, Texas and Dunman Mountain, Texas 7.5' USGS maps showed that the only house structures within one-half mile of the project area are four structures located north-northwest of the project area within previously recorded archaeological sites 41LL357 and 41LL358. These structures were previously described and assessed in LCRA archaeologist Bruce Nightengale's report of the LCRA Baird Tract in 1994. The three structures at site 41LL357 were determined to be the Baird ranchhouse and two cabins that had been moved into site 41LL357from other locations. The Baird ranchhouse is a 1940s era structure that was originally located downslope near Pecan Creek in an area now inundated by the lake. After its move, the ranchhouse was extensively renovated. The two cabins were moved to site 41LL357 from the Wirtz Dam area where they had been used to house engineers during the construction of the dam in 1950. Archival research determined that the structure at site 41LL358 was the caretaker's house on the LCRA Baird tract. It had also been moved in to its current location from elsewhere and had undergone extensive structural modifications. Six other bunkhouses that once stood north of the caretaker's house at site 41LL358were also determined to have been moved in from the Wirtz Dam area. Nightengale assessed all of these structures as not National Register eligible, due to the combination of impacts that had altered the structural and locational integrity of these structures. The THC concurred with those assessments on February 11, 1994.

Aerial maps from the era of the construction of the original power plant do not suggest that there are any other structures in the vicinity of the project area. Overall, the review of maps and aerial photographs suggests that the general area around the Ferguson Power Plant project area was isolated and sparsely inhabited until lake houses and suburbs started to be built around the Lake LBJ shoreline in the 1970s and 1980s. Thus, it appears that the construction of the proposed power plant replacement project would not have visual impacts on any historic structures.

Based on the results of the file search, the LCRA recommends that the proposed construction of the replacement power plant be allowed to proceed without any further cultural resource investigations. As always, standard emergency discovery procedures are applicable.

The LCRA requests your concurrence with our assessment and recommendations for the Ferguson Power Plant Replacement Project. If you have any questions about the draft report, please contact me at 397-6714.

Sincerely,

Daniel J. Prikryl

Daniel J. Prikryl, Program Manager
LCRA Cultural Resources

attachments

CONCUR
by Mark K Wolfe
for Mark Wolfe
Executive Director, THC
Date 11-16-10
Track# 201103664

