



CONSTRUCTION MONITORING, MECHANICAL SCRAPING AND INADVERTENT DISCOVERY PLAN

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

August 2025
(Version 7)



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1. PROJECT DESCRIPTION

1.1 Project 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 extends 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. 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 would 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 meter) for platform slabs up to 22 feet (6.7 meters) for light poles and traffic signal masts.

However, in the downtown area, stations are planned within existing right-of-way (ROW) and with limited station amenities to minimize ground disturbance and construction impacts.

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 meter) to 4 feet (1.2 meters).

1.2 Archaeological Desktop Review

VIA conducted an archaeological desktop review for the Project, as documented in the *Advanced Rapid Transit (ART) EAST/WEST Corridor Project Archaeological Desktop Overview* (VIA 2025). The desktop review details known archaeological and cultural resources within the Project Area of Potential Effect (APE), which includes all areas that may be directly affected by the Project. Additionally, the desktop review included research on the environmental setting, Texas Archaeological Sites Atlas research, historic map research (topographic quadrangles and Sanborn Fire Insurance maps), and State and Federal mandated stakeholder considerations.

As a result of the archaeological desktop overview, VIA recommends 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

2. CONSTRUCTION MONITORING PLAN

2.1 Construction Monitoring Method

The Project is part of VIA's overall ART program, which also consists of the proposed VIA ART North/South Corridor project. A Construction Monitoring and Inadvertent Discoveries Plan for the VIA ART North/South Corridor project was completed and accepted by THC in 2023. In November 2024, FTA initiated the Section 106 consultation with THC for the V/A ART East/West Corridor Project (THC Tracking # 202503232). As part of the consultation, THC recommended developing a similar plan for the East/West Corridor Project. In response, the Construction Monitoring and Inadvertent Discoveries Plan for the VIA ART East/West Corridor

Project was developed using the same approach and structure as the previously approved North/South Corridor project plan.

Archaeological monitoring will be conducted in high probability areas, which will be determined in consultation with THC and COSA OHP once the full extent of ground disturbances is defined in the project plans. The high probability areas containing NRHP-eligible archeological deposits based on factors including, but not limited to, archeological deposits being previously found within the vicinity, located in high-probability areas as identified by locations where artifacts were previously recorded, locations with multiple overlapping features (e.g., historic districts, previous archeological projects, NRHP-listed districts and sites, etc.), areas known to have been occupied or developed during the Spanish colonial era, and portions of the project area that are very likely to incur construction impacts beyond the extent of modern development/disturbance.

In accordance with guidance from THC, which is the State Historic Preservation Office (SHPO), FTA, in coordination with VIA, proposes the following construction monitoring and plan for archeological discoveries for the Project:

- VIA, on behalf of FTA, will conduct construction monitoring for cultural resources under a valid and current Texas Antiquities permit.
- VIA will ensure that all construction monitoring is carried out by, or under the direct supervision of, persons meeting the Secretary of the Interior's Professional Qualifications Standards (36 Code of Federal Regulations [CFR] Part 61).
Initial excavations will be monitored at the in high-probability areas. Once the ground has been disturbed in a given area, no additional monitoring of construction activities (e.g., installation of poles, pouring of slab) will be required.
- If potentially diagnostic archeological materials, deposits, features, or sites (e.g., buried organic layers, in situ bricks or masonry, infilled pit outlines, identifiable/dateable ceramics, glass, lithics, coins) are observed in any monitoring location, excavation and construction activities near the finds will cease immediately while the finds are examined. Project archeological personnel may clean or stabilize exposures and/or excavate small, controlled test units (e.g., 50-by-50-centimeter or 1-by-1-meter blocks) to more fully characterize the finds. If the observed resource appears to be potentially significant, FTA, THC, and COSA OHP will be notified within 24 hours, and construction will not resume around the potential archeological find until authorized by FTA, THC and COSA OHP.

