



# ARCHAEOLOGICAL DESKTOP OVERVIEW

## ADVANCED RAPID TRANSIT (ART) EAST/WEST CORRIDOR PROJECT

October 2025  
(Version 11)



## EXECUTIVE SUMMARY

The Federal Transit Administration (FTA) has initiated National Environmental Policy Act (NEPA) compliance for VIA Metropolitan Transit's (VIA) Advanced Rapid Transit (ART) East/West Corridor Project (the Project). On August 13, 2024, FTA issued an initial determination that the NEPA class of action for the Project is a Categorical Exclusion (CE). FTA has also determined that the Project would be a Federal undertaking subject to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and is the type of activity that has the potential to cause effects on historic properties.

The Project is an approximately 7.3-mile bus rapid transit line within the City of San Antonio, Texas. The Project corridor would extend from General McMullen Drive in the west, through Downtown, to Coca Cola Place in the east, along the following roadways: Commerce Street, Buena Vista Street, Dolorosa Street, Market Street, Cherry Street, and East Houston Street (see **Appendix A** for **Project Location Map**). The Project includes transit signal priority and is proposed to operate in a mixture of center dedicated lanes, curbside dedicated Business Access and Transit (BAT) lanes, and in mixed traffic. Based on the conceptual design, approximately 5.10 miles (70%) of the route would feature dedicated lanes, including 2.15 miles (30%) of center dedicated lanes and 2.95 miles (40%) of curbside dedicated BAT lanes. The remaining 2.20 miles (30%) would operate in mixed traffic. The Project includes 18 new or modified station areas. Stations are planned to include amenities such as off-board fare collection, real-time arrival information, security cameras, lighting, and platforms for level boarding.

Stations will be located at main cross streets along the Project corridor. According to VIA's engineering team, typical disturbance depths at the stations will range from approximately 2 feet (0.6 meters) for platform slabs up to 22 feet (6.7 meters) for light poles and traffic signal masts. The depth of disturbance for road or sidewalk widening is expected to correspond to the current depth of the existing road base, which is approximately 2 feet (0.6 meters) to 4 feet (1.2 meters). Overall, the project footprint covers approximately 100 acres.

This archaeological desktop overview report includes background research detailing known archaeological and cultural resources within the Project Area of Potential Effect (APE). Additionally, the background research includes environmental setting research, Texas

Archaeological Sites Atlas research, historic map research (topographic quadrangles and Sanborn Fire Insurance maps), and State and Federal mandated stakeholder considerations.

Information contained in this report relating to the nature and location of archaeological sites is considered private and confidential and not for public disclosure in accordance with federal laws Antiquities Code of Texas (ACT) (Sec. A191.004), Texas Administrative Code (TAC) (§24.13), and Texas Government Code (Chapter 442, Sec. 442.007), Section 304 of the NHPA (54 U.S.C. § 307103), 36 Code of Federal Regulations (CFR) Part 800.6 (a)(5) of the Advisory Council on Historic Preservation's rules implementing Sections 106 and 110 of the Act, and Section 9(a) of the Archaeological Resource Protection Act (54 U.S.C. § 100707).

VIA will be proactive in investigations to determine where there are internments at any proposed construction location where there is proposed development or excavation. This will involve the following:

- Archaeological monitoring at all high probability areas containing NRHP-eligible archeological deposits within the APE. The high probability areas will be determined in consultation with THC and the City of San Antonio Office of Historic Preservation (COSA OHP) once the full extent of ground disturbances is defined in the project plans;
- Drafting and implementation of an unanticipated discovery plan; and
- Drafting and implementation of a backhoe scraping plan near the historic cemetery.

## CONTENTS

EXECUTIVE SUMMARY .....	I
1. PROJECT DESCRIPTION .....	3
1.1 Project Summary .....	3
1.2 Project Details.....	4
2. SECTION 106 CONSULTATION.....	5
3. AREA OF POTENTIAL EFFECTS.....	7
3.1 APE Definition.....	7
3.2 Current Land Use.....	7
4. LITERATURE AND BACKGROUND RESEARCH.....	7
4.1 Research Resources .....	7
4.2 Environmental Setting.....	8
4.3 Cultural Background .....	9
<b>Archaic</b> .....	10
<b>Protohistoric/Early Historic</b> .....	11
<b>Historic Context</b> .....	11
4.4 Cultural Resource NRHP Criteria.....	15
4.5 Archaeological Background Research .....	16
4.6 Historic Map Research.....	19
4.7 Cemetery Research .....	21
4.8 Tribal Groups .....	22
4.9 Texas Freedom Colonies .....	25
4.10 Acequia Resources.....	25
4.11 National Historic Trail.....	27
4.12 Texas Department of Transportation Potential Archaeological Liability Map (PALM).....	29
5. CONCLUSIONS AND RECOMMENDATIONS .....	29
6. REFERENCES.....	31
7. ACRONYMS.....	36



## LIST OF TABLES

Table 1: Consulting Parties Invited to Participate in the Section 106 Process .....	6
Table 2: Soils with the APE .....	9
Table 3: Previously Recorded Archaeological Resources Within or Adjacent to the APE .....	16
Table 4: Previously Conducted Archaeological Surveys Within the APE .....	18
Table 5: Historic Maps Used for Background Research .....	20

## LIST OF FIGURES

Figure 1: Proposed Stations near BX-C339 (a Vicinity Cemetery).....	22
---	----

## APPENDICES<sup>1</sup>

APPENDIX A	PROJECT LOCATION MAP
APPENDIX B	CONSULTING PARTIES CORRESPONDENCE
APPENDIX C	OVERVIEW OF PROJECT APE ON TOPOGRAPHIC QUADRANGLE
APPENDIX D	PREVIOUSLY RECORDED ARCHAEOLOGICAL RESOURCES WITHIN AND ADJACENT TO THE PROJECT APE
APPENDIX E	SANBORN FIRE INSURANCE MAPS
APPENDIX F	THC CORRESPONDANCE
APPENDIX G	TXDOT POTENTIAL ARCHAEOLOGICAL LIABILITY MAPS (PALM)
APPENDIX H	ARCHAEOLOGICAL RESOURCES WITHIN 1-KILOMETER BUFFER OF THE PROJECT

---

<sup>1</sup> Appendix A-G provide information/archaeological resources for the Project APE. For reference, archaeological resources within 1-kilometer buffer of the Project are also provided in Appendix H.

# 1. PROJECT DESCRIPTION

## 1.1 Project Summary

The Project is an approximately 7.3-mile bus rapid transit line within the City of San Antonio, Texas. The Project corridor would extend from General McMullen Drive in the west, through Downtown, to Coca-Cola Place in the east, along the following roadways: Commerce Street, Buena Vista Street, Dolorosa Street, Market Street, Cherry Street, and East Houston Street (see **Appendix A** for **Project Location Map**). The 7.3-mile segment defines the Project's capital limits, which represent the area where construction activities are planned. While the capital limits cover this 7.3-mile segment, bus rapid transit service is planned to extend beyond these limits. To the west, service would connect to the Kel-Lac Transit Center, and to the east, it would link to the future Eastside Transit Center. No construction activities are anticipated outside of the 7.3-mile capital limits. NEPA compliance will apply exclusively to this 7.3-mile segment defined by the capital limits.

The Project includes transit signal priority and is proposed to operate in a mixture of center dedicated lanes, curbside dedicated Business Access and Transit (BAT) lanes, and in mixed traffic. Based on the conceptual design, approximately 5.10 miles (70%) of the route would feature dedicated lanes, including 2.15 miles (30%) of center dedicated lanes and 2.95 miles (40%) of curbside dedicated BAT lanes. The remaining 2.20 miles (30%) would operate in mixed traffic.

Within the capital limits, the Project includes 18 new or modified station areas. Stations are planned to include amenities such as off-board fare collection, real-time arrival information, security cameras, lighting, and platforms for level boarding. In general, VIA plans to minimize significant ground disturbance or construction impacts in downtown by including stops with limited amenities. Sidewalk improvements are planned to provide pedestrian and Americans with Disabilities Act access to the transit stations.

Stations will be located at main cross streets along the Project corridor. According to VIA's engineering team, typical disturbance depths at the stations will range from approximately 2 feet (0.6 meters) for platform slabs up to 22 feet (6.7 meters) for light poles and traffic signal masts. The depth of disturbance for road or sidewalk widening is expected to correspond to the current depth of the existing road base, which is approximately 2 feet (0.6 meters) to 4 feet (1.2 meters).

## 1.2 Project Details

**County:** Bexar County, Texas

**City:** San Antonio

**Limits:** The Commerce Street, Buena Vista Street, Dolorosa Street, Market Street, Cherry Street, and East Houston Street corridor from West Commerce Street at General McMullen Drive to East Houston Street at Coca-Cola Place.

**Project Type:** Bus Rapid Transit (BRT), locally referred to as Advanced Rapid Transit (ART)

**Proposed Construction Date:** 2027

**Section 106 Applicability (Federal Funding and Permitting):**

- Funded by FTA

**Antiquities Code of Texas Applicability:**

- Project owned by VIA, a political subdivision of the State of Texas

**May affect archeological sites:**

- Would occur inside a recorded archeological site or designated historic district
- Would involve 5,000 or more cubic yards of earth moving
- Would involve 5 or more acres of ground disturbance

**Principal Investigator:** John A. Hunter, MA, RPA WSP

## 2. SECTION 106 CONSULTATION

Section 106 regulations state that certain entities have by-right consulting privileges and are entitled to participate as consulting parties during Section 106 review. These parties include the State Historic Preservation Officer (whose duties the Texas Historical Commission [THC] conduct in Texas); Native American tribes and Native Hawaiian organizations; representatives of local governments; and applicants for federal assistance, permits, licenses, and other approvals. During the development of the Project, consulting parties may be engaged in its planning and development with public meetings and informal electronic mail correspondence and telephone contact. Public involvement should incorporate the opportunity for consulting parties to provide comments about the Project in accordance with Section 106.

On February 7, 2025, FTA contacted six Native American tribes with an invitation to help identify places that may be impacted by the Project that may have traditional religious and cultural importance to their tribal organizations. These six Native American tribes include:

- Alabama-Coushatta Tribe of Texas
- Apache Tribe of Oklahoma
- Comanche Nation, Oklahoma
- Coushatta Tribe of Louisiana
- Mescalero Apache Tribe of the Mescalero Reservation, New Mexico
- Tonkawa Tribe of Indians of Oklahoma

FTA received no responses to this invitation. In addition to Native American tribes, VIA identified a list of potential consulting parties during the Section 106 consultation initiation with THC. In May of 2025, VIA issued invitations to the identified parties. Four of the parties confirmed their interest participating in the Project as a consulting party: the COSA Office of Historic Preservation (COSA OHP), the Conservation Society of San Antonio, Dignowity Hill Neighborhood Association and the Downtown Neighborhood Association (See **Table 1**). The consulting parties were provided the opportunity to review the findings from both the above ground historic resources and archaeology analyses conducted for the Project. Both studies were provided to the consulting parties on August 13, 2025, and on August 28, 2025, a consulting party meeting was held to discuss results. Consulting party comments were recorded (see **Appendix B** for the consulting party invitations and responses). Resulting updates to the

archeological desktop overview included a review of additional information provided by COSA OHP on potential archeological resources in the area.

Public involvement conducted as part of the NEPA process also satisfied the public involvement requirements under Section 106. Opportunities for public input were provided through public meetings, project website updates, and comment periods, allowing interested parties and members of the public to learn about the Project and provide feedback on potential effects to historic properties.

**Table 1: Consulting Parties Invited to Participate in the Section 106 Process**

Consulting Party	Response
<b>Public and Nonprofit Entity:</b>	
Bexar County Historical Commission	None
COSA Office of Historic Preservation	Confirmed Participation
Conservation Society of San Antonio	Confirmed Participation
<b>Neighborhood Associations:</b>	
Prospect Hill	None
Las Palmas	None
Historic Westside Residents	None
Gardendale	None
Downtown Neighborhood Association	Confirmed Participation
Dignowity Hill	Confirmed Participation
Denver Heights	None
Jefferson Heights	None
Harvard Place East Lawn	None
Alamodome Gardens	None
<b>Indian Tribes:</b>	
Alabama-Coushatta Tribe of Texas	None
Apache Tribe of Oklahoma	None
Comanche Nation, Oklahoma	None
Coushatta Tribe of Louisiana	None
Mescalero Apache Tribe of the Mescalero Reservation, New Mexico	None
Tonkawa Tribe of Indians of Oklahoma	None

Source: VIA, 2024; Tribal Directory Assessment Tool, 2024

### 3. AREA OF POTENTIAL EFFECTS

#### 3.1 APE Definition

An area of potential effects (APE) is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking (U.S. Congress 1966). The APE for the Project was developed in consideration of the nature of the proposed undertaking, which has potential for direct effects to historic properties.

In coordination with FTA and THC, the APE for archaeological resources was established as all areas that may be directly impacted by the Project, including existing and proposed right-of-way (ROW) and all station locations. The Project APE on topographic quadrangle is depicted in **Appendix C**.

#### 3.2 Current Land Use

The Project APE for archaeological resources covers a variety of land uses including commercial, residential, educational, governmental, recreational, religious, social, cultural, and transportation. Both east and west segments of the APE consist largely of medium-density residential with commercial properties along Commerce Street and Houston Street. Religious, educational, recreational, social, and cultural uses are scattered throughout each of these segments and include parks, grade schools, higher-education facilities, and churches. The downtown segment of the APE consists largely of medium- to high-density commercial uses mixed with single- and multiple-family residential, educational, governmental, religious, and recreational uses.

### 4. LITERATURE AND BACKGROUND RESEARCH

#### 4.1 Research Resources

WSP archaeologists conducted research of areas within the Project APE and a 1-kilometer buffer surrounding the APE to establish a broader cultural context. The following sources were reviewed:

- Texas Archaeological Sites Atlas, THC;
- United States Department of Agriculture (USDA) Soil Survey;

- City of San Antonio (COSA) Office of Historic Preservation (OHP), website;
- Series of topographic maps from the U.S. Geological Survey (USGS);
- The Texas Almanac, website;
- Handbook of Texas Online articles, including entries for San Antonio and Bexar County, Texas State Historical Association (TSHA) website;
- Sanborn Map Company fire insurance maps;
- Texas Department of Transportation (TxDOT) Potential Archaeological Liability Maps (PALM);
- Previously prepared cultural resource management studies

This archaeological desktop overview report focuses on background review of archaeological and cultural resources within and adjacent to the Project APE. A complete list of resources identified within 1-kilometer buffer of the Project is provided in **Appendix H**.

## 4.2 Environmental Setting

The Project area falls within the Gulf Coastal Plains physiographic region, also referred to as the Inner Coastal Plains, which is the western extension of Central Plains physiographic province that extends from the Atlantic to beyond the Rio Grande. The interior limit of the Gulf Coastal Plains is the Balcones Escarpment, a series of faults extending eastward from the Rio Grande near Del Rio north to Baxter County where it turns into the northeast intersection the Colorado River north of Austin, Texas (The Texas Almanac 2024). More specifically, the Project area is in the Blackland Belt. This physiographic region is characterized by rolling prairies easily turned by plow, ranging from 750 to 2,000 feet in altitude and is the most densely populated region in the state (The Texas Almanac 2024).

Eight soil types are defined within the APE: Branyon clay, 0 to 1 percent slopes (HtA); Branyon clay, 1 to 3 percent slopes (HtB); Tinn and Frio clay, 0 to 1 percent slopes, frequently flooded (Tf); Houston black clay, 1 to 3 percent slopes (HsB); Houston black clay, 3 to 5 percent slopes (HuC); Houston black gravelly clay, 1 to 3 percent slopes (HuB); Louisville silt clay, 0 to 1 percent slopes (LvA); Louisville silt clay, 1 to 3 percent slopes (LvB). Information concerning soil types within the survey areas was compiled using the information available on the USDA National Resource Conservation Service (NRCS) Web Soil Survey (USDA NRCS 2025).

However, it should be noted that a majority of the APE has been disturbed and modified by past and current infrastructure construction and past and ongoing maintenance activities down to a depth of 3 feet (0.91 meter). As such, the mapped soils profiles detailed above, are unlikely to be present within the APE. Additionally, if any unknown intact cultural deposits are located



within the APE, they would likely be beneath the disturbances from current and past infrastructure. See **Table 2** for the list of soils depicted within the APE.

**Table 2:** Soils with the APE

Soil Name	Soil Profile	Drainage	Parent Material	Landform
Branyon clay, 0 to 1 percent slopes (HtA)	Clay (Ap), clay (Bkss), clay (BCKss)	Moderately well drained	Calcareous clayey alluvium derived from mudstone of Pleistocene age	Stream Terraces
Branyon clay, 1 to 3 percent slopes (HtB)	Clay (Ap), clay (Bkss), clay (BCKss)	Moderately well drained	Calcareous clayey alluvium derived from mudstone of Pleistocene age	Stream terraces
Houston Black clay, 1 to 3 percent slopes (HsB)	Clay (Ap), clay (Bkss), clay (Bkss)	Moderately well drained	Clayey residuum weathered from calcareous mudstone of upper cretaceous age	Ridges
Houston Black gravelly clay, 1 to 3 percent slopes (HuB)	Gravelly clay (Ap), clay (Bkss), clay (BCKssz)	Moderately well drained	Clayey residuum weathered from calcareous mudstone of upper cretaceous age	Ridges
Houston Black gravelly clay, 3 to 5 percent slopes (HuC)	Gravelly clay (Ap), clay (Bkss), clay (BCKssz)	Moderately well drained	Clayey residuum weathered from calcareous mudstone of upper cretaceous age	Ridges
Lewisville silty clay, 0 to 1 percent slopes (LvA)	Silty clay, (Ap), silty clay (Bk1), silty clay (Bk2)	Well drained	Calcareous clayey alluvium derived from mudstone	Stream terraces
Lewisville silty clay, 1 to 3 percent slopes (LvB)	Silty clay, (Ap), silty clay (Bk1), silty clay (Bk2)	Well drained	Calcareous clayey alluvium derived from mudstone	Stream terraces
Tinn and Frio, 0 to 1 percent slopes, frequently flooded (Tf)	Clay (A), clay (Bss), clay (Bkssy)	Moderately well drained	Calcareous clayey alluvium	Flood plains

Source: USDA NRCS, 2025

### 4.3 Cultural Background

The history of human activity in Bexar County and the surrounding region spans thousands of years. The earliest groups to leave a definitive material record of their presence were early Paleoindians who entered the region during the Late Pleistocene glacial epoch, more than 11,000 years ago. Their descendants and the descendants of other Native American groups who migrated to the region lived in the region until the arrival of the first European explorers.

While cultural change is a slow and continual process, archaeologists and other researchers divide the human history of a region into distinct cultural periods. Archaeologists and historians recognize five broadly defined periods: Paleoindian, Archaic, Late Precontact, Protohistoric, and Historic. Due to the lack of cultural material identified during the current investigations, the following sections have been abbreviated.

### **Precontact Context**

Previous archaeological research in the Project region has defined five distinct time periods that include, Paleoindian: 11,500 Before Present (BP) to 8,800 BP; Archaic: 8,800 BP to 1,200 BP; Late Precontact/Protohistoric: 1,200 BP to 500 BP; and Historic: 500 BP to present. The distinction between these periods relies heavily on the different types of subsistence practices utilized and the cultural traits present.

### **Paleoindian**

Artifacts and sites from Paleoindians in Central Texas are common. Paleoindian artifacts, such as Clovis and Folsom points, have been found with mammoth remains and lead to the idea that Paleoindians were hunters of big game (Collins 2004). Nevertheless, that view is quickly changing to one that Paleoindians were hunter-gatherers that hunted big game (Kenmotsu and Boyd 2012; Mauldin et al. 2012).

### **Archaic**

The majority of the precontact record in Texas belongs in the Archaic Period, which is differentiated from the Paleoindian Period by changes in hunting and gathering practices, expansion of diet breadth, and changes of settlement patterns/strategy (Black 1998; Black et al. 1998; Collins 2004; Prewitt 1981). Compared to the Paleoindian period, stone tools associated with the Archaic period exhibit characteristics for hunting both large and smaller sized animals, such as buffalo, deer, and rabbits (Prewitt 1981).

The Middle Archaic period is defined by another change in stone tools to a larger, straight-stemmed projectile point. There are more sites associated with Middle Archaic diagnostics than sites of earlier periods, suggesting increasing populations during the Middle Archaic (Prewitt 1981; Weir 1976). Fire-altered rock, thought to be a sign of indirect cooking methods, appeared in the Early Archaic, but increased in frequency in Middle Archaic sites. Evidence of earth ovens to cook foods such as sotol and bulbous plants also appears in sites dated to the Middle Archaic (Black and McGraw 1985; Hester 1991), and so-called “burned rock middens” appear to have resulted from extensive use of the earth ovens. The Late Archaic period saw an influx of new projectile points, but also continuation of strategies from the Middle Archaic, such as heated

rock/indirect heating for cooking food, and, as mentioned above, the resulting “burned rock midden”. Montell, Castroville, Lange, Marcos, and Esno and Frio are projectile points associated with the Late Archaic period (Turner and Hester 1993).

### **Protohistoric/Early Historic**

In the sixteenth and seventeenth centuries, Spanish explorers and the mission system impacted the economy of native groups as they introduced European-made trade goods into the region. The indigenous cultures of Native groups of this area were severely impacted in the eighteenth century because of diseases introduced by the Spanish, the movement of people into missions, and the adoption of farming livelihoods (Hester 1989).

### **Historic Context**

Bexar County is located within the interior belt of the Coastal Plain of South-Central Texas and intersects with the Balcones Escarpment and the Edwards Plateau. Bexar encompasses 1,248 square miles. The county originally encompassed the majority of the western edge of the settlement in Texas. In December 1836, Bexar County was established with San Antonio as the county seat (Long 2024).

The first Europeans to explore the area were the Spanish. In 1691, Do Mingo Terán de los Ríos and Fray Damián Massaner reached the San Antonio River near the area of San Juan Capistrano Mission. Around 1709, Antonio de San Buenaventura y Olivares, Isido Félix de Espinosa (both Franciscan Fathers), and Officer Pedro de Aguirre visited the area and felt it was a great setting for a settlement. In 1714, Louis Juchereau de St Denis crossed the area on his way to San Juan Bautista Espinosa and again in 1716 on his way to East Texas. In 1716, Louis Juchereau de St. Denis recommended San Pedro Springs as the location for a Mission. Martín de Alarcón led an expedition in May 1718 that founded the San Antonio de Valero Mission and San Antonio de Béxar Presidio. By winter, various Native American groups joined the mission (Long 2024).

In the 1720s, the Spanish population was approximately 200, including 53 soldiers and their families and four civilians with their families. Fifty-five Canary Islanders arrived at Bexar County in March of 1731, and the Villa of San Fernando de Béxar became the first municipality in the Spanish Province of Texas. Five missions, together with the Presidio and the Villa of San Fernando, made up the most important Spanish concentration in Texas. By the mid-1730s, the population in the area was around 900, including 300 Spanish and 600 Native American converts. An epidemic in 1738 and 1739 killed three fourths of the Native American mission population (Long 2024).

Over time, the Missions became self-supporting communities, each surrounded by farmland irrigated by a comprehensive system of acequias (irrigation ditches). Common crops grown were grain, cotton, flax, beans, sugar cane, and vegetables. The primary livestock raised was cattle, sheep, and goats. Although government offices moved from Los Adaes to Bexar County, Bexar County remained a small frontier outpost. In the late 1770s, Bexar County was described as resembling a poor village with all the houses poorly built without a preconceived plan. There were 59 houses of stone, and 79 houses of wood were documented. After the missions became secularized around 1793-1794, they became satellite civilized communities under Bexar County's authority. Lands that belonged to the missions were distributed to the few remaining Native Americans and the increasing numbers of Spanish settlers, with the better land nearest to the settled areas controlled by town elites (Long 2024).

