

# Executive Committee

March 3, 2023



# TEXAS HISTORICAL COMMISSION

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## AGENDA EXECUTIVE COMMITTEE

Stephen F. Austin Building  
1700 N. Congress Ave.  
Room 170  
Austin, TX 78701  
March 3, 2023  
10 a.m.

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*This meeting of the Executive Committee has been properly posted with the Secretary of State's Office according to the provisions of the Texas Open Meetings Act, Chapter 551, Texas Government Code. The members may discuss and/or take action on any of the items listed on the agenda.*

*Members of the public may provide public comments in person concerning any matter within the authority of the Commission by registering at the meeting location on March 3, 2023.*

*\*NOTE: The THC may go into executive session (close its meeting to the public) on any agenda item if appropriate and authorized by TGC, Ch. 551.*

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**1. Call to Order – Chairman John L. Nau, III**

- A. Committee member introductions
- B. Establish quorum
- C. Recognize and/or excuse absences

**2. Public comment**

Members of the public may address the Commission concerning any matter within the authority of the Commission. The Chairman may limit the length of time available to each individual.

No one will be allowed to yield their time to another person.

**3. Brackenridge Park, Lambert Beach area, San Antonio, Bexar County**

- A. Discussion and possible action regarding Historic Buildings and Structures Antiquities Permit #1208 for Phase I of the 2017 bond project – *Brummett*
  
- B. Discussion and possible action regarding an Archeology Permit for investigations associated with Brackenridge Park Phase I of the 2017 bond project– *Jones*

**4. Executive Session under the Open Meetings Act, TGC §551, for consultation with commissioners regarding agenda items. – Chairman Nau**

**5. Committee Chairman's Report – Chairman Nau**

- A. Ongoing Projects; and
- B. Updates and Upcoming Events

**6. Adjourn**

*NOTICE OF ASSISTANCE AT PUBLIC MEETINGS: Persons with disabilities who plan to attend this meeting and who may need auxiliary aids or services such as interpreters for persons who are deaf or hearing impaired, readers, large print or Braille, are requested to contact Paige Neumann at (512) 463-6100 at least four (4) business days prior to the meeting so that appropriate arrangements can be made.*

TAB 3

# TEXAS HISTORICAL COMMISSION

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## Item 3.A

Texas Historical Commission  
Executive Committee Meeting  
March 3, 2023

### **Discussion and possible action regarding Historic Buildings and Structures Antiquities Permit #1208 for Phase I of the 2017 Bond Project at Brackenridge Park, Lambert Beach area, San Antonio, Bexar County**

#### **Background:**

San Antonio's Brackenridge Park, approximately 343 acres in size, is named after local philanthropist and owner of the San Antonio Water Works, George W. Brackenridge, who deeded 199 acres on the east side of the San Antonio River to the City in 1899. The park has grown piecemeal over time, to include land owned by the City since Spanish Colonial rule in the 1730s. In 1979, its master plan was developed after park uses were established. Brackenridge Park is comprised of numerous natural, archeological, and historic structural resources, including the 1870s First Water Works Pump House, 1920s Donkey Barn, and 1926 Dionicio Rodriguez Bridge. The park also includes projects from the Works Projects Administration and National Youth Administration.

Brackenridge Park was listed in the National Register of Historic Places as an Historic District in 2011 for its significance in Archeology, Architecture, Art, Conservation, Engineering, Entertainment and Recreation, Industry, and Landscape Architecture. Its period of significance ranges from 12,500-350 BP (Paleoindian to Late Prehistoric) and 1719-1961. Brackenridge Park was also designated as a State Antiquities Landmark in 2011, and is a City of San Antonio Historic Landmark. It retains a high level of integrity of design, setting, feeling, materials, workmanship, and association.

In March 2017, San Antonio City Council adopted the Brackenridge Park Master Plan. That May, residents of the City of San Antonio voted to pass an \$850 million bond program that would provide funding to various infrastructure and parks and recreation projects, including improvements and restorations to Brackenridge Park. The 2017 Bond project area encompasses the northern portion of Brackenridge Park, with East Hildebrand Avenue as its approximate northern boundary, and the first pedestrian bridge that crosses the San Antonio River at Lambert Beach as its approximate southern boundary. In May 2022, voters approved an additional \$1.2 billion in bond money to fund additional infrastructure and parks and recreation projects, which allocated more funds to the Brackenridge Park 2017 Bond project.

In January of 2022, the City of San Antonio's Public Works Department submitted a joint Historic Buildings and Structures Antiquities Permit application and Section 106 review request for the removal of over 100 trees in the 2017 Bond project area. Division of Architecture staff issued a response letter in February noting that it could not complete its review of the permit application at that time due to insufficient information included in the application materials, which did not provide staff with a clear understanding of the proposed project scope.

## TEXAS HISTORICAL COMMISSION

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Throughout the year after staff issued the letter, several residents from San Antonio contacted staff to express concerns about the proposed scope of work and design developments as they were announced. The project also received ongoing media coverage. In September, a group of San Antonio residents hand-delivered a packet of information to Division of Architecture staff, which included a letter summarizing its observations of park activities and growing concerns with the project as it developed on the local level, news articles from local newspapers featuring interviews of some residents voicing their concerns with the proposed work, letters from local indigenous Tribes outlining the park's natural significance to their respective cultures, and a petition with over 1,000 signatures in support of keeping the trees in the 2017 Bond project area intact. Excerpts of these materials are included on the following pages. Multiple concerned residents have also proposed moving the historic stone walls at Lambert Beach in order to preserve the heritage trees.

### **Scope of Work:**

In December of 2022, after coordination throughout the late summer and fall with Division of Architecture staff, the City of San Antonio's Public Works Department submitted a new Historic Buildings and Structures Antiquities Permit application to the Commission for a modified scope of work affecting the 1.83-acre Lambert Beach area of Brackenridge Park, also referred to as Phase I of the 2017 Bond project. The Lambert Beach area is a priority of the 2017 Bond project, as it contains a number of historic resources that are currently inaccessible to the public because of safety concerns. The overall goal of the project is to create and enhance pedestrian accessibility, as well as to restore the public's ability to interact with the affected historic resources.

Division of Architecture staff reviewed the permit application materials, which includes an historic resources report, 95% completed construction documents, and a construction specifications manual (selected sections of the submittal are included on the following pages). The scope of work outlined in the submittal documents proposes to remove 48 trees; relocate 19 trees; rehabilitate failed or failing portions of the historic Lambert Beach limestone walls, to include constructing concrete shadow walls to support the historic walls; reconstruct missing portions of the Lambert Beach limestone walls; drill new weep holes at the base of the limestone walls; remove two submerged, "floating" staircases in the San Antonio River; remove the existing concrete floor at the Pump House to underpin and stabilize its foundation; demolish the existing concrete pad to west of Pump House and existing brick walkway to north of Pump House to allow for foundation excavation activities, and replace the affected areas with new concrete; pour a new concrete floor once underpinning activities are completed at the Pump House; demolish the existing Grand Staircase and reconstruct with a new foundation, stair and grading design; install a new lift station; and install new plants and 26 new trees throughout the project area.

As a result of continued coordination between the applicant and the Division of Architecture staff, the project scope has been modified to increasingly adhere to the Secretary of the Interior's Standards for Rehabilitation as it pertains to the two submerged staircases and Grand Staircase, both character-defining features of the Brackenridge Park National Register Historic District and State Antiquities Landmark. Division of Architecture staff understands that the two submerged staircases will now be removed from the project scope altogether, which allows the resources to remain in place. Additionally, the Grand Staircase's scope of work will be modified so that the staircase's existing configuration will be maintained to the greatest extent possible, and existing material will be utilized in its rehabilitation. The drawings included in the packet, which were prepared for the February 1, 2023 joint Antiquities Advisory Board and Commission's Quarterly Meeting, show

## TEXAS HISTORICAL COMMISSION

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demolition of the submerged staircases, and near-complete demolition and reconstruction of the Grand Staircase. Due to time constraints, the applicant was not able to submit updated drawings reflecting the change in scope affecting these resources for the March 3, 2023 Executive Committee meeting. However, revised drawings that illustrate this change are forthcoming from the applicant.

In February 2023, the applicant submitted a boring study of four heritage trees of varying species along Lambert Beach. The study was requested by the Commission as the trees in Brackenridge Park are of great public concern. The results of the study indicate that the sampled trees were likely planted during or after the construction of Lambert Beach in the 1920s. This study is included in the permit application materials for the Executive Committee's consideration of the proposed permit scope.

The Executive Committee will separately consider an Archeology Permit for investigations associated with construction of the project, as Item 3.B.

The Executive Committee may authorize the permit as written, apply special conditions to the permit, request additional information for review, request a revised scope of work, or deny the permit.

### **Motion Option 1:**

Move to authorize the Executive Director to issue Historic Buildings and Structures Antiquities Permit #1208 related to Phase I of the 2017 Bond project at Brackenridge Park, Lambert Beach area, San Antonio, Bexar County, contingent upon receipt of an updated plan set reflecting the proposed project changes.

### **Motion Option 2:**

Move to deny issuance of Historic Buildings and Structures Antiquities Permit #1208 related to Phase I of the 2017 Bond project at Brackenridge Park, Lambert Beach area, San Antonio, Bexar County.

TEXAS HISTORICAL COMMISSION

ANTIQUITIES PERMIT APPLICATION
Historic Buildings and Structures

GENERAL PROJECT INFORMATION

Please complete the following. See detailed instructions, How to Complete the Antiquities Permit Application for Historic Buildings and Structures, for additional information.

1. Property Name and Location
NAME OF STATE ANTIQUITIES LANDMARK: Brackenridge Park
ADDRESS: 3700 N. St. Mary' s St.
CIT: San Antonio
COUNT: Bexar
IP CODE: 78212

2. Project Name
NAME OR BRIEF DESCRIPTION OF PROJECT ORK: Brackenridge Park - Lambert Beach (please see attached scope, plan set, and supporting documents)

3. Applicant (Owner or Controlling Agency)
OWNER/AGENCY: City of San Antonio
REPRESENTATIVE: Miranda Garrison
TITLE: Arch Hist/ENV PM
ADDRESS: 100 W. Houston St.
CIT: San Antonio
STATE: TX
IP CODE: 78205
PHONE: 210-207-1454
EMAIL: miranda.garrison@sanantonio.gov

4. Architect or Other Project Professional
NAME/FIRM: SWA Group
REPRESENTATIVE: Kinder Baumgardner
TITLE: Managing Principal
ADDRESS: 712 Main St., 6th Floor
CIT: Houston
STATE: TX
IP CODE: 77002
PHONE: 713-868-1676
EMAIL: kbaumgardner@SWAGroup.com

5. Construction Period
PROJECT START DATE: Spring/Summer 2022
PROJECT END DATE: 2024

PERMIT CATEGORY

Please select the category that best describes the proposed work. (Pick one.)

- Preservation (checked), Rehabilitation, Restoration, Reconstruction, Architectural Investigation, Hazard Abatement, Relocation, Demolition, New Construction

ATTACHMENTS

For all projects, please attach the following:

- Written description of the proposed project;
Project documents (plans, specifications, etc.); and
Photographs of the property showing areas of proposed work.