- For all archeological sites and cultural material observed and documented during the construction monitoring, FTA and VIA will apply National Register of Historic Places (NRHP) criteria in accordance with 36 CFR 800.4 and 36 CFR 60.4, considering applicable precontact and historic contexts, management plans, and previous projects in the area. If FTA and VIA recommend that any of the NRHP criteria are met for a given site, and the THC agrees, the site will be considered potentially eligible, eligible, or unassessed for the NRHP. If any archaeological site is recommended to be partially eligible or unassessed for the NRHP, additional formal archaeological work would be needed to assess the site for the NRHP. If FTA and VIA recommended that the NRHP criteria are not met, and the THC agrees, the site will be considered ineligible for the NRHP.
- As the Project will be implemented over an extended period, VIA will prepare reports on a quarterly basis describing work done to date and monitoring results within segments of the Project Area, with the size of the segments to be determined based on field observations and in consultation with the THC. These quarterly reports will be provided to FTA and the Project Management Oversight Contractor (PMOC) as part of their oversight of the Project. Quarterly reports will be distributed to THC and all consulting parties including Bexar County Historical Commission, COSA OHP, Conservation Society of San Antonio and project area neighborhood associations (see **Appendix B** for the **Consulting Parties List**) and made public on VIA's project website. Reports will ensure that shared data, including data concerning the precise location, historic properties, and properties of religious and cultural significance, are protected from public disclosure to the greatest extent permitted by law.
- Within one year of completing all monitoring and associated archeological investigations conducted under the same Texas Antiquities Permit, VIA will prepare a draft report for submittal to FTA and COSA OHP, and then to the THC for review. The review period will be 30 days from receipt of the document. FTA and VIA will fully consider THC comments before finalizing the report. Distribution of the final report will be like the quarterly reports.

2.2 Assessment of Effects, Treatment, and Mitigation

If any unanticipated archeological materials or deposits are found at any stage of construction, work will cease, and VIA will contact appropriate COSA OHP and the THC personnel within 24 hours. The area of work stoppage will be adequate to provide for the security, protection, and integrity of the archeological resource. At its discretion, pursuant to 36 CFR 800.13(c), FTA may

assume any unanticipated potential archeological resources uncovered during construction activities would be treated as potentially eligible for the NRHP or as a State Antiquities Landmark (SAL) until further research can be undertaken.

If one or more archeological resources uncovered during construction-phase excavations are determined to be eligible for the NRHP, and may be affected by the Project, VIA, in consultation with FTA, THC and/or COSA OHP, will make a reasonable effort to avoid effects through design modification or through other mitigative means. If avoidance is not feasible, mitigation efforts may be required.

If effects to one or more archeological resources encountered and evaluated pursuant to these stipulations cannot be avoided, FTA and VIA will apply the criteria of adverse effect in accordance with 36 CFR 800.5.

If the Project is found to have an adverse effect on an archeological resource, FTA, in consultation with VIA, THC, COSA OHP, and consulting parties, will notify the Advisory Council of Historic Preservation (ACHP) of the adverse effect and develop a treatment plan to resolve/mitigate the adverse effect. The plan will be submitted to the THC, consulting parties, and interested Native American Tribes, for review and comment, and will also be made available to the public for comment. The treatment plan may include controlled archeological excavations of stratified deposits, precision drawings of acequias or other features, educational signage and/or exhibits, and/or other mitigative measures to be determined in consultation with THC and consulting parties.

3. MECHANICAL SCRAPING PLAN

3.1 Historic Cemetery

A historic cemetery (BX-C339) was identified in the vicinity of the Project (see *ART EAST/WEST Corridor Project Archaeological Desktop Review Overview [VIA 2025]*).

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 (**Appendix C**) 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 24 and 28 inches. In July 2025, THC recommended scraping at this location for unmarked graves (**Appendix C**). In response to THC's recommendation, VIA, in coordination with FTA, plans to conduct archaeological scraping 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 a historic cemetery

Figure 1: Proposed Stations near Historic Cemetery

3.2 Mechanical Scraping Plan

In accordance with guidance from THC, VIA, in coordination with FTA, proposes the following scraping plan for unmarked graves near the proposed westbound Bowie Street Station on Commerce Street between Bowie and Elm Streets (Figure 1):

Pre-Excavation Planning and Permitting: As the Project is conducted for a state entity, it is governed by the Antiquities Code of Texas (Texas Natural Resource Code, Title 9, Chapter 191). A Texas Antiquities Permit must be secured from the THC prior to any ground disturbance. The permit application will be submitted by a Principal Investigator who meets THC's professional qualification standards. Additionally, an application for archaeological clearance will be submitted to COSA OHP, including the State Antiquities Permit from THC as part of the submission.

Pavement Removal and Site Preparation: Existing pavement (asphalt/concrete) will be carefully saw-cut and removed using appropriate heavy machinery. This process will be monitored by a professional archaeologist to identify any underlying historic features (e.g., old road surfaces, foundations) that may be immediately apparent upon pavement removal. Once pavement and any associated base material are removed, a grid system will be established over the exposed subgrade to ensure accurate spatial control for all findings.