In the Colonial Period, Bexar County continued to serve as the Capital of the Province of Texas and as the main shipping point for supplies headed for Nacogdoches and La Bahía. Between 1811 and 1813, the city of San Antonio was a center of revolutionary activity against Spanish rule. Juan Bautista de las Casas mounted an insurrection in Bexar in 1811. The insurrection spread throughout the province. Early in this conflict, the Governor and his military staff were arrested, and the property of the most ardent royalists was seized. In March 1811, conservative military officers and clergy, supported by the Isleños (decedents of the Canary Island settlers), staged a counterrevolution leading to the death of Las Casas. Leadership fell to Bernardo Gutiérrez de Lara who led an army of Mexican Revolutionaries and sympathetic Americans to seize San Antonio in the spring of 1813 and declared Texas an independent state. In August, the royalist forces succeeded in stamping down the insurrectionist and restored order. After the rebellion the population of the region declined (Long 2024).

Despite the downturn caused by secularization and the insurrection, San Antonio de Béxar Presidio was primarily agricultural with subsistence farming. Cultivators worked small family plots though many farms were also worked by tenant farmers and day laborers. Some of the largest farms (the “elite”) bought up land with some exporting horses and cattle to Coahuila and Louisiana. The acequia system was partially abandoned and by 1815 the amount of irrigated farmland declined (Long 2024).

Around 1821, Anglo-Americans began migrating to Texas, and San Antonio became the westernmost outpost of settlements. In 1824, Texas and Coahuila united into one state with Saltillo as the capital. In the 1820s and 1830s, the population of Anglo-Americans in San Antonio increased, and the city remained mostly populated by those of Mexican decent. In late

October 1835, Texas volunteers laid siege to San Antonio, which was held by the Mexican Army. By December 10, Texas forces temporally gained control of the city until Antonio López de Santa Anna during the Battle of the Alamo. Frequent conflict deflated the population. It was after Texas joined the Union that the population began to recover (Long 2024).

The area around Bexar County got its first Protestant churches in 1844 when John Wesley Devilbiss (Methodist) and John McCullough (Presbyterian) formed their congregations. The first presbyterian church was constructed in 1847 with the first methodist church built in 1852, and other denominations soon followed suite (Long 2024).

The newly formed Bexar County covered most of the western edge of the settlement of Texas. Texas was divided into four departments during the Mexican Period (1821-1831) (Whitehurst 2025b). After Texas gained independence, the departments became counties. By December 1836, Bexar was established with San Antonio as the county seat, and 128 counties were carved from Bexar (Long 2024).

The Old south and German migrant population increased in the late 1840s. During the Spanish (1689-1821) (Whitehurst, 2025a) and Mexican period, the economy was based on ranching and subsistence farming with livestock the most important agricultural product and corn the most important crop. Less than 5 percent of farmland was tilled, and as late as 1858, three fourths of the terrain was prairie. The size of the farms was also small, with only one farm in the county over 1,000 acres, with most farms less than fifty acres. Trade carried by steam trains between San Antonio, Mexico, and New Orleans was the main source of revenue for the county. In 1860, there were only 28 manufacturing establishments employing 135 people (Long 2024).

After the Civil War, land prices dropped, farms often fell idle, and less taxes were paid causing public services to fall into disrepair. In 1866 the county had a major Cholera outbreak. Much of Bexar County remained sparsely settled and underdeveloped; most of the population was concentrated along the San Antonio River valley. The economy began to recover in the late 1860s and early 1870s with the start of the cattle drives. Bexar County is located at the northern apex of a diamond shaped area of land that was known as the Cattle Kingdom. There was an increase in sheep ranching between 1870 and 1880 (Long 2024).

The arrival of the Galveston, Harrisburg, and San Antonio Railway helped boost economic recovery in the area. The railroad reached San Antonio in February 1877, linking the city to the coast. The International-Great Northern Railroad reached the city in 1881, leading to changes in the city's esthetic. San Antonio looked like a Mexican city despite the Anglo-American influence,

and the railroads spurred immigration into the city, and the city began to resemble other Texas communities. The 1880s saw new industry in the county with three book binders, four breweries, three carriage factories, four ice factories, three tanneries, one wool- scouring plant, and an iron foundry. By 1920, the county had 328 factories that employed 6,860 people (Long 2024).

The late 19th and early 20th centuries also saw growth in agriculture, with the number of farms increasing from 1,136 to 3,205 between 1880 and 1920. After World War I, a group of Belgian immigrants began truck farming (production of crops suited to their culture on a scale that allows shipment to distant markets on a large scale. Early 20th century crops in the region consisted of corn, milo, hegari, cane, oats, vegetables, and fruit. Before World War II, Bexar County was still a significant source of beef cattle, with dairy and poultry increasing in importance. By the 1940s, more than half of the county's agricultural production came from livestock and livestock products. Between 1910 and 1930, cotton became an important cash crop; by the mid-1930s, one third of improved land was devoted to cotton. Oil was discovered in 1889 and has been a large part of the County's economy since World War II (Long 2024).

Before 1810, less than 10 percent of farms were worked by tenants. In 1910, 40 percent of farmers worked as tenant farmers. By 1930, more than half of the farmers were tenants. The majority of leaseholders were Anglo-American, while the laborers were Mexican and were paid poorly. In the 1920s, agriculture became more mechanized, and the number of tractors and other machines increased. The Great Depression, the arrival of Boll weevils, and the decrease in crop prices made life hard on the region's farmers. Many were forced to change occupations or move to the city, while others invested more into truck farming and growing food for livestock (Long 2024).

Tourism is another important facet of Bexar County's economy. Tourists are drawn to the area by the Alamo, the missions, and a mild winter climate. In the 1890s, a spa and hotel was opened at Hot Sulphur Well south of San Antonio. Around 1900, San Antonio rivaled Hollywood as the center of the budding movie industry.

During the second half of the 19th century, San Antonio developed as an important military center. During World War II, the military presence grew, and the area's bases became important training centers (Long 2024).

After the war, the military personnel enrolled in community college or university by the thousands, while others moved to the city. This influx in demand for higher education led to the

area becoming a major education center in the 20th century. The earliest mention of schools in the area was in 1780 when José de la Mata asked the Cabildo (town council) to grant official standing to his private school. There were several private schools during the Spanish and Mexican periods, predominately in private homes. In 1879, the first public high school in the area was founded (Long 2024).

In the early 1980s, the number of businesses was 18,747, with leading industries including (but not limited to): oil and gas extraction, soft drink canning and bottling, book binding, lumber milling, pharmaceuticals, and clothing manufacturing. 66 percent of land in 1982 was farms and ranches with 27 percent of farmland under cultivation and only 14 percent of cultivated land irrigated. Tourism currently is the largest provider of non-government jobs in the county (Long 2024).

## 4.4 Cultural Resource NRHP Criteria

Archaeological sites are assessed against the criteria for the National Register of Historic Places (NRHP) in order to determine their potential eligibility (U.S. Department of Interior National Park Service 1997 [1990]). These criteria require that the quality of significance in American history, architecture, culture, and archaeology should be present in buildings, structures, objects, sites, or districts that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that the buildings, structures, objects, sites or districts that meet one or more of the following Criteria of Significance:

- Criterion A: Association with a famous event. This criterion involves the association of a building or archaeological site with an important event specifically (such as World War II) in American prehistory or history or a specific historical pattern or trend that significantly contributed to local, state, or national history (such as the development of agriculture within the state).
- Criterion B: Association with a significant historical figure. This criterion involves the association with a person at a local, state, or national level who has contributed greatly to history. The resource should “illustrate” rather than “commemorate” these contributions and must be properly documented before eligibility will be granted.
- Criterion C: Association with a distinctive type/period/method of construction, a master designer or builder, high artistry, or whose components lack individual merit. This criterion accounts for the physical design of a resource, including its architecture, landscape architecture, engineering, or artistry. Because of the last part of the criterion,



historic districts have been nominated for eligibility due to their characteristics as a group of buildings, allowing for the nomination of resources that individually do not satisfy any of the NRHP criteria, but contribute to a grouping of resources that do.

- **Criterion D: Information Potential.** Properties that yield, or are likely to yield, information important in prehistory or history. Criterion D is most often (but not exclusively) associated with archaeological resources. To be considered eligible under Criterion D, sites must be associated with specific or general patterns in the development of the region. Therefore, sites become significant when they are seen within the larger framework of local or regional development.

## 4.5 Archaeological Background Research

WSP archaeologists reviewed the THC's Texas Archaeological Sites Atlas for archaeological sites and previously completed archaeological survey reports located within the APE. Based on this background research, a total of 31 archaeological sites are located within or overlap portions of the APE. Of these archaeological sites, 1 has been listed on the NRHP, 3 have been recommended eligible for listing on the NRHP, 13 are ineligible for listing on the NRHP, 5 have undetermined eligibilities, and 9 have not been assessed for listing on the NRHP. Additionally, 49 previously conducted archaeological surveys are located within or overlap the APE.

Previously recorded archaeological resources located within or adjacent to the APE are listed in **Table 3**, while **Table 4** lists previously conducted archaeological surveys within the APE. The recorded archaeological sites and surveys located within the APE are also depicted in the **Previous Recorded Cultural Resources with the APE** map exhibit in **Appendix D**.

**Table 3: Previously Recorded Archaeological Resources Within or Adjacent to the APE**

Site #	Site Type	Cultural Affiliation	NRHP Status
41BX7	Multicomponent	Precontact and 18th to 20th century	Not assessed
41BX179	Structure	Spanish Colonial	Eligible
41BX600	Lithic Scatter	precontact	Ineligible
41BX620	Acequia (Irrigation Ditch)	Historic	Eligible
41BX647	House	Historic	Not assessed
41BX795	Structure	Mid-18th to mid-20th century	Eligible
41BX983	Warehouse	Late 19th to mid-20th century	Not assessed

Site #	Site Type	Cultural Affiliation	NRHP Status
41BX984	Occupation	Late 19th to early 20th century	Not assessed
41BX992	Cemetery	Mid to late 19th century	Not assessed
41BX1598	Occupation/Orphanage	18th to 19th century	Not assessed
41BX1952	Occupation	Mid-19th century to present	Not assessed
41BX2050	Engineered feature/structure	Late 19th century	Ineligible
41BX2051	Engineered feature/structure	Late 19th century	Ineligible
41BX2088	Occupation	Precontact to late statehood	Listed
41BX2194	Engineered feature/structure	Late 19th century	Ineligible
41BX2195	Engineered feature/structure	Early 20th century	Ineligible
41BX2196	Engineered feature/structure	Early 20th century	Ineligible
41BX2197	Engineered feature/structure	Modern (1901 to present)	Undetermined
41BX2320	Engineered feature/structure	Late 19th century to present	Ineligible
41BX2345	Engineered feature/structure/acequia	Historic	Undetermined
41BX2346	Engineered feature/structure	Historic	Ineligible
41BX2354	Engineered feature/structure	Spanish Colonial to 19th century	Ineligible
41BX2361	Engineered feature/structure	Modern (1901 to present)	Ineligible
41BX2363	Occupation	Historic	Ineligible
41BX2401	Engineered feature/structure	Mid-19th century to present	Not assessed
41BX2419	Engineered feature/structure	Mid-19th century to present	Undetermined
41BX2420	Engineered feature/structure	Late 19th century	Undetermined
41BX2463	Occupation	Mid to late 19th century	Undetermined
41BX2474	Structure	18th to 20th century	Not assessed
41BX2478	Historic scatter	Historic	Ineligible
41BX2581	Burials and historic scatter	Historic	Ineligible

Source: THC, 2025

**Table 4:** Previously Conducted Archaeological Surveys Within the APE

Atlas #	Author(s)	TAC Permit
8500000290	Fox, Anne A.	1744
8500002995	Unavailable	N/A
8500002996	Unavailable	N/A
8500003004	Cox, I. Wayne	657
8500003005	Unavailable	N/A
8500003007	Unavailable	N/A
8500003008	Unavailable	N/A
8500003011	Unavailable	N/A
8500003015	Tennis, Cynthia L. and Barbara A. Winkler	1177
8500003016	Unavailable	N/A
8500012357	Anthony, Dana and David O. Brown	3072
8500013850	Hester, Eaton, and Hard	433
8500013858	Cox, I. Wayne	606
8500014070	Fox, Daniel, Dan Scurlock, and John Clar	N/A
8500015225	Figueroa, Antonia	4853
8500016281	Held, Pollyanna, and Chris Murray	5031
8500017431	Ulrich, Kristi M.	5486
8500017811	Hanson, Casey and Brandy Harris	4886
8500020000	Shafer, Harry J. and Thomas R. Hester	6026
8500022090	Dase, Amy E.; Griffith, Timothy B.	N/A
8500025608	Fields, Ross, and Jennifer K. McWilliams	N/A
8500025667	Clark, Pollyanna, Chris Murray, and Sally Victor	6367
8500038963	Acuna, Laura I. And Mary Jo Galindo	6403
8500058369	Sloan, Katie A.	6837
8500062599	Haefner, Josh	6881
8500076660	McKenzie, Clinton et al.	6526
8500080248	Fox, Anne A.	N/A

Atlas #	Author(s)	TAC Permit
8500080549	Nichols, Kristi Miller	7299
8500080609	Ward, Rhiana D. et al.	7541
8500080725	Matthews, Chris; Steve A. Tomka, and Rhiana D. Ward	8416
8500080831	Ahr, Steven and Jake Reid	6507
8500080837	Thomas, Andrea and Clinton McKenzie	7913
8500080857	Figueroa, Antonia L. and Jose Zapata	7893
8500081230	Zapata, José E.	N/A
8500081394	Fred Valdez, Jr. et al	N/A
8500081746	A. Thomas; C. McKenzie	7913
8500081751	Unavailable	N/A

Source: THC, 2025

VIA's archaeologists also reviewed the data provided by COSA OHP. Based on the data provided, the APE and the surrounding 1-km buffer contain a rich military history. This includes possible funeral pyre locations following the Battle of the Alamo along/adjacent to Commerce Street; redoubts (temporary fortifications) along/adjacent to the eastern portion of the APE; the battle of Alazán overlapping a portion of the APE to the west; and multiple 18 pound cannon balls, musket balls, and canister shot within the 1-km buffer surrounding the APE. Additionally, multiple military earthworks, such as Mexican Batteries/Redoubts, are purported to be within the APE and the surrounding 1-km buffer. Areas within the APE associated with significant military activity—such as funeral pyres from the Battle of the Alamo, redoubts, and locations related to the Battle of Alazán—are designated as high probability areas, in further consultation with THC and COSA OHP.

## 4.6 Historic Map Research

A review of historic topographic maps, aerials, atlases, and Sanborn fire insurance maps was conducted to determine land use history, if any historic resources are present, and to verify locations of any historic or cultural resources. See **Table 5** for list of historic maps used and **Appendix E** for **Sanborn Fire Insurance Maps**.

**Table 5:** Historic Maps Used for Background Research

Map	Year	Author
San Antonio	1767	Joseph de Urrutia
San Antonio Sanborn	1885	Sanborn Map Company
San Antonio Atlas	1889	J. J. Oleson and Sons
San Antonio Sanborn	1904	Sanborn Map Company
San Antonio Atlas	1909	Jules A. Appler's
San Antonio City Map	1924	Nic Tengg
USGS San Antonio West, Texas	1953	USGS
USGS San Antonio East, Texas	1953	USGS
USGS San Antonio West, Texas	1967	USGS
USGS San Antonio East, Texas	1967	USGS
USGS San Antonio East, Texas	1992	USGS
USGS San Antonio West, Texas	1993	USGS

The earliest available map is the 1767 map of San Antonio published by Joseph de Urrutia, showing the San Antonio River approximately where modern-day West Commerce Street crosses the San Antonio River. This map indicates three acequias (two share the same name) and three additional waterways in the Project area. The acequias are labeled as Acequia para regadio and Acequia Del Million, and the waterways are labeled Camino de S. Saba, Rio Grande, and Camino Para de Bosque. Labeled structures in the Project area include Casa del Presidio (house of the president), Casa del Capitan (house of captain), Cuerpo de Guardia (guard Corp), Plaza de la Villa (town plaza), Casas Reales (royal house), Iglesia (church), and Mision de San Joseph (mission of San Joseph). In addition, 1767 map of San Antonio provided by COSA OHP also shows that structures are located within the current APE.

The 1885 and 1904 Sanborn Fire Insurance Maps are the next available maps of Project area. Much of the area around the Project area is developed with mixed development of houses, businesses, and hotels (Sandborn 1885 and 1904). All subsequent maps indicate that the area has been in some form of development prior to 1767 (USGS San Antonio East 1967, USGS San Antonio West 1967, USGS San Antonio East 1992, USGS San Antonio West 1993; see **Sandborn Fire Insurance Maps in Appendix E**). The earliest aerial is 1956, well after most San Antonio's development.

Based on historic map research, the APE has been historically occupied since the late 18<sup>th</sup> century. As shown on historic mapping (**Appendix E**), areas with the APE where structures are located are designated as high-probability areas and will be further evaluated for constructing monitoring in consultation with THC and COSA OHP.

## 4.7 Cemetery Research

A review of the THC's Texas Archeological Sites Atlas shows two cemeteries/vicinity cemeteries adjacent of the Project APE. Both cemeteries identified (BX-C300, BX-C339) do not list the number of known graves or the year of the oldest grave. No cemeteries identified are located within the APE (see **Previously Recorded Cultural Resources Within and Adjacent to the Project** map in **Appendix D**).

BX-C300 (City/Milam Park) is the resting place of Benjamin Milam, an important figure during the Texas Revolution. His remains are under a monument on the west side of the park. The grounds use to be part of the El Camp Sano Catholic Cemetery that has been relocated. The original location of El Campo Cemetery is now Saint Rosa Hospital. The cemetery was closed in 1860s. Redevelopment occurred in the 1970s. No stations or construction activities are planned near BX-C300.

The only information available in THC's Texas Archeological Sites Atlas is the location of BX-C339, a historic vicinity cemetery. However, information provided by COSA OHP indicated that U.S. soldiers had originally been interred at this location but were later exhumed and reburied in the Odd Fellows Cemetery. COSA OHP provided documentation showing that multiple newspaper accounts (1903, 1904, 1909, 1913, 1914, and 1932) reported discoveries of human remains within or adjacent to the APE, all of which correspond to the historic Vicinity Cemetery (BX-C339).

The Project includes westbound Bowie Street Station along E Commerce Street and eastbound Bowie Street Station along Market Street (See **Figure 1**). For the eastbound station on Market Street, the Project will construct a new station that includes a platform, shelter, canopy, seating, signage, lighting, and other streetscape improvements. In February 2025, THC commented (see **Appendix F, THC Consultation**) that this location is likely within the footprint of the historic cemetery and recommended proactive scraping to identify unmarked graves. In response, VIA adjusted the station location along Market Street and developed two alternative options (Figure 1), both situated outside the likely footprint of the historic cemetery. THC agreed that proactive archaeological scraping would no longer be needed at these locations.

For the westbound station on Commerce Street between Bowie and Elm Streets, the Project will not involve the construction of a new station; instead, the existing stop will be retrofitted with new equipment. VIA plans to construct a bus stop pad at this location with ground disturbance between 22 and 28 inches. In July 2025, THC recommended proactive scraping in the areas to identify unmarked graves. In response to THC's recommendation, VIA, in coordination with FTA, plans to conduct archaeological scraping of the construction footprint at this location, including at station areas and any associated roadway work, wherever construction activities are planned to determine if human burials are present. The construction footprint will be determined in consultation with THC and COSA OHP once the full extent of ground disturbances is defined in the project plans.

The map has been redacted to protect sensitive information related to BX-C339 ( historic cemetery)

**Figure 1:** Proposed Stations near BX-C339 (a Vicinity Cemetery)  
Source: VIA, 2024

## 4.8 Tribal Groups

According to the Tribal Directory Assessment Tool (TDAT), there are six Native American Tribes with an association to Bexar County, Texas: the Alabama-Coushatta Tribe of Texas, the Apache Tribe of Oklahoma, Comanche Nation of Oklahoma, Coushatta Tribe of Louisiana, Mescalero Apache Tribe of the Mescalero Reservation in New Mexico, and the Tonkawa Tribe of Indians of Oklahoma (TDAT 2025).



The Alabama-Coushatta Tribe of Texas is the oldest reservation in Texas. Originating in Alabama, the tribe migrated to modern-day east Texas by the 1780s. The Alabama-Coushatta are made up of different but closely associated tribes. The Alabama-Coushatta fought with the Revolutionaries during the Mexican War of Independence from Spain. Mexico recognized both (Alabama-Coushatta and the Revolutionaries) and offered them tracts of land for permanent settlement. Sam Houston negotiated a treaty (1830) with the tribes before the Texas War of Independence from Mexico. The treaty gave them land between the Neches and Sabine Rivers, in return, for not siding with Mexico (Alabama-Coushatta Tribe of Texas 2025).

The Apache Tribe of Oklahoma (Ka-Ta-Kas/Kiowa Apache) are descendants of Apache groups who lived in the Great Plains since the 16th century. Around the year 1400, Arthpaskan speaking ancestors of the Apache and Navajos migrated to the Southern Plains and the Southwest from Western Canada. They were nomadic hunter-gatherers who lived in smoke-darkened hide tipis in groups of closely related family. During plentiful times, local groups would come together to renew kinship and ceremonial ties. During their seasonal rounds, the tribes would trade with Missions and with the Pueblo who lived in New Mexico. During the winter, the Ka-Ta-Kas would camp near the Pueblo. When the Spaniards gained control of New Mexico in the late 16th and early 17th centuries, the tribe started to trade with them. By 1680, the Plains Apaches had horses that expanded their hunting and trading ranges (Apache Tribe of Oklahoma 2025).

Comanche, Arapahoe, and Cheyenne forced the Apachean groups (such as the Lipan and Jicarilla) to move further south and west. The Ka-Ta-Kas was the only tribe to remain. The concentration of Comanche, Cheyenne, Arapahoe, Kiowa, and Ka-Ta-Kas living in the Central and Southern Plains caused conflict over hunting and trading ranges. The conflict was intensified by the arrival of a large number of settlers and by people on the route to Santa Fe. The Ka-Ta-Kas and Arapahoes acted as peacemakers, and the five tribes entered an unbroken alliance. With the signing of the 1865 Treaty of Little Arkansas, tribes were assigned to a common reservation. The treaty limited the Ka-Ta-Ka hunting range to below the Arkansas River (Apache Tribe of Oklahoma 2025).

Congress failed to ratify the treaty, resulting in settlers taking tribal land. During the reservation years the traditional values, beliefs, and practices of the tribes were suppressed. Children were forced to boarding schools where they were not allowed to follow their lifeways or speak their languages. Some of the tribal members converted to Christianity while others converted to the Peyote religion (the Native American Church opened in 1918). European settlers and the

Federal government continued to take land leaving the Apache only 32,643 acres (Apache Tribe of Oklahoma 2025).

The Comanche Nation, Oklahoma (NUH-MUH-NUH/Numunuu) were once part of the Shoshone Tribe. In the late 1600s and early 1700s, they moved from their kinsman to the Northern Great Plains and then south looking for a new homeland. Like the Ka-Ta-Ka, they adopted horses and were skilled traders, breeders. They were proficient in using horses in warfare (Comanche Nation 2025).

The Coushatta Tribe of Louisiana originates from Southwest Louisiana; they relocated several times to avoid European encroachment. The Coushatta resettled near the convergence of the Cossa and Tallapoosa Rivers in Alabama by the 1700s. While in Alabama, they became part of the Creek Confederacy. In 1797, Red Shoes (Stilaphkachatta) lead a group of approximately 400 to Spanish Louisiana, and 450 more joined them in 1804. Over the next few decades, the Coushatta moved their villages in an effort to remain in neutral areas between the French, Spanish, Mexican, and American territories (Coushatta Tribe of Louisiana 2023).

The Mescalero Apache Tribe of the Mescalero Reservation, New Mexico was originally a hunter-gather and warrior society. They lived in brush shelters (wickiup) and roamed Texas, Arizona, Chihuahua México, and Sonora México. Currently, there are three subtribes - the Mescalero, Lipan, and Chiricahua. Early on, the reservation was recognized by the Spanish, Mexican, and American Treaties. The reservation was formally established by President Ulysses S. Grant in 1870. The Lipan survivors of the Texas Wars were brought to the reservation in 1903. Then, in 1913, around 200 members of the Chiricahua tribe arrived. The Chiricahua had been held prisoner at Fort Sill, Oklahoma since the capture of Geronimo in 1886. All the Native Americans brought to the reservation became members of the Mescalero Tribe and reorganized under the provisions of the Indian Reorganization Act of 1934 (Mescalero Apache Tribe 2025).