Application reports may be required based on the project work or at the request of Texas Historical Commission staff. Please indicate if the following are provided with your application:

- Historic Structure Report, Historical Documentation, Architectural Documentation (checked), Archeological Documentation

PROPERTY NAME: Brackenridge Park

COUNTY: Bexar

**CERTIFICATIONS**

The applicant and project professional must complete, sign, and date the following certifications. The Texas Historical Commission's Rules of Practice and Procedure and the Secretary of the Interior's Standards for the Treatment of Historic Properties are available through links from the Antiquities Permits page on our website at [www.thc.texas.gov/preserve/projects-and-programs/state-antiquities-landmarks/antiquities-permits](http://www.thc.texas.gov/preserve/projects-and-programs/state-antiquities-landmarks/antiquities-permits). Standard permit terms and conditions are listed in the detailed instructions, How to Complete the Antiquities Permit Application for Historic Buildings and Structures. Special conditions may also be included in a permit. Please contact Texas Historical Commission staff with any questions regarding the Rules, our procedures, and permit requirements prior to signing and submitting a permit application.

**Applicant's Certification**

I, Miranda Garrison, as legal representative of the Applicant,  
City of San Antonio, do certify that I have reviewed and approved the plans and specifications for this project. Furthermore, I understand that failure to conduct the project according to the approved contract documents and the terms of this permit may result in cancellation of the permit.

Signature *Miranda Garrison* Date 12/15/22

**Project Professional's Certification**

I, Kinder Baumgardner, as legal representative of the Firm,  
SWA Group, do certify that I am familiar with the Texas Historical Commission's Rules of Practice and Procedure and the Secretary of the Interior's Standards for the Treatment of Historic Properties. Furthermore, I understand that submission of a completion report is required for all Historic Buildings and Structures Permits. Furthermore, I understand that failure to conduct the project according to the Rules, Standards, approved contract documents, and the terms of this permit may result in cancellation of the permit.

Signature *Kinder Baumgardner* Date 12/15/22

**SUBMISSION**

Please submit the completed permit application in hard copy with original signatures to the mailing or physical address below, or electronically with scanned signatures to [hsp permit@thc.texas.gov](mailto:hsp permit@thc.texas.gov). Attachments, including plans and photographs, must be sent to the mailing address below or delivered to 108 West 16th St., Second Floor, Austin, TX 78701.

Texas Historical Commission  
Division of Architecture  
P.O. Box 12276  
Austin, TX 78711-2276  
512.463.6094  
fax 512.463.6095  
[architecture@thc.texas.gov](mailto:architecture@thc.texas.gov)



**TEXAS HISTORICAL COMMISSION**  
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CITY OF SAN ANTONIO  
**PUBLIC WORKS  
DEPARTMENT**

December 15, 2022

Texas Historical Commission  
P.O. Box 12276  
Austin, Texas 78711-2276

**SUBJECT: Antiquities Advisory Board Meeting Submittal/HS Permit Application  
Brackenridge Park – Lambert Beach  
San Antonio, Bexar County, Texas**

To Whom It May Concern:

Lambert Beach is located within Brackenridge Park. Brackenridge Park is listed in the National Register of Historic Places. The park is also a designated State Antiquities Landmark and a City of San Antonio (COSA) Historic Landmark. This project requires a permit through the U.S. Army Corps of Engineers. Because a federal agency is involved in the development/regulation of this project, any historic resources located within the project area and the area of potential effect (APE) are protected under Section 106 of the National Historic Preservation Act.

In March 2017 San Antonio City Council adopted the Brackenridge Park Master Plan. One of the approved public strategies of the Master Plan is to restore, preserve, and articulate park cultural and historic features. In May 2017, the City's Proposition 3 Bond Program was overwhelmingly passed by more than 70% of voters, which explicitly included the historic river walls and structures at Brackenridge Park. This allowed for a seamless transition from the Master Plan to scoping the bond project.

Assessment of the park and its cultural resources identified the Lambert Beach area as a priority for the 2017 Bond capital improvement project. This area contains a number of historic resources that are currently inaccessible to the public due to safety concerns, including the Lambert Beach recreational area. In the Master Plan, this historic resource was identified as an opportunity for restoration and reuse. This project will create and enhance pedestrian accessibility, and the ability for the public to again interact with these historic resources.

The proposed project scope for Lambert Beach includes the preservation, reconstruction, repair, and stabilization of the historic landscape architectural features including the Grand Staircase and the stone walls along the San Antonio River. The proposed project also includes the underpinning

of the walls beneath the Pump House with concrete foundations for stabilization, and the removal of two floating staircases that sit below the surface of the San Antonio River. COSA has worked closely with the THC to determine the appropriate treatments as guided by the Secretary of the Interior's *Standards for the Treatment of Historic Properties*.

Brackenridge Park sits on approximately 343 acres of land. While the majority of these acres all contain a variety of trees, grasses, and other vegetation, at least one third is defined as forested or having an average of 60 trees per acre per the *USDA Tree Marking Guide*. This project will affect 1.83 acres, over one third of it encompassed by the San Antonio River, that fall within an unforested area that was originally created as an entertainment zone for park visitors in 1915. In order to successfully restore, reconstruct, repair, and stabilize the historic walls along Lambert Beach, 48 trees will be removed, and an additional 19 trees will be relocated, including one heritage tree (24" and above). The 48 trees to be removed include:

- 4 invasive species trees
- 4 trees that are dead/dying
- 10 trees less than 6" in diameter
- 24 trees between 6" and 24" in diameter
- 6 heritage trees

In addition to the removal/relocation of these trees, 26 new trees will be planted. The total number of trees remaining in the project area after it is complete is 40 trees, 12 of which are heritage trees.

In removing the 48 trees, COSA is following the guidelines set forth in the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. The trees are damaging, and will continue to damage, the historic stone walls and the Pump House. In order to protect and preserve their form, integrity, and materials, the trees will need to be removed. In the areas where the trees have already destroyed historic resources, reconstruction methods will be utilized. COSA's goal is to also protect the areas of significance as outlined in the *Brackenridge Park National Register Nomination*, which includes landscape architecture and entertainment and recreation. Lambert Beach is listed as a contributing resource within those areas of significance in 1915 and 1925, which include the historic stone walls. According to the nomination, Brackenridge Park never had a formal landscape plan. While there was a plan for Lambert Beach, there is no evidence that any of the existing trees were part of that plan, but rather planted from random seed dispersal. Letting the trees remain to further harm and erase the historic resources would set an unacceptable precedent for future projects.

Please find the attached HS Permit application, the Lambert Beach Improvements Tree Exhibit, and the Brackenridge Park – Lambert Beach Construction Specifications. The Lambert Beach Historic Resources report, which was completed by our consultant for cultural resources, Stantec, will arrive in a separate email along with the Brackenridge Park – Lambert Beach Construction

Documents. If you have any questions or would like to set up a meeting to go over the enclosed documents, please do not hesitate to ask.

Sincerely,

A handwritten signature in blue ink that reads "L. Miranda Garrison". The signature is written in a cursive, flowing style.

Miranda Garrison, Architectural Historian/Environmental Project Manager  
Public Works Department – Environmental Management Division  
City of San Antonio

Brackenridge Park

San Antonio, TX

Lambert Beach Improvements

EXHIBIT:

Large Significant and Heritage Trees near Cultural  
Resources



*Figures 1 & 2: Tree No. 95, 32-inch Live Oak proposed to be removed. Proximity to Cultural Resource: 0 inches.*



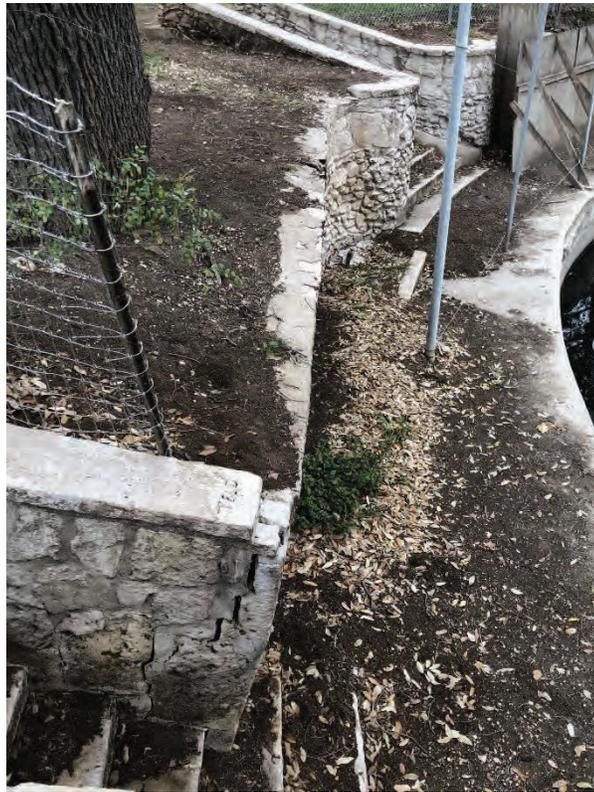
*Figure 3: Tree No. 97, 22-inch Live Oak proposed to be removed. Proximity to Cultural Resource: 3 inches*



*Figure 4: Foreground - Tree 98, 18-inch Live Oak proposed to be removed. Proximity to Cultural Resource: 18 inches. Background Left – Tree No. 97 proposed to be removed, Background Right – Tree No. 96 proposed to be preserved.*



*Figure 5: Foreground – Tree No. 99, 16-inch live oak proposed to be removed. Proximity to Cultural Resource: Less than 5 feet. Background – (L to R) Tree No. 97, Tree No. 98, both proposed to be removed, Tree No. 96 proposed to be preserved.*



*Figures 6 and 7: Tree No. 100, 37-inch Live Oak proposed to be removed. Proximity to original position of Cultural Resource (severe lean): less than 15 inches*



*Figures 8 and 9: Tree No. 101, 44-inch Live Oak proposed to be relocated approximately 15-20 feet further away from river than current location. Proximity to original position of Cultural Resource (demolished): less than 18 inches.*



Figure 10: Tree No. 102, 18-inch Cedar Elm proposed to be removed. Proximity to original position of Cultural Resource(demolished): less than 3 feet.



Figure 11: Tree No. 134, 16-inch Live Oak proposed to be removed. Proximity to Cultural Resource: 0 inches.



Figure 12: Tree No. 135, 15-inch Live Oak proposed to be removed. Proximity to Cultural Resource: 0 inches.



Figure 13: Tree No. 135, 15-inch Live Oak proposed to be removed. Proximity to Cultural Resource: 0 inches.



Figure 14: Tree No. 136, 20-inch Live Oak proposed to be removed. Proximity to Cultural Resource: 0 inches.



Figure 15: (L to R) Tree Nos. 137, 17-inch Cedar Elm, and 138, a 16-inch Cedar Elm, proposed to be removed. Proximity to Cultural Resource: 1-3 inches.



Figure 16: (L to R) Tree Nos. 138, 16-inch Cedar Elm, and 137, a 17-inch Cedar Elm, proposed to be removed. Proximity to Cultural Resource: 1-3 inches.