Mechanical Scraping Procedure: The archaeological backhoe scraping will be carried out by, or under the direct supervision of, persons meeting the Secretary of the Interior's Professional Qualifications Standards (36 Code of Federal Regulations [CFR] Part 61). The road surface and previous construction subgrade fill will be removed as a single layer, until undisturbed soil is encountered. Once undisturbed soil is encountered, a smooth bucket backhoe will methodically remove soils, no deeper than 10 centimeters at a time. Hand shovel skimming will also be conducted in conjunction with mechanical soil removal, when necessary, to identify the grave shaft locations. Special attention will be made to identify any possible grave treatments that may be located during excavations. Mechanical soil removal will proceed to a minimum depth of the anticipated proposed construction. The depth of soil removal will ensure that if human burials are present, they are detected. A THC-approved archaeological monitor will be present at all times during mechanical scraping to observe the removal of soil and identify any changes in soil color or texture, artifact concentrations, or potential features.

Discovery of Human Remains: In the event of the discovery of suspected human remains, the following steps will be taken immediately:

All ground-disturbing activities in the immediate vicinity of the discovery will halt. The area will be secured.

The San Antonio Police Department will be notified immediately. The remains will not be touched or moved pending their investigation.

The Archeology Division of THC will be contacted as required by the Texas Health and Safety Code, Chapter 711 and the Antiquities Permit stipulations.

COSA OHP will be informed of the discovery.

The remains and their immediate surroundings will be left in situ and protected from the elements until law enforcement and the THC provide authorization to proceed.

Post-Discovery Investigation and Reporting: Following clearance from law enforcement, THC will determine the appropriate course of action for the treatment of the human remains in consultation with all stakeholders. Any excavation of human remains will be conducted with the utmost respect and in accordance with professional archaeological standards, THC guidelines, and applicable laws. A comprehensive final report detailing all findings will be prepared and submitted to THC and COSA OHP as required by the Antiquities Permit.

Site Restoration: Upon completion of all archaeological fieldwork and with written authorization from THC and COSA OHP, the project area will be restored. This will involve:

Backfilling the excavated areas with approved material.

Compacting the soil to appropriate engineering standards.

Replacing the pavement in-kind to match pre-existing conditions and specifications

4. INADVERTENT DISCOVERY PLAN

4.1 Inadvertent Discovery of Burial/Funeral Objects

Human remains discovered unexpectedly during the construction activities must be treated with the utmost dignity and respect.

If evidence of mortuary feature(s) or human remains are discovered during the Project, construction within 50-feet (15-meters) of the discovery will immediately cease and VIA will immediately notify local medical examiner (ME) and local law enforcement in compliance with Texas Administrative Code (TAC) Title 13 Part 2 Chapter §711.010 - §711.015. If the ME determines that the remains are not of evidentiary or forensic interest, FTA, THC, COSA OHP and other consulting parties will be contacted within 24 hours.

All work will be undertaken with dignity and respect for the individual and will follow the Texas Health and Safety Code (Chapter 711) and Chapter 49 of the Texas Code of Criminal Procedure. The THC will be notified and will provide guidance. The procedures apply to Native

American human remains, funerary objects, sacred objects, and objects of cultural patrimony as defined in the statute of the Native American Graves protection and Repatriation Act (NAGPRA), (25 U.S.C. 3001-3013) that are discovered inadvertently on Federal or Tribal lands. All procedures are in keeping with the regulations of NAGPRA regarding Inadvertent Discoveries (43 CFR 10.4). The actions/procedures described outlined in **Section 4.2** should in no way be construed as a justification to excavate any human remains outside the specific and discrete standards of archaeological activity.

4.2 Actions/Procedures If Mortuary Features or Human Remains Are Discovered

The archaeologists will immediately suspend all ground disturbing activities in the area and a 50-foot (15-meter) buffer surrounding the area. Mortuary features/human remains will be covered and secured without disturbance, and the area will be secured to ensure the remains are not disturbed. No photographs of the mortuary features/human remains will be taken.