The Tonkawa Tribe of Indians of Oklahoma (Tickanwa-tic) belong to the Tonkawa linguistic family and lived in the region that runs west from South Central Texas, and from Western Oklahoma to Eastern New Mexico. The Tonkawa were known as one of the more war-like tribes, who lived a nomadic life during the early historic period. They would move their tipi villages according to the wishes of the band's chief. They became skilled horse riders in the early 18th century. From around 1800, the Tonkawa were allied with the Lipan and friendly to Texans and other southern divisions. By 1837, they had mostly drifted toward the Southwest frontier of Texas. In October of 1884, the Tonkawa was forcibly removed from Fort Giffin, Texas

and transported by railway from Cisco, Texas to a stop at the Sac-Fox agency near Stoud, Oklahoma, where they wintered over. In the spring, they traveled by wagon for at least another 100 miles to the Ponca Agency then to Oakland in June 1885. This forced removal is known as the Tonkawa Trail of Tears (Tonkawa Tribe 2025).

## 4.9 Texas Freedom Colonies

The Texas Freedom Colonies (FCs) are communities with historical significance that formerly enslaved people settled during the Reconstruction period and Jim Crow eras in Texas. African Americans accumulated land and founded 557 Black settlements. These colonies and settlements provided safe places for Black Texans. Factors such as natural disasters, cultural erasure, urban renewal, and population loss caused a decline in these communities (Freedom Colonies Project 2020). One Freedom Colony, Ellis Alley Enclave, is located within the vicinity of the APE. None are located within the APE (See **Appendix D** for **Previously Recorded Cultural Resources Within and Adjacent to the Project** map).

Ellis Alley Enclave is south of East Houston Street and north of East Commerce Street, approximately 300 feet outside of the APE. VIA owns these properties. The Ellis Alley Enclave is a group of three homes and the last remnants of the city's original urban freedom colony. The "Texas Freedom Colonies Atlas & Study" has three documented data points for Ellis Alley, two of which are documented by the public and one is labeled as "Located FCs" (Roberts and Biazar 2018).

## 4.10 Acequia Resources

Acequias are irrigation ditches developed in arid regions of Spain and were adopted by the Missions in the San Antonio de Valero area for planting and harvesting. The earliest acequias were built by missionaries and Native Americans. Conflict over water rights lead Don Juan Maria de Ripperda (Governor of the Province of Texas) to decree the construction of irrigation ditches that included stipulations that plants such as prickly pear had to be used to keep cattle away, that stone and mortar foundations were to be used, and dictated depth of width of the canals. Both mission and community control were constructed in the early colonial period (see **Appendix D**).

Pajalache/Conception Ditch is the oldest acequia in San Antonio. Construction on the acequia started before the Canary Islanders arrived and was mainly used to provide water for Mission Concepcion lands. A large dam near present-day Presa Street Bridge diverted water south. Pajalache Ditch was deep and wide, Franciscans used to navigate it with boats. This acequia

roughly parallels modern-day St. Mary's/Roosevelt Street. The northern section was abandoned in 1869 because the dam posed a flooding risk. The southern portion was used until the turn of the century. The Pajalache Ditch is approximately 1000 feet south of Market Street (Brune and Mims III 1967).

Acequia del Alamo (Acequia del Valero/ Acequia Madre) dates to 1719 and was used to provide water to the Misson San Antonio De Valero. The diversion dam was first built at the first bend of the San Antonio River, crossing the river at present-day Witte Museum. The path of the acequia was approximately that of Broadway Street. The channel was roughly 18 feet wide and 12 feet deep and was a total of 3.5 miles long. Acequia del Alamo closed in 1905 (Texas State University ND).

The San Pedro Acequia (Acequia Principal/ San Pedro Principal Acequia) was constructed to serve the military and civilians in 1738. The starting point of the acequia was San Pedro Springs, where it traveled south following close to modern-day Flores Street until intersecting the river to the west of Misson Concepcion. In the 1800s, the San Pedro Acequia was adapted and used exclusively for drinking water (Brune and Mims III 1967).

The Alazan Ditch was the last major acequia built in San Antonio. Construction began in 1872 and was completed in 1876. Alazan Ditch provided water for land west of San Pedro Creek; beginning at the starting point of the Upper Labor Ditch. It ran west along West Ashby Place to the Missouri-Pacific Railroad where it turned south following the railroad until intersecting with the river (Brune and Mims III 1967).

The Segundo Acequia was intended to service the Misson San Antonio de Valero. The location of the original canal is not known, but its existence is not contested. Documentary evidence suggest that the original location was near Misson Valero Acequia near the first location of the mission on San Pedro Creek. A second site was chosen in January 1719 near the headwaters of the San Antonio River. This is the site of the dam and the mother ditch of the Balero irrigation system that served the second and third Misson sites (McKenzie 2024).

The Laredito Acequia refers to an acequia that is implied or referenced in deeds from the 1760 to the 1790s, portions of which are depicted in surveys from the year 1850. The Laredito could possibly be a reopening or extension of an earlier acequia (McKenzie 2024).

San Antonio Valley Ditch and the Navarro Acequia are part of a series of acequias that were built to serve missions and civilian settlements at Villa San Fernando during the 19th century.

Eventually the acequias were left to drain storm water, but the city outgrew the compacity of the ditches. Most are now closed (City of San Antonio 2025).

In addition, based on the acequias map from COSA OHP, the APE crosses multiple acequias, many of which include multiple branches and projected branches. These include Madre Acequia, Alazan Acequia, and an unnamed acequia.

## 4.11 National Historic Trail

A National Historic Trail (NHT) is a federally designated route that commemorates a significant historical event or movement in U.S. history. These trails are part of the larger National Trails System, established by the National Trails System Act of 1968, and are managed by the National Park Service (NPS) in partnership with other agencies.

One NHT, El Camino Real de los Tejas, intersects the APE at six different locations: Buena Vista Street near South Frio Street, West Commerce Street near I-35, Dolorosa Street near East Main Plaza, East Commerce Street near East Main Plaza, East Market Street at North Presa Street, and East Commerce Street at North Presa Street (see **Previously Recorded Cultural Resources Within and Adjacent to the Project** map in **Appendix D**). The El Camino Real de los Tejas extends approximately 2,500 miles from colonial Mexico City through Texas and terminates in Natchitoches, Louisiana (NPS 2024). The period of significance for the Historic Resources of El Camino Real de los Tejas is limited to the period of Spanish colonial rule in Texas, c.1690 through 1821. According to the Historic Resources of El Camino Real de los Tejas National Historic Trail Multiple Property Documentation Form:

The primary areas of significance for historic properties nominated for their association with Camino Real are “Exploration/Settlement” (Criterion A) and “Archeology” (Criterion D), and this document will focus on those areas and criteria, although further research regarding each property may also support significance under Criteria B and C. Properties may also be eligible under additional areas of significance related to their historic function(s), including Commerce, Ethnic Heritage, Military, Politics/Government, and Religion), depending on the property’s particular history. All of the intact missions in Texas associated with Camino Real (those in San Antonio) were evaluated and listed at the national level of significance, partly because their high level of integrity and close proximity to one another ensured that they exemplified the ideals and community building philosophies of the Spanish Government during the colonial period [Sweeten McDonald and Scott 2011, F-29].

During the Late Archaic period, various Indigenous tribes established a vast network of routes used for trade, cultural exchange, and warfare across present day Texas. These routes evolved to link major Indigenous settlements, notably the Caddo. Additional tribes moved into Texas

during the seventeenth and eighteenth centuries, including the Apache, Cherokee, Choctaw, Comanche, Kiowa largely as a result of displacement from traditional lands north and east of Texas (Sweeten McDonald and Scott 2011). As Spanish colonialism extended into North America, many ‘royal roads’—or caminos reales—were established to tie distant regions of the empire to Mexico City. One collection of indigenous trails and trade routes was known as El Camino Real de los Tejas and served as the primary overland route for the colonization of what would become Texas and northwestern Louisiana (NPS 2020).

The name of the trail is attributed both to its geographic extent and some of its original users, a group of Caddo Indians known by the Spanish as the ‘Tejas’ (NPS 2020). The use of the trail by the Spanish began in 1690, when a Spanish explorer, Alonso de León, crossed the Rio Grande heading north to establish missions in what is today considered eastern Texas. The next year additional missionaries followed the route under the leadership of Domingo Terán de los Ríos. In addition to missions, the Spanish utilized the trail to build presidios for the protection of Spanish territory against French intrusion along with trading posts and ranches (NPS 2024).

El Camino Real de los Tejas played a significant role in a cycle of Spanish population and abandonment of Texas. The foundation of San Juan Bautista on the Río Grande and the settlement of San Fernando de Béxar and San Antonio de Valero in the early eighteenth century highlight that El Camino Real de los Tejas was becoming a major route of travel during the Spanish colonial period. Additional expeditions and the establishment of the East Texas missions closer to the fortifications along the frontier of New Spain resulted in a well-established link that enabled trade and movement between the Spanish and French territories in Texas and Louisiana (Gonzales 2024).

By the early 1800s, trade between San Antonio and Mexico increased, and the desire for a shorter route resulted in the establishment of the Laredo Road Route. The new route became San Antonio’s main thoroughfare leading towards the Rio Grande to the south (Pfeiffer and Haynes 2022). The establishment of this new route through the city encouraged commercial and residential development on the west side of San Pedro Creek, which was predominately Mexican American.

The period of significance for the Historic Resources of El Camino Real de los Tejas is limited to the period of Spanish colonial rule in Texas, but the trail retained its importance even after Mexican independence (Sweeten McDonald and Scott 2011; NPS 2020). Ranchers moved cattle along the route and established large ranches along the Rio Grande. Large numbers of Anglo settlers used the trail as they moved west into new homes in Texas. In 1845 with the



annexation of Texas by the United States, use of the original route diminished. El Camino Real de los Tejas served to link a variety of cultural and linguistic groups, becoming an agent of cultural diffusion, biological exchange, and communication and a conduit for exploration, trade, migration, settlement, and livestock drives. Spanish, Mexican, French, American, Black, and Indigenous travelers utilizing the route resulted in a palimpsest of traditions, laws, and cultures that is reflected in all aspects of the character of Texas today (NPS 2020).

## 4.12 Texas Department of Transportation Potential Archaeological Liability Map (PALM)

The Texas Department of Transportation Potential Archeological Liability Maps (TxDOT PALM) was reviewed on April 14, 2025. The PALM Database indicates that approximately 1,381 linear feet (421 linear meters) of the APE and approximately 7,675 square feet (713 square meters) of the proposed station locations exhibit a moderate probability or above (PALM score 5 or higher) to contain cultural resources. See **Appendix G** for the map of **TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project**.

## 5. CONCLUSIONS AND RECOMMENDATIONS

This archaeological desktop overview details the background research regarding the APE and includes soils and environmental data, previous archaeological background research (including archaeological sites and archaeological surveys), historic map research, Freedom Colony research, acequia research, and data provided by COSA OHP.

Based on the research, due to the noted disturbances across the APE, the mapped soil profiles previously detailed are unlikely to be present within the APE. However, if any unknown intact cultural deposits are located within the APE, they would likely be beneath the disturbances from current and past infrastructure.

Based on archaeological background research, previously recorded archaeological sites are located within or overlapping the APE. These archaeological sites may still contain intact cultural material, likely beneath the disturbances from current and past infrastructure. Based on the historic map research and data from COSA OHP, the APE has been historically occupied since the late 18<sup>th</sup> century with multiple acequias crosses the APE. No Freedom Colonies are recorded within the APE. Additionally, based on probability data gathered from TxDOT PALM, approximately 1,381 linear feet (421 linear meters) of the APE and approximately 7,675 square



feet (713 square meters) of the proposed station locations exhibit a moderate probability or above (5 or higher) to contain cultural resources.

Data regarding the archaeological site locations (see **Appendix D** for the map of **Previously Recorded Cultural Resources Within and Adjacent to the Project**) within the APE and possible historic structures (see **Appendix E** for **Sanborn Fire Insurance Maps**), as determined from the historic map research, within the APE, were compiled and referenced to all locations where possible ground disturbances are proposed within the APE. Locations where archaeological sites or historic structures correspond to proposed ground disturbance locations were determined to need archaeological monitoring during construction activities. Additionally, proposed construction activities exceeding 3 feet (0.91 meter) that do not directly correspond to known archaeological sites or possible historic structures, located within PALM moderate probability or above areas, warrant archaeological monitoring during construction activities.

Archaeological monitoring in high probability areas would require the presence of a professional archaeologist(s) monitoring all excavations, with the authority to stop work, to examine any potential cultural material uncovered. The high probability areas will be determined in consultation with the THC and COSA OHP once the full extent of ground disturbances is identified through project plans.

Archaeological scraping is recommended near the historic cemetery. The areas for scraping will be determined in consultation with the THC and COSA OHP once the full extent of ground disturbances is identified through project plans.

Additionally, it is recommended that an unanticipated discovery plan be drafted and implemented for the construction phase of the Project. The unanticipated discovery plan will provide a plan of action should construction activities encounter archaeological resources or human remains.

On October 8, 2025, THC concurred with the recommended approach for archaeological monitoring and scraping (**Appendix B**).

## 6. REFERENCES

### Alabama-Coushatta Tribe of Texas

2025 Our History. Electronic document, <https://www.alabama-coushatta.com/about-us/our-history/>. Accessed January 13, 2025.

### Apache Tribe of Oklahoma

2025. History. Electronic document, <https://apachetribe.org/history/>. Accessed January 13, 2025.

### Appler's Jules, A.

1900 San Antonio 1900. Electronic document, <https://historicmapworks.com/Map/US/22136/San+Antonio+1900+29+x+42/>. Accessed January 12, 2025.

### Black, S.L. and J.A. McGraw.

1985 The Panther Springs Creek Site: Cultural Change and Continuity within the Upper Salado Creek Watershed, South-Central Texas. Archaeological Survey Report No 100. Center for Archaeological Research, The University of Texas San Antonio.

### Black, S.L.

1989 South Texas Plains. In From the Gulf to the Rio Grande: Human Adaptation in Central, South, and Lower Pecos, Texas, by T.R. Hester, S.L. Black, D. G. Stelle, B.W. Olive, A.A. Fox, K. J. Reinhard, and L.C. Bement, pp. 38-62. Center for Archeological Research, Then University of Texas at San Antonio and the Arkansas Archaeological Survey, Fayetteville.

Black, S.L., K. Jolly, C.D. Frederick, J.R. Lucas, J.W. Karbula, P.C. Takac, and D.R. Potter  
1998 Investigations and Experimentation at the Higgins Sites (41BX1984). Archaeology along the Wurzbach Parkway, Module 3. Studies in Archaeology 27. Center for Archaeological Research, The University of Texas San Antonio.

### Brune, D.H., M. III, Con.

1967 The San Antonio River and its Seven Acequias. The Journal of San Antonio, San Antonio River Authority. Electronic document, <https://www.uiw.edu/sanantonio/sevenacequias.html>. Accessed January 14, 2025.

City of San Antonio (COSA)

2025 Mission Trails Historic Sites. Acequias. Electronic document, <https://www.sanantonio.gov/Mission-Trails/Mission-Trails-Historic-Sites/Detail-Page/ArtMID/16185/ArticleID/4230/Acequias>. Accessed January 12, 2025.

Collins, M.B.

2004 Archaeology of Central Texas. In *The Prehistory of Texas*, edited by T.K. Perttula, pp. 101-126. Texas A&M University Press, College Station.

Comanche Nation

2025 About Comanche Nation, History. Electronic document, <https://www.comanchenation.com/about/page/history>. Accessed January 13, 2025.

Coushatta Tribe of Louisiana

2023 Our Story, A History of Resilience and Perseverance. Electronic document, <https://www.coushatta.org/our-story/>. Accessed January, 13, 2025.

Hester, T.R.

1989 Historic Native American Populations. In *From the Gulf to the Rio Grande: Human Adaptation in Central, South, and Lower Pecos Texas*, by T.R. Hester, S.L. Black, D.G. Steele, B.W. Oliver, A. A. Fox, K. Reinhard, and L.C. Bement, pp 77-84, Research Series No. 33, Arkansas Archaeological Survey, Fayetteville.

Kenmotsu, N.A., and D.K. Boyd.

2012 *The Toyah Phase of Central Texas: Late Precontact Economic and Social Processes*. First ed. Texas A&M University Press, College Station.

Long, C.

2024 Bexar County. Handbook of Texas Online. Texas State Historical Society. Electronic document, <https://www.tshaonline.org/handbook/entries/bexar-county>. Accessed January 10, 2025.

Mauldin, R., J. Thompson, and L. Kemp

2012 Reconsidering the Role of Bison in the Terminal Late Precontact (Toyah) Period in Texas. In *The Toyah Phase of Central Texas: Late Precontact Economic and Social Processes*, edited by Nancy K. Kenmotsu and Douglas K. Boyd, pp. 90-110. First ed. Texas A&M University Press, College Station.

McKenzie, C.M.M.

2024 A History of the Barrio de Laredo, 1741-1860. Special Report, No. 38. Center for Archaeological Research, The University of Texas at San Antonio.

Merriam-Webster Dictionary. ND. Truck Farming, Merriam-Webster Dictionary. Electronic document. <https://www.merriam-webster.com/dictionary/truck%20farming>. Accessed January 13, 2025.

Mescalero Apache Tribe.

2025 Our Culture. Electronic document, <https://mescaleroapachetribe.com/our-culture/>. Accessed January 13, 2025.

National Park Service (NPS).

2007 National Register Bulletin. How to Apply the National Register Criteria for Evaluation. U.S. Department of the Interior.

2020 History and Culture. *El Camino Real de los Tejas*. Website, National Parks Service. Accessed February 21, 2025, <https://www.nps.gov/elte/learn/historyculture/index.htm>.

2024 Louisiana and Texas: El Camino Real de los Tejas National Historic Trail. *El Camino Real de los Tejas*. Website, National Parks Service. Accessed February 21, 2025, <https://www.nps.gov/articles/delostejas.htm>.

Oleson and Sons, J. J.

1889 San Antonio Atlas. Electronic document, <https://historicmapworks.com/Map/US/20039/San+Antonio+1889/>. Accessed January 12, 2025.

Prewitt, E.R.

1981 Cultural Chronology in Texas. Bulletin of the Texas Archeological Society 52:65-90.

Roberts, A., and M. J. Biazar.

2018 "The Texas Freedom Colonies Atlas & Study." Esri. ArcGIS StoryMap. The Texas Freedom Colonies Atlas & Study, July 2018. <https://arcg.is/09vnS5>. Accessed January 12, 2025.

San Antonio Office of Historic Preservation (OHP).

2025 City of San Antonio Office of Historic Preservation. Electronic document, <https://www.sa.gov/Directory/Departments/OHP>. Accessed March, 2025.

Sanborn Fire Insurance Maps.

1885 Sanborn Fire Insurance Map from San Antonio, Bexar County, Sanborn Map Company. Electronic document. [https://www.loc.gov/item/sanborn08740\\_001/](https://www.loc.gov/item/sanborn08740_001/). Accessed January 12, 2025.

1904 Sanborn Fire Insurance Map from San Antonio, Bexar County, Sanborn Map Company. Electronic document. [https://www.loc.gov/item/sanborn08740\\_005/](https://www.loc.gov/item/sanborn08740_005/). Accessed January 11, 2025.

Texas Almanac

2024 Physical Regions. Electronic document, <https://www.texasalmanac.com/articles/physical-regions>. Accessed January 14, 2025.

Texas Department of Transportation (TxDOT)

2025 TxDOT Potential Archaeological Liability Map. Electronic document, <https://www.arcgis.com/home/item.html?id=cf03bd93003b411e8d8d2e07c438b762>, accessed April 2025.

Texas Historical Commission (THC) Texas Site Atlas

2025 Online ArcGIS Server. Electronic document, <https://atlas.thc.state.tx.us/Map>.  
2025 Texas Archaeological Sites Atlas. Online data base <https://atlas.thc.state.tx.us/>, accessed January 12, 2025.

Texas State University.

1719 Acequia Madre and the Almo Dam. From The Texas Public Archaeology Network. Electronic document, <https://txpan.txst.edu/projects/history-of-the-witte-memorial-museum/1719-acequia-madre.html>. Accessed January 14, 2025.

Tonkawa Tribe

2025 Tribal History. Electronic document, <https://tonkawatribe.com/language-culture/history/>. Accessed January 13, 2025.

Tribal Directory Assessment Tool (TDAT)

2025 Tribal Directory Assessment Tool U.S. Department of Housing and Urban Development. <https://egis.hud.gov/TDAT/>. Access February 2025.

Turner, S.E. and T.R. Hester

1993 Stone Artifacts of Texas Indians. Second Edition. Texas Monthly and Gulf Publishing Company, Houston.

De Urrutia, J.

1767 San Antonio 1767. Electronic document,  
<https://www.historicmapworks.com/Map/US/176709/San+Antonio+1767/>. Accessed  
January 23, 2025.

United States Department of Agriculture Natural Resources Conservation Service (USDA  
NRCS)

2025 Natural Resources Conservation Service, United States Department of Agriculture.  
Web Soil Survey. <http://websoilsurvey.sc.egov.usda.gov/>. Accessed January 12, 2025.

United States Geological Survey (USGS) Topographic Quadrangles

1967 San Antonio East Quadrangle, Texas- Bexar County. 7.5 Minute Series, 1:24000.  
1967 San Antonio West Quadrangle, Texas-Bexar County. 7.5 Minute Series, 1:24000.  
1992 San Antonio East Quadrangle, Texas-Bexar County. 7.5 Minute Series, 1:24000.  
1993 San Antonio West Quadrangle, Texas-Bexar County. 7.5 Minute Series, 1:24000.

Weir, F.A.

1976 The Central Texas Archaic. Ph.D. dissertation, Anthropology Department,  
Washington State University, Pullman.

Whitehurst, K.D.

2025a Spanish Colonial, Texas Our Texas. Electronic document,  
<https://texasourtexas.texaspbs.org/the-eras-of-texas/spanish-colonial/>, accessed January  
13, 2025

2025b Mexican Rule, Texas Our Texas. Electronic document  
<https://texasourtexas.texaspbs.org/the-eras-of-texas/mexican-rule/>, accessed January 13,  
2025.

