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HISTORICAL
COMMISSION

The State Agency for Historic Preservation

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12 March 2002

Jock Whitworth
Superintendent
Padre Island National Seashore
P.O. Box 181300
20301 Park Road 22
Corpus Christi, Texas 78480-1300

Re: Project review under Section 106 of the National Historic Preservation Act of 1966, Draft Report: *A Cultural Resources Survey of the Proposed Lemon/Lemon Seed No. 1 Drilling Pad, Access Road and Flowline Route, Padre Island National Seashore, Kenedy County, Texas* (NPS)

Dear Mr. Whitworth:

Thank you for your correspondence describing the above referenced Environmental Impact Statement. 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 Debra L. Beene, has completed its review. The project area was surveyed in 1988 (Rickless) and again in 2001 (Moore and Warren); cultural resources were not found during either of these surveys. Therefore, the project will not have an effect to historic properties eligible for inclusion in the National Register of Historic Places and should proceed without further consultation with our office. However, if cultural resources are found during the construction, all work should cease in the area of the find until assessed by a professional archeologist. Please have the author respond to the comments (Attachment I) prior to submitting the twenty final copies of the report to this office.

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 Debra L. Beene at 512/463-5865.**

Sincerely,

A handwritten signature in dark ink, appearing to read "F. Lawrence Oaks", written over the word "for".

for
F. Lawrence Oaks, State Historic Preservation Officer

Attachment: Review Comments
cc: Bill Moore, BEI
FLO/dlb

NPS DOCUMENT # **511**

COMMENTS: : *A Cultural Resources Survey of the Proposed Lemon/Lemon Seed No. 1 Drilling Pad, Access Road and Flowline Route, Padre Island National Seashore, Kenedy County, Texas*

1. Pg.s ii & 10: please adjust the assessment language: '...inclusion in the National Register...' and '...listing as a State Archeological Landmark.'
2. Pg. ii: suggested phrasing - '...failed to identify cultural resources within the project area'.
3. Pg. iv: please provide the total acreage investigated.
4. Pg. 6, second paragraph: '...and movement of the island topography...'; please elaborate on the erosion elements which result in movement of soils.
5. Please plot the location of Prewitt's survey on the quad map; it is located only 200 m west of the project ROW.
6. Please show the location of the wetland on Fig. 5.
7. Please describe the project area-did it include tidal flats, vegetated barrier flats, etc.?
8. Also, include descriptions of the vegetation as it varied across the project ROW. The author states that the project ROW was heavily vegetated, did the ROW lack variation?
9. Pg. 10: Please discuss the shovel testing; what were the dimensions of the tests other than their depths? Were any problems encountered? How did the surveyors keep the sand from caving in as they excavated? Was shovel testing appropriate in these particular kinds of soils?
10. Pg. 10: suggested phrasing - 'Since cultural resources were not discovered in the project area...' or 'Because the project area lacked evidence of cultural resources, we recommend that the project proceed...'
11. Pg. 11: reference Rickless' work in the area as well as his 1998 survey within the same project area.