Figure 17: (L to R) Tree Nos. 139, a 26-inch Pecan, and 140, a 24-inch Pecan, proposed to be removed. Proximity to original position of cultural resource (partially demolished): less than 2 feet.



Figure 18: Tree No. 141, 27-inch Bald Cypress proposed to be removed. Proximity to Cultural Resource: 0 inches.



Figure 19 and 20: Tree No. 141, 27-inch Bald Cypress proposed to be removed. Proximity to Cultural Resource: 0 inches.



Figure 21: Tree No. 142, 20-inch Pecan proposed to be removed. Proximity to Cultural Resources: 6 inches to 5 feet



Figure 22: Tree No. 142, 20-inch Pecan proposed to be removed. Proximity to Cultural Resources: 6 inches to 5 feet



Figure 23: (L to R) Tree Nos. 108, 22-inch Black Walnut, and 107, 18-inch Black Walnut, both proposed to be removed. Proximity to Cultural Resource: 3 to less than 24 inches.



Figure 24: Tree No. 107, 18-inch Black Walnut proposed to be removed. Proximity to Cultural Resource: 3 inches.



*Figure 25: Tree No. 122, 22-inch Pecan proposed to be removed. Proximity to Cultural Resources, 0 inches to 8 inches.*



*Figure 26: Tree No. 125, 27-inch Crepe Myrtle proposed to be removed. Proximity to Cultural Resource: Less than 1 foot.*

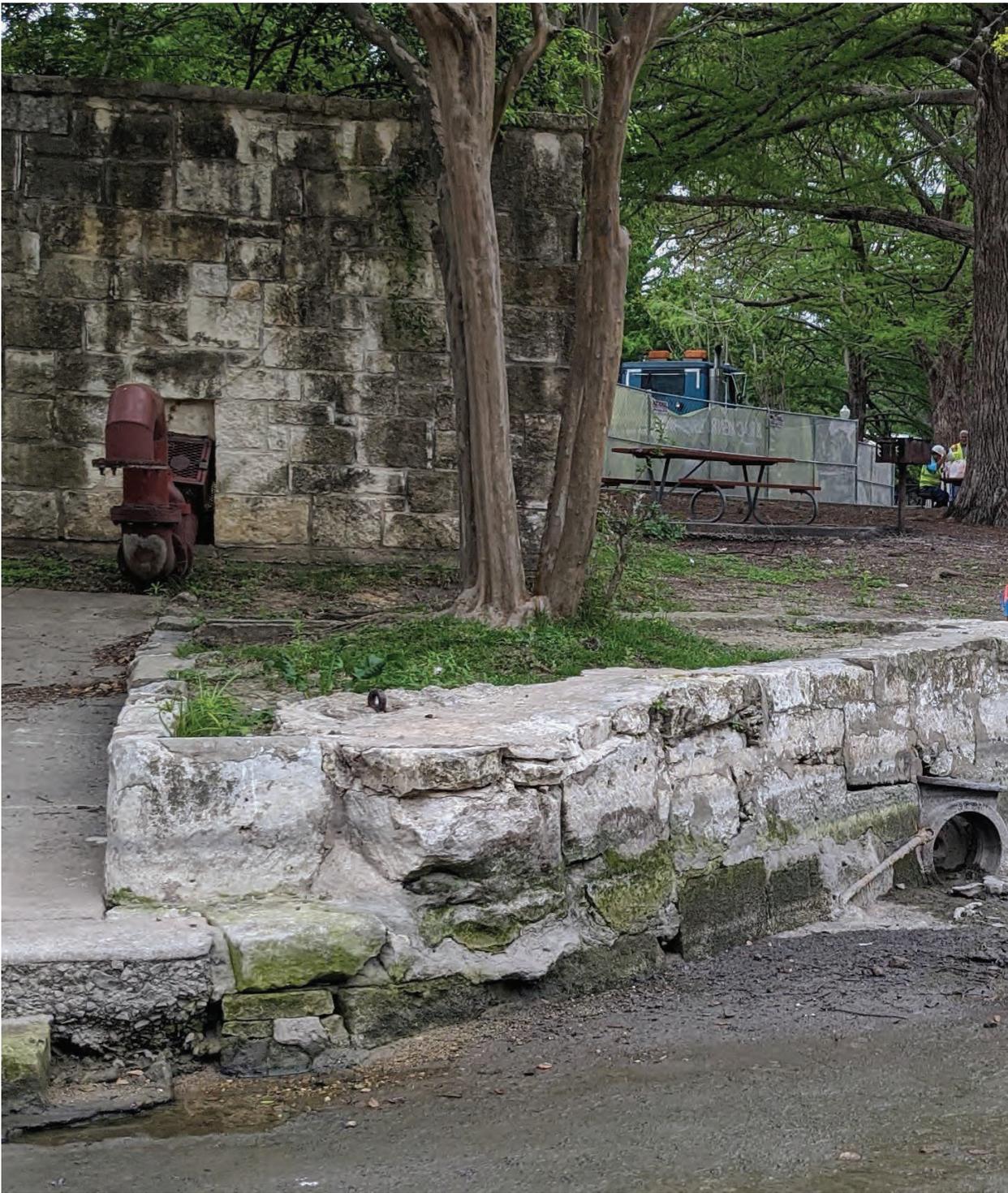


Figure 27: Tree No. 215, 19-inch Crepe Myrtle proposed to be removed. Proximity to Cultural Resources: Less than 3 feet.



## **COSA Response to THC Questions/Comments per SAL Permit Applications BRACKENRIDGE PARK: LAMBERT BEACH IMPROVEMENTS**

06 January 2023

### **General Comments**

- **The project narrative provided is brief and does not describe why the work is being performed.**

In March 2017 San Antonio City Council adopted the Brackenridge Park Master Plan. One of the approved public strategies of the Master Plan is to restore, preserve, and articulate park cultural and historic features. In May 2017, the City's Proposition 3 Bond Program was overwhelmingly passed by more than 70% of voters, which explicitly included the historic river walls and structures at Brackenridge Park. This allowed for a seamless transition from the Master Plan to scoping the bond project.

Assessment of the park and its cultural resources identified the Lambert Beach area as a priority for the 2017 Bond capital improvement project. This area contains a number of historic resources that are currently inaccessible to the public due to safety concerns, including the Lambert Beach recreational area. In the Master Plan, this historic resource was identified as an opportunity for restoration and reuse. This project will create and enhance pedestrian accessibility, and the ability for the public to again interact with these historic resources.

- **Additionally, the drawings, while thorough, do not explain why the work is being performed**
  - **For example, why is the underpinning at the Pump House being proposed? This answer will help the Commission understand the purpose of the permit application.**

The underpinning of the Pump House is necessary for the stabilization and preservation of the structure and to prevent further deterioration. The design team is proposing the underpinning to occur in this project to accompany the proposed work for the adjacent cheek walls. This will also ensure the long-term structural integrity of the foundation and preserve a unique historic structure, providing an opportunity for the public to access and enjoy this resource.

Extant walls and structures will be protected in place and receive additional structural stabilization. Walls that have collapsed will be reconstructed with salvaged and matching stockpiled material on new foundations.

The Lambert Beach Grand Staircase continues to structurally decline due to hydrologic forces and a lack of sufficient foundation. The design team proposes reconstruction of a

new more stable foundation, which will prolong the life of the historic resource while also providing safer public access.

- **Will the project professional overseeing the work be an SOI qualified professional, or have experience with the Standards? It's unclear which firm is taking the lead on this project.**

The Prime Consultant, SWA Group, has a highly qualified and comprehensive team of design professionals including Seventh Generation Design, Inc., an architectural design firm who are SOI qualified and continue to advise and oversee all historic aspects of the project.

Additionally, the COSA project management team includes an additional SOI qualified professional (Miranda Garrison, Architectural Historian) who continues to collaborate and advise on the project process and scope.

### **Cox McLain Report/Historic Resources Survey**

- **Please note that this project will require coordination with USACE, as waters are affected.**
  - **As such, Section 106 review of the project will likely be required, pending USACE confirmation.**

COSA agrees that coordination with the USACE is required. To date, the USACE has been made aware of the project and Regulatory Division staff have visited the project area several times. Once THC agrees with how the plans are presented, they will be submitted to the USACE Regulatory Division for preliminary review and discussion of the appropriate nationwide permit to authorize the proposed improvements. Per the Programmatic Agreement (dated 29 June 2019) between the USACE, THC, and COSA, a treatment plan is required. Once the plans are near final, the treatment plan will be developed and submitted to the THC and USACE for review and comment, and approval.

- **The project description in this report notes that the 1920s concrete lined staircases are proposed to be removed but does not give a reason why.**
  - **The report also notes that while integrity is diminished, the resource is still contributing. THC needs more information about why the contributing resource is proposed for demolition and will be replaced with a newly designed staircase.**

The Lambert Beach Grand Staircase foundation has not been addressed due to financial constraints and continues to decline structurally, including from the scouring force of the river as it flows into the Lambert Beach area. This decline has become a public safety hazard and has forced closure of the area. Without a new foundation the staircase will eventually succumb to hydrological forces.

The design team proposes a reconstruction of the staircase to approximate its current configuration with adjustments to ensure regular stair tread rise and run. The majority of the staircase was rebuilt in 2002 with existing stone. The two original pieces identified as

the "historic bench" and "original historic steps" will be preserved in place. A strategy to provide a new foundation for these pieces is included in the structural drawings.

### **Construction Drawings – 95% Set**

- **Sheet C1.01 – project scope (boundary) goes beyond that which was initially discussed and agreed upon with COSA, SWA, Lundy & Franke, SHPO.**
  - **The project scope previously discussed was not to go beyond southern face of the Pump House/Pump House foundation. Please explain why the project boundary now includes Pump House patio area and brick walkway to Northeast of Pump House.**

The project scope has expanded to include the construction zone required for the work to be performed on the Pump House foundation. Performing work on the adjacent cheek walls of the Pump House without ensuring the structural integrity could result in damage to the Pump House.

- **Sheet C1.51 – How far apart will the weep holes be spaced?**
  - **Also, we recommend using as small of a diameter weep hole as possible to further minimize damage to historic materials.**

Weep holes will be spaced 60" on center. SWA Group and IES Engineering to update drawings to include this dimension.

- **Sheet C6.01 – Proposed lift station not previously discussed, unsure about purpose; please explain.**

Due diligence on any capital improvement project requires that utility infrastructure be included in the project scope where appropriate or necessary. Therefore, scope was added to re-route and upgrade utility infrastructure within the Lambert Beach area of the existing Acequia watering system, which currently flows in the opposite direction of historic use.

The installation of the new lift station is replacing the existing lift station located further upstream, and the area proposed was determined to be the best location so as not to disturb existing trees and historic structures. To install this upgraded infrastructure, it was necessary to include it in the project rather than after completion of the project in a subsequent phase. The required reconstruction of the walls in these areas provide an opportunity to include the lift station and associated piping without damage to extant structures.

- **Sheet L1.00 – Where are trees in stair/Pump House area proposed to be relocated? If not providing a plan to show this, please provide notes somewhere that state relocated trees' new location.**

Trees 112 and 113 are to be relocated by the restroom across Brackenridge Rd. from the Lambert Beach area. All other trees to be relocated will be transplanted along the St. Mary's corridor in the park as well as the main entrance along Broadway St.