List of Figures

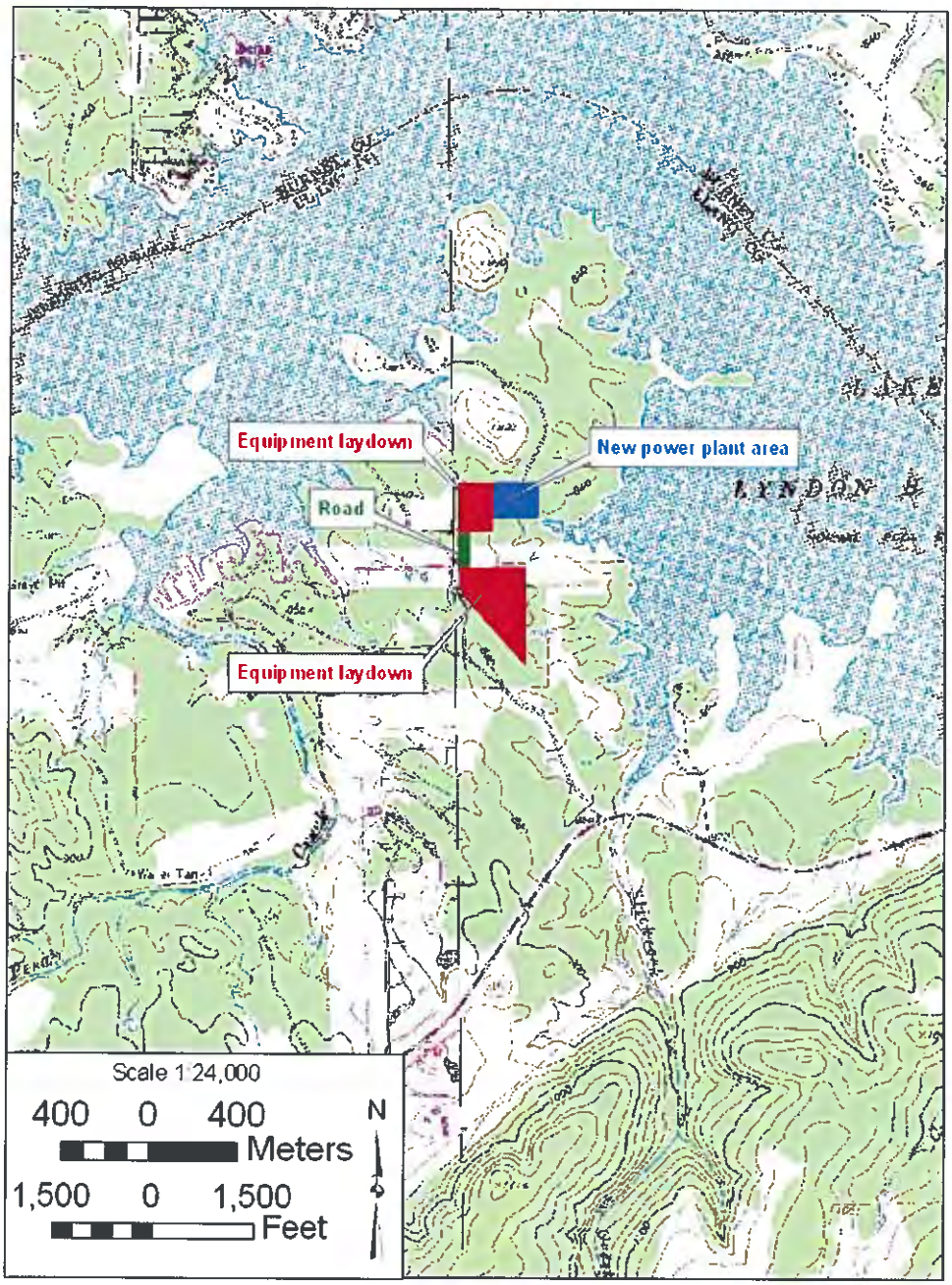

Figure 1. Sections of the 1967 Marble Falls and Dunman Mountain, Texas 7.5' USGS maps showing the new Ferguson Power Plant Project Area.