## 7. ACRONYMS

Acronym/Abbreviation	Definition
ACT	Antiquities Code of Texas
ART	Advanced Rapid Transit
APE	Area of Potential Effect
BAT	Business Access and Transit
BRT	Bus Rapid Transit
BP	Before Present
CE	Categorical Exclusion
CFR	Code of Federal Regulations
COSA	City of San Antonio
Et al.	Et Alia (and others)
E/W	East/West
FTA	Federal Transit Administration
FC	Freedom Colony
Ltd	Limited Liability Company
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRCS	National Resources Conservation Service
NPS	National Park Service
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
PALM	Potential Archaeological Liability Map
PhD	Doctor of Philosophy
ROW	Right-of-Way
RPA	Register of Professional Archaeologist
SHPO	State Historic Preservation Office
TAC	Texas Administrative Code

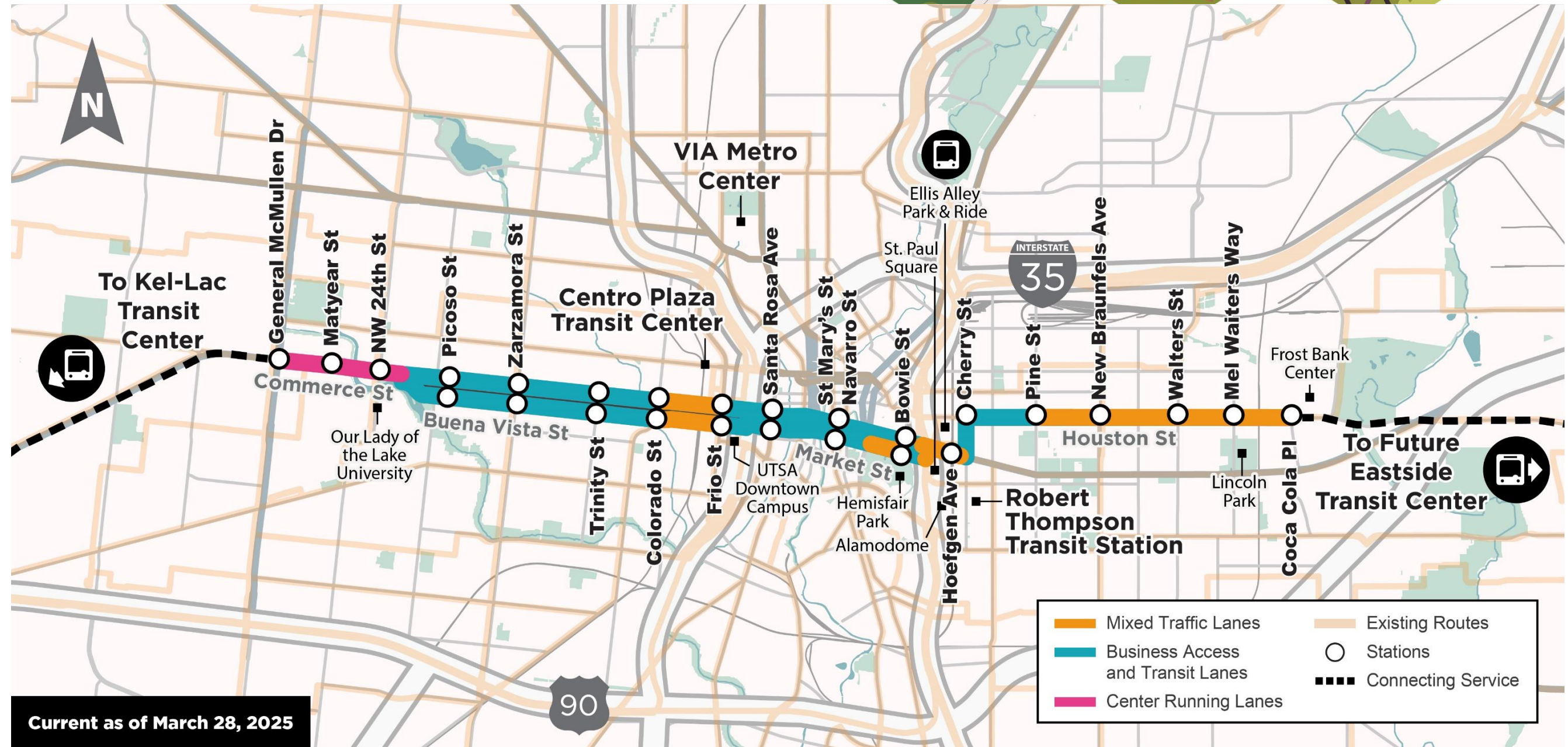


Acronym/Abbreviation	Definition
TBD	To Be Determined
TDAT	Tribal Directory Assessment Tool
THC	Texas Historical Commission
TSHA	Texas State Historical Association
TxDOT	Texas Department of Transportation
USDA	United States Department of Agriculture
USGS	United States Geological Survey
VIA	VIA Metropolitan Transit
WSP	Williams Sale Partnership Ltd



---

## Appendix A: Project Location Map





---

## Appendix B: Consulting Parties Correspondence





VIA Advanced Rapid Transit (ART) East/West Corridor Project							
Re: Response to Consulting Party Comments Under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas							
THC Tracking #202512356							
Date: 10/31/2025							
Phase	Reviewer	Organization	Date	Source	Comments	VIA Response	Action
Section 106 Initiation: Consulting Party Invitation	Dr. Vincent Michael	CSSA	6/4/2025	Email	In response to the invitation to be a consulting party for this Project, Dr. Michael stated that CSSA had previously provided comments on the project’s zoning requirements in a letter to the city council on December 19, 2024. That letter was included in his correspondence with VIA.	VIA noted this previous correspondence with the City and CSSA’s interest in the project.	No action required. The letter was related to the city's zoning ordinance for Transit-Oriented Development (TOD).
Consultation on Findings	Justin Kockritz	Texas Historical Commission (THC)	7/31/2025	Email	The THC History Programs Division, led by Justin Kockritz, has completed its review of the Above-Ground Historic Resources Survey Report (dated June 2025) and concurs with your determinations of National Register eligibility summarized in Table 2, Table 3, and Appendix C.	Noted.	No action required.
Consultation on Findings	Claudia Espinosa	THC	7/31/2025	Email	The THC Division of Architecture review staff, led by Claudia Espinosa, is requesting that project plans be submitted for review to gain a full understanding of the visual impact of the proposed stations and the historic aged structures.	VIA contacted THC to discuss further.	Additional explanation of the visual impacts of the proposed Project on historic properties including project plans, station booklet and additional renderings of stations were included in the consulting party presentation dated August 28, 2025, and attached to the response letter to THC.



<b>VIA Advanced Rapid Transit (ART) East/West Corridor Project</b> <b>Re: Response to Consulting Party Comments Under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas</b> THC Tracking #202512356 Date: 10/31/2025							
Phase	Reviewer	Organization	Date	Source	Comments	VIA Response	Action
Consultation on Findings	Dr. Emily Dylla	THC	7/31/2025	Email	Regarding archeology, the THC is unable to provide concurrence that archeological monitoring may be limited to the proposed locations without additional information. Please provide any available design or construction plans. If such plans are not yet available, the proposed unanticipated discoveries plan should be revised. Rather than identify specific areas for monitoring, the revised plan should clarify that monitoring will occur in high probability areas to be determined in consultation with the THC and COSA-OHP once the full extent of ground disturbances is identified through project plans.	Noted.	VIA has provided KMZ file of designs plans and updated the Construction Monitoring Plan to state that monitoring will be conducted in all high probability areas (in consultation with the THC).
Consultation on Findings	Dr. Emily Dylla	THC	7/31/2025	Email	Per THC, the proposed station on Commerce Street between Bowie and Elm Streets is situated in a high probability area for unmarked graves, and as such archeological scraping at this location will be required to ensure compliance with Chapter 711 of the Texas Health and Safety Code.	On August 19, 2025, VIA reached out to THC for clarification and THC responded on August 26, 2025.	THC requires backhoe scraping at the proposed WB Bowie Street Station location, because the Texas Health and Safety Code does not allow development on a cemetery that disturbs the cemetery until the graves/remains are exhumed. VIA has updated the Construction Monitoring Plan to include a backhoe scraping plan and the scraping will be carried out under a THC-issued permit before any construction starts in 2027.



<b>VIA Advanced Rapid Transit (ART) East/West Corridor Project</b>							
<b>Re: Response to Consulting Party Comments Under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas</b>							
THC Tracking #202512356							
Date: 10/31/2025							
Phase	Reviewer	Organization	Date	Source	Comments	VIA Response	Action
Consulting Parties Meeting: Discussion of Findings	Matthew Elverson	City of San Antonio Office of Historic Preservation (COSA OHP)	8/28/2025	Consulting Party Meeting	During the consulting party meeting, Matthew Elverson (COSA OHP) described knowledge of human remains discoveries in the general area of the vicinity cemetery, stating that there are likely several separate instances of such and likely covers a large area. He also described several other sites that may be adjacent to or overlapping the APE and recommended VIA reach out to him to coordinate finalization of results.	VIA reached out to Matthew Elverson and Amy Fulkerson with COSA OHP via email to coordinate additional information for the Project on August 28 and September 5, 2025	On August 28, 2025, COSA OHP responded that they were meeting internally to review the APE for the project, their survey data, and additional research. Additional information was provided on September 18, 2025. This data was reviewed and added to the archeological desktop overview and will be incorporated in any future probability analyses of the APE.
Consulting Parties Meeting: Discussion of Findings	Dr. Vincent Michael	Conservation Society of San Antonio (CSSA)	8/28/2025	Consulting Party Meeting	Dr. Vincent Michael, PhD asked what information the team has on the historic period cemetery near the cooling facility on Market Street.	VIA replied that it's a vicinity cemetery to which purported graves are located, but there is little other information on it. The Texas Health and Safety Code doesn't allow development on any cemetery.	VIA will be proactive in investigations to determine where there are internments at any proposed construction location where there is proposed development or excavation.
Consulting Parties Meeting: Discussion of Findings	Amita Thomas	Downtown Neighborhood Association	8/28/2025	Consulting Party Meeting	Amita Thomas asked what the difference is between being determined eligible for the National Register of Historic Places (NRHP), vs being listed in the NRHP, and if listing is desired, what that process would look like.	VIA responded that the scope of this Project is not to list any resources, but to understand which ones may be eligible so that they are treated as if they are listed in the NRHP in avoidance of adverse effects. The process for listing a property requires additional research, writing, and funding which often happens through the help of the city or other preservation organizations. Dr. Vincent Michael, PhD replied that this is something his organization often assists with.	No action required.





<b>VIA Advanced Rapid Transit (ART) East/West Corridor Project</b>							
<b>Re: Response to Consulting Party Comments Under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas</b>							
THC Tracking #202512356							
Date: 10/31/2025							
Phase	Reviewer	Organization	Date	Source	Comments	VIA Response	Action
Consulting Parties Meeting: Discussion of Findings	Matthew Elverson	COSA OHP	8/28/2025	Consulting Party Meeting	COSA OHP has recently worked on study of underrepresented communities in the city, resulting in their understanding of five neighborhoods with historic significance to African American communities which were previously recommended eligible for the NRHP, two of which are on the east side and at least one on the west side adjacent to the project APE. He stated he would share this information with VIA.	VIA reached out to Matthew Elverson and Amy Fulkerson with COSA OHP via email to coordinate additional information for the Project on August 28 and September 5, 2025	On August 28, 2025, COSA OHP responded that they were meeting internally to review the APE for the project, their survey data, and additional research. No additional information was provided by the deadline for comments on September 12, 2025. No further action taken.
Consulting Parties Meeting: Discussion of Findings	Amy Fulkerson	COSA OHP	8/28/2025	Consulting Party Meeting	Amy Fulkerson (COSA OHP) stated that there are Westside enclaves running along West Commerce Street that are eligible for the Nation Register and associated with the African American Community. She stated she would share information on these with VIA as well.	VIA reached out to Matthew Elverson and Amy Fulkerson with COSA OHP via email to coordinate additional information for the Project on August 28 and September 5, 2025.	On August 28, 2025, COSA OHP responded that they were meeting internally to review the APE for the project, their survey data, and additional research. No additional information was provided by the deadline for comments on September 12, 2025. No further action taken.
Post-Meeting Comments from Consulting Parties	Matthew Elverson	COSA OHP	9/18/2025	Email	Please review the online OHP Acequia Maps. The APE crosses at least 5 different acequias, some of which are multiple branch locations.	VIA reviewed the Acequia Maps provided by OHP.	VIA has incorporated the information provided by OHP into the desktop overview. Please see the last paragraph of Section 4.10 on page 26 of the revised Archeological Desktop Overview Report.



**VIA Advanced Rapid Transit (ART) East/West Corridor Project**  
**Re: Response to Consulting Party Comments Under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas**  
THC Tracking #202512356  
Date: 10/31/2025

Phase	Reviewer	Organization	Date	Source	Comments	VIA Response	Action
Post-Meeting Comments from Consulting Parties	Matthew Elverson	COSA OHP	9/18/2025	Email	Newspaper accounts and referenced polygons (approximate locations of newspaper accounts) where human remains and/or military-related artifacts were found along the APE. Due to the proximity of the previous human remains discoveries, scraping may be required for the proposed western-most station on Market near the intersection of Market and Bowie. You will need to reconstruct the original neighborhood layout via quite a few Sanborn maps to accurately georeference these locations. All provided polygons are for general reference only. I also attached polygons and newspaper accounts for other locations within or adjacent to the APE.	VIA reviewed the additional data provided by OHP.	VIA has added the information to the desktop overview. Please see Section 4.7 of the revised Archeological Desktop Overview Report.  These locations where human remains were discovered have been designated as high-probability areas and will be used to determine specific locations for construction monitoring in consultation with THC and COSA OHP.



VIA Advanced Rapid Transit (ART) East/West Corridor Project							
Re: Response to Consulting Party Comments Under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas							
THC Tracking #202512356							
Date: 10/31/2025							
Phase	Reviewer	Organization	Date	Source	Comments	VIA Response	Action
Post-Meeting Comments from Consulting Parties	Matthew Elverson	COSA OHP	9/18/2025	Email	<p>In addition, please find a chapter dedicated to researching the possible funeral pyre locations following the Battle of the Alamo. Many are along/within Commerce street in the APE.</p> <p>The Battle of the Alazan battlefield general area also overlaps a portion of the APE to the west.</p> <p>There are also modern military-related artifact discoveries adjacent to the eastern part of the APE that may be associated with a redoubt from the Battle of the Alamo. Do not share the names associated with these locations.</p> <p>Also, I've included an exhibit that identifies the likely redoubt locations during the Battle of the Alamo (note several along/adjacent to the APE). This information is not to be shared. This exhibit doesn't take into account other redoubts and earthworks associated with earlier or later conflicts.</p>	VIA reviewed the additional data provided by OHP regarding possible funeral pyre locations following the Battle of the Alamo.	VIA has incorporated the information provided by OHP regarding possible funeral pyre locations following the Battle of the Alamo. Please see the last paragraph of Section 4.5 of the revised Archeological Desktop Overview Report. These locations have been designated as high-probability areas and will be used to determine locations for construction monitoring in consultation with THC and COSA OHP.
Post-Meeting Comments from Consulting Parties	Matthew Elverson	COSA OHP	9/18/2025	Email	Please overlay the 1767 map of downtown San Antonio and see if any structures from this date fall within/adjacent to your APE.	VIA reviewed the 1767 map of downtown San Antonio	VIA has georeferenced the 1767 map of downtown San Antonio with the current APE and identified structures located within the APE. These locations have been designated as high-probability areas and will be used to determine locations for construction monitoring in consultation with THC and COSA OHP.

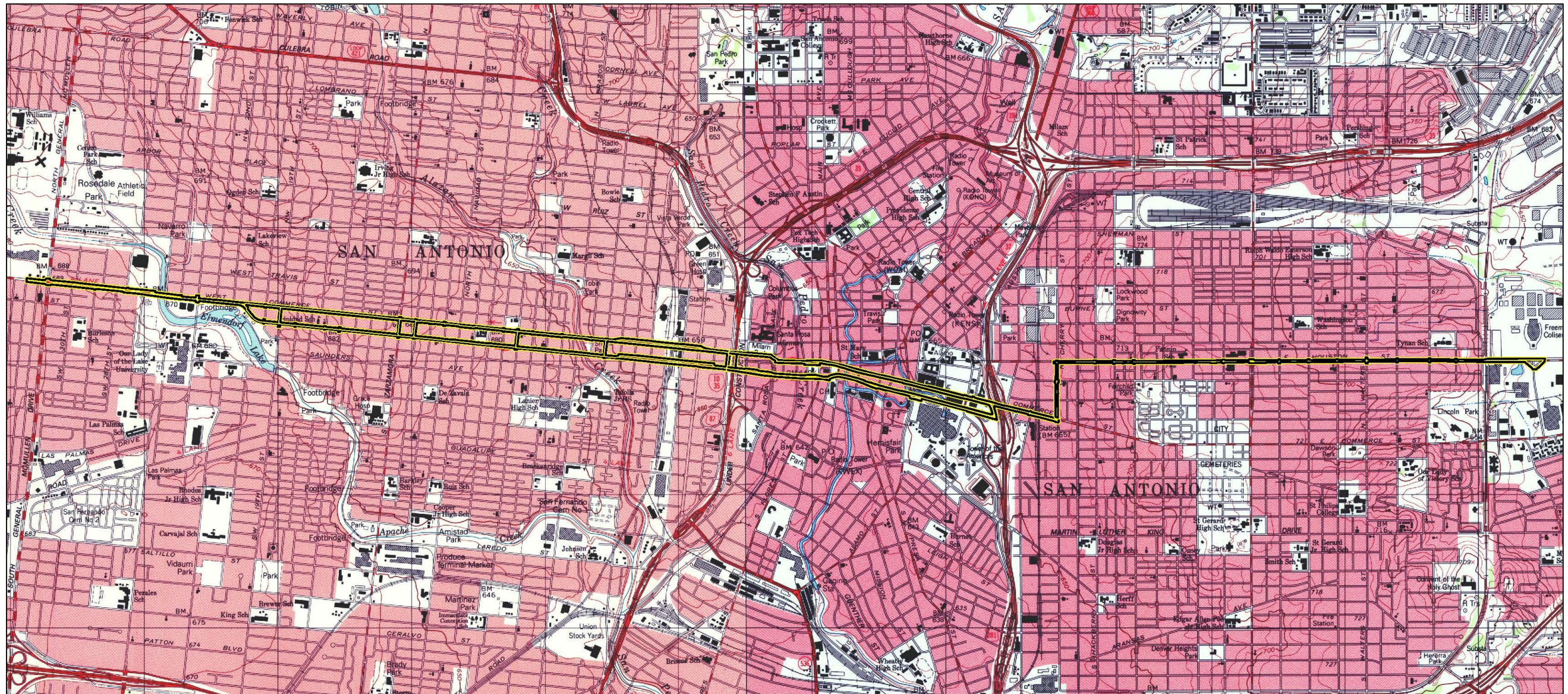


<b>VIA Advanced Rapid Transit (ART) East/West Corridor Project</b> <b>Re: Response to Consulting Party Comments Under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas</b> THC Tracking #202512356 Date: 10/31/2025							
Phase	Reviewer	Organization	Date	Source	Comments	VIA Response	Action
Post-Meeting Comments from Consulting Parties	Matthew Elverson	COSA OHP	9/18/2025	Email	Please email me the SOW for review and comment along with the TAC permit application.	Noted.	VIA replied to Matthew’s email communicating the following plan: In early 2026, VIA will apply for Texas Antiquities Code (TAC) permit only where scraping is required. Complete construction only where scraping has occurred. Closer to completion of Final Design, likely late 2026, VIA will apply for a TAC permit for the rest of the project and then pursue construction for the rest of the project in 2027. Matthew should expect to receive a scope for review after January 1, 2026.  Consultation with THC and COSA OHP will be conducted throughout the entire process.



## Appendix C: Project APE on Topographic Quadrangle



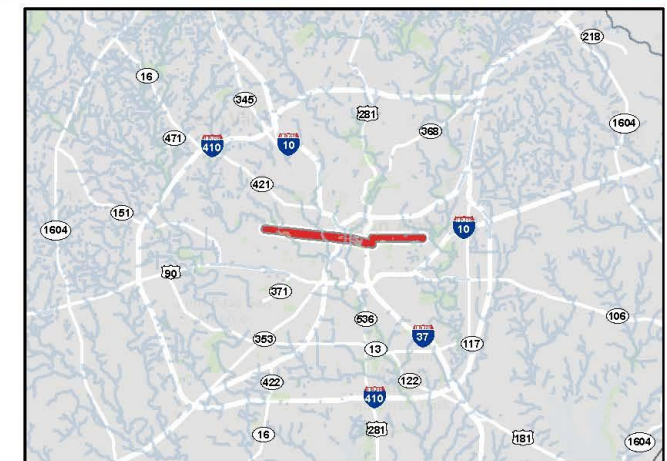


## VIA ART East/West Corridor Project -Project APE on Topographic Basemap

### Legend

 Project APE

0 0.5 1 Miles



Imagery: USGS San Antonio West, TX (1993) & San Antonio East, TX (1992) 7.5-min. topographic





---

## Appendix D: Previously Recorded Archaeological Resources Within and Adjacent to the Project APE

Maps have been redacted to protect sensitive information





---

## Appendix E: Historic Maps

Maps have been redacted to protect sensitive information



---

## Appendix F: THC Consultation

or construction impacts downtown by including stops with limited amenities. Sidewalk improvements are planned to provide pedestrian and Americans with Disabilities Act access to the stations.

### *Project Development*

The Project is included in FTA's Capital Investment Grant Small Starts program. VIA selected the locally preferred alternative (LPA) in October 2018. The LPA was adopted into the fiscally constrained long-range transportation plan in September 2020. The Project entered Small Starts Project Development in October 2022. VIA is coordinating with FTA to ensure it provides all necessary documentation to request a Construction Grant Agreement from FTA in late 2026, with the start of revenue service scheduled for late 2029.

### *Area of Potential Effects*

To facilitate our consultation, we developed an Area of Potential Effects (APE) considering the Project's potential to both directly and indirectly affect historic resources. The APE reflects the characteristics of the Project, which would generally be limited to the existing right-of-way (ROW). Project activities outside the ROW are primarily at station locations and select intersections where small ROW acquisitions may be necessary to ensure safe bus turns. The APE for above-ground resources is the existing ROW, with a 150-foot buffer around proposed station locations and from areas where new ROW may be acquired. The APE for archeological resources includes all areas that may be directly impacted by the Project, including existing and proposed ROW and all station locations. We understand this project will also be subject to regulation under the Antiquities Code of Texas.

### *Next Steps*

Architectural Historians meeting the Secretary of the Interior's (SOI) Professional Qualifications Standards will survey the APE to identify historic-age properties and evaluate their eligibility for listing in the National Register of Historic Places (NRHP). A historic resources survey report will be submitted to THC, which will include eligibility and effects evaluations, including maps, photographs, and design exhibits.

To facilitate robust involvement in our Project planning, we compiled a list of potential consulting parties for your review (see Attachment 2). We have also identified six Indian tribes with whom we plan to consult. FTA and VIA plan to extensively engage these parties throughout the environmental review process, discussing concerns they may have regarding the Project's potential effect on historic and cultural resources. Likewise, we will continue to work with your office and are always open to your input and guidance. If you have any questions, please contact me at (817) 978-0573 or via email at [terence.plaskon@dot.gov](mailto:terence.plaskon@dot.gov).

Sincerely,

Terence Plaskon  
Environmental Protection Specialist  
Federal Transit Administration, Region VI

November 12, 2024  
Mr. Joseph Bell

Page 3

Enclosures

Cc: Manjiri Akalkotkar, VIA  
Maricela Diaz-Wells, VIA  
Tony Ogboli, FTA

### Attachment 1: Project Map



## **Attachment 2: Potential Consulting Parties**

### ***Public and Nonprofit Entities:***

- Bexar County Historical Commission
- City of San Antonio Office of Historic Preservation and Certified Local Government
- Conservation Society of San Antonio

### ***Neighborhood Associations:***

- Prospect Hill
- Las Palmas
- Historic Westside Residents
- Gardendale
- Downtown Neighborhood Association
- Dignowity Hill
- Denver Heights
- Jefferson Heights
- Harvard Place East Lawn
- Alamodome Gardens

### ***Indian Tribes:***

- Alabama-Coushatta Tribe of Texas
- Apache Tribe of Oklahoma
- Comanche Nation, Oklahoma
- Coushatta Tribe of Louisiana
- Mescalero Apache Tribe of the Mescalero Reservation, New Mexico
- Tonkawa Tribe of Indians of Oklahoma

Wang, Bin

---

From: Diaz-Wells, Maricela <maricela.diaz-wells@viainfo.net>  
Sent: Monday, March 10, 2025 8:46 AM  
To: Wang, Bin; Christy Haven  
Cc: Weyer, Chris  
Subject: Fw: VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project

as info

---

From: Plaskon, Terence (FTA) <Terence.Plaskon@dot.gov>  
Sent: Monday, March 10, 2025 7:40 AM  
To: Diaz-Wells, Maricela <maricela.diaz-wells@viainfo.net>  
Cc: Ogboli, Tony (FTA) <Ikemefune.ogboli@dot.gov>; Akalkotkar, Manjiri <manjiri.akalkotkar@viainfo.net>  
Subject: [EXTERNAL] FW: VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project

FYI -

---

From: noreply@thc.state.tx.us <noreply@thc.state.tx.us>  
Sent: Friday, March 7, 2025 10:29 AM  
To: Plaskon, Terence (FTA) <Terence.Plaskon@dot.gov>; reviews@thc.state.tx.us  
Subject: VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.



**Re:** Project Review under Section 106 of the National Historic Preservation Act and/or the Antiquities Code of Texas

**THC Tracking #202506261**

**Date:** 03/07/2025

VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project  
San Antonio

**Description:** Updated station location.

Dear Terence Plaskon:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas.



The review staff, led by Justin Kockritz, Brad Jones and Emily Dylla, has completed its review and has made the following determinations based on the information submitted for review:

#### Archeology Comments

- THC/SHPO concurs with information provided.

