

# TEXAS HISTORICAL COMMISSION

*real places telling real stories*

March 27, 2014

Gabriel Moreno-Fergusson  
Environmental Manager  
Camp Stanley Storage Activity  
McAlester Army Ammunition Plant  
25800 Ralph Fair Rd  
Boerne, TX 78015-4800

*Re: Project review under Section 106 of the National Historic Preservation Act of 1966  
Updated Integrated Cultural Resources Management Plan (ICRMP), Camp Stanley, Boerne, Bexar  
County*

Dear Mr. Moreno-Fergusson:

Thank you for your submittal of the Camp Stanley ICRMP, updated February 2014, which we received on February 25, 2014. 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, comprised of Theresa A. de la Garza (filling in for Elizabeth Brummett), Brad Jones and William McWhorter, has completed its review of the ICRMP. Specific comments have been addressed in the enclosed SHPO Comment Sheet.

Generally speaking, the Archeology Division is in agreement with the proposed procedures for management of archeological resources as outlined in the ICRMP, but the review identified the need for additional information in order to complete our review. Specifically, as discussed in Sections 3.1.3 and 3.2 of the report, the majority of the installation considered to have potential for archeological resources was surveyed and tested during two distinct field investigations. The initial archeological survey identified 34 sites, 28 of which were deemed ineligible for the NRHP and another six of which were determined to require additional investigation. These were described in a 1998 report titled *Archeological Survey at Camp Stanley Storage Activity, Bexar County, Texas* authored by Kibler et al. The second field investigation involved additional survey that recorded six new sites, one of which was considered eligible, and testing of three of the sites previously identified as having eligibility potential during the first survey. These results were published in a second report titled *Archeological Survey and Testing at Camp Stanley Storage Activity, Bexar County, Texas* authored by Scott et al. 1998. While SHPO concurrence with the results of this second survey and testing is included in Appendix D, a review of our records suggests that the SHPO never reviewed or commented on the original determinations for the 34 sites presented in the Kibler et al. 1998 survey report. The exceptions are the three sites that were subsequently tested (41BX1163, 41BX1180, and 41BX1189) and reported on by Scott et al. 1998. As a result, in order to concur with the ICRMP, which presumes that only archeological sites determined to be eligible for the NRHP or that otherwise remain undetermined for such eligibility (i.e. "potentially eligible") need review (Section 4.2.1), our office will need to be provided with either copies of the SHPO correspondence or a copy of the Kibler et al. 1998 survey report in order to verify eligibility determinations on the 28 sites determined ineligible and not subsequently tested. Until such time as this is received, all archeological sites which lack eligibility-determinations from our office should be considered undetermined for NRHP-eligibility and treated as such.



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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 Theresa A. de la Garza at 512/463-8952.**

Sincerely,

A handwritten signature in black ink, reading "Theresa A. de la Garza". The signature is written in a cursive style with a large, stylized initial 'T'.

Theresa A. de la Garza, Project Reviewer, for:  
Mark Wolfe, Chief Deputy State Historic Preservation Officer

cc: James Cannizzo, U.S. Army (via email)  
Julie Burdey, Parsons (via email)

MW/tg

**CAMP STANLEY ICRMP  
(Updated 2014)**

**SHPO COMMENT MATRIX**

<b>Comment No.</b>	<b>Page; Para/Sect</b>	<b>Comment</b>
1	ES-1; Para 3	Please include a summary of extant historic buildings and structures, as you have provided for archeological sites.
2	2-3; Sect 2.2.2	Five-step review process lacks key steps and can be misleading. A more appropriate process would include: identification of the APE, in consultation with SHPO; identification of historic properties, in consultation with SHPO; assessment of effects, in consultation with SHPO; notification/consultation with interested parties and ACHP (as needed); resolution of any adverse effects, in consultation with SHPO, ACHP and consulting parties.
3	2-4; Section 2.2.3	This section only describes those guidelines associated with documentation/recordation. Please add content that addresses the SOI's Standards and Guidelines for the Treatment of Historic Properties, which addresses appropriate treatments for "Restoration", "Preservation", "Reconstruction" and "Rehabilitation" projects.
4	3-8 (and Appendix F)	We concur with Camp Stanley Storage Activity's application of the 2007 nationwide <i>Program Comment for World War II Era (1939-1974) Ammunition Storage Facilities</i> for the associated property types located at Camp Stanley and noted in your report.
5	3-9; Para 3	CSSA Environmental Safety Office (2014). Please update to include SHPO concurrence, as expressed in the following comment.
6	3-14; Sect 3.3.3 (plus 4-5 and Appendix G)	We concur with Camp Stanley's determination of <b>NOT ELIGIBLE</b> for structures #19 [pool]; #32 [storehouse], and #33 [storehouse]. We also concur with Camp Stanley's determination that structure #97 [general storehouse] to the overall military landscape is potentially <b>ELIGIBLE</b> for the NRHP and should be consider so for future undertakings that might impact this structure.
7	4-2; Section 4.1.1	Regarding Traditional Cultural Properties (TCPs) the ICRMP notes that these are common items of concern for Native Americans but states that no TCP surveys have been done or Native Americans consulted on these issues. Is there currently a plan to implement consultation with Native Americans over the potential for TCPs on Camp Stanley?
8	4-2; Sect 4.1.2	Does CSSA CRM also need to review tenant improvement or self-help projects within historic buildings, which do not get managed or funded through the CSSA process for standard construction projects?
9	4-3; Sect 4.2; Para 3	This paragraph is focused on archeological techniques. Please amplify to include the application of the SOI's Standards and Guidelines for Treatment of Historic Properties as a means for avoiding adverse effects and addressing preservation/protection of architectural historic resources.
10	4-5; 4.2.1.2	Section states that "Implementation of an education/awareness program is a goal for the Cultural Resources Program at CSSA". How is this being accomplished? Are there active programs or plans for programs to be developed?
11	4-5; Sect 4.2.1.3	Given that this is a subsection of Archeological Resources, in may be best to only address those undertakings affecting those resources and exclude "existing structures".
12	4-5; Section 4.2.3	Architectural Resources. It would be helpful to expand this section to be comparable to the previous section for Archeological Resources. Subheadings could include "Neglect/Deterioration", "Tenant Improvements/Self-help Projects" and "Undertakings".