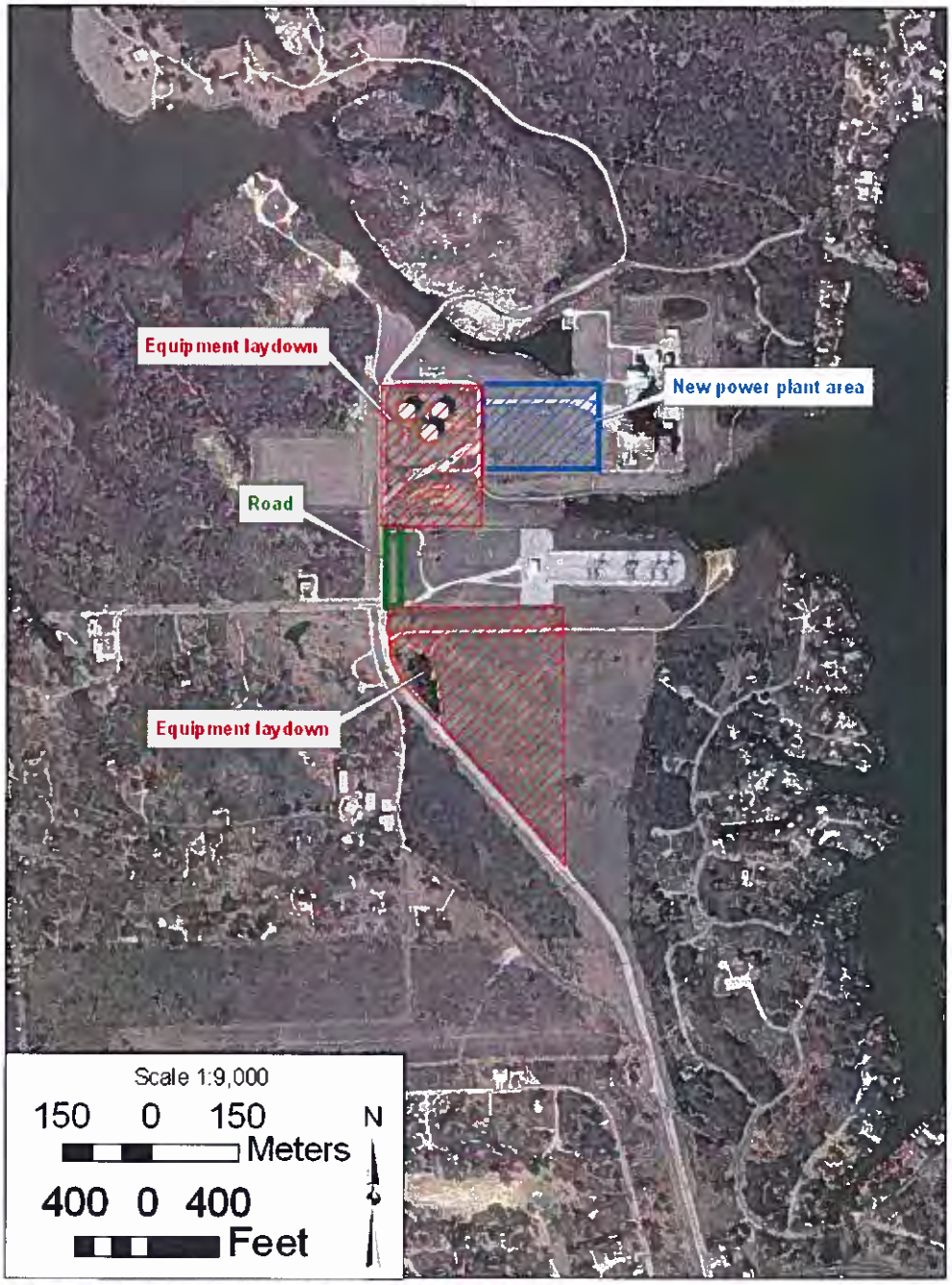

Figure 2. Modern aerial map showing the new Ferguson Power Plant Project Area.

