



United States Department of the Interior

#EI-3030

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

DTW
#PD-34284

IN REPLY REFER TO:

DETERMINATION OF ELIGIBILITY NOTIFICATION National Register of Historic Places National Park Service

Project Name: STB Finance Docket No. 34284, Southwest Gulf Railroad Company

Location: Medina County

State: TX

Request submitted by: Victoria Rutson, Chief, Section of Environmental Analysis, STB Federal Preservation

Date received: 06/08/07

Additional information received: 07/24/07

Eligibility

Name of property	SHPO opinion	Secretary of the Interior's opinion	Criteria
Quihi /Upper Quihi Rural Historic District	Eligible	Additional documentation requested (see attached comments)	

James McClelland
 Keeper of the National Register
for me
 Date: 7/24/07

The United States Department of the Interior National Park Service

National Register of Historic Places

Determination of Eligibility Comment Sheet

Property Name: Quihi/Upper Quihi Rural Historic District
Medina County, Texas

Secretary of the Interior Findings: Additional Documentation Requested

The Surface Transportation Board (STB) has submitted a formal determination of eligibility (DOE) request to the National Register, pursuant to federal regulations 36 CFR, Part 63, based upon recommendations by the Advisory Council for Historic Preservation (ACHP). The STB is seeking specific guidance from the National Register with regard to: 1) whether or not the Quihi and the Upper Quihi Rural Historic Districts are eligible for the National Register as separate districts or as a single district; 2) appropriate boundaries; 3) clarification of contributing and non-contributing elements; and 4) the significance of cenotés.

Our review to date has verified that what has been proposed by the STB as two separate and contiguous districts, the Quihi and Upper Quihi Rural Historic Districts, represent a single rural historic district focused on the settlement and subsequent development of the area emanating from the original town site at the confluence of the Elm, Cherry and Quihi Creeks. Although the documentation the STB submitted to the National Register supports the significance of this area under National Register Criteria A and C, it does not provide enough information to make a definitive finding of significance of the area – which appears to have additional significance for its archeological resources-- or to assess the proposed boundaries, classification of contributing and non-contributing resources, or the significance of cenotés. Specifically, the information submitted with the STB's request does not 1) provide an evaluation of the precontact and historical archeological resources under Criterion D, 2) consider the full historical and archeological value of the area within an appropriate period of significance and relevant areas of significance, and 3) provide enough information to determine the presence and eligibility of cenotés or other potential sacred, religious, or traditional properties that may be eligible as a Traditional Cultural Properties (TCPs). Additionally, any updated documentation provided to the National Register should include U.S.G.S. quadrant maps, with UTM coordinates marking the boundaries of the proposed rural historic district.

We recognize that the STB has made a substantial effort to document the eligibility of this property as a rural historic landscape, and appreciate the time and attention the agency has given to this project. We encourage the STB to work with any interested Tribes and/or parties to provide the additional documentation described below so that we may complete this DOE.

Archeological Resources and Additional Areas of Significance Under Criterion D

While it is clear from the technical memorandum submitted with the documentation entitled, *TECHNICAL MEMORANDUM: Supplement to the Preliminary Cultural Resources Assessment; STB Finance Docket 3428 – Southwest Gulf Railroad Company – Construction and Operation Exemption – Medina County, TX*, prepared by Daniel Cassedy, that the proposed rural historic district is likely to be eligible under Criterion D in the areas of Prehistoric Archeology, Historic Archeology (Aboriginal) and Historic Archeology (Non-Aboriginal), there is no meaningful evaluation of Criterion D in this supplement or in the subsequent reports. Furthermore, the *Rural Historic Landscape Analysis, Quihi Vicinity, Medina County* and the accompanying inventory identify the presence of numerous contributing sites (mostly consisting of standing ruins associated with the area's early Euro-American settlement), but lack an explanation of the significance of these sites for their ability to provide important information in the area of Historic Archeology (Non-Aboriginal), Ethnic Heritage (European), Exploration/Settlement, and/or Architecture. Evaluation under Criterion D will require the examination of data sets and likely data sets within the district and the development of a research design that discusses their ability to provide important information under each of the three areas of significance relating to Archeology -- Prehistoric, Historic (Aboriginal), and Historic (Non-Aboriginal).

Please provide a discussion that addresses the likely origins, historic use, and archeological significance of the known and predicted precontact sites, the likely below ground historical archeological deposits, and associated historical archeological features such as the 2000-foot stone wall, domestic and other ruins, lime kilns, and cemeteries. Archeological resources within a district do not need to be individually eligible, they only need to contribute to the significance of the district, thus, you should consider how standing ruins, when considered archeological resources, are important and what information they are likely to reveal about early agricultural practices, settlement patterns, or building techniques.