FTA, COSA OHP and VIA will be notified immediately. VIA will then contact local law enforcement and the ME to determine whether the remains are part of a modern crime scene. If the ME determines that the remains are not associated with a modern crime scene, VIA will notify the THC by phone. The following steps will then be taken:

- If the remains are determined to be Native American, VIA will immediately notify FTA so FTA can consult with the appropriate federally recognized Tribe(s) to determine the appropriate response, including cessation of construction activities, protection of burial/funerary objects, notification of appropriate parties, consultation, and implementation of agreed upon action. The remains and associated items will be treated in accordance with the NAGPRA. VIA will be responsible to either preserve in place or repatriate human remains and/or objects, depending on the agreed upon determination of the Tribe(s).
- If the remains are determined to be non-Native American, the approximate age of the burial will be determined as accurately as possible, and recommendations on historic significance with THC guidance will be determined. In consultation with THC, VIA will take possession of the remains and decide on their final disposition.

5. REFERENCES

VIA ART East/West Corridor Project Archaeological Desktop Review Report. 2025.

National Park Service (NPS)

2004. Native American Graves protection and Repatriation Act (NAGPRA).US

Department of the Interior. Accessed 08 April 2025.

National Park Service (NPS)

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

Texas Statutes

2013. Texas Health and Safety Code (Chapter 711) and Chapter 49 of the Texas Code of Criminal Procedure. Accessed 01 April 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)

2025. Texas Archaeological Sites Atlas. Online database.

<https://atlas.thc.state.tx.us/>. Accessed January 12, 2025.

2025. Texas Site Atlas Online ArcGIS Server. Electronic document.

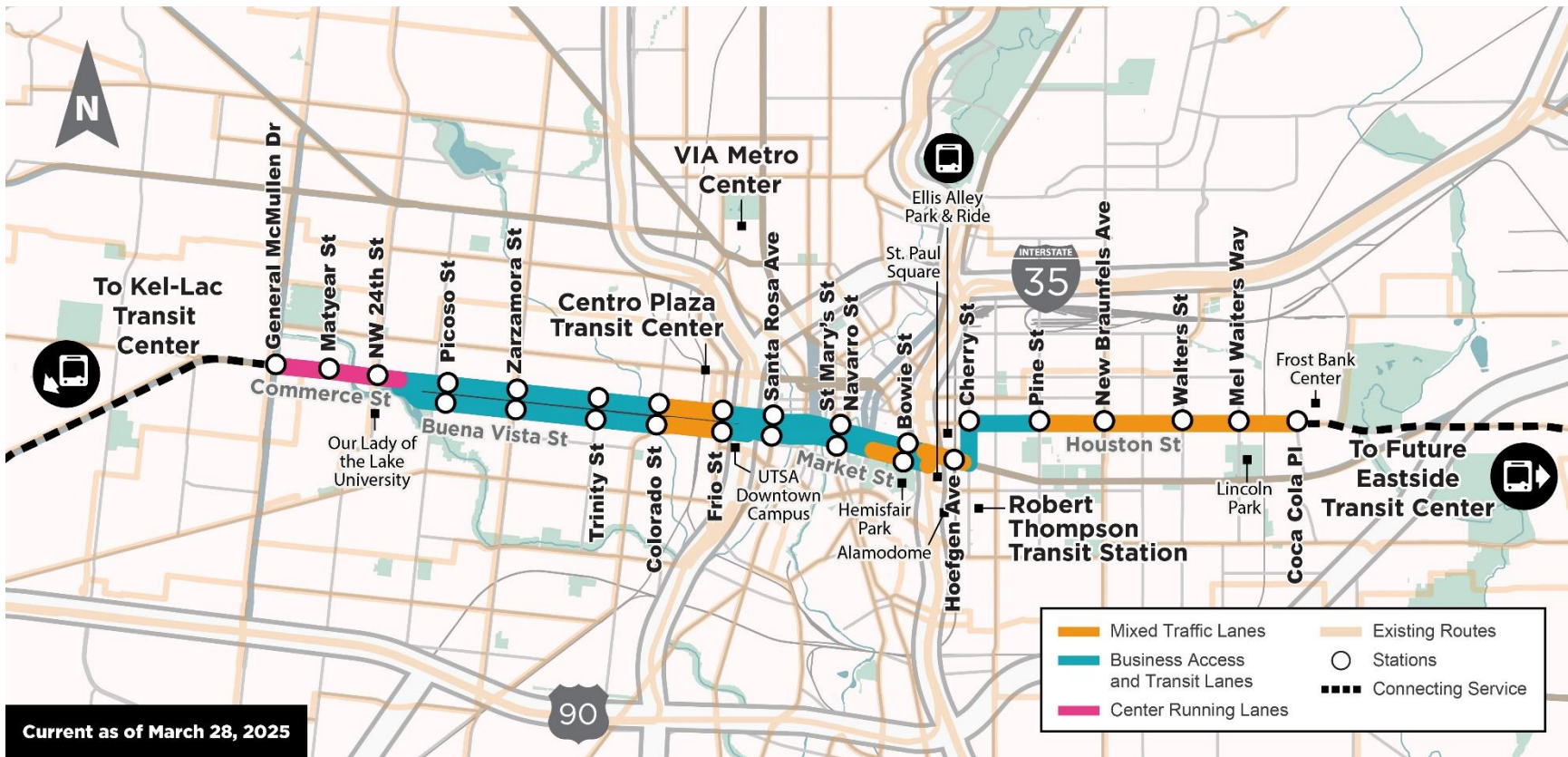
<https://atlas.thc.state.tx.us/Map>. Accessed January 12, 2025.