- **Sheet L2.01 – Keynotes:**

- **D01 – Why are submerged stairs proposed for demolition?**

The submerged stairs are not listed as contributing resources in the Brackenridge Park National Register Nomination and impede the repair and construction of the river channel walls and subsequent maintenance.

- **D04 – Why demo concrete step?**

The concrete pad and stairs are to be removed to allow construction access for the underpinning of the foundation of the Pump House.

- **D05 – Why demo concrete paving?**

The concrete pad and stairs are to be removed to allow construction access for the underpinning of the foundation of the Pump House.

- **D06 – Why demo the walls?**

These walls are not historic and were constructed in 2002 as part of a larger renovation project. The removal of these walls allows for the reconstruction of the Lambert Beach Grand Staircase and also replaces these walls with material that better approximates the adjacent extant historic walls. These walls will be visually distinguishable from historic material per SOI's guidelines, but with approximate stone size and mortar gaps.

- **D07 – What is the basis for selective demolition of the stairs? Why are stairs in their entirety depicted to be demolished? Please show which portions of stairs will remain and explain why other portions are proposed for demolition.**

The majority of the Grand Staircase was rebuilt in 2002 with existing stone. The limits of demolition and preservation are correct on sheet L2.01 Demolition Plan. The existing historical elements of the staircase, H05 Historic Bench and H06 Original Stone Steps and Landing will be protected in place and receive a new foundation. The new design will integrate these elements. The rest of the staircase is to be demolished, and material salvaged where possible to be used on construction.

- **D09 – Why is this sump pump slated for removal?**

This sump pump will no longer be used because it is being replaced by new infrastructure. Please reference the comment response to sheet C6.01 on the previous page.

- **Patio and portion of stone walk to northeast of Lambert Beach proposed for removal**

- **Scope not discussed with SHPO previously; no reason given in this submittal for demolition.**

The patio adjacent to the Pump House is to be removed to allow construction access for the underpinning of the foundation of the Pump House. The stone walk is contemporary concrete unit pavers installed on a stabilized sand setting bed. These are to be removed to allow for the installation of the previously mentioned Lift Station and reinstalled on a new sand-setting bed around the top of the new vault. Details will be provided in the drawings to clarify which pavers are to be removed versus replaced.

- **Sheet L3.01 – Stairs proposed for near-complete removal and redesign**

- **New design does not replicate the historic design; please explain rationale for demolition and new design.**

The new design approximates the existing design as much as possible, allowing for the inclusion of the extant historic elements of the H05 Historic Bench and H06 Original Stone steps, as well as meeting safety standards for regular tread rise and run to ensure public safety when accessing the stair.

- **A01 – What is the purpose of the chain link fence? Is this replacing an existing fence? How tall will the fence be?**

The new chain link fence will replace the existing chain link fence, which is in disrepair in multiple areas. The fence will be 48" high and in approximately the same location as the current fence. The purpose of the fence is to prevent access to the steep slope below the walk.

- **A02 – New lift station not previously discussed. Please provide rationale for new lift station equipment and location.**

Please see previous explanation for sheet C6.01.

- **Please update stair enlarged plan and section reference numbers; we did not receive a Sheet L6.02 in this set.**

This is a typo. This callout will be updated to reflect the correct detail reference.

- **Sheet L4.04 – Ensure all tie backs and reinforcements are installed in mortar joints rather than masonry to minimize damage to historic materials.**

This note will be added to the drawings.

- **Sheet L4.05 – Sections 02 and 03 – unsure where on the wall(s) these images/drawings reference; please clarify.**

These are the details for the new paving at the Lambert Beach Grand Staircase landing, and the cladding at the vertical wall at the staircase. SWA to update the callouts to reference these areas. These areas to be new construction and new stone.

- **Sheet S2.00 – Please provide approximate lengths of rebuilt stone walls in feet and inches.**

The approximate lengths of the rebuilt/currently collapsed or deteriorated stone walls will be delineated on this plan sheet.

- **Sheet S3.00 – Is this the minimum quantity and spacing of stainless-steel rebar/ties that is structurally necessary? Is it possible to use fewer ties to help minimize damage to historic materials?**

The minimum spacing is provided for secure wall stabilization. The heights of the walls vary along the length of the river, and the heights will determine the quantity. Additional notes will be added to clarify the horizontal spacing on the sections of this sheet.

- **Sheet S4.05 – Keynote 7 – Please explain why the existing concrete channel wall needs to be removed and replaced for the Commission’s understanding.**

Due to the forces of water acting on the face of the channel wall and the structural deterioration observed during the Dewatering Phase of the project, the design team recommends the removal and reconstruction of this wall on a new foundation. This wall is not only responsible for providing structure to the River Channel, but also for the walls above. The design team believes that water infiltration through this wall has contributed to the collapse of the upper walls. The design team will include photos from the dewatering that illustrate the extent of the damage, and also provide all dewatering photos to the THC for reference.

## **Specifications Document**

- **Structural Demolition, Section 02 4116, appears to be for non-historic resources and precedes Section 02 29 96, Historic Removal and Dismantling, Subsection 1.2.B.2: Will contractors know to take special care with removal of historic resources? How will it be made clear to the contractor which demolition/dismantling section they should follow?**

General notes will be added referencing specifications at the beginning of the drawings. A preconstruction meeting with the design team, the COSA PM team, the COSA Architectural Historian, and OHP to precede any demolition or construction on the project, and to ensure all parties are clear on the scope of demolition, construction, and application of appropriate specifications.

Structural demolition will only apply to the riverbed and areas of concrete to be completely removed. All other items refer to correct specifications for specific procedures within the keynotes area of S4 sheets.

- **Historic Removal and Dismantling, Section 02 29 96, Subsection 1.6.A, Quality Assurance: what are the specific requirements being sought in the “qualified historic treatment specialist”? For example, are you seeking years of experience, breadth of experience, experience with specific project types, etc.? Please explain.**

Subsection 1.6.A. will be amended to read as follows to conform with the other historic preservation specification sections:

A. Basis for Standard of Care: U.S. Department of the Interior – National Park Service – Standards for the Treatment of Historic Properties.

B. Historic Removal and Dismantling Specialist Qualifications: A qualified historic treatment specialist. General selective demolition experience is insufficient experience for historic removal and dismantling work.

1. A minimum of seven years of experience with removal and dismantling of historic materials for the purpose of historic rehabilitation.

2. A list of jobs of similar scope and complexity, completed within the last seven years, shall be provided. Identify when, where, and for whom the work was performed.

- **Cast-in-Place Concrete, Section 03 3000, Subsection 2.6.D, Waterstops; will this material only be applied to new materials, or will this be applied to historic materials at all?**

This material is only to be applied to new construction.

- **Landscape Cast-in-Place Concrete, Section 03 30 10, Subsection 1.2.1, Summary: The scope of work affecting concrete stairs and steps is to be clarified.**

Foundations for reconstructed staircase to follow Structural Cast-In-Place concrete specification 03 30 00. Clarification will be made in the schedules making this distinction.

- **Landscape Cast-in-Place Concrete, Section 03 30 10, Subsection 1.3.1, Quality Assurance: City name should be changed from “City of College Station, Texas” to “City of San Antonio, Texas”.**

This is a formatting error and will be corrected.

- **Historic Stone Masonry Cleaning, Section 04 03 10, Subsection 2.1, Paint Removers: Is there paint to be removed in this project scope? If so, what type of paint will be removed? This information will determine the appropriate solvent. THC will need to be apprised of testing and progress on any related paint-removal work.**

There is currently no paint removal within the scope of the project. This section will be omitted from the scope.

- **Historic Stone Masonry Cleaning, Section 04 03 10, Subsection 3.1.A: This should also conform to NPS Preservation Brief #1.**

Subsection 3.1.A. will be amended to include reference to NPS Preservation Brief #1: "Assessing Cleaning and Water-Repellent Treatments for Historic Masonry Buildings."

- **Historic Stone Masonry Cleaning, Section 04 03 10, Subsection 3.1.K.4: All stone within this scope is limestone; therefore, this approach does would not apply.**

The specification is clear that acidic cleaning agents are not to be utilized on historic limestone materials. Reference to cast-in-place concrete cleaning will be added to help clarify the scope of the work.

- **Historic Stone Masonry Cleaning, Section 04 03 10, Subsection 3.4.G.5: THC recommends utilizing a low-pressure spray instead of a medium-pressure spray.**

Subsection 3.4.G.5. will be amended to read as follows:

5. Rinse with hot water applied by low-pressure spray (under 200psi) to remove chemicals and soil.

- **Historic Stone Masonry Repair and Repointing, Section 04 03 42, Subsection 1.9.B.2.a: THC will want to know who the stonemason is once selected.**

The construction team, including subcontractors, will be provided to THC once a selection is made by COSA.

- **Historic Stone Masonry Repair and Repointing, Section 04 03 42, Subsection 2.3: THC will need to review and approve mortar recipes and mockups.**
  - **□ Please note that THC does not recommend Type S mortar on historic materials; please advise if Type S is specified for portions of historic materials that will be submerged, and if it's possible for Type N mortar to be used instead.**

All mock-ups and mortar recipes to be reviewed by THC prior to approval.

Mortar specification for submerged material will be addressed. Type N mortar will be used, and guidance will be provided for adjustment within the 04 03 42 subsection.

- **Masonry Work, Section 04 42 00, Subsection 1.1.A: THC will need to see a sample; also, please confirm if "Avalon Blend" Ledge stone is the correct material.**

This is a formatting error in the specification and will be updated. The stone is to be provided by Alamo Stone, color Champagne/West Texas Cream.

Sample of both stone and mortar to be provided to THC for approval.

- **Masonry Work, Section 04 42 00, Subsection 2.1.B: THC will need to see mockup of the new masonry stone; what is the difference between Alamo Stone and Ledge stone?**

This is a formatting error and will be updated in the specifications. LedgeStone is not to be included in the project.

THC will be notified upon the completion of all mock-ups. Final approval to be per THC review and approval.

TREE-RING DATING OF FOUR HERITAGE TREES IN BRACKENRIDGE PARK  
CITY OF SAN ANTONIO, TEXAS

JOE BUCK  
CROSS TIMBERS DENDRO CONSULTING LLC  
[www.oldtrees.co](http://www.oldtrees.co)

A project sponsored by:



FINAL REPORT SUBMITTED TO:

ROSS HOSEA, SPECIAL PROJECTS MANAGER  
URBAN FORESTRY AND TRAILS  
PARKS AND RECREATION DEPARTMENT  
5800 HISTORIC OLD HWY 90  
SAN ANTONIO, TEXAS, 78227

JANUARY 30, 2023

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## Abstract

The 349-acre Brackenridge Park is one of the oldest parks in San Antonio, Texas. The park is listed on the National Register of Historic Places and is a Texas State Antiquities Landmark. The site where the park is situated has been used by Indigenous peoples for at least 12,000 years. Beginning in the early 1700s, the site was used by Spanish colonialists who built acequias and other man-made structures for the establishment of their colony and laid the foundations for what would become San Antonio. The San Antonio River and its associated streams were instrumental in the development of the area (Brackenridge Park Conservancy, 2023).