Periods of Significance/Natural Resources

The archeological record predates 1846, the date of Euro-American settlement (chosen as the beginning date for the Quihi districts period of significance), and likely extends to periods in prehistory as well as the occupation of Native American groups before, during, and after the region's influential Mission era. For these reasons, the period of significance should be expanded appropriately and rural landscape characteristics, such as land uses and activities, response to the natural environment, and circulation networks, be considered for the expanded period(s) of time. For example, the context should be expanded to discuss the exceptionally important natural water features of the area and explain the use, meaning, and value they had to the various cultural groups who became closely associated with this area in various periods of prehistory and history. These features include the creeks, lakes, springs, and sinkholes (also called cenotés) characteristic of the region's karst topography. You should discuss the importance of the natural features, such as Quihi Lake and any naturally occurring ponds (perhaps adapted for use as stock ponds), in the study area and explain the ways in which these features were used modified by Euro-American settlers or had been used by various aboriginal groups who previously occupied the land. Similarly, the changing agricultural patterns that shaped the proposed district should be discussed, including the relationship of water resources to

raising crops or livestock, the region's reliance on the Edwards Aquifer, the presence of irrigation features (canals, impoundments, etc.), and technological advances (e.g. rural electrification) of the 20th century.

Maps and Boundaries

In addition, please provide original U.S.G.S. quadrant maps for the area proposed as the rural historic district; the maps should identify the UTM coordinates marking the boundaries of the proposed Quihi and Upper Quihi Rural Historic Districts. Does the evaluation of an expanded period of significance, and identification of archeological resources and TCPs suggest that the boundaries should be changed to take in, for example, the interstitial areas formed by the tributaries to the East, areas subject to seasonal flooding, or traditionally used for plant-gathering or fishing.

Cenotés and Other TCPs

The documentation submitted to the National Register does not include enough information to determine the presence or significance of cenotés or any other natural features within the project area that individually or collectively forms a National Register eligible TCP. It appears, from the documentation provided in the *Supplement to the Preliminary Cultural Resource Assessment* and the January 2007 report prepared by the Tapilam-Coahuiltecan Nation, that such TCPs likely exist within or adjacent to the area current identified as the Quihi and Upper Quihi rural historic districts. Such places may be natural features (lakes, creeks, springs, sinkholes, etc.) that figured importantly in traditional customs, ceremonies, or rituals; resources embodying the origin stories of one or more of the cultural groups associated with this region; and sites of traditional activities such as hunting, fishing, or plant-gathering.

In order to determine the significance of cenotés or any TCPs located in this area, documentation submitted to the National Register should include three things: 1) detailed information about the defining characteristics of the sites in particular and site types in general located in the district; 2) a context for these types of sites, including a comparison to other known sites of the type found within and outside of the district; and 3) an evaluation of the site or sites under the National Register Criteria. We strongly encourage the STB to work with interested Tribes to define the significance of cenotés and/or other TCPs within the district and gather the information needed to evaluate these resources.

We understand that some of this information may be privileged. Please be aware that under Section 304 of the National Historic Preservation Act, the Secretary of the Interior has the authority to withhold from public disclosure information about the location, character, or ownership of a historic resource that may cause a significant invasion of privacy, risk harm to the resource or impede the use of a traditional religious site by practitioners. If the updated documentation includes sensitive information, please specify what that information is so that the information can be withheld from the public under Section 304.

If you find that a property does not meet the National Register characteristics as a TCP, you may evaluate the property as an historic or precontact site under the National Register Criteria.

Thank you for your cooperation and assistance in providing information on this matter. Please note that a copy of this comment sheet will be retained in the permanent National Register file for the STB Finance Docket No. 34284, Southwest Gulf Railroad Company Determination of Eligibility Request. If you have other questions regarding this matter, please contact Erika Martin Seibert at (202) 354-2217 or Erika_Seibert@nps.gov, or Linda McClelland at (202) 354-2258 or Linda_McClelland@nps.gov.

References

Parker, Patricia L. and Thomas F. King, 1998 [revised; 1990, 1992] *The National Register Bulletin, Guidelines for Evaluating and Documenting Traditional Cultural Properties*. U.S. Department of the Interior, National Park Service.

cc: Texas SHPO (Larry Oaks)
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