We have the following comments: Thank you for providing the updated locations for the proposed stations. The THC will not require mechanical scraping in either proposed area.

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 review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: [justin.kockritz@thc.texas.gov](mailto:justin.kockritz@thc.texas.gov), [brad.jones@thc.texas.gov](mailto:brad.jones@thc.texas.gov), [emily.dylla@thc.texas.gov](mailto:emily.dylla@thc.texas.gov).

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,



To help protect your privacy, Microsoft Office prevented automatic download of this picture from the Internet.

for Joseph Bell, State Historic Preservation Officer  
Executive Director, Texas Historical Commission  
**Please do not respond to this email.**

---

From: Diaz-Wells, Maricela <[maricela.diaz-wells@viainfo.net](mailto:maricela.diaz-wells@viainfo.net)>  
Sent: Friday, February 14, 2025 3:48 PM  
To: [justin.kockritz@thc.texas.gov](mailto:justin.kockritz@thc.texas.gov) <[justin.kockritz@thc.texas.gov](mailto:justin.kockritz@thc.texas.gov)>; [brad.jones@thc.texas.gov](mailto:brad.jones@thc.texas.gov) <[brad.jones@thc.texas.gov](mailto:brad.jones@thc.texas.gov)>; [emily.dylla@thc.texas.gov](mailto:emily.dylla@thc.texas.gov) <[emily.dylla@thc.texas.gov](mailto:emily.dylla@thc.texas.gov)>; [Alexander.Shane@thc.texas.gov](mailto:Alexander.Shane@thc.texas.gov) <[Alexander.Shane@thc.texas.gov](mailto:Alexander.Shane@thc.texas.gov)>  
Cc: Akalkotkar, Manjiri <[manjiri.akalkotkar@viainfo.net](mailto:manjiri.akalkotkar@viainfo.net)>; Terence plaskon <[Terence.plaskon@dot.gov](mailto:Terence.plaskon@dot.gov)>  
Subject: Re: VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project

**Ref: Section 106 Consultation for the VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project, San Antonio, Texas (THC Tracking # 202503232)**

Hello,

On November 12, 2024, the Federal Transit Administration (FTA) initiated consultation with you for the VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project (the Project) in San Antonio, Texas (Texas Historical Commission (THC) Tracking # 202503232). VIA Metropolitan Transit Authority (VIA) and FTA received your comments on the Project on December 10, 2024. Thank you for your review.

The following are responses to your comments:

**Above-ground Resources**

VIA acknowledges THC's concurrence with the proposed Area of Potential Effect (APE) for the above-ground cultural resources. VIA will survey the APE to identify historic-age properties and evaluate their eligibility for listing in the National Register of Historic Places (NRHP).

Additionally, VIA acknowledges the additional properties that have been determined eligible for listing in the National Register through previous Section 106 consultation with the Texas Department, including:

- Prospect Hill Historic District,
- Buena Vista Historic District, and
- The West Commerce Street Bridge over the Union Pacific Railroad.

VIA will include these properties in the Project's effect assessment and consult with relevant stakeholders, including consulting parties and Native American Tribes, for further input.

## **Archeology**

THC has recommended a construction monitoring and inadvertent discoveries plan for the Project. VIA will develop this plan in alignment with the approach used for the VIA ART North/South Corridor project.

THC commented that there is a planned station on Market Street east of Bowie Street, within the likely footprint of a historic cemetery. Please note that the station location identified by THC is based on an earlier conceptual layout for the Project. To avoid the impact to the historic cemetery, VIA has modified the Project design and proposed two alternative station locations (see exhibit below): Option A, located on Market approximately 150 feet west of the likely cemetery footprint, and Option B, located on Market approximately 110 feet east of the likely cemetery footprint. Both proposed options are outside the current footprint of the historic cemetery. VIA will incorporate both options into the preliminary design, with the final site selection being made after the environmental review and Section 106 processes. With this modification, VIA believes proactive mechanical scraping would not be necessary. VIA proposes incorporating the updated station location into the archaeological monitoring plan and requests THC reconsider the requirement for proactive scraping in this area.

### **Ongoing Cultural Resources Efforts and Schedules**

A historic resources survey report, which will include eligibility and effects evaluations, will be submitted to THC for review in summer 2025.

VIA is preparing an archaeological background desktop report to identify any archaeological resources that could be impacted by the proposed construction activities. VIA is committed to monitoring any ground disturbance during construction. To ensure this, VIA will develop a construction monitoring and inadvertent discoveries plan, which will outline procedures and steps during construction activities to be followed to monitor and protect archaeological and cultural resources. This plan will align with the approach used for the VIA ART North/South Corridor project. VIA will obtain a Texas Antiquities Permit from the Texas Historical Commission Archeology Division and assign qualified archaeologists to the project site to conduct monitoring, excavations, and address inadvertent discoveries.

We look forward to further consultation on this Project to aid in fostering historic preservation. If you have any questions or need further information about the Project, please do not hesitate to contact me.

Sincerely,

**Maricela Díaz-Wells, AICP**

Special Projects Manager  
VIA Metropolitan Transit  
[maricela.diaz-wells@viainfo.net](mailto:maricela.diaz-wells@viainfo.net)  
Cell: 210-740-2395

---

**From:** Plaskon, Terence (FTA) <[Terence.Plaskon@dot.gov](mailto:Terence.Plaskon@dot.gov)>  
**Sent:** Tuesday, December 10, 2024 3:21 PM  
**To:** Diaz-Wells, Maricela <[maricela.diaz-wells@viainfo.net](mailto:maricela.diaz-wells@viainfo.net)>  
**Cc:** Ogboli, Tony (FTA) <[Ikemefune.ogboli@dot.gov](mailto:Ikemefune.ogboli@dot.gov)>; Akalkotkar, Manjiri <[manjiri.akalkotkar@viainfo.net](mailto:manjiri.akalkotkar@viainfo.net)>; Christy Haven ([chaven@HNTB.com](mailto:chaven@HNTB.com)) <[chaven@HNTB.com](mailto:chaven@HNTB.com)>  
**Subject:** [EXTERNAL] FW: VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project

---

**From:** [noreply@thc.state.tx.us](mailto:noreply@thc.state.tx.us) <[noreply@thc.state.tx.us](mailto:noreply@thc.state.tx.us)>  
**Sent:** Tuesday, December 10, 2024 2:29 PM  
**To:** Plaskon, Terence (FTA) <[Terence.Plaskon@dot.gov](mailto:Terence.Plaskon@dot.gov)>; [reviews@thc.state.tx.us](mailto:reviews@thc.state.tx.us)  
**Subject:** VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.



**TEXAS HISTORICAL COMMISSION**  
*real places telling real stories*

**Re:** Project Review under Section 106 of the National Historic Preservation Act and/or the Antiquities Code of Texas

**THC Tracking #202503232**

**Date:** 12/10/2024

VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project

San Antonio

San Antonio, TX 78207

**Description:** The Project is an approximately 7.3-mile bus rapid transit line, extending from General McMullen Drive, through downtown, to Coca Cola Place.

Dear Terence Plaskon:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas.

The review staff, led by Justin Kockritz, Brad Jones, Emily Dylla and Alexander Shane, has completed its review and has made the following determinations based on the information submitted for review:

#### **Above-Ground Resources**

- THC/SHPO concurs with information provided.

#### **Archeology Comments**

- Areas where ground disturbance will occur need to be monitored by a professional archeologist during construction. If cultural materials are encountered, the monitor will stop construction in the immediate vicinity and examine the discovery. Construction may take place beyond a 50 ft. buffer surrounding the find.
- An archeological survey is required. You may obtain lists of archeologists in Texas through the Council of Texas Archeologists and the Register of Professional Archaeologists. Please note that other qualified archeologists not included on these lists may be used. If this work will occur on land owned or controlled by a state agency or political subdivision of the state, a Texas Antiquities Permit must be obtained from this office prior to initiation of fieldwork. All fieldwork should meet the Archeological Survey Standards for Texas. A report of investigations is required and should be produced in conformance with the Secretary of the Interior's Guidelines for Archaeology and Historic Preservation and submitted to this office for review. Reports for a Texas Antiquities Permit should also meet the Council of Texas Archeologists Guidelines for Cultural Resources Management Reports and the Texas Administrative Code. In addition, any buildings 45 years old or older that are located on or adjacent to the tract should be documented with photographs and included in the report. To facilitate review and make project information available through the Texas Archeological Sites Atlas, we appreciate the submittal of survey area shapefiles via the Shapefile tab on eTRAC concurrently with submission of the draft report. Please note that while appreciated for Federal projects this is required for projects conducted under a Texas Antiquities

Permit. For questions on how to submit these, please visit our video training series at:  
<https://www.youtube.com/playlist?list=PLONbbv2pt4cog5t6mCqZVaEAX3d0MkgQC>

We have the following comments: The THC History Programs Division, led by Justin Kockritz, concurs that your proposed Area of Potential Effect for aboveground historic properties is appropriate. At this time, we have no additional potential consulting parties to add to your list. We look forward to further consultation, including reviewing the historic resources survey report, when available. As you know, the proposed route passes through or near numerous historic properties that have been previously identified. In addition to several historic districts and properties listed in the National Register of Historic Places or locally designated, we also note that the following properties have been determined eligible for listing in the National Register through previous Section 106 consultation with the Texas Department of Transportation: Prospect Hill Historic District, Buena Vista Historic District, and the West Commerce Street Bridge over the Union Pacific Railroad. Regarding archeology, similar to the document developed for the VIA Advanced Rapid Transit North/South Corridor Project we recommend developing a construction monitoring and inadvertent discoveries plan for the East/West Corridor Project. Additionally, per the Interactive Comment Map available on the project website, there is a planned station on Market Street east of Bowie Street, within the likely footprint of a historical cemetery. To keep in compliance with the Texas Health and Safety Code (Chapter 711), proactive scraping will need to occur in this area to identify whether graves are present. All archeological work occurring within publicly-owned or -controlled property must be permitted through our Archeology Division, per the Texas Natural Resources Code (Chapter 191.054), prior to the commencement of fieldwork.

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 review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: [justin.kockritz@thc.texas.gov](mailto:justin.kockritz@thc.texas.gov), [brad.jones@thc.texas.gov](mailto:brad.jones@thc.texas.gov), [emily.dylla@thc.texas.gov](mailto:emily.dylla@thc.texas.gov), [Alexander.Shane@thc.texas.gov](mailto:Alexander.Shane@thc.texas.gov).

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,



for Joseph Bell, State Historic Preservation Officer  
Executive Director, Texas Historical Commission

**Please do not respond to this email.**

Wang, Bin

---

From: Diaz-Wells, Maricela <maricela.diaz-wells@viainfo.net>  
Sent: Friday, August 1, 2025 8:57 AM  
To: Christy Haven; Wang, Bin  
Cc: manjiri.akalkotkar; Herrera, Arturo; Toby Hemphill; Weyer, Chris; John Bonaparte  
Subject: VIA Metropolitan Transit Advanced Rapid Transit

THC is asking for the design plans and brought up Bowie again. This will add an additional 30 days.

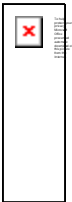
---

From: noreply@thc.state.tx.us <noreply@thc.state.tx.us>  
Sent: Thursday, July 31, 2025 4:08 PM  
To: Diaz-Wells, Maricela <maricela.diaz-wells@viainfo.net>; reviews@thc.state.tx.us <reviews@thc.state.tx.us>; Terence plaskon <Terence.plaskon@dot.gov>; matthew.elverson@sanantonio.gov <matthew.elverson@sanantonio.gov>  
Subject: [EXTERNAL] VIA Metropolitan Transit Advanced Rapid Transit

---

**This Message Is From an External Sender**

This message came from outside your organization.



**Re:** Project Review under Section 106 of the National Historic Preservation Act and/or the Antiquities Code of Texas

**THC Tracking #202512356**

**Date:** 07/31/2025

VIA Metropolitan Transit Advanced Rapid Transit  
San Antonio San Antonio 78207

**Description:** VIA Metropolitan Transit (VIA), in cooperation with the Federal Transit Administration (FTA), is completing environmental studies for the VIA Advanced Rapid Transit (ART) East/West Corridor Project.

Dear Maricela Diaz-Wells:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas.

The review staff, led by Justin Kockritz, Brad Jones, Emily Dylla and Claudia Espinosa, has completed its review and has made the following determinations based on the information submitted for review:

**Above-Ground Resources**

- Property/properties are eligible for listing or already listed in the National Register of Historic Places.



- THC/SHPO unable to complete review at this time based on insufficient documentation. A supplemental review must be submitted, and the 30-day review period will begin upon receipt of adequate documentation.

### **Archeology Comments**

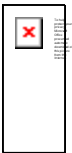
- THC/SHPO unable to complete review at this time based on insufficient documentation. A supplemental review must be submitted, and a new review period will begin upon receipt of adequate documentation.

We have the following comments: The THC History Programs Division, led by Justin Kockritz, has completed its review of the Above-Ground Historic Resources Survey Report (dated June 2025) and concurs with your determinations of National Register eligibility summarized in Table 2, Table 3, and Appendix C. The Division of Architecture review staff, led by Claudia Espinosa, is requesting that project plans be submitted for review to gain a full understanding of the visual impact of the proposed stations and the historic aged structures. Regarding archeology, the THC is unable to provide concurrence that archeological monitoring may be limited to the proposed locations without additional information. Please provide any available design or construction plans. If such plans are not yet available, the proposed unanticipated discoveries plan should be revised. Rather than identify specific areas for monitoring, the revised plan should clarify that monitoring will occur in high probability areas to be determined in consultation with the THC and COSA-OHP once the full extent of ground disturbances is identified through project plans. In addition, the proposed station on Commerce Street between Bowie and Elm Streets is situated in a high probability area for unmarked graves, and as such archeological scraping at this location will be required to ensure compliance with Chapter 711 of the Texas Health and Safety Code.

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 review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: [justin.kockritz@thc.texas.gov](mailto:justin.kockritz@thc.texas.gov), [brad.jones@thc.texas.gov](mailto:brad.jones@thc.texas.gov), [emily.dylla@thc.texas.gov](mailto:emily.dylla@thc.texas.gov), [claudia.espinosa@thc.texas.gov](mailto:claudia.espinosa@thc.texas.gov).

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,



for Joseph Bell, State Historic Preservation Officer  
Executive Director, Texas Historical Commission

**Please do not respond to this email.**

cc: [terence.plaskon@dot.gov](mailto:terence.plaskon@dot.gov) , [matthew.elverson@sanantonio.gov](mailto:matthew.elverson@sanantonio.gov)

---

From: noreply@thc.state.tx.us <noreply@thc.state.tx.us>

Sent: Thursday, July 31, 2025 4:08 PM

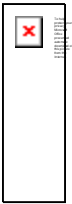
To: Diaz-Wells, Maricela <maricela.diaz-wells@viainfo.net>; reviews@thc.state.tx.us <reviews@thc.state.tx.us>; Terence plaskon <Terence.plaskon@dot.gov>; matthew.elverson@sanantonio.gov <matthew.elverson@sanantonio.gov>

Subject: [EXTERNAL] VIA Metropolitan Transit Advanced Rapid Transit

---

**This Message Is From an External Sender**

This message came from outside your organization.



**Re:** Project Review under Section 106 of the National Historic Preservation Act and/or the Antiquities Code of Texas

**THC Tracking #202512356**

**Date:** 07/31/2025

VIA Metropolitan Transit Advanced Rapid Transit

San Antonio San Antonio 78207

**Description:** VIA Metropolitan Transit (VIA), in cooperation with the Federal Transit Administration (FTA), is completing environmental studies for the VIA Advanced Rapid Transit (ART) East/West Corridor Project.

Dear Maricela Diaz-Wells:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas.

The review staff, led by Justin Kockritz, Brad Jones, Emily Dylla and Claudia Espinosa, has completed its review and has made the following determinations based on the information submitted for review:

**Above-Ground Resources**

- Property/properties are eligible for listing or already listed in the National Register of Historic Places.

- THC/SHPO unable to complete review at this time based on insufficient documentation. A supplemental review must be submitted, and the 30-day review period will begin upon receipt of adequate documentation.

### **Archeology Comments**

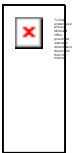
- THC/SHPO unable to complete review at this time based on insufficient documentation. A supplemental review must be submitted, and a new review period will begin upon receipt of adequate documentation.

We have the following comments: The THC History Programs Division, led by Justin Kockritz, has completed its review of the Above-Ground Historic Resources Survey Report (dated June 2025) and concurs with your determinations of National Register eligibility summarized in Table 2, Table 3, and Appendix C. The Division of Architecture review staff, led by Claudia Espinosa, is requesting that project plans be submitted for review to gain a full understanding of the visual impact of the proposed stations and the historic aged structures. Regarding archeology, the THC is unable to provide concurrence that archeological monitoring may be limited to the proposed locations without additional information. Please provide any available design or construction plans. If such plans are not yet available, the proposed unanticipated discoveries plan should be revised. Rather than identify specific areas for monitoring, the revised plan should clarify that monitoring will occur in high probability areas to be determined in consultation with the THC and COSA-OHP once the full extent of ground disturbances is identified through project plans. In addition, the proposed station on Commerce Street between Bowie and Elm Streets is situated in a high probability area for unmarked graves, and as such archeological scraping at this location will be required to ensure compliance with Chapter 711 of the Texas Health and Safety Code.

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 review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: [justin.kockritz@thc.texas.gov](mailto:justin.kockritz@thc.texas.gov), [brad.jones@thc.texas.gov](mailto:brad.jones@thc.texas.gov), [emily.dylla@thc.texas.gov](mailto:emily.dylla@thc.texas.gov), [claudia.espinosa@thc.texas.gov](mailto:claudia.espinosa@thc.texas.gov).

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,



for Joseph Bell, State Historic Preservation Officer  
Executive Director, Texas Historical Commission

**Please do not respond to this email.**

cc: [terence.plaskon@dot.gov](mailto:terence.plaskon@dot.gov) , [matthew.elverson@sanantonio.gov](mailto:matthew.elverson@sanantonio.gov)

Ref: Section 106 Consultation for the VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project, San Antonio, Texas (THC Tracking # 202512356)

Maricela Diaz-Wells  
Special Projects Manager  
123 N. Medina St.  
San Antonio, TX 78207

September 8, 2025

Joseph Bell  
State Historic Preservation Officer  
Executive Director, Texas Historical Commission (THC)  
P.O. Box 12276  
Austin, TX 78711-2276

Attn: Justin Kockritz, Brad Jones, Emily Dylla and Claudia Espinosa

**Ref: Section 106 Consultation for the VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project, San Antonio, Texas (THC Tracking # 202512356)**

Dear Mr. Bell,

On July 1, 2025, VIA Metropolitan Transit Authority (VIA) and the Federal Transit Administration (FTA) submitted the following three documents to you for the VIA Metropolitan Transit Advanced Rapid Transit East/West Corridor Project (the Project) in San Antonio, Texas:

- Aboveground Historic Survey
- Archaeological Desktop Review
- Archeological Construction Monitoring and Inadvertent Discovery Plan

VIA and FTA received your comments on the Project on July 31, 2025. VIA would like to thank you for your review and offer to meet, so that we may present the information provided in response to your comments. Each of the THC's comments is addressed as follows.

#### ***Above-Ground Resources***

VIA acknowledges THC History Programs Division, led by Justin Kockritz concurs with the determinations of National Register eligibility. The Division of Architecture review staff, led by Claudia Espinosa, is requesting that project plans be submitted for review to gain a full understanding of the visual impact of the proposed stations and the historic aged structures.

#### **Existing Visual Conditions**

The Project corridor is an active urban street with numerous modern features that define its visual character, including existing transit stops, street lighting, traffic signals, signage, utility poles, and other common streetscape elements. These contribute to the corridor's already complex visual environment.

Adjacent land uses include commercial, residential, urban open space, and industrial areas. The inventory of visual resources considers the area of visual effect—the area where the Project corridor is visible—shaped by surrounding topography, vegetation, and structures.



### Key Views and Viewer Groups

Key views within the corridor include both representative streetscapes and notable architectural landmarks—structures or features of aesthetic, artistic, cultural, or historical interest. Two primary viewer groups were considered:

- Neighbors: Viewing the corridor from adjacent properties
- Travelers: Experiencing the corridor while moving through it

### Proposed Visual Elements

The Project will introduce 18 new or modified stations which will include platforms, shelters, canopies, seating, signage, lighting, and/or other streetscape improvements. The stations will remain along the roadway consistent with the placement of current VIA bus stops. New stations and transit traffic along the existing transportation corridor will not result in a substantive change in setting for the historic properties.

To optimize the visual impacts, VIA plans to do the following:

- VIA will use station designs standardized under VIA's first Bus Rapid Transit, locally known as Advanced Rapid Transit (ART), project, the ART North/South Corridor Project (Green Line). The Green Line stations resemble standard shelter design with a minimal and light structural design, which are used throughout the transit system. These shelters have been granted a Certificate of Appropriateness by the City of San Antonio's Office of Historic Preservation (COHA OHP) for use throughout the city.
- VIA will seek a Certificate of Appropriateness for all stations. As part of this process, VIA will meet with community members in Historic Districts.
- Through the VIA Art in Transit program, windscreen panel designs will be solicited from students, by working with the schools along the East/West corridor. The artwork for the panels can reflect the historic, cultural and artistic expressions of the specific station areas.
- Within most of the downtown segment, existing stops will be retrofitted with new equipment. In St. Paul Square (Hoefgen Station) and in the Zona Cultural (Frio Station), the existing approved shelter design will be used and there will be no platform or ramps. The Frio Station, along with several other stops in the Zona Cultural, will include artwork that aligns with the historic area's brand, as VIA previously coordinated the shelter design with the City of San Antonio.

Overall, the proposed station design is a fairly transparent design with a cantilevered canopy that reduces the sense of enclosure. As such, the appropriately modern structure will offer components (windscreen art panels, horizontal structure band) that can reflect local station iconography, while allowing the existing historic fabric to 'read through' the station environment. The station components are not anticipated to substantially alter the visual setting for either neighbors or travelers, nor disrupt any established architectural/landmark viewsheds.

### Design Status and Review Materials

While the final station designs are not yet complete, VIA has provided sample designs from the Green Line project, which will serve as the general design model (see **Attachment A**). VIA has also provided preliminary sample designs from the East/West Corridor project (see **Attachment B**). Current design plans are also available in KMZ format (**Attachment C**), showing proposed station locations, along with maps (**Attachment D**) illustrating station proximity to properties recommended as eligible for the National Register of Historic Places (NRHP). VIA seeks the THC's determination that the Project will not cause adverse visual effects to nearby historic properties.

### **Archaeology**

Construction Monitoring Plan

Regarding the Construction Monitoring Plan, THC noted that they cannot provide concurrence on limiting archaeological monitoring to the proposed locations without additional information. THC requested any available design or construction plans. If such plans are not yet available, THC advised that the proposed Unanticipated Discoveries Plan be revised. Instead of identifying specific monitoring areas at this stage, the revised plan should state that monitoring will occur in high-probability areas, to be determined in consultation with THC and COSA OHP once the full extent of ground disturbances is known through project plans.

VIA acknowledges THC's comments and has updated the Unanticipated Discoveries Plan accordingly, noting that monitoring will take place in high-probability areas to be defined in consultation with THC and COSA OHP once project plans identify the full extent of ground disturbances. VIA also provided the current design plans (**see Attachment C**).

Archaeological Scraping

THC recommended archaeological scraping at the proposed westbound station on Commerce Street between Bowie and Elm Streets, as this location is considered a high-probability area for unmarked graves.

VIA, in coordination with FTA, plans to conduct archaeological scraping at this location. The existing stop will be retrofitted with new equipment and a bus pad in the roadway, which we do not anticipate disturbing any deeper than the existing roadway base. The Mechanical Scraping Plan includes the station area and any associated roadway work, covering locations where construction activities are planned. The scraping will be conducted under a THC-issued permit prior to the start of construction to ensure full compliance with Chapter 711 of the Texas Health and Safety Code. The areas for scraping will be defined in consultation with THC and COSA OHP once project plans identify the full extent of ground disturbances. VIA has incorporated this scraping plan into the Construction Monitoring Plan document (**Attachment E**), which outlines the procedures to be followed. VIA respectfully requests THC's concurrence with this proposed approach.