Camp Stanley ICRMP: SHPO Comment Matrix

Comment No.	Page; Para/Sect	Comment
13	4-6; Para 3	Content requires clarification as it is a bit misleading. Resolution of effects can include minimization and avoidance measures. However, if an effect remains adverse, despite all attempts to minimize and avoid, then the effect must be mitigated. Documentation does serve as a typical means of mitigation. However, limiting the scope or adaptive reuse in lieu of demolition are minimization and avoidance measures, which may reduce the effect below the threshold of being adverse and needing to be mitigated. They, in and of themselves, are not mitigation. An adverse effect that cannot be resolved through minimization and avoidance would lead to development of an MOA to carry out further mitigation.
14	4-7; Para 1	How does this recommendation of annual systematic inspections translate into a management plan? It would be helpful to know what goals might be set to accomplish this in the coming five years (i.e. develop a comprehensive checklist of building systems/features that should be inspected). Also, it would be helpful to have a discussion of who might perform this inspection and whether this might be combined with any regular inventory that Real Property may conduct as part of their requirements - encouraging integration of CRM with other disciplines.
15	4-8; Para 2	This paragraph is incorrect. The Keeper does not get involved with dispute resolution.
16	4-8; Para 3	It is advisable to include reference to the 30-day review period required for submittals to the SHPO, on top of the 10-day CRM review.
17	4-20; Section 4.4.1.6	In the final sentence of the paragraph at the top of the page the word "listed" is incorrectly spelled "lited".
18	4-26; 4.8	Points of Contact: Remove Bob Brinkman, as he is no longer a Section 106 project reviewer. Please remove "Mr. Brad Jones" from the contact list and replace with "Bexar County Reviewer" for the Archeology Division. Because of potential future changes in staffing, the best person to contact should be verified through our website ( <a href="http://www.thc.state.tx.us/contact#contact_proj_review">http://www.thc.state.tx.us/contact#contact_proj_review</a> ), where current staff assignments are posted. Additionally, Darrell Creel is no longer the Director of the Texas Archeological Research Laboratory (TARL), and my understanding is they have appointed Jonathon Jarvis as acting director. I would recommend contacting them for an updated contact. Due to the span of the ICRMP, it may be optimal for specific reviewer names to be omitted and correspondence be addressed to each Division.
19	5-7; SOP 3: Unanticipated Discovery	Three Typical Situations (#1-3) are outlined in which unanticipated discoveries are proposed. However, under subheading "Responsible Parties" the discussion refers to Situations #2, 3, and 4. Please correct to match Typical Situations as presented.
20	5-8; partial paragraph at top of page.	In the paragraph describing response to sites with human remains, please modify this sentence - "If human remains are found on land not owned by the federal government, CSSA must notify the SHPO." – to say: "If human remains are found on land not owned by the federal government, CSSA must notify the SHPO and follow guidelines for the discovery of human remains as set forth in Chapters 711–715 of the Texas Health and Safety Code."
21	5-8; Procedures	Discussion of procedures begins with "Situation #2". This needs to be changed to "Situation #1" to match Typical Situations as presented on page 5-7.
22	A-2	Please update links for online resources as some appear obsolete or have moved.
23	A-3	Reference for Secretary of Interior's Standards for Rehab (second listing on page) comes from an outdated federal tax program link. A preferable link that provides a more interactive use of the standards and guidelines can be found at: <a href="http://www.nps.gov/history/hps/tps/standguide/">www.nps.gov/history/hps/tps/standguide/</a> .