6. ACRONYMS

Acronym/Abbreviation	Definition
ACHP	Advisory Council of Historic Preservation
ACT	Antiquities Code of Texas
ART	Advanced Rapid Transit
APE	Area of Potential Effect
BAT	Business Access and Transit
CE	Categorical Exclusion
CFR	Code of Federal Regulations
FTA	Federal Transit Administration
ME	Medical Examiner
NAGPRA	Native American Graves protection and Repatriation Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
NRHP	National Register of Historic Places
PALM	Potential Archaeological Liability Map
PMOC	Project Management Oversight Contractor
ROW	Right-of-Way
SAL	State Antiquities Landmark
SHPO	State Historic Preservation Office
TAC	Texas Administrative Code
TDAT	Tribal Directory Assessment Tool
THC	Texas Historical Commission
TxDOT	Texas Department of Transportation
VIA	VIA Metropolitan Transit



Appendix A: Project Location Map



Source: VIA, 2025



Appendix B: Consulting Parties List

Consulting Parties

Public and Nonprofit Entity:

Bexar County Historical Commission

City of San Antonio Office of Historic Preservation

Conservation Society of San Antonio

Neighborhood Associations:

Prospect Hill Neighborhood Association

Las Palmas Neighborhood Association

Historic Westside Residents Association

Gardendale Neighborhood Association

Downtown Neighborhood Association

Dignowity Hill Neighborhood Association

Denver Heights Neighborhood Association

Jefferson Heights Neighborhood Association

Harvard Place Eastlawn Neighborhood Association

Alamodome Gardens Neighborhood Association



Appendix C: THC Coordination

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

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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, brad.jones@thc.texas.gov, 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>
Sent: Friday, February 14, 2025 3:48 PM
To: justin.kockritz@thc.texas.gov <justin.kockritz@thc.texas.gov>; brad.jones@thc.texas.gov <brad.jones@thc.texas.gov>; emily.dylla@thc.texas.gov <emily.dylla@thc.texas.gov>; Alexander.Shane@thc.texas.gov <Alexander.Shane@thc.texas.gov>
Cc: Akalkotkar, Manjiri <manjiri.akalkotkar@viainfo.net>; Terence plaskon <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
Cell: 210-740-2395

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

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

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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, brad.jones@thc.texas.gov, emily.dylla@thc.texas.gov, 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

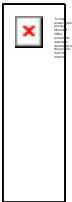
From: Diaz-Wells, Maricela <maricela.diaz-wells@viainfo.net>
Sent: Friday, August 1, 2025 8:57 AM
To: Christy Haven; Wang, Bin
Cc: manjiri.akalkotkar; Herrera, Arturo; Toby Hemphill; Weyer, Chris; John Bonaparte
Subject: VIA Metropolitan Transit Advanced Rapid Transit

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

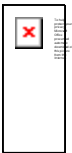
- THC/SHPO unable to complete review at this time based on insufficient documentation. A supplemental review must be submitted, and a new review period will begin upon receipt of adequate documentation.

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, brad.jones@thc.texas.gov, emily.dylla@thc.texas.gov, claudia.espinosa@thc.texas.gov.

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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 , matthew.elverson@sanantonio.gov



QUESTIONS?



To learn more about this project and
download materials, visit
KeepSAmoving.com.



Call 210-362-2590



Email: KeepSAmoving@viainfo.net