

US EPA ARCHIVE DOCUMENT

TEXAS HISTORICAL COMMISSION
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August 28, 2013

Jeff Robinson
Section Chief
Air Permits Section
United States Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RECEIVED
13 SEP 25 PM 3:04
AIR PERMITS SECTION
EPA

Attention: A.C. Dumaul

Re: Project review under Section 106 of the National Historic Preservation Act
Draft report: *Pedestrian Cultural Resources Survey for the Proposed Occidental Chemical Corporation Pipeline in San Patricio County, Texas*. (EPA)

Dear Mr. Robinson:

Thank you for allowing us to review the report referenced above. 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 Bill Martin, has completed its review. After reviewing the documentation, we concur that the construction of the proposed pipeline is unlikely to affect historic properties. Construction may proceed without further consultation with this office. However, additional information about site 41SP256 needs to be included in the final report. We believe there will be no adverse effect on the site because most of the artifacts are outside of the right-of-way and the shovel test within the right-of-way was negative, but the site description must be more fully developed. Please have the authors address the attached comments.

We look forward to receiving a revised final report that addresses our comments along with an electronic version in the form of a tagged PDF. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If we may be of further assistance, please call Bill Martin of our staff at 512/463-5867.**

Sincerely,



for
Mark Wolfe, State Historic Preservation Officer

MW/wam

Enclosure



Comments on: *Pedestrian Cultural Resources Survey for the Proposed Occidental Chemical Corporation Pipeline in San Patricio County, Texas.*

The site may be completely disturbed, but that has not been clearly demonstrated in this report. This site contains identifiable stone tools and has very good bone preservation, as seen in Plate B1, so it could have research potential if the deposit is intact. Even if it is disturbed, it could retain research potential if all of the artifacts are the result of a single period of occupation. In that case, vertical provenience would not be important.

The report does not adequately describe the quantities of artifacts encountered on the surface or within the shovel tests that were positive. There needs to be a table or paragraph describing what was found and at what depth within positive shovel tests. The reader needs to know the approximate numbers of artifacts observed. Terms like "a few" or "a wide variety" need to be omitted in favor of terms such as "less than ten" or "more than 50." There should also be some effort to identify the types of raw materials and the kinds of animal bone that were found.

One final problem is that the artifacts are said to be within the plow zone, but the plow zone is said to reach 50 cm in depth. Plow zones are usually only 20-30 cm deep unless root plowing has occurred. There are no photographs of shovel tests to illustrate the nature of the soils and there is no information regarding the farming practices that might substantiate the authors' conclusion. Something is needed to support this claim.