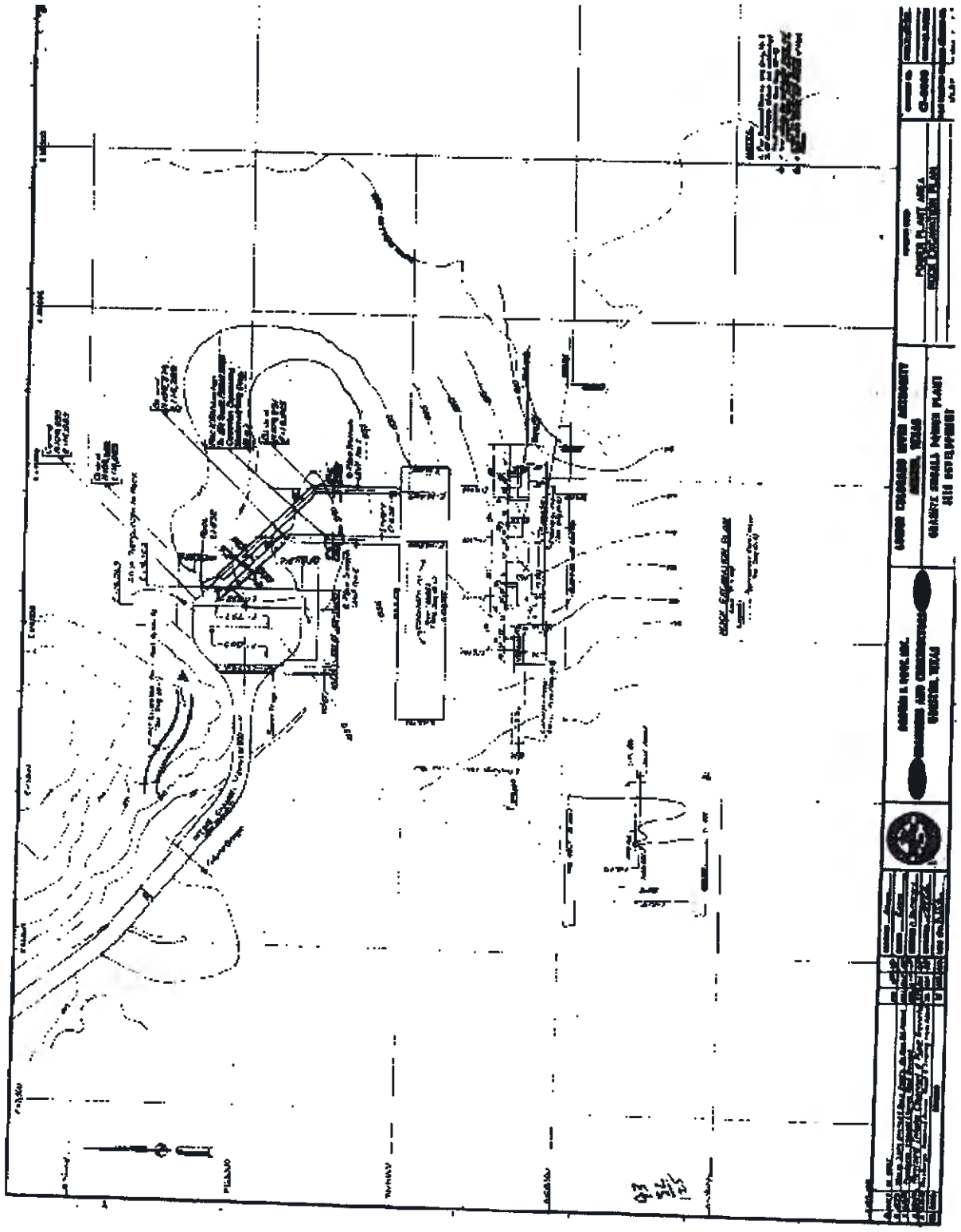

Figure 3. Plan view of the original Ferguson Power Plant "Rock Excavation Plan" showing the locations of the Condenser Pit and associated pipelines within the replacement power plant construction area.

Figure 4. Modern aerial map showing the location of the previously excavated Condenser Pit in relation to the new power plant construction area.

Figure 5. Looking east into the Condenser Pit, excavation in progress, November 2, 1970.

Figure 6. Looking northwest at excavation machinery on top of 20 foot high backdirt pile located between the discharge channel and the south edge of the Condenser Pit, December 1, 1970.

Figure 7. Aerial view looking southeast at the original Ferguson Power Plant construction area with the intake channel in the foreground and the proposed location of the new replacement power plant outlined in red, March 3, 1971.

Figure 8. Looking west during the construction of the original Ferguson Power Plant at temporary buildings and equipment laydown areas within the proposed location of the replacement power plant, with existing fuel oil tanks in background, April 30, 1973.

Figure 9. Another view looking west during the construction of the original Ferguson Power Plant at temporary buildings and equipment laydown areas within the proposed location of the replacement power plant, with existing fuel oil tanks in the background, August 31, 1973.

Figure 10. Aerial view of completed original Ferguson Power Plant area with currently proposed South Equipment Laydown Area outlined in red, 1974.