We look forward to further consultation on this Project. If you have any questions or need further information about the Project, please do not hesitate to contact me at 210-740-2395 or maricela.diaz-wells@viainfo.net.

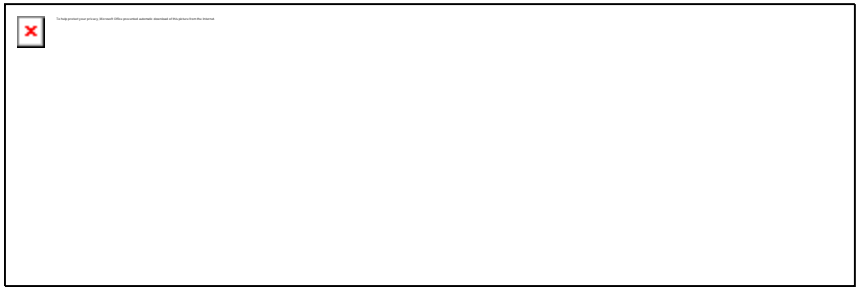
Sincerely,

Maricela Diaz-Wells,  
Special Projects Manager  
VIA Metropolitan Transit

cc: Manjiri Akalkotkar, Major Capital Program Officer, VIA Metropolitan Transit  
Terence Plaskon, Environmental Protection Specialist, FTA Region VI

Attachments are located in a folder online at: [For THC Review - Round 2](#)

- Attachment A: Green Line Station Renderings
- Attachment B: East/West Corridor Project Station Renderings
- Attachment C: Design Plans
- Attachment D: Maps of Historic Properties and Station Locations
- Attachment E: Construction Monitoring, Mechanical Scraping and Inadvertent Discovery Plan



**Re:** Project Review under Section 106 of the National Historic Preservation Act

**THC Tracking #202600443**

**Date:** 10/08/2025

VIA Metropolitan Transit Advanced Rapid Transit

San Antonio San Antonio 78207

**Description:** Please see the attached letter that addresses your comments. Due to size constraints, I have put all of the attachments/supplemental documents in a location online.

Dear Maricela Diaz-Wella:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Justin Kockritz, Emily Dylla and Claudia Espinosa, has completed its review and has made the following determinations based on the information submitted for review:

**Above-Ground Resources**

- Property/properties are eligible for listing or already listed in the National Register of Historic Places.
- No adverse effects on historic properties.

**Archeology Comments**

- THC/SHPO concurs with information provided.

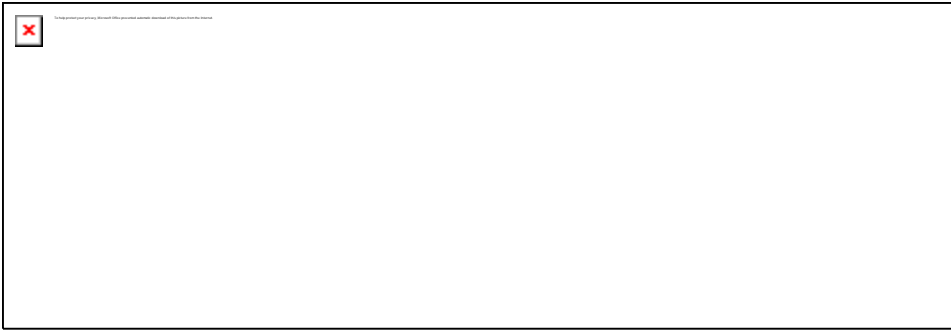
We have the following comments: The Division of Architecture review staff, led by Claudia Espinosa, finds that there will be no adverse effects to the above-ground historic aged properties. Staff acknowledges that the current plans provided are at 40% completion and requests to review plans as plans proceed further (i.e. 60% or greater) via supplemental submission. Regarding archeology, the THC Archeology Division concurs with the recommendations for monitoring and scraping.

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 review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: [justin.kockritz@thc.texas.gov](mailto:justin.kockritz@thc.texas.gov), [emily.dylla@thc.texas.gov](mailto:emily.dylla@thc.texas.gov), [claudia.espinosa@thc.texas.gov](mailto:claudia.espinosa@thc.texas.gov).

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,





for Joseph Bell, State Historic Preservation Officer  
Executive Director, Texas Historical Commission

**Please do not respond to this email.**

---

NOTICE: This communication and any attachments ("this message") may contain information which is privileged, confidential, proprietary or otherwise subject to restricted disclosure under applicable law. This message is for the sole use of the intended recipient(s). Any unauthorized use, disclosure, viewing, copying, alteration, dissemination or distribution of, or reliance on, this message is strictly prohibited. If you have received this message in error, or you are not an authorized or intended recipient, please notify the sender immediately by replying to this message, delete this message and all copies from your e-mail system and destroy any printed copies.

J.AEmHhHzd Iz8ITWfa4Hgs7pbKl

*This e-mail and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed. If you are NOT the intended recipient and receive this communication, please delete this message and any attachments. Thank you.*

*This e-mail and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed. If you are NOT the intended recipient and receive this communication, please delete this message and any attachments. Thank you.*



---

## Appendix G: TxDOT Potential Archaeological Liability Maps (PALM)



## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 1 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

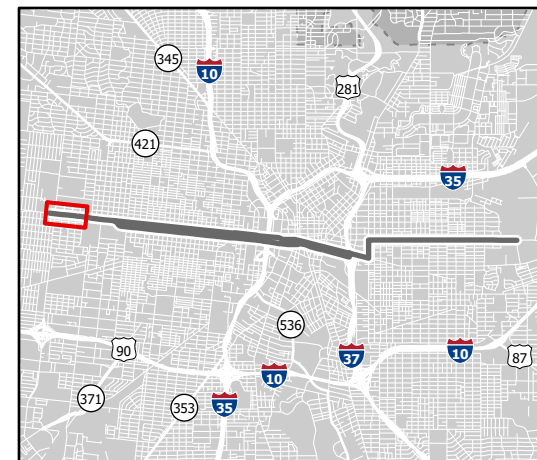
Road

#### TxDOT PALM

0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 2 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

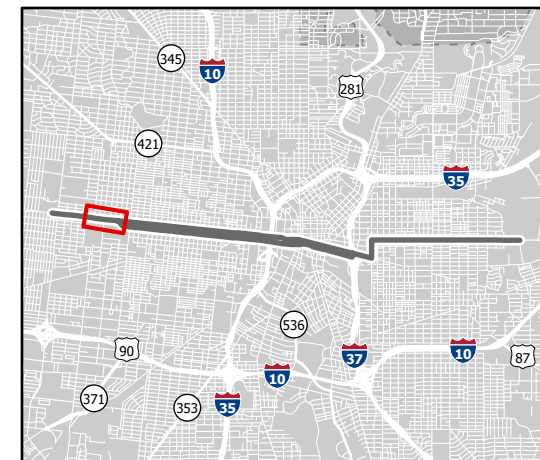
Road

#### TxDOT PALM

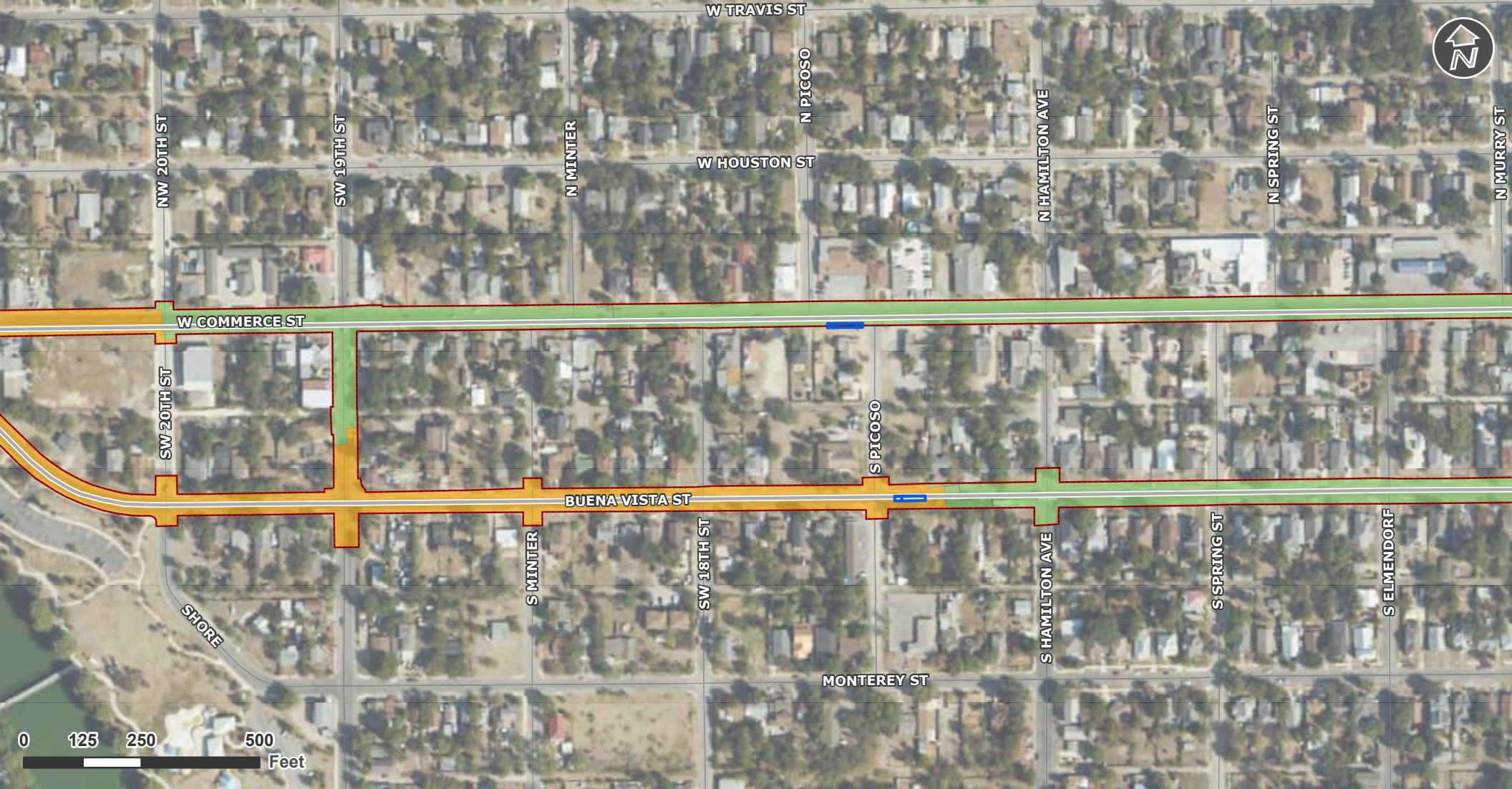
0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep  
Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 3 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

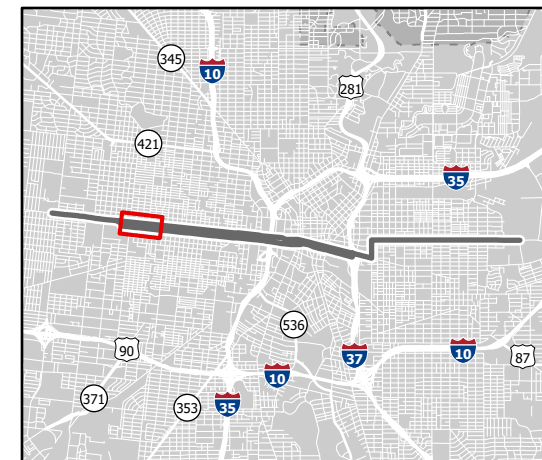
Road

#### TxDOT PALM

0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep  
Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 4 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

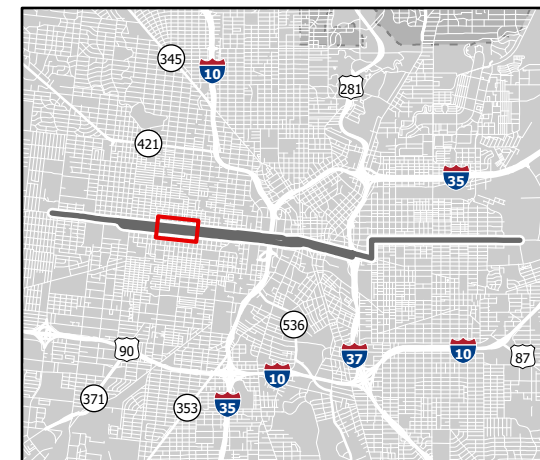
Road

#### TxDOT PALM

0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep  
Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 5 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

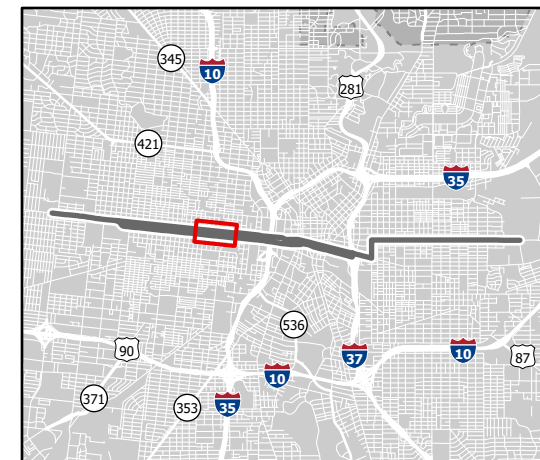
Road

#### TxDOT PALM

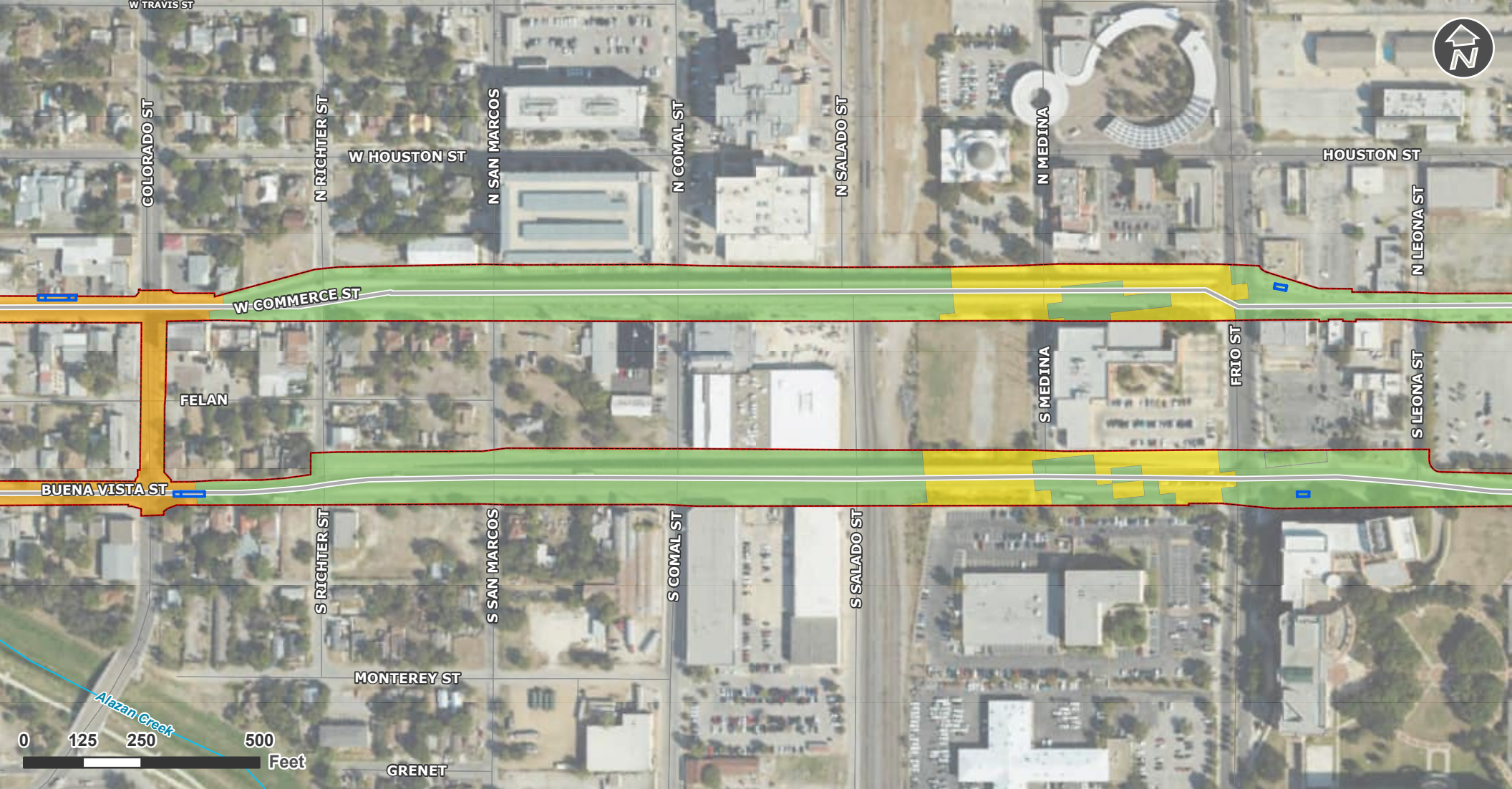
0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 6 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

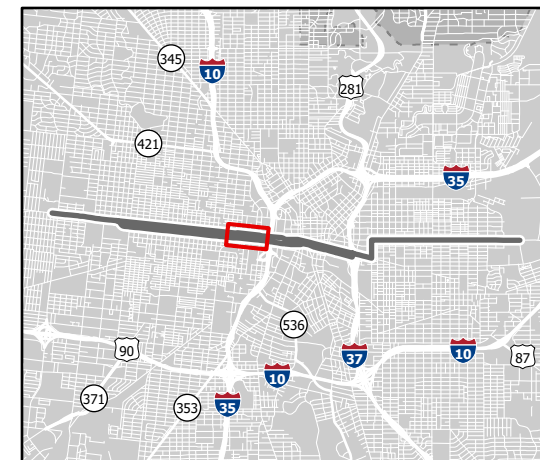
Road

#### TxDOT PALM

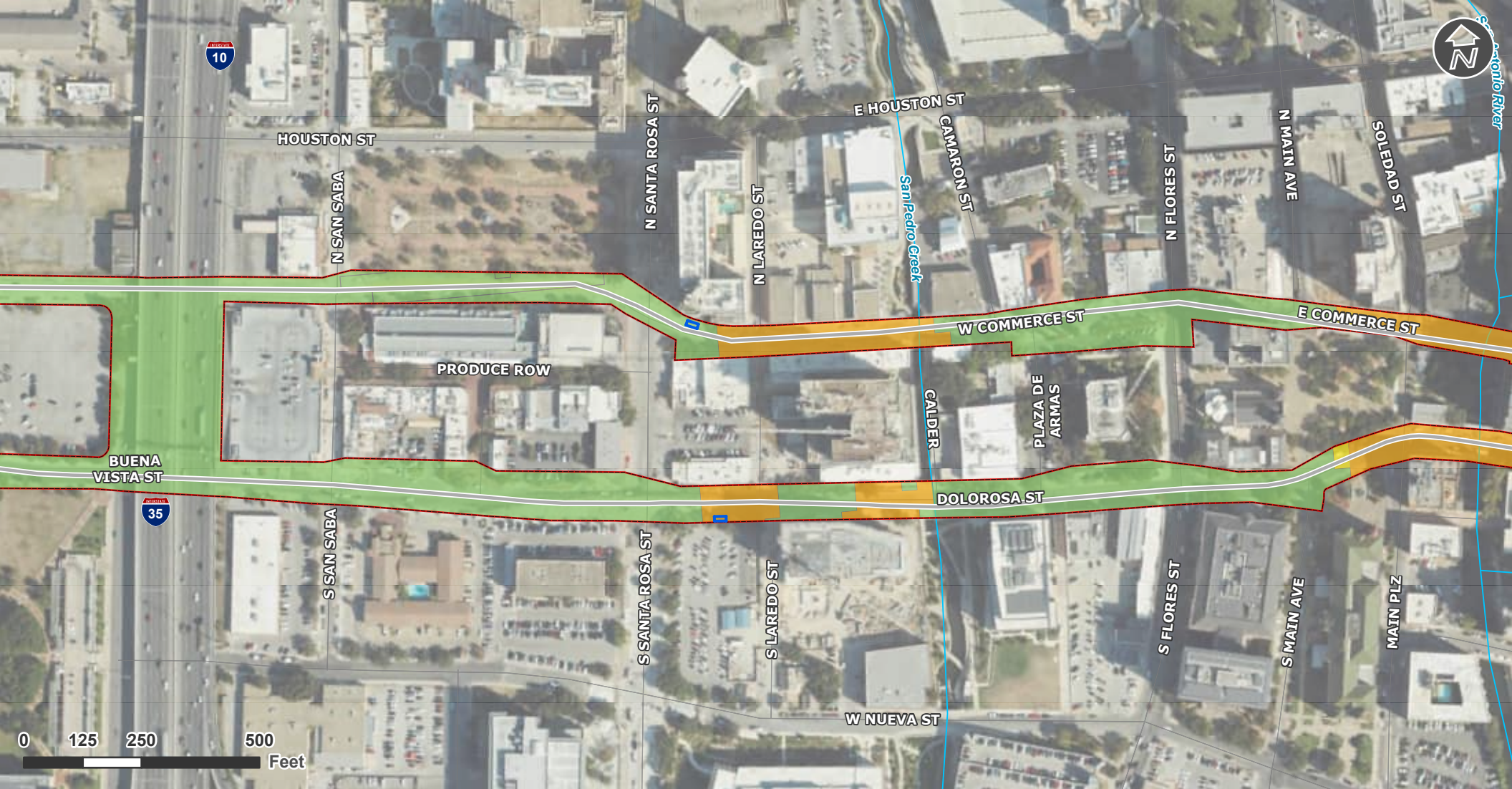
0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep  
Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 7 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

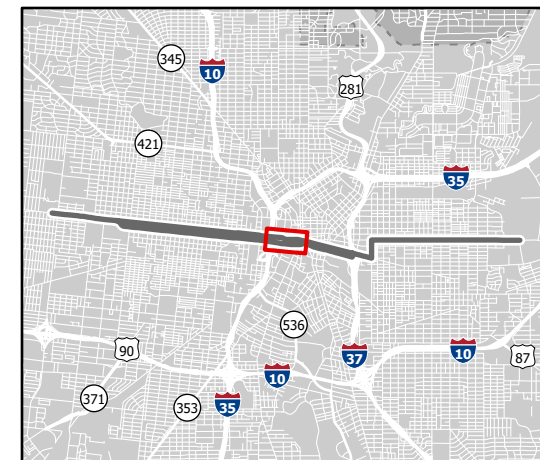
Road

#### TxDOT PALM

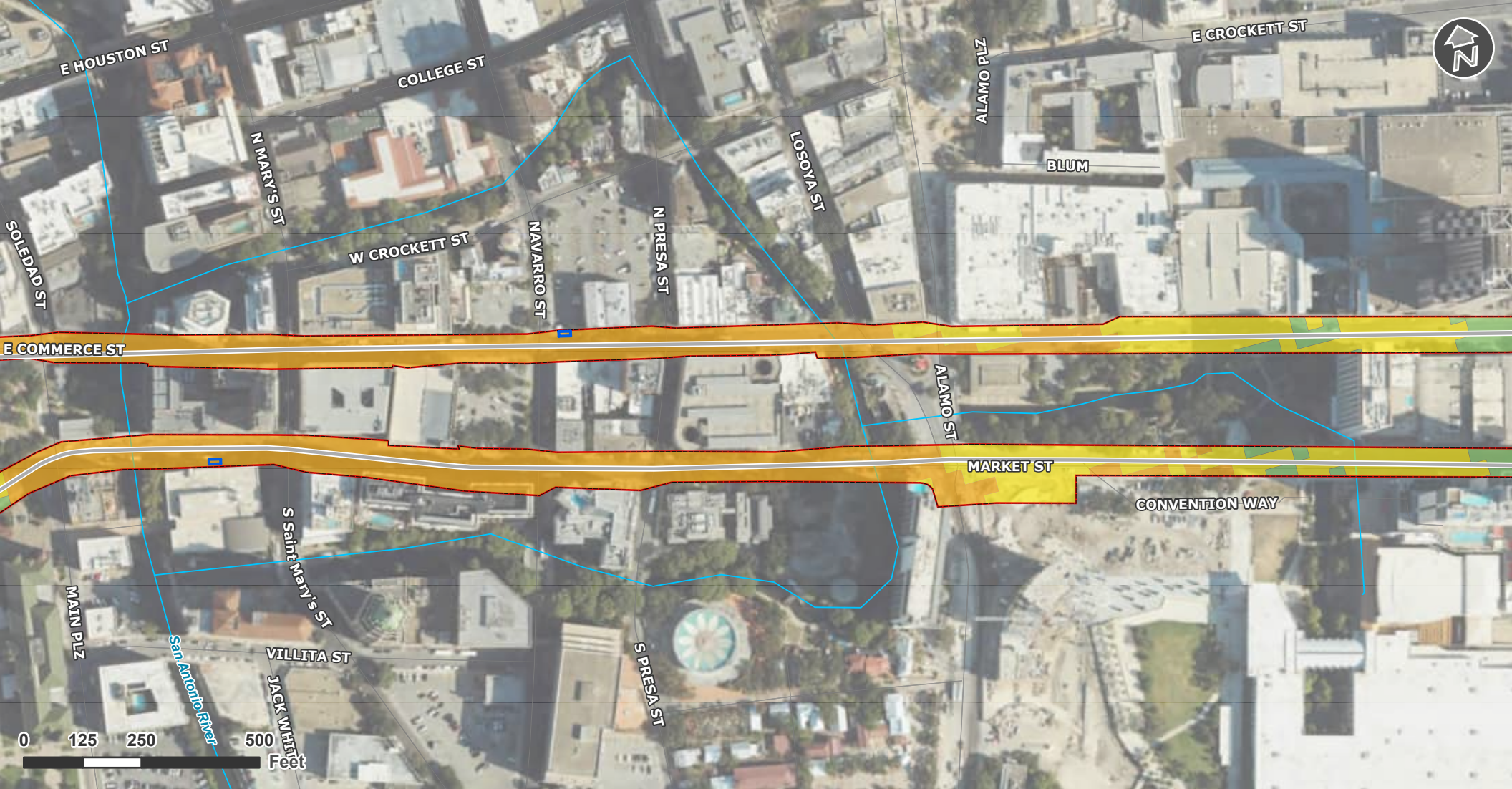
0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep  
Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 8 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