In 1899, George Brackenridge donated 199 acres to be designated as public park land, setting the stage for what modern San Antonio residents and visitors enjoy today. Beginning in the 1910s, and continuing through the 1940s, the park underwent much of its foundational development including the Japanese Tea Garden (1917), roads and walkways, golf course (1916), recreation areas, and stone river walls (Reed et al., 2020).

The scope of this project was to determine the age of six heritage trees in Brackenridge Park to accurately place them in historic context as natural landscape features of the park. My aim is simply to prescribe ages to the trees to the best of my professional abilities.

## Introduction

Trees put on annual growth rings and the variation in ring width each year, caused by the tree's response to environmental factors, such as precipitation and temperature, creates unique patterns of wide and narrow rings throughout a tree's lifespan. Trees that were alive during the same period and were exposed to the same environmental conditions have similar patterns in growth that can be matched through time. This process of pattern matching is used to crossdate living trees, dead trees, and archaeological timbers and is part of the science of tree-rings known as dendrochronology (Figure 1; Speer, 2010).

### *The Heritage Trees of Brackenridge Park*

Parks and Recreation of the City of San Antonio asked me to determine tree ages of six heritage trees (Heritage trees are those measuring over 24 inches in diameter) in Brackenridge Park in the City of San Antonio, TX. The stated goal was to determine the rightful historical place of the trees as features of the park's human and natural features. There are many beautiful and ecologically beneficial trees in the park, but the six trees identified for dating are important as there is an upcoming wall reconstruction project that could necessitate the removal or relocation of some of the trees in question. On January 21, 2023, Ross Hosea (Special Projects Manager Urban Forestry and Trails, Parks and Recreation) and I surveyed six heritage trees to consider their suitability as candidates for tree-ring dating. We selected five as suitable candidates: Tree numbers: #95, #100, #101 (live oaks), #139 (pecan), and #141 (bald cypress). All trees were located within approximately 50 yards from each other close to 29°27'49.5"N, 98°28'12.9"W. Pecan #140 was originally slated for dating but was deemed too hollow to accurately date.

## Methods

### *Field Methods*

Before beginning the project, I conducted an initial inspection of the trees to determine if they were candidates for tree-ring dating. 5 of the 6 trees were identified as suitable for dating. The live oaks (*Quercus virginiana/fusiformis*) were identified as suitable in terms of potentially solid trees, though I indicated the difficulty of coring such dense, hard tree species. The oak trees were clearly identified as either live oak (*Q. virginiana*) or Texas live oak (*Q. fusiformis*), but specific ID was not necessary for dating purposes so the exact tree ID was not attempted at this time. The pecan and bald cypress are normally moderate and easy to core, respectively. I collected all samples using a 5.15mm increment borer. All samples were taken at a height on the tree bole that was as low as possible to obtain maximum age and in a position to reliably extract an intact, solid tree core. After collecting samples, they were labeled, stored in straws, and placed in a map tube for safe handling and transport until they could be prepared in the lab. (See Figures 2-5 for photos of sampled trees.)

### *Laboratory Methods*

All samples were glued to wooden mounts with the cross-sectional surface facing upwards and masking tape was placed tightly over the samples to evenly adhere them to the mounts. Once the glue had dried (ca. 24 hours) I cut the mounts to sample sizes and sanded samples by hand using progressively finer sandpaper (80, 120, 180, 220, 320, 400, 600, 800, and 1200 ANSI-grit)

to display the cellular features of the rings. I then used an air compressor equipped with a high-pressure nozzle to remove remnant dust particles, hand buffed each sample, then utilized compressed air once again to remove any remaining dust particles and debris.

Under the microscope, I initially conducted a process of overlooking and familiarizing myself with each tree core sample to note any interesting characteristics, ring patterns, and anomalies. Temporary sequential calendar years were assigned to the rings of each sample, starting with the outermost complete ring (2022 in all cases) and moving inward to the innermost complete ring (Stokes and Smiley, 1996). All samples were then scanned individually into the computer at 2400dpi using an Epson V600 scanner and the scanning program SilverFast 9. Using the dendrochronology software Coorecorder 9.6 (Maxwell and Larsson, 2021), I measured and recorded each ring-width of each sample, starting with the known outermost year, to the nearest 0.001 mm.

The samples were assigned annual dates on all tree-rings based on careful attention to xylem vessel and tracheid anatomical detail. Special care was taken to account for all possible rings that could be misinterpreted, and these were recorded in detail. (See Figures 6 and 7 for photos of prepared samples.)

## Results

### *Samples*

Table 2 can be consulted to clearly see the results of tree ages for four of the heritage trees at Brackenridge Park. All tree ages are estimates with a margin of error unique to each tree. The sampled tree ages are listed below in order from potentially oldest to youngest trees.

Pecan tree #139 is ring count dated to 92 years old (1931 - 2023) with a margin of error of - 10 years (92 to 82 years old). Live oak tree #100 is ring count dated to 78 years old (1945 - 2023) with a margin of error of +/- 3 years (81 to 75 years old). Live oak tree #95 is ring count dated to 76 years old (1950 – 2023) with a margin of error of +/- 3 years (79 to 73 years old). Bald cypress #141 is ring count dated to 36 years old (1987 – 2023) with a margin of error of +/- 2 years (38 to 34 years old). No cores were obtained for live oak #101 or pecan #140.

### *Internal Crossdating*

Only preliminary statistical analyses were run to compare park samples to one another. The initial results were not sufficient to crossdate any of the samples and were therefore struck from consideration of use for this report.

### *Regional Comparisons*

Only preliminary statistical analyses were run to compare park samples to regional chronologies. The initial results were not sufficient to crossdate any of the samples and were therefore struck from consideration of use for this report.

## Discussion

Using tree-ring dating methods I determined that the maximum possible age for the four sampled heritage trees was 92 years old, dating to ca. 1931CE and the minimum age was 34 years old, dating to ca. 1989CE. Coring live oak tree #101 was attempted, but the increment borer broke due to the high amount of torque force needed to turn the borer in the tree (live oak is one of North America's densest woods), and no core was obtained. The tree was too large and dense to be sampled using traditional methods core sampling, though it is unlikely necessary to date if the goal is to determine old age alone. It is unlikely to be an "old" tree, given the known ages of other trees and is likely similar in age to the others. Regarding age, the same can be said for pecan #140, a tree impossible to sample due to vast hollowing out from decay. A second core (b) was taken from bald cypress #141, but it was not deemed necessary to measure or date considering the young age of the first sample from the tree (a).

Given the proximity to the river, all trees were likely either planted or allowed to grow from natural regeneration following the completion of wall construction along the river. Any trees of substantial size along the bank were most likely removed prior to construction in the early 1900s.

The gold standard in dendrochronology is the use of multiple methods of verifying tree-ring patterns, including the use of statistical analyses (Cook, 1985). I normally use the dendrochronology program CDendro 9.6 (Maxwell and Larsson, 2021) to run statistical analyses to compare samples to regional or site chronologies. There were two main issues preventing this from occurring for this project highlighted below:

### 1. Time constraints:

Three regional tree-ring chronologies (Table 1) are available on the International Tree-Ring Data Bank (ITRDB, 2023), but due to time constraints, I was unable to run quality comparisons and report out in time for this project. The four samples from the park were compared to one another to see if there was a statistically significant site-specific growth pattern, but time constraints and small sample size meant I was unable to analyze to any accurate degree. Accuracy is a must, and due to the fastidiousness of the project, I deemed ring counts with a large margin of error the most reliable method of dating for the time allotted.

### 2. Unique site characteristics:

The likelihood of samples matching a regional chronology is dependent on the similarity of site characteristics from both locations and the similarity of the species being compared. In this case, there was a lack of similarity in both regards. Two of the regional chronologies consisted of post oak (*Quercus stellata*) (Stahle, 2002; Stahle et al., 2006). Post oak is found mainly in upland plant communities, and its use is therefore indicative of a very different ecological system than Brackenridge Park. This matters because post oak growth patterns are less likely to match the growth patterns of the trees sampled in the riparian strip due to entirely different measures of water availability, which has a great influence on the growth of annual tree-rings. The other regional chronology consists of bald cypress, which has a very different growth behavior than the hardwoods sampled at the park. Bald cypress #141 is not a good candidate for statistical dating as it possesses too few tree-rings to be reliably dated statistically.

It is my opinion that tree-ring counts with special emphasis on attention to anatomical features is the best course of action given the small sample size and short window of time to bring a report to fruition. In order to more precisely date trees in the area, a site chronology would need to be constructed using at least 20 trees within the park. Unless exact annual precision is required, the ring count method of dating is often sufficient to understand the growth dynamics of a given area. I did my professional best to ensure the widest possible accurate range for all sampled trees is provided without unnecessarily exaggerating the trees' potential age one way or another.

## Conclusions

A total of four heritage trees were sampled from Brackenridge Park. All trees were ring counted and prescribed estimated ages. Bald cypress #141 is the youngest tree, estimated to be between 34 to 38 years old (ca. 1987). Live oak #100 is the next oldest, estimated to be between 73 to 79 years old (ca. 1945). Live oak #95 is the third oldest tree, estimated to be between 75 to 81 years old (ca. 1947). Pecan #139 is the oldest of the four trees, estimated to be between 82 to 92 years old (ca. 1931). This project has provided an example of fast-growing, riparian trees capable of reaching heritage size in a few decades. All tree cores will be stored for future use and will be available to the City of San Antonio upon request.

## References

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Table 1. Historic bald cypress (*Taxodium distichum*; TADI) and post oak (*Quercus stellata*; QUST) reference chronologies from the International Tree Ring Data Bank used to date samples from Brackenridge Park. Latitude and longitude are approximated for the chronologies represented. GRSP (Guadalupe River State Park), CAKN (Capote Knob), and ECCR (Ecletto Creek) are all located within 50 sq mi from Brackenridge Park. Distance and direction in relation to Brackenridge Park is listed as D&D From BP.

ID	Span	Species	D&D From BP	Lat.	Long.	Citation
GRSP	1486 – 2009	TADI	35 mi North	29.87	-98.50	Cleaveland et al.
CAKN	1712 – 1982	QUST	50 mi East	29.48	-98.78	Stahle
ECCR	1695 – 1996	QUST	40 mi East	29.45	-97.92	Stahle et al.

Table 2. Five samples were collected from Brackenridge Park. Species include live oak (*Quercus virginiana/fusiformis*; QUVI), pecan (*Carya illinoensis*; CAIL), and bald cypress (*Taxodium distichum*; TADI). Sample ID, Tree Number, Species, Innermost Year Measured (IY), Outermost Year Measured (OY), Estimated Pith Year (Pith Yr), Age, Margin of Error (MOE) and Attributes are provided. \*Estimate for Age and Pith Year with a generous margin of error (MOE) listed in years.

Sample ID	Tree #	Species	DBH (in)	IY	OY	Pith Yr	Age	MOE	Attributes
BPO095	95	QUVI	32	1950	2022	1947*	76*	+/- 3	Solid core
BPO100	100	QUVI	37	1949	2022	1945*	78*	+/- 3	Solid core; borer snapped
BPP139	139	CAIL	26	1934	2022	1931*	92*	- 10	Solid core; large diffuse vessels in outermost rings
BPC141a	141	TADI	27	1987	2022	1987*	36*	+/- 2	Solid core; taken @ 54" above ground, 16.1" diam
BPC141b	141	TADI	27	-	-	-	-	-	Solid core; taken @ 23.2" above ground, 31.8" diam

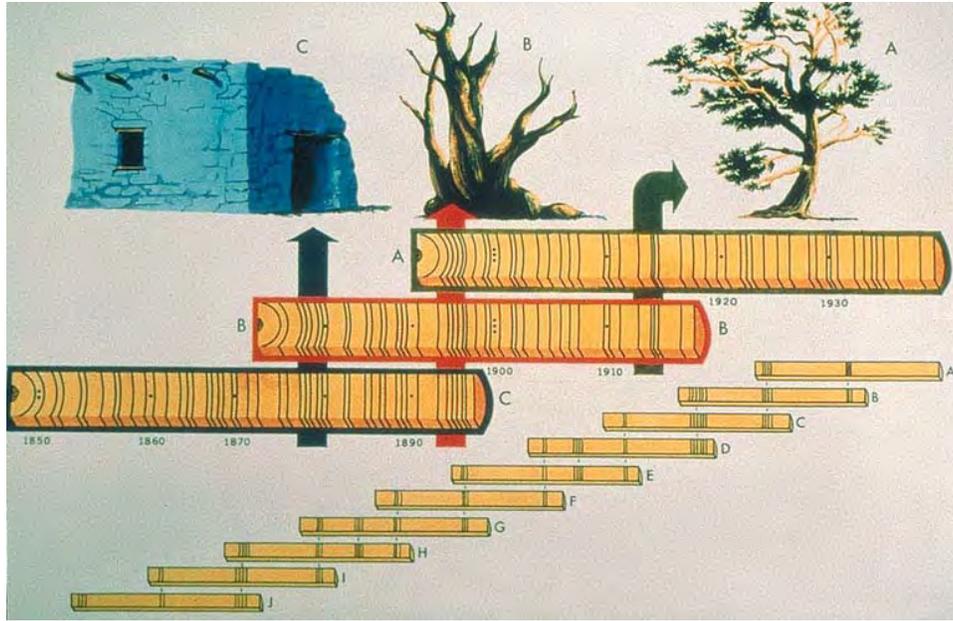


Figure 1. Patterns of tree ring-width variability are used to provide annual dates to historic structures by comparing them with living and dead trees. Courtesy of NOAA Paleoclimatology Program.



Figure 2. Photo of tree #95, a live oak (*Quercus virginiana/fusiformis*) successfully sampled at Brackenridge Park. Photo courtesy of City of San Antonio Parks and Recreation.



Figure 3. Photo of tree #100, a live oak (*Quercus virginiana/fusiformis*) successfully sampled at Brackenridge Park. Photo courtesy of City of San Antonio Parks and Recreation.



Figure 4. Photo of pecan (*Carya illinoensis*) trees #139 (left) and #140 (right). Tree #139 was successfully sampled. Tree #140 was hollow and not sampled. Photo courtesy of City of San Antonio Parks and Recreation.



Figure 5. Photo of tree #141, a bald cypress (*Taxodium distichum*) successfully sampled at Brackenridge Park. Photo courtesy of City of San Antonio Parks and Recreation.



Figure 6. Photo of core four tree core samples. (Top to bottom: #139, #95, #141, #100)

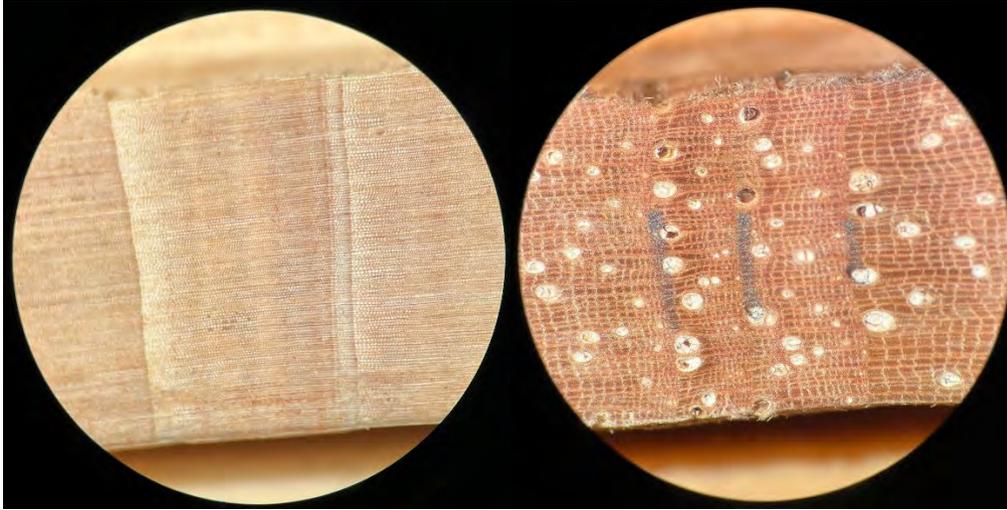


Figure 7. Photo of tree cores #141 (left) and #139 (right) under the microscope.

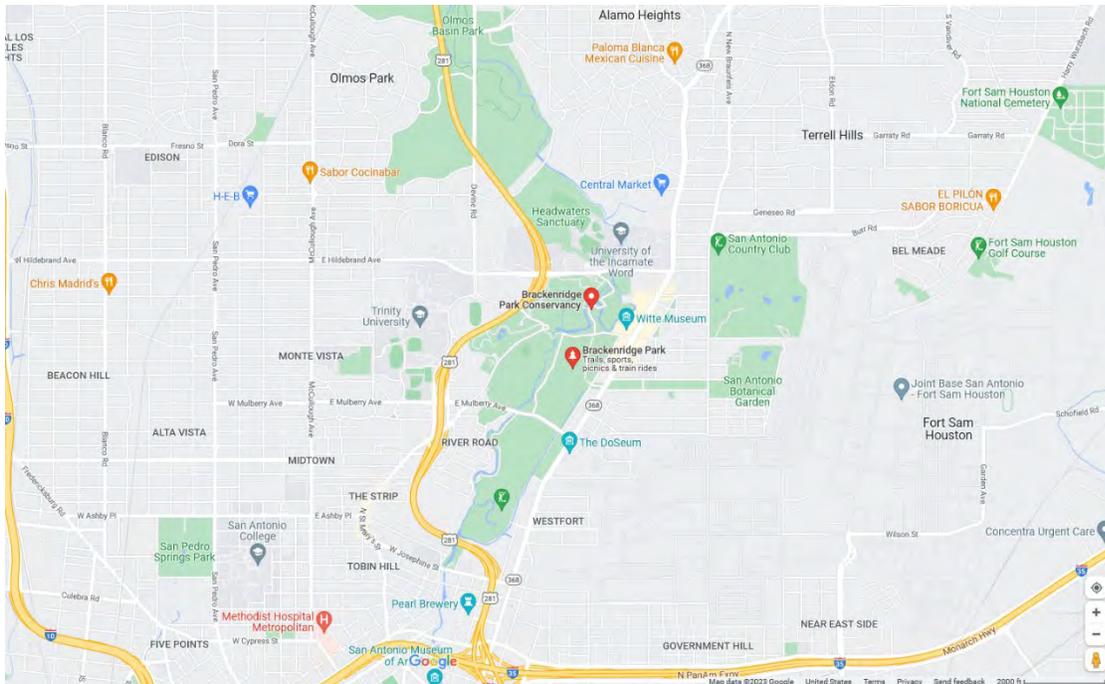


Figure 8. Map of Breckenridge Park in City of San Antonio, TX. Screenshot from Google Maps.

To: Texas Historic Commission; Secretary of the Interior

From: Concerned Citizens of San Antonio, Texas

Re: Brackenridge Park

This letter is an urgent request for your oversight and/or intervention in a City of San Antonio 2017 Bond Park Project that is being undertaken in Brackenridge Park, our State Antiquities Landmark. We are concerned with the project's effect on the historical integrity of our park.

The beginnings of Brackenridge Park are best told on page 48 of the National Register: "These roads have been opened through the dense forest upon a plan to give the most pleasure and variety of scenery." Roads were constructed with "care being taken not to disturb the throne of a single monarch of the forest." Today, the City of San Antonio is preparing to cut down 100 trees, including heritage trees, for their park design. And instead of protecting park wildlife habitats, they are harassing the wildlife and destroying their habitats.

The Standards state that "changes to a property that have acquired historic significance in their own right will be retained and preserved." However, the City plans to remove a rear wall from an 1870s Pump House to "reveal the original arches;" yet, there is photographic evidence that the wall was present as far back as the 1920s, giving those walls their own historic significance. The City also wants to reveal an acequia that was recommended buried for preservation. Their proposed actions show a disregard for the history and culture of Our Park.

Our distrust for the City's Park Project began at a hearing with our local Historic and Design Review Commission regarding the removal of over 100 trees. When the Commission asked for plans that would warrant the need to cut down so many trees, the City insisted they did not have a plan. Yet, a community member in opposition presented Concept Drawings of a proposed plan. After seven months of public meetings, the City continues to withhold details, including any plans, regarding the Project. In fact, a NEPA for the Project was published in the Austin American Statesman, bypassing public comment in San Antonio. Nevertheless, we have over 1,000 signatures opposing the Park Project, which we acquired from walking the park and an online petition.

Research into the Park Project and legal guidelines for historic properties, environmental concerns, etc., produced more misinformation. At the hearing with our local HDRC, when questioned as to whether they had been in contact with the Texas Historic Commission, the City responded that they were in conversation with THC, implying a positive response from THC. However, through FOIA requests, we discovered that the week prior to the hearing, THC had sent a letter to the City stating that they were unable to complete a permit review due to insufficient documentation provided.

The City has continued to show a lack of care and respect for preserving the culture and aesthetics of our historic park. Its use of pyrotechnic explosives, board-banging, and mylar balloons in trees to deter migratory birds not only violated the peace of the park for visitors, it also violated the Migratory Bird Treaty Act by continuing to harass nesting birds when eggs and hatchlings were present. These actions continued for five months, including Easter weekend when hundreds of families filled the park. Complaints by the public to local law enforcement regarding noise and disturbance to the park setting were dismissed or ignored.

As we have walked the park these many months now, informing park visitors and keeping a watchful eye on this historic treasure, we have become concerned that Brackenridge Park has been neglected in

order to advance this Project. For a photo video of neglected historic structures within the park, you may go to <https://youtu.be/9Fj2wm56mhA>.

Brackenridge Park is not only an historic landmark, it is also a spiritual landmark to the indigenous people who are deeply connected to the birds and the river that runs through the Park. We have three letters of opposition from indigenous tribes who want to preserve the site of their own history.

We would greatly appreciate your help in preserving Brackenridge Park's history for future generations.