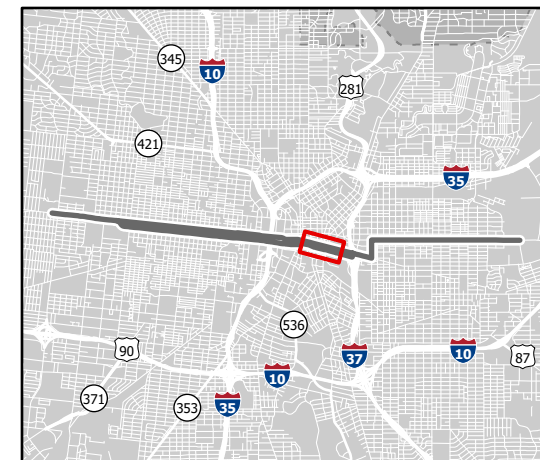
Road

#### TxDOT PALM

0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep  
Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 9 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

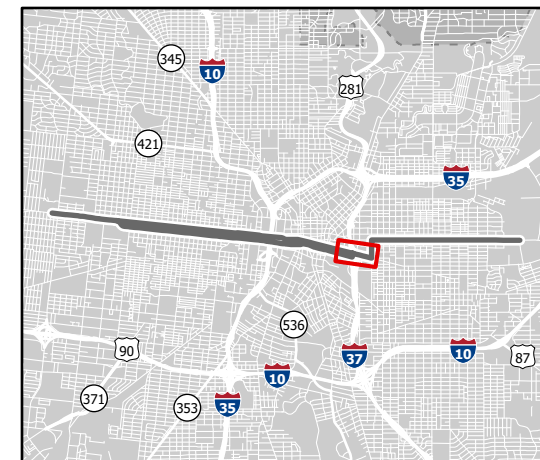
Road

#### TxDOT PALM

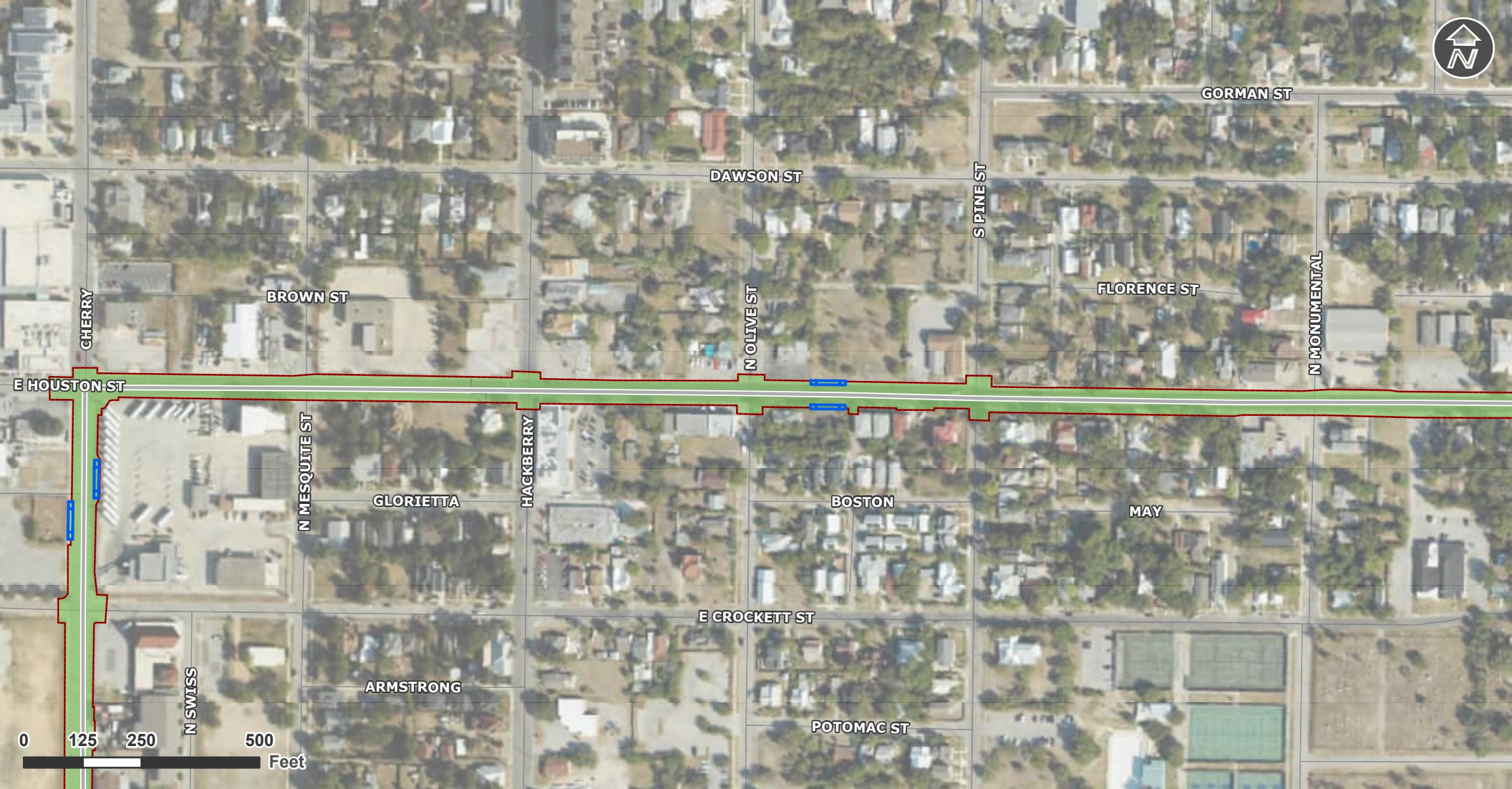
0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep  
Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 10 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

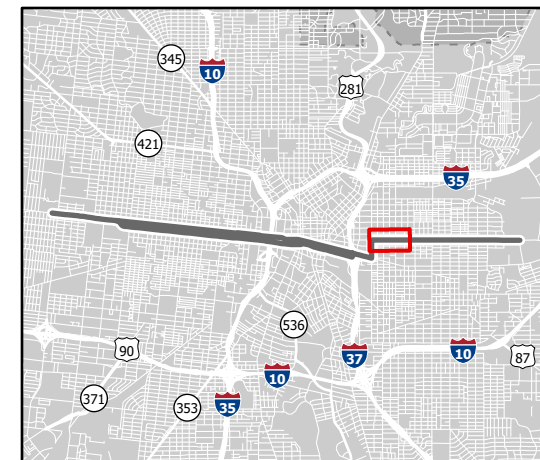
Road

#### TxDOT PALM

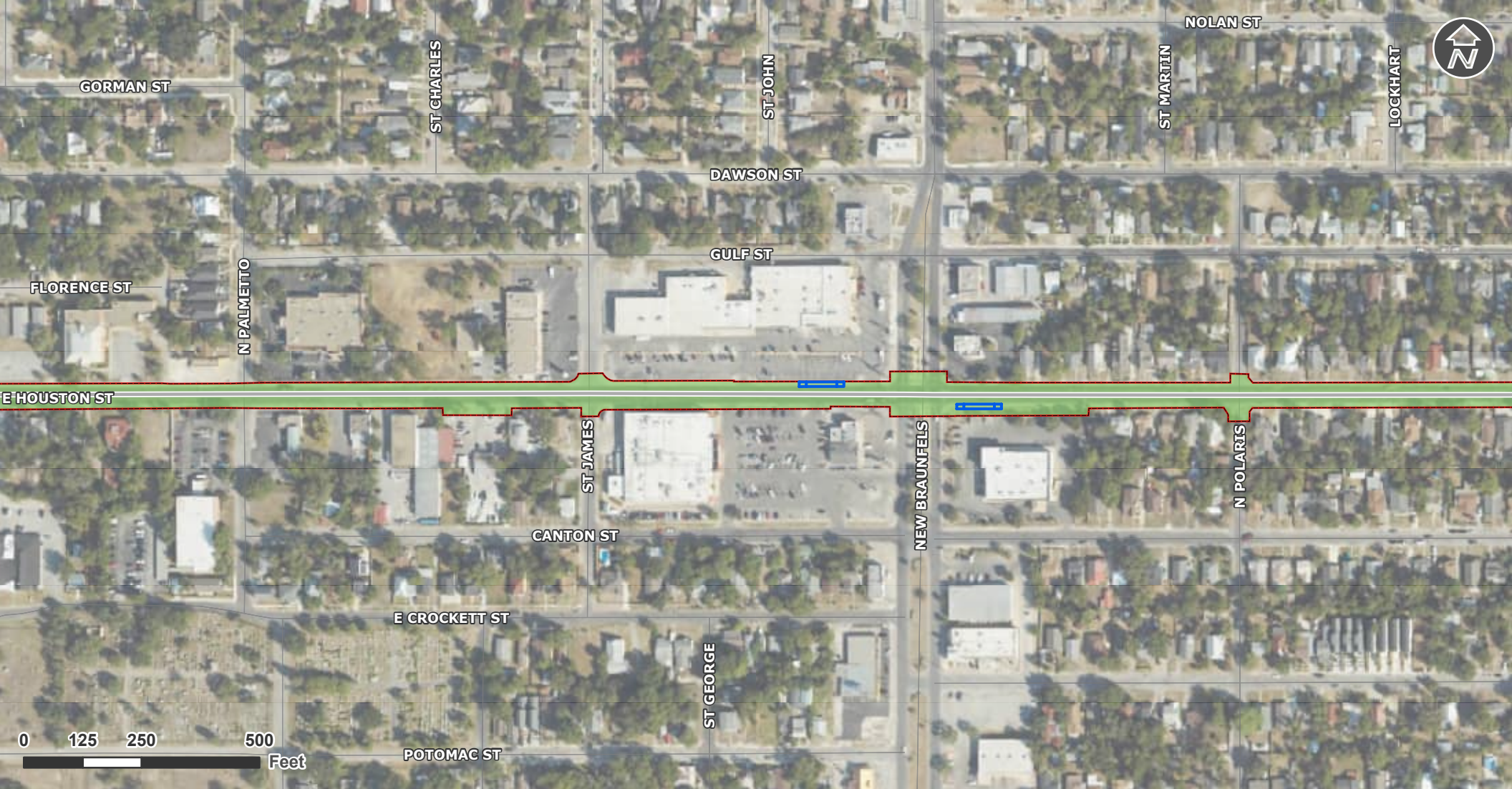
0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep  
Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 11 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

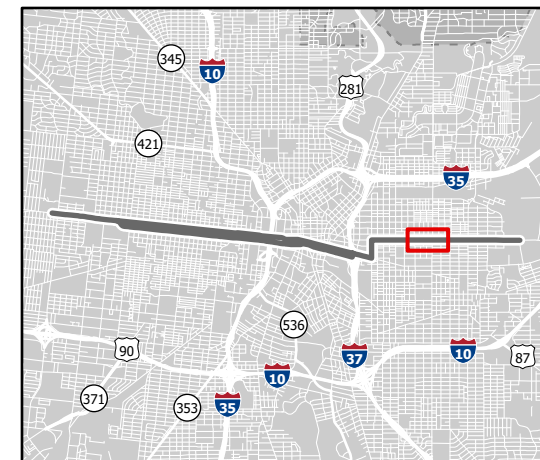
Road

#### TxDOT PALM

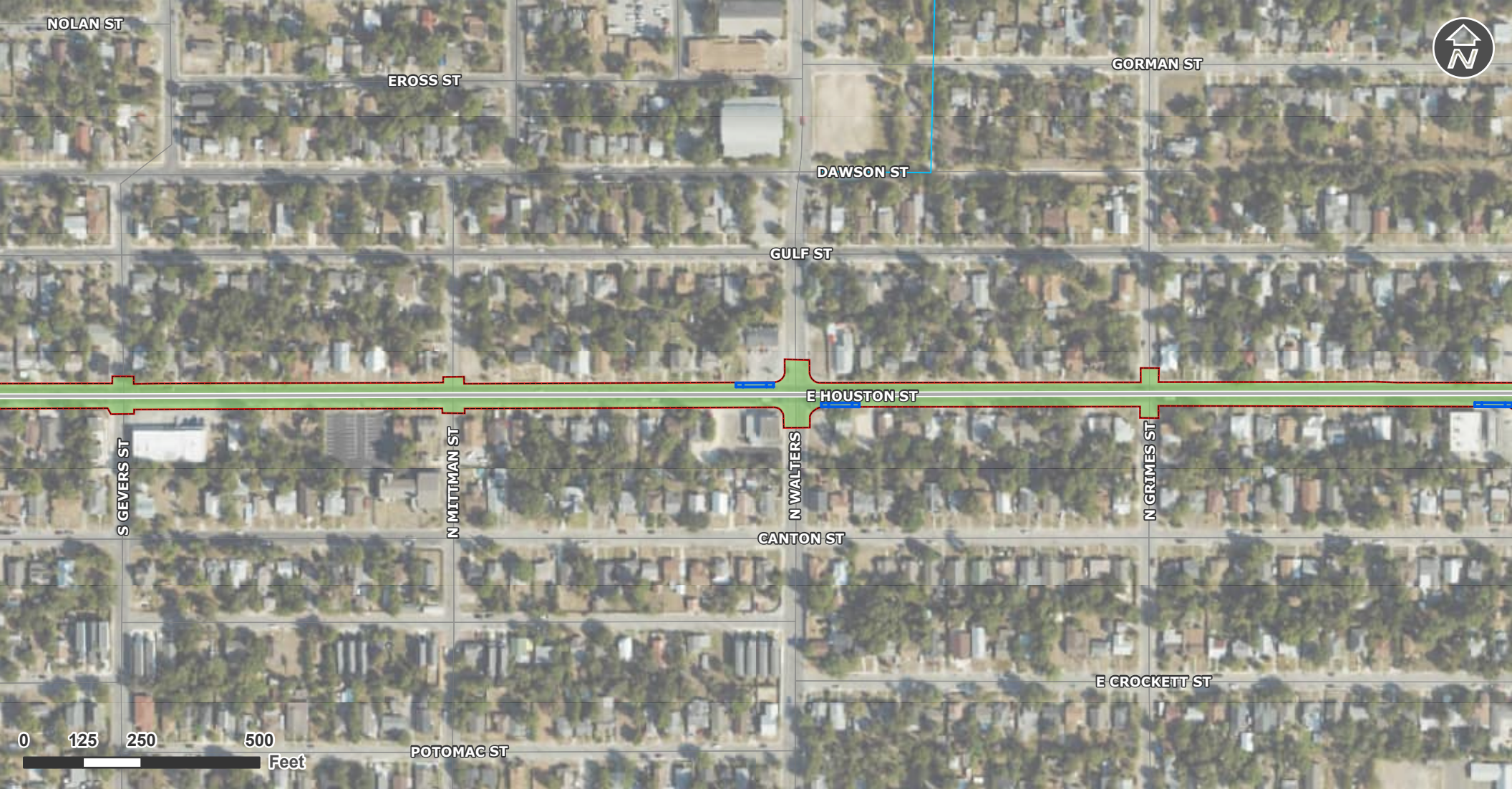
0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep  
Potential







## VIA ART East/West Corridor Project

### TxDOT Potential Archaeological Liability Maps (PALM) Areas within the Project

Page 12 of 13

ART East/West Alignment

Project Area of Potential Effect (APE)

Proposed Stations

Stream

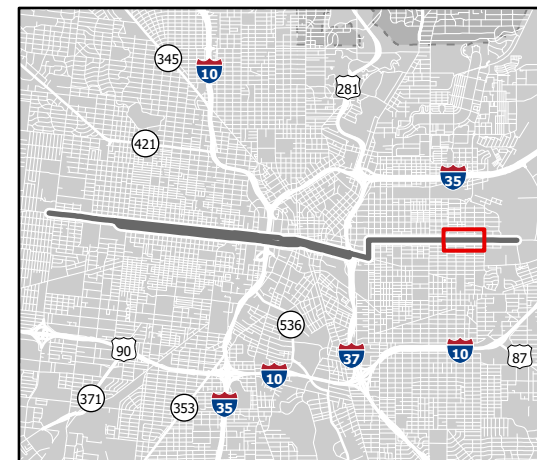
Road

#### TxDOT PALM

0-4: Negligible Potential to Moderate  
Shallow Potential, Low Deep Potential

5: Moderate Potential

6: Moderate Shallow Potential, High Deep  
Potential









---

## Appendix H: Archaeological Resources Within 1-Kilometer Buffer of the Project

Archaeological Sites Within 1-Kilometer Buffer Surrounding the Project

Previously Conducted Archaeological Surveys Within 1-Kilometer Buffer Surrounding the Project

Identified Cemeteries Within the 1-Kilometer Buffer Surrounding the Project

Freedom Colonies Within the 1-kilometer Buffer Surrounding the Project

### Archaeological Sites Within 1-Kilometer Buffer Surrounding the Project

Site #	Site Type	Cultural Affiliation	NRHP Status
41BX5	(information not available)	(information not available)	(information not available)
41BX6	Spanish Mission	Spanish colonial to mid-19th century	Listed
41BX7	Multicomponent	Precontact and 18th to 20th century	Not assessed
41BX79	Structure	Spanish Colonial	Eligible
41BX179	Structure	Spanish Colonial	Eligible
41BX236	Occupation	Mid to late 19th century	Not assessed
41BX302	Multicomponent	Mid-19th century	Eligible
41BX304	Occupation	Mid to late 19th century	Not assessed
41BX326	Occupation	Early 20th century	Not assessed
41BX329	Occupation	19th century	Not assessed
41BX334	Occupation	Late 19th century	Eligible
41BX335	Occupation	Mid-19th century	Eligible
41BX336	Occupation	Mid-19th to early 20th century	Not assessed
41BX342	Mill	Historic	Not assessed
41BX369	Occupation	Mid to late 19th century	Not assessed
41BX436	Occupation	Historic	Not assessed
41BX437	Multicomponent	Archaic and Historic ice factory	Not assessed
41BX438	Multicomponent	Precontact and early 18th to late 19th century	Potentially eligible
41BX483	Cistern	Historic	Not assessed
41BX507	Occupation	Historic	Listed
41BX508	Industrial	Mid-19th to mid-20th century	Eligible
41BX511	Occupation	Historic	Ineligible
41BX514	(information not available)	(information not available)	(information not available)
41BX572	House	Mid to late 19th century	Not assessed
41BX573	House	Mid-19th to mid-20th century	Not assessed
41BX574	House	Late 19th to early 20th century	Not assessed
41BX575	House	Early to late 19th century	Not assessed
41BX576	House	19th century	Not assessed
41BX577	House	19th century	Not assessed

Site #	Site Type	Cultural Affiliation	NRHP Status
41BX578	House	Late 19th century	Not assessed
41BX579	House	Late 19th century	Not assessed
41BX580	House	Late 19th century	Not assessed
41BX581	House	Mid to late 19th century	Not assessed
41BX582	House	19th century	Not assessed
41BX583	House	Mid to late 19th century	Not assessed
41BX584	House	19th century	Not assessed
41BX585	House	19th century	Not assessed
41BX586	House	Late 19th century	Not assessed
41BX587	House	Late 19th century	Not assessed
41BX588	House	Early 20th century	Not assessed
41BX590	House	Late 19th century	Not assessed
41BX600	Lithic Scatter	precontact	Ineligible
41BX602	Commercial	Early 20th century	Not assessed
41BX603	House	Historic	Listed
41BX604	House	Mid to late 19th century	Listed
41BX605	Commercial/Occupation	Late 19th to early 20th century	Listed
41BX606	Commercial	Early 20th century	Not assessed
41BX607	Mill	Early 20th century	Listed
41BX608	Mill	Historic	Ineligible
41BX609	House	Early 20th century	Ineligible
41BX610	House	Historic	Eligible
41BX611	House	Mid to late 19th century	Eligible
41BX612	House	Mid to late 19th century	Not assessed
41BX613	House	Mid to late 19th century	Potentially eligible
41BX614	Commercial/Occupation	Early 20th century	Listed
41BX615	Commercial	Historic	Listed
41BX616	House	Late 19th century	Listed
41BX617	House/Farm	Early 20th century	Listed
41BX618	House	Mid-19th century	Listed
41BX619	Commercial	Mid-19th century	Listed



Site #	Site Type	Cultural Affiliation	NRHP Status
41BX620	Acequia (Irrigation Ditch)	Historic	Eligible
41BX647	House	Historic	Not assessed
41BX648	Commercial	Historic	Ineligible
41BX677	Earthworks	Precontact and mid-19th century	Potentially eligible
41BX786	Blacksmith	Late 19th to early 20th century	Not assessed
41BX795	Structure	Mid-18th to mid-20th century	Eligible
41BX829	Multicomponent	Middle Archaic to Late Archaic and Spanish Colonial to present	Potentially eligible
41BX881	House	late 19th to mid-20th century	Not assessed
41BX882	House	Late 19th to late 20th century	Ineligible
41BX883	House	Late 19th century	Ineligible
41BX884	Multicomponent	Precontact and late 19th century to present	Eligible
41BX885	House	Late 19th century to present	Ineligible
41BX890	Commercial	Late 19th to early 20th century	Ineligible
41BX891	Commercial/Occupation	20th century/mid-19th to early 20th century	Ineligible
41BX892	Commercial/Occupation	Mid to late 20th century/ mid-19th to mid-20th century	Ineligible
41BX893	Multicomponent	Precontact and late 19th to late 20th century	Ineligible
41BX894	House	Early to late 20th century	Ineligible
41BX895	Commercial	Late 19th to late 20th century	Ineligible
41BX896	House	Mid-19th century to present	Eligible
41BX898	House	Mid-19th century	Eligible
41BX899	House	Mid-19th century	Eligible
41BX900	Commercial/Occupation	Late 18th to early 20th century	Not assessed
41BX917	Multicomponent / Church	Precontact and 18th to early 19th Century	Eligible
41BX926	Occupation	Late 19th to early 20th century	Ineligible
41BX927	Commercial/Occupation	Late 19th to early 20th century	Not assessed
41BX928	Industrial/Occupation	Late 19th to early 20th century	Not assessed
41BX929	Industrial/Occupation	Late 19th to early 20th century	Not assessed
41BX930	Occupation	Late 19th to early 20th century	Not assessed
41BX931	Occupation	Late 19th to early 20th century	Not assessed
41BX932	House	Late 19th century to present	Not assessed

Site #	Site Type	Cultural Affiliation	NRHP Status
41BX936	Occupation	Early 20th century	Not assessed
41BX937	Occupation	Late 19th to early 20th century	Not assessed
41BX938	Occupation	Late 19th to early 20th century	Not assessed
41BX941	House	20th century	Not assessed
41BX942	House	20th century	Not assessed
41BX944	Occupation	20th century	Not assessed
41BX945	House	Late 19th to early 20th century	Eligible
41BX955	Industrial/Occupation	Late 19th to early 20th century	Not assessed
41BX956	Occupation	Late 19th to early 20th century	Not assessed
41BX957	Occupation	Late 19th to early 20th century	Not assessed
41BX982	Occupation	Mid to late 19th century	Not assessed
41BX983	Warehouse	late 19th to mid-20th century	Not assessed
41BX984	Occupation	Late 19th early 20th century	Not assessed
41BX992	Cemetery	Mid to late 19th century	Not assessed
41BX1274	monument/occupation	Mid-19th century to present	Undetermined
41BX1299	Occupation	Historic	Ineligible
41BX1369	Mill	Mid-19th to early 20th century	Ineligible
41BX1370	Historic midden	Mid to late 19th century	Ineligible
41BX1476	Multicomponent	Precontact and mid to late 20th century	Ineligible
41BX1598	Occupation/Orphanage	18th to 19th century	Not assessed
41BX1752	Fort/battlefield	French and Spanish colonial to Republic period	Eligible
41BX1753	Occupation	French and Spanish colonial to middle statehood	Eligible
41BX1775	Historic	Late 19th early 20th century	Not assessed
41BX1894	Well	Historic	Ineligible
41BX1952	Occupation	Mid-19th century to present	Not assessed
41BX1967	Occupation/Privy	Late 19th early 20th century	Eligible/Excavated and destroyed
41BX1968	Occupation	Post contact Native American/Spanish colonial to mid-19th century	Not assessed



Site #	Site Type	Cultural Affiliation	NRHP Status
41BX2023	Engineered feature/structure/School	Mid to late 19th century	Ineligible
41BX2024	Engineered feature/structure	Mid to late 19th century	Ineligible
41BX2025	Midden	Mid to late 19th century	Ineligible
41BX2026	Midden	Mid to late 19th century	Ineligible
41BX2027	Engineered feature/structure	Mid to late 19th century	Ineligible
41BX2028	Engineered feature/structure	Mid to late 19th century	Ineligible
41BX2029	Midden	Mid to late 19th century	Ineligible
41BX2030	Engineered feature/structure	Mid to late 19th century	Ineligible
41BX2031	Engineered feature/structure	Mid to late 19th century	Ineligible
41BX2032	Midden	Mid to late 19th century	Ineligible
41BX2033	Engineered feature/structure	Mid to late 19th century	Ineligible
41BX2034	Engineered feature/structure	Mid to late 19th century	Ineligible
41BX2035	Well	Mid to late 19th century	Ineligible
41BX2050	Engineered feature/structure	late 19th century	Ineligible
41BX2051	Engineered feature/structure	late 19th century	Ineligible
41BX2068	Midden	Mid to late 19th century	Ineligible
41BX2088	Occupation	precontact to late statehood	Listed
41BX2108	Occupation	Late 19th century	Ineligible
41BX2194	Engineered feature/structure	late 19th century	Ineligible
41BX2195	Engineered feature/structure	Early 20th century	Ineligible
41BX2196	Engineered feature/structure	Early 20th century	Ineligible

Site #	Site Type	Cultural Affiliation	NRHP Status
41BX2197	Engineered feature/structure	Modern (1901 to present)	Undetermined
41BX2231	Occupation	Early to mid-20th century	Ineligible
41BX2247	Structure	Late 19th to early 20th century	Ineligible
41BX2248	Structure	Late 19th to early 20th century	Ineligible
41BX2265	Engineered feature/structure	Mid to late 19th century	Not assessed
41BX2320	Engineered feature/structure	late 19th century to present	Ineligible
41BX2345	Engineered feature/structure/acequia	Historic	Undetermined
41BX2346	Engineered feature/structure	Historic	Ineligible
41BX2354	Engineered feature/structure/ruin	Spanish colonial to 19th century	Ineligible
41BX2356	Engineered feature/structure	Mid-19th century to present	Ineligible
41BX2361	Engineered feature/structure	Modern (1901 to present)	Ineligible
41BX2363	Occupation	Historic	Ineligible
41BX2401	Engineered feature/structure	Mid-19th century to present	Not assessed
41BX2419	Engineered feature/structure	Mid-19th century to present	Undetermined
41BX2420	Engineered feature/structure	Late 19th century	Undetermined
41BX2423	Engineered feature/structure	Historic	Ineligible
41BX2463	Occupation	Mid to late 19th century	Undetermined
41BX2474	Structure	18th to 20th century	Not assessed
41BX2475	Historic scatter	Historic	Ineligible
41BX2478	Historic Scatter	Historic	Ineligible
41BX2534	Engineered feature/structure	Mid-20th century	Ineligible
41BX2581	Burials and historic scatter	Historic	Not assessed

Site #	Site Type	Cultural Affiliation	NRHP Status
41BX2633	Engineered feature/structure	Mid-19th to mid-20th century	Ineligible

Source: THC, 2025

**Previously Conducted Archaeological Surveys Within 1-Kilometer Buffer Surrounding the Project**

<b>Atlas #</b>	<b>Author(s)</b>	<b>TAC Permit</b>
8500000064	Unavailable	N/A
8500000207	Unavailable	N/A
8500000288	Unavailable	N/A
8500000290	Fox, Anne A.	1744
8500000318	Unavailable	N/A
8500000319	Unavailable	N/A
8500000328	Unavailable	N/A
8500000329	Unavailable	N/A
8500002993	Unavailable	N/A
8500002994	Unavailable	N/A
8500002995	Unavailable	N/A
8500002996	Unavailable	N/A
8500002997	Unavailable	N/A
8500003004	Cox, I. Wayne	657
8500003005	Unavailable	N/A
8500003006	Unavailable	N/A
8500003007	Unavailable	N/A
8500003008	Unavailable	N/A
8500003009	Unavailable	N/A
8500003010	Unavailable	N/A
8500003011	Unavailable	N/A
8500003012	Fox, Anne A.	759
8500003015	Tennis, Cynthia L. and Barbara A. Winkler	1177
8500003016	Unavailable	N/A
8500003017	Unavailable	704
8500003018	Labadie, Joseph H.	607
8500003021	Labadie, J. with K. Brown, A. Fox, et. al	480

Atlas #	Author(s)	TAC Permit
8500003022	McCulloch, Samuel D. and Melissa W. Voellinger	1098
8500003023	James, Stephen R	932
8500003036	Unavailable	N/A
8500003040	Unavailable	N/A
8500003041	Unavailable	N/A
8500003044	Unavailable	N/A
8500003045	Unavailable	N/A
8500003052	Kegley, George B.	468
8500003053	Unavailable	110
8500003055	Unavailable	N/A
8500003058	Unavailable	N/A
8500009589	Unavailable	1503
8500009857	Unavailable	219
8500010441	Unavailable	2349
8500010714	Unavailable	2649
8500010803	Unavailable	N/A
8500012357	Anthony, Dana, and David O. Brown	3072
8500013498	Weston, Jason D.	2917
8500013850	Hester, Eaton, and Hard	433
8500013854	Unavailable	N/A
8500013858	Cox, I. Wayne	606
8500014061	Leutenegger, Benedict	N/A
8500014070	Fox, Daniel, Dan Scurlock and John Clark	N/A
8500015099	Tomka, S.A., A. Fox, A. Figueroa, J. Thompson	1033
8500015225	Figueroa, Antonia	4853
8500015562	Feit, Rachel	5067
8500016281	Held, Pollyanna, Chris Murray	5031
8500017431	Ulrich, Kristi M.	5486

Atlas #	Author(s)	TAC Permit
8500017811	Hanson, Casey & Brandy Harris	4886
8500017825	Peyton, Abigail	5668
8500018322	DiVito, Nathan, and Kristi Ulrich	5620
8500018679	Katauskas, Stephanie L. et. al.	5485
8500019365	Galindo, Mary Jo, et. al.	5604
8500019794	Figueroa, Antonia L.	4853
8500019805	Thompson, Jennifer	5952
8500020000	Shafer, Harry J., Thomas R. Hester	6026
8500020242	Iruegas, Sergio, Melinda Tate-Iruegas	5989
8500020746	Galindo, Mary Jo	6046
8500022090	Dase, Amy E.; Griffith, Timothy B.	N/A
8500025277	Dickey, Cynthia M., et al.	5859
8500025608	Fields, Ross, and Jennifer K. McWilliams	N/A
8500025667	Clark, Pollyanna, Chris Murray, Sally Victor	6367
8500030547	Lawrence, Ken, Mary Jo Galindo	6491
8500034956	Clark, Pollyanna, Chris Murray	6517
8500038963	Acuna, Laura I., Mary Jo Galindo	6403
8500044564	Tomka, Steve A., et al.	5843
8500053003	Iruegas, Sergio A., Melinda Tate-Iruegas	6669
8500053005	Nichols, Melanie	6613
8500058321	Green, Melissa M. et al.	6248
8500058336	Beecher, Preston and Antonia Figueroa	6781
8500058369	Sloan, Katie A.	6837
8500060012	Stotts, Matthew and Laura Acuna	N/A
8500060043	Nichols, Kristi	6534
8500061382	Mauldin, Raymond	6738
8500061391	Cody, Mercedes and Mary Jo Galindo	6596



Atlas #	Author(s)	TAC Permit
8500061809	Stotts, Matthew C., et al.	6645
8500062598	Acuna, Laura and Mary Jo Galindo	6249
8500062599	Haefner, Josh	6881
8500062601	Haefner, Josh, et al.	6915
8500062603	McKenzie, Clinton M.	6999
8500065918	Galindo, Mary Jo and Michael Smith	7058
8500068402	Fields, Ross C., Aaron R. Norment, and Amy E. Dase	6846
8500076660	McKenzie, Clinton et al.	6526
8500076717	Hamilton, Joshua and Melanie Nichols	7444
8500079868	Figueroa, Antonia L. and Jason B. Perez	7065
8500079870	Acuna, Laura	6851
8500080136	Figueroa, Antonia L.	6779
8500080226	Zapata, Jose E.	7428
8500080248	Fox, Anne A.	N/A
8500080344	Galindo, Mary Jo, et al.	7511
8500080345	Yelacic, David M.	7048
8500080424	Osburn, Tiffany	7485
8500080498	Yelacic, David	7203
8500080535	Figueroa, Antonia L.	7906
8500080549	Nichols, Kristi Miller	7299
8500080600	Moore, Virginia A.	8295
8500080601	Anderson, Nesta J. et al.	7692
8500080602	Nichols, Krisit Miller and Steve Tomka	7692
8500080609	Ward, Rhiana D. et al.	7541
8500080725	Matthews, Chris; Steve A. Tomka. and Rhiana D. Ward	8416
8500080744	Thomas, Andrea, Clinton McKenzie, and Jose Zapata	8141

Atlas #	Author(s)	TAC Permit
8500080748	Moore, Virginia and Mary Jo Galindo	8294
8500080820	Zapata, Jose E.	7852
8500080831	Ahr, Steven; Jake Reid	6507
8500080832	Zapata, José E.	8335
8500080836	Nichols, K.M., S.A. Tomka, M.P. Luzmoor, A. Jones	7813
8500080837	Thomas, Andrea and Clinton McKenzie	7913
8500080837	Thomas, Andrea and Clinton McKenzie	7913
8500080838	Griffith, T., J.M. Sanchez, R. Lapham, A. Reynold,	6411
8500080839	Iruegas, Sergio A. and Melinda Tate Iruegas	5989
8500080854	Acuna, Laura	6851
8500080857	Figueroa, Antonia L., and Jose Zapata	7893
8500080943	Stacy, Cathy A., A. Figueroa, and J. Bloom	5786
8500081121	Matthews, Chris, Jason M. Whitaker, and Kristi M.	8579
8500081212	Luzmoor, Mark P.	7664
8500081230	Zapata, José E.	N/A
8500081361	Anderson, Nesta J.; Jacob I. Sullivan	8010
8500081394	Fred Valdez, Jr. et al	N/A
8500081442	Wigley, Sarah	8848
8500081443	Zapata, José E.	8710
8500081446	Yelacic, David M.	7859
8500081449	Nichols, Melanie, M. Sc. and Nesta Anderson, PhD	8698
8500081453	Zapata, José E. et al	7118
8500081454	Rhiana Ward	8631

Atlas #	Author(s)	TAC Permit
8500081460	Wigley, Sarah	8563
8500081562	Kemp, Leonard	8726
8500081702	Sophia Salgado et al	7961
8500081708	Unavailable	7961
8500081721	Chris Matthews and Lindy Martinez	9209
8500081746	A. Thomas, C. McKenzie	7913
8500081751	Unavailable	N/A
8500081932	Matthews, Chris	9366
8500081974	Atwood, Kirsten M. and Chris Matthews	8981
8500082007	Zapata, Jose E.	7612
8500000064	Unavailable	N/A
8500000207	Unavailable	N/A
8500000288	Unavailable	N/A
8500000290	Fox, Anne A.	1744
8500000318	Unavailable	N/A
8500000319	Unavailable	N/A
8500000328	Unavailable	N/A
8500000329	Unavailable	N/A
8500002993	Unavailable	N/A
8500002994	Unavailable	N/A
8500002995	Unavailable	N/A
8500002996	Unavailable	N/A
8500002997	Unavailable	N/A
8500003004	Cox, I. Wayne	657
8500003005	Unavailable	N/A
8500003006	Unavailable	N/A
8500003007	Unavailable	N/A
8500003008	Unavailable	N/A
8500003009	Unavailable	N/A
8500003010	Unavailable	N/A
8500003011	Unavailable	N/A

Atlas #	Author(s)	TAC Permit
8500003012	Fox, Anne A.	759
8500003015	Tennis, Cynthia L. and Barbara A. Winkler	1177
8500003016	Unavailable	N/A
8500003017	Unavailable	704
8500003018	Labadie, Joseph H.	607
8500003021	Labadie, J. with K. Brown, A. Fox, etc	480
8500003022	McCulloch, Samuel D. and Melissa W. Voellinger	1098
8500003023	James, Stephen R	932
8500003036	Unavailable	N/A
8500003040	Unavailable	N/A
8500003041	Unavailable	N/A
8500003044	Unavailable	N/A
8500003045	Unavailable	N/A
8500003052	Kegley, George B.	468
8500003053	Unavailable	110
8500003055	Unavailable	N/A
8500003058	Unavailable	N/A
8500009589	Unavailable	1503
8500009857	Unavailable	219
8500010441	Unavailable	2349
8500010714	Unavailable	2649
8500010803	Unavailable	N/A
8500012357	Anthony, Dana, and David O. Brown	3072
8500013498	Weston, Jason D.	2917
8500013850	Hester, Eaton, and Hard	433
8500013854	Unavailable	N/A
8500013858	Cox, I. Wayne	606
8500014061	Leutenegger, Benedict	N/A

Atlas #	Author(s)	TAC Permit
8500014070	Fox, Daniel, Dan Scurlock and John Clark	N/A
8500015099	Tomka, S.A., A. Fox, A. Figueroa, J. Thompson	1033
8500015225	Figueroa, Antonia	4853
8500015562	Feit, Rachel	5067
8500016281	Held, Pollyanna, Chris Murray	5031
8500017431	Ulrich, Kristi M.	5486
8500017811	Hanson, Casey & Brandy Harris	4886
8500017825	Peyton, Abigail	5668
8500018322	DiVito, Nathan, and Kristi Ulrich	5620
8500018679	Katauskas, Stephanie L. et. al.	5485
8500019365	Galindo, Mary Jo, et. al.	5604
8500019794	Figueroa, Antonia L.	4853
8500019805	Thompson, Jennifer	5952
8500020000	Shafer, Harry J., Thomas R. Hester	6026
8500020242	Iruegas, Sergio, Melinda Tate-Iruegas	5989
8500020746	Galindo, Mary Jo	6046
8500022090	Dase, Amy E.; Griffith, Timothy B.	N/A
8500025277	Dickey, Cynthia M., et al.	5859
8500025608	Fields, Ross, and Jennifer K. McWilliams	N/A
8500025667	Clark, Pollyanna, Chris Murray, Sally Victor	6367
8500030547	Lawrence, Ken, Mary Jo Galindo	6491
8500034956	Clark, Pollyanna, Chris Murray	6517
8500038963	Acuna, Laura I., Mary Jo Galindo	6403
8500044564	Tomka, Steve A., et al.	5843
8500053003	Iruegas, Sergio A., Melinda Tate-Iruegas	6669
8500053005	Nichols, Melanie	6613
8500058321	Green, Melissa M. et al.	6248

Atlas #	Author(s)	TAC Permit
8500058336	Beecher, Preston and Antonia Figueroa	6781
8500058369	Sloan, Katie A.	6837
8500060012	Stotts, Matthew and Laura Acuna	N/A
8500060043	Nichols, Kristi	6534
8500061382	Mauldin, Raymond	6738
8500061391	Cody, Mercedes and Mary Jo Galindo	6596
8500061809	Stotts, Matthew C., et al.	6645
8500062598	Acuna, Laura and Mary Jo Galindo	6249
8500062599	Haefner, Josh	6881
8500062601	Haefner, Josh, et al.	6915
8500062603	McKenzie, Clinton M.	6999
8500065918	Galindo, Mary Jo and Michael Smith	7058
8500068402	Fields, Ross C., Aaron R. Norment, and Amy E. Dase	6846
8500076660	McKenzie, Clinton et al.	6526
8500076717	Hamilton, Joshua and Melanie Nichols	7444
8500079868	Figueroa, Antonia L. and Jason B. Perez	7065
8500079870	Acuna, Laura	6851
8500080136	Figueroa, Antonia L.	6779
8500080226	Zapata, Jose E.	7428
8500080248	Fox, Anne A.	N/A
8500080344	Galindo, Mary Jo, et al.	7511
8500080345	Yelacic, David M.	7048
8500080424	Osburn, Tiffany	7485
8500080498	Yelacic, David	7203
8500080535	Figueroa, Antonia L.	7906
8500080549	Nichols, Kristi Miller	7299
8500080600	Moore, Virginia A.	8295
8500080601	Anderson, Nesta J. et al.	7692



Atlas #	Author(s)	TAC Permit
8500080602	Nichols, Krisit Miller and Steve Tomka	7692
8500080609	Ward, Rhiana D. et al.	7541
8500080725	Matthews, Chris; Steve A. Tomka. and Rhiana D.Ward	8416
8500080744	Thomas, Andrea, Clinton McKenzie, and Jose Zapata	8141
8500080748	Moore, Virginia and Mary Jo Galindo	8294
8500080820	Zapata, Jose E.	7852
8500080831	Ahr, Steven; Jake Reid	6507
8500080832	Zapata, José E.	8335
8500080836	Nichols, K.M., S.A. Tomka, M.P. Luzmoor, A. Jones	7813
8500080837	Thomas, Andrea and Clinton McKenzie	7913
8500080837	Thomas, Andrea and Clinton McKenzie	7913
8500080838	Griffith, T., J.M. Sanchez, R. Lapham, A. Reynold,	6411
8500080839	Iruegas, Sergio A. and Melinda Tate Iruegas	5989
8500080854	Acuna, Laura	6851
8500080857	Figueroa, Antonia L., and Jose Zapata	7893
8500080943	Stacy, Cathy A., A. Figueroa, and J. Bloom	5786
8500081121	Matthews, Chris, Jason M. Whitaker, and Kristi M.	8579
8500081212	Luzmoor, Mark P.	7664
8500081230	Zapata, José E.	N/A
8500081361	Anderson, Nesta J.; Jacob I. Sullivan	8010
8500081394	Fred Valdez, Jr. et al	N/A
8500081442	Wigley, Sarah	8848

Atlas #	Author(s)	TAC Permit
8500081443	Zapata, José E.	8710
8500081446	Yelacic, David M.	7859
8500081449	Nichols, Melanie, M. Sc. and Nesta Anderson, PhD	8698
8500081453	Zapata, José E. et al	7118
8500081454	Rhiana Ward	8631
8500081460	Wigley, Sarah	8563
8500081562	Kemp, Leonard	8726
8500081702	Sophia Salgado et al	7961
8500081708	Unavailable	7961
8500081721	Chris Matthews and Lindy Martinez	9209
8500081746	A. Thomas, C. McKenzie	7913
8500081751	Unavailable	N/A
8500081932	Matthews, Chris	9366
8500081974	Atwood, Kirsten M. and Chris Matthews	8981
8500082007	Zapata, Jose E.	7612

Source: THC, 2025

### Identified Cemeteries Within the 1-Kilometer Buffer Surrounding the Project

Cemetery #	Cemetery Name	Year	Number of Interments
BX-C027	Dignowity/Unknown	Unknown	Unknown
BX-C058	Our Lady of the Lake Convent	Unknown	Unknown
BX-C145	Temple Beth-El	1885-	Unknown
BX-C146	Agudas Achim Palmetto	1885-	Unknown
BX-C147	St. Joseph's Catholic	Unknown	Unknown
BX-C148	City Cemetery No. 5	Unknown	Unknown
BX-C149	Dullnig Family	Unknown	34 Known
BX-C150	St. Michael's Catholic	Unknown	Unknown
BX-C151	Harmonia Lodge No. 1	Unknown	Unknown
BX-C152	Nat Lewis Plot and Mausoleum	Unknown	Unknown
BX-C153	Odd Fellows	Unknown	Unknown
BX-C154	Alamo Masonic Lodge	Unknown	Unknown
BX-C155	City Cemetery No. 1	Unknown	Unknown
BX-C156	City Cemetery No. 2	Unknown	Unknown
BX-C157	Anchor Masonic	Unknown	Unknown
BX-C158	St. Elmo Lodge No. 25	Unknown	Unknown
BX-C159	City Cemetery No. 3	Unknown	Unknown
BX-C160	St. Peter Claver Catholic	Unknown	Unknown
BX-C161	Knights of Pyhias	Unknown	Unknown
BX-C162	Beacon Light Masonic Lodge No. 50	Unknown	Unknown
BX-C163	United Brothers of Friendship	Unknown	Unknown
BX-C164	Grand United Order of Odd Fellows	Unknown	Unknown
BX-C165	San Antonio Lodge No. 1	Unknown	Unknown
BX-C166	St. Mary's	Unknown	Unknown
BX-C167	Hermann Sons Cemetery	1870-present	2,000 +
BX-C168	St. John Lutheran	Unknown	Unknown
BX-C170	St. Joseph's Society	Unknown	Unknown
BX-C171	City Cemetery No.4	Unknown	Unknown

Cemetery #	Cemetery Name	Year	Number of Interments
BX-C172	Confederate Cemetery	1868 to present	912 Known
BX-C173	City Cemetery No. 6	Unknown	Unknown
BX-C174	German Lutheran	Unknown	Unknown
BX-C175	San Antonio National	Unknown	Unknown
BX-C299	Cemetery on the Grounds of the Alamo	Unknown	Unknown
BX-C300	City/Milam Park	Unknown	Unknown
BX-C339	Vicinity Cemetery	Unknown	Unknown

Source: THC, 2025

#### Freedom Colonies Within the 1-kilometer Buffer Surrounding the Project

Name	Status	Date	Existing Structures
Ellis Alley Enclave (Black East Side)	Located FCs	1885	St. Paul Church
Ellis Alley (Ellis Alley Enclave)	Public Input-Mapping Tool	1885	-
Ellis Alley Enclave	Public Input- Storyteller Portal Survey	1885	-
Baptist Settlement	Located FCs	1871	Mount Zion First Baptist Church Youth Center/ Mount Zion Baptist Church, New Light Free Mission Baptist Church.
Baptist Settlement	Public Input-Mapping Tool	1871	City Plaque

Source: The Texas Freedom Colonies Atlas and Study, 2018