Respectfully,

Ida Ayala and Alesia Garlock, Advocates for the Preservation of History, Nature, and Culture

And countless San Antonians who enjoy and appreciate the history and culture of Brackenridge Park

# COMANCHE NATION

March 21, 2022

City of San Antonio  
ATT: Mayor Ron Nirenberg  
100 Military Plaza  
San Antonio, TX 78203

**RE: San Antonio Parks and a request for variance to remove over 100 trees from Brackenridge park**

Dear Mayor Nirenberg,

The Comanche Nation Tribal Historic Preservation Office was notified by the local Native American groups of San Antonio of the removal of the trees within Brackenridge Park. The Comanche Nation lives strong ties to the area and still uphold the annual pilgrims to gather medicine along the Rio Grand River. The tribal citizens considers this area to be a cultural significance regarding the water, trees, and the migratory birds. We still practice our religious ceremonies, which dates associated with the birds. Our Native American Church songs speak about the river of the Yampahana and many tribes also uphold these songs today. We stand in support against the Brackenridge Park Tree Removal and understand the damage of the sacred trees and migratory birds.

Our office performs reviews in order to identify and preserve the Comanche Nation and State cultural heritage. In consultation with the State Historic Preservation Office. Please contact the Comanche Nation Tribal Historic Preservation Office at (580) 595-9618, if you require additional information on this project.

Best Regards,

**Martina Minthorn**

Comanche Nation Historic Preservation Office  
Martina Minthorn, Tribal Historic Preservation Officer  
#6 SW "D" Avenue, Suite C  
Lawton, OK. 73501  
[Martina.Minthorn@comanchenation.com](mailto:Martina.Minthorn@comanchenation.com)  
(580) 492-1153/Fax (580) 595-9733



# LIPAN APACHE TRIBE

(Lipan Apache Tribe of Texas)

P.O. Box 5218

McAllen TX 78502

March 18, 2022

Dear Sirs,

It has come to our attention that there is a possibility of the destruction of a few historic heritage trees in Breckenridge Park. It is our understanding that the removal of these heritage trees that are on, or near, the San Antonio River could have a devastating effect on the river's environment including but not limited to the trees themselves but the also the Cormorant.

The Lipan Apache have historically (for hundreds of years) and to date, been actively involved in the Native American Church (NAC) and its ceremonies, even prior to being collectively referred to as the NAC. Our people have long been known to be a celestial, as well as a ceremonial people. In the Lipan NAC the San Antonio River, which is represented celestially, and its habitat are a sacred Earthly body. Within this environment the Cormorant migrates to and nests in these trees.

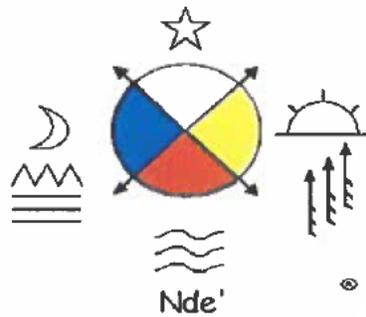
The Cormorant is a very important and a sacred bird to the Lipan NAC. It also has a celestial representation and is a basis for the Lipan ceremony.

We feel that protecting the San Antonio River and its habitats especially the Cormorant and the heritage trees it nests in and migrates to, is of utmost importance due to our ceremonious and sacred connection to them.

Therefore, we stand with those who oppose the destruction of the heritage trees in and around the San Antonio River.

Tom Castillo  
Historical/Cultural Preservation Officer  
Lipan Apache Tribe





Lipan Apache Band of Texas  
Richard A. Gonzalez, Vice Chairman  
PO box 1866 Brackettville, Tx 78832

May 20, 2022

To: San Antonio Mayor, San Antonio City Manager, Brackenridge Park, Property Management Office of HR Services Commission, City of San Antonio Historic Department and Review Commission and all others that have interest in Brackenridge Park.

Subject: Letter of Opposition to cutting trees and removing birds

This Historic Park and its contents have come to our attention due to plans to destroy or alter the historical trees and minatory birds nesting in the area.

Our ancestors have lived in this region with several other Indigenous Tribes for countless generations. Our ancestors lived alongside Spanish settlers and later other immigrants from Eastern United States and European Countries.

Lipan stood with Steven Austin, with the First Texas Rangers and Cuelgas de Castro (our 3<sup>rd</sup> Great Grandfather), he received the rank of General of Texas Rangers.

Lipan signed five peace treaties as well as one under the Live Oak Treaty Tree in Austin, that tree was poisoned by a deranged man in 1996 but the city of Austin quickly removed the poison and restored the tree.

These trees are Historical and significant to the Lipan, representing the Elders who have gathered under the trees for council and shelter.

Today the Brackenridge Park is central and accessible to many people to enjoy, however with about 94 percent of the Land in Texas fenced as private land making the public access to this park and these magnificent trees critical for most of the population.

All efforts should be exhausted to protect these trees and birds. The small area the birds use for roosting should be protected as well. Their presence is vital and should be an inspiration to visitors and an example how we can live alongside.

Much of the conflicts there have been in history are based on a misunderstanding of cultures and humans failing to grasp the importance of all cultures around us. Today there are still historical markers in Texas declaring that the "Indians" Indigenous people, were removed from Texas. This of course is not true as we are still here.

We pray this commission on and our government find a way to preserve this which has been loaned to us all, the Brackenridge Park and pass it on to future generations preserved as much as possible.

Richard A. Gonzalez

Vice Chairman Lipan Apache Band of Texas

richard.gonzalez3585@gmail.com

Madam Secretary,

For thousands of years the early peoples of North America have traveled through what is now known as Central Texas to gather peyote from our gardens in Southern Texas. A major stop along the way is the headwaters of the San Antonio River known in those days as Yanaguana or "Spirit Waters" this word is sung in peyote ceremonies throughout the US and Canada. The river itself flows through Brackenridge Park where heritage trees along the river are being threatened and migratory birds are being displaced for development. The unique flow of the river as it passes through the park is identical to a constellation called Eridanus name by the Greeks meaning "The River" and our Southern constellations in our Texas skies are of the birds that inhabit the river as well. The constellation of Phoenix and Grus to name a few. Any further development of this region is simply further insult to injury regarding our shared colonial past. Please investigate this matter to protect the cultural legacy of the foundations of our shared culture, The Native American Church. Please see the accompanying letters of opposition.

Best Wishes

Gary Perez – Coahuiltecan

Matilde Torres - Otomi

## GOV &amp; POLITICS

# Indigenous advocates want Brackenridge bond project to recognize native peoples' history



by **Lindsey Carnett**  
June 28, 2022



Matilde Torres, an Indigenous environmental advocate, says the San Antonio River and its surrounding trees in Brackenridge Park speak to thousands of years of native history and cosmology. Credit: Bria Woods / San Antonio Report

Standing before about 50 people in a large room at the Witte Museum during the last public meeting on the Brackenridge Park bond project, Matilde Torres held one end of a laminated poster depicting an intricate cave mural painted thousands of years ago in the Lower Pecos region of southwest Texas.

The ancient work contains the origin story of her ancestors, Torres explained, and the San Antonio River plays a central — and spiritual — role in that story: the headwaters of Yanaguana, or Spirit Waters, as the river was known to the Coahuiltecan, is considered the sacred spot where life began.

That conviction is one reason why Torres and other Indigenous descendants say they oppose the removal of dozens of trees from the banks of the river at Brackenridge Park as a part of the 2017 **bond project**.

“Those trees are alive and they’re also a part of the underworld, and the middle world and the upper world,” Torres said. “Everything that flows within that tree is water, right? Those are waters [that were] within our ancestors.”

More than just opposing the tree removal, however, Torres and others want to ensure that as Brackenridge Park is revitalized, it represents and honors the history of the people who lived along its banks for 12,000 years before the Spanish arrived.

## **Origin stories**

The 26-foot-long cave painting, now known as the White Shaman Mural, is considered one of the most important and illuminating pre-historic artifacts of the Lower Pecos Canyonlands Archeological District. Located in Val Verde County, about 200 miles from San Antonio, researchers have been studying its many-layered meanings for decades. That includes Gary Perez, an Indigenous descendant and researcher who has deciphered crucial elements of the mural; his voice can be heard in the Witte Museum’s video exhibit about the people of the Lower Pecos.

In his interpretation, Perez sees a map of Texas — perhaps the oldest one in existence. This map includes depictions of the four great springs of Central Texas, Perez said: Barton Springs in Austin, Comal Springs in New Braunfels, San Marcos Springs in San Marcos, and the headwaters of the San Antonio River, now known as the Blue Hole.

He and Torres recently shared various aspects of their ancestors’ origin story and other cosmological myths of the **Payaya people**, one of the Coahuiltecan tribes of South Texas who lived along the banks of the San Antonio River, likely within the bounds of modern-day Brackenridge Park.

“Our roots go deep,” Perez said. “These trees are our teachers because the trees teach us that our roots go deep and are everywhere.”

The headwaters of the river, which spring from the Edwards Aquifer, is located on 53 acres now preserved in perpetuity and stewarded by the Sisters of Charity of the Incarnate Word through the nonprofit Headwaters at Incarnate Word. The spring was a sacred pilgrimage site for Indigenous peoples for thousands of years, Perez said.

The story goes, Torres said, that a waterbird flew into the Blue Hole, where he encountered a blue panther that lived there. Startled, the waterbird immediately flew back out, flinging water droplets from his tailfeathers. These droplets fell onto the land, and from them sprang life.

The Payaya were one of the groups upon whose sweat the San Antonio de Valero Mission was established, according to accounts kept by [the Texas Historical Association](#). They are mentioned in records of this mission as late as 1776.

Today, the story of the blue panther and the waterbird is loosely depicted through art and sculptures at [Yanaguana Garden in Hemisfair](#).

Torres and Perez also said they share Indigenous people’s cosmological belief that the part of the river where the bond project will be primarily focused — the horseshoe bend just north of Joske’s Pavillion — aligns perfectly with the Eridanus, a constellation in the southern celestial hemisphere, each winter solstice.



Matilde Torres points out that the shape of the San Antonio River at the horseshoe bend in Brackenridge Park is the same shape as the constellation Eridanus. Credit: Bria Woods / San Antonio Report

Indigenous populations native to the area, Perez said, believed a bridge between the physical world and spirit world opened there at midnight on the solstice — “much like the bridge in [the movie] *Coco* does on Dia de Los Muertos,” Torres added.

Both said the headwaters and the river are still considered sacred to local Indigenous people today, and they want to see that reality represented inside San Antonio’s central park.

## **Representation within the park**

Over the last several decades, Brackenridge park has fallen into disrepair.

In an effort to reverse that slide, the City of San Antonio commissioned a master plan in 2016 “to shape the future development and rehabilitation of Brackenridge Park for many years to come.”

That master plan was finalized and approved by City Council in 2017.

As a part of the process, the Brackenridge Park Conservancy, a nonprofit created in 2008 to help restore and care for the park, commissioned extensive research on the park and its history. The result was the **Brackenridge Park Cultural Landscape Report**, which aims to understand the park's assets and deficits, and asks how best to accurately reflect its history while also serving city residents in the decades to come.

According to the report, the occupation of the area by Indigenous people prior to written history is one of eight distinct timeframes encompassed by the parkland's history.

In 2017, San Antonio voters approved an \$850 million bond for city projects, with \$116 million to improve parks. Of that, **roughly \$7.75 million** was to be used to "repair and enhance" historic features of Brackenridge Park, including the Lily Pond, Upper Labor dam, Upper Labor acequia, the pump house and Lambert Beach.

While the coronavirus pandemic slowed down those plans, city staff went before the San Antonio Planning Commission **in January seeking a project variance** to remove 104 trees — including nine heritage trees — as part of the project. City staff said those trees were either damaging the historic structures, are diseased or invasive, and so should be removed. To replace the lost tree canopy, the plan has always included planting new trees.

While the planning commission approved the removal, the city's Historic and Design Review Commission **delayed making a decision** after about dozens of citizens spoke passionately against the action. The city paused the project, and later announced a series of public meetings to get input from the community on the design process.

Those meetings **began in March**; at the last one, city staff shared a preliminary design that it called phase one of the project, and announced three more meetings to discuss phase two.

Torres has attended all four public meetings, joining environmentalists and other advocates who continue to strenuously object to any tree removal. Attendees also continue to demand that the **city cease its rookery mitigation efforts** in the park.

During the last meeting, city officials and project designers announced they would be able to save 19 of the trees **originally slated for removal** by relocating them within the park.

But like others who have shown up to every meeting, Torres was not impressed with the city's most recent effort. Prioritizing the walls and other "built" structures at the expense of the trees favors colonial and post-colonial history over Indigenous history, she said.

She chided officials for not reaching out to any Indigenous groups before designing the project, even though three tribes (the Lipan Apache Tribe of Texas, the Lipan Apache Band of Texas and the Comanche Nation Historic Preservation Office) had written letters opposing the tree removal.

San Antonio Parks and Recreation Director Homer Garcia said during the meeting that while he hasn't seen the letters, he would be happy to meet with representatives from San Antonio's indigenous community, as did Kinder Baumgardner, managing principal with the SWA Group, the landscape architecture firm designing the project.

"We know that there are these Indigenous contributions and significance to the park," Baumgardner said. He added he and his staff will look for ways to incorporate Indigenous history into phase two of the project.

To date, no meeting has been set; Garcia told the San Antonio Report he and his staff plan to call Torres and Perez this week to set up a time.

Torres stressed she is just one representative, and said she hopes Garcia speaks with representatives from multiple tribes.

"One thing they need to understand is that [one group doesn't] speak for all Indigenous people," Torres said. "I would like to see [the city] invite these other groups, invite these other tribes as well [and to] make it a day for them to share their knowledge, to share their stories."

*Correction: An earlier version of this story misidentified the relationship between Gary Perez and the Witte Museum, and misattributed the owner of the land where the Blue Hole is located.*

## **MORE FROM SAN ANTONIO REPORT**

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### **Sakai to oversee first Bexar County Commissioners Court meeting**

by [Andrea Drusch](#)

As we informed park visitors of the Park Project, they wanted something to sign to voice their protest. (Online attached)

Batch A  
177

Please sign below to stop the tree removal, allow migratory bird-nesting, and suspend work on the Brackenridge Park Project until a better plan is developed to preserve OUR PARK for generations to come.

Brackenridge Park is on the *National Register of Historic Places* and is a *Texas State Antiquities Landmark*.

Several species of birds that migrate to Brackenridge Park are protected under *The Migratory Bird Treaty Act*.

Sample of Written Petition  
(First Page)

Name Fred Mendiola Jr.

Complete Address [Redacted]

Zip Code [Redacted]

City Council District Number \_\_\_\_\_

Signature Fred Mendiola Jr.

Name Vanisa Santos

Complete Address [Redacted]

Zip Code [Redacted]

City Council District Number \_\_\_\_\_

Signature [Redacted]

Name Betricia Carr

Complete Address [Redacted]

[Redacted] Zip Code [Redacted]

City Council District Number \_\_\_\_\_

Signature Betricia Carr

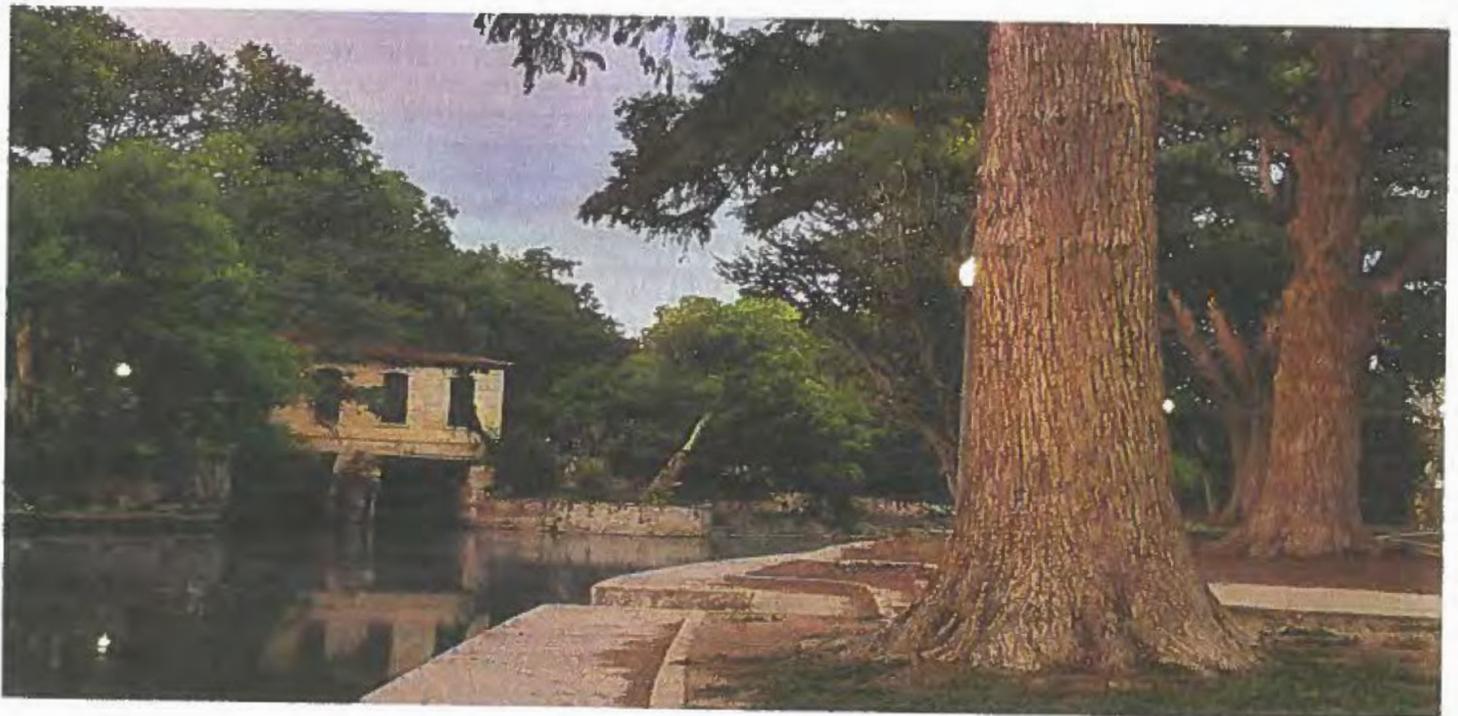
Name	City	State	Postal Code	Country	Signed On
Ida Ayala		TX		US	4/23/2022
Josephine Ayala					4/23/2022
Marco Ayala					4/23/2022
Charles Miksch					4/23/2022
Micaela Elizondo					4/23/2022
Zed Trick					4/24/2022
Michelle Molina					4/24/2022
Alesia Garlock					4/24/2022
Jennett Espinoza					4/24/2022
Stephanie Yanes					4/24/2022
Rosie Torres					4/24/2022
Nicole Gomez					4/24/2022
Amaris Valdez					4/24/2022
Eric Morales					4/24/2022
Maria Valdez					4/24/2022
Chris Courtney					4/24/2022
Santos Guajardo					4/24/2022
Falcon Knight					4/24/2022
Zed Hawk					4/24/2022
Vulture Bones					4/24/2022
Regina Ortiz					4/24/2022
Gregory Harman					4/25/2022
Grace Espinoza					4/25/2022
Joyce Espinoza					4/25/2022
MARGARITA MALDONADO					4/25/2022
Laura Juarez					4/25/2022
Erin Ashley Gomez					4/25/2022
Rosey Abuabara					4/25/2022
Angelita Olvera					4/25/2022
Catherine Lee					4/25/2022
Zoe Molina					4/25/2022
Maria A Berriozabal					4/25/2022
Tiffany Pippin					4/25/2022

## Brackenridge Park Pumphouse



**Above Photo: National Register of Historic Places 1920s**

**Below Photo: Summer of 2022**



TAB 3

## TEXAS HISTORICAL COMMISSION

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### Item 3.B

Texas Historical Commission

Executive Committee

March 3, 2023

### **Discussion and possible action regarding an Archeology Permit for investigations associated with Brackenridge Park Phase I of the 2017 bond project at Brackenridge Park, Lambert Beach area, San Antonio, Bexar County**

#### **Background:**

Legacy Cultural Resources, on behalf of the City of San Antonio (COSA), is requesting an archeological permit for Intensive Survey to conduct monitoring and backhoe trenching in support of the preservation, reconstruction, repair, and stabilization of historic landscape architectural features at Lambert Beach in Brackenridge Park. The project area is 1.7 acres in size and will consist of subsurface impacts at least .5 feet and up to 28 feet in depth, including the removal or relocation of 48 trees. The project area occurs within the Brackenridge Park Historic District, which is listed on the National Register of Historic Places, as a State Antiquities Landmark, and as a Local Historic Landmark. No previously recorded archeological sites are present, but the project area includes historic structures and landscape features and other precontact archeological sites have been recorded in the surrounding area. This project is subject to review under both the Antiquities Code of Texas and by the US Army Corps of Engineers, and because it has the potential to negatively impact archeological resources, requires archeological investigation to assess the project area.

#### **Scope of work:**

Legacy Cultural Resources proposes a combination of archeological monitoring and backhoe trenching to identify archeological resources that have the potential to be adversely impacted by the proposed project. Specifically, in consultation with THC and COSA archeologists, a series of backhoe trenches will be excavated on both sides of the river and outside of tree driplines to preemptively assess the potential for intact archeological deposits within the project area prior to commencement of construction. If archeological resources are encountered, they will be recorded and Legacy Cultural Resources will consult with THC and COSA on an appropriate plan for avoidance, testing or mitigation.

Following completion of the backhoe trenching, archeologists will continue to monitor all ground disturbing activities to ensure that no archeological or historic resources are impacted. Should intact features or deposits be encountered during construction, work will halt at that location and the THC and COSA will be notified to determine the appropriate manner to proceed.

Staff have reviewed the submitted scope-of-work for the project and find it acceptable. Methodology, reporting, and curation meet all relevant state and federal requirements and follow the Council of Texas Archeologists standards for fieldwork and reporting. Staff recommend that the AAB and Commission authorize issuance of a permit.

#### **Recommended Motion (Commission):**

Move to recommend authorizing the Executive Director to issue an Archeology Antiquities Permit for the archeological investigations associated with Phase I of the 2017 bond project at Brackenridge Park, Lambert Beach area, San Antonio, Bexar County.

## Proposed Archaeological Scope of Work for Phase I Brackenridge Park – Lambert Beach, San Antonio, Bexar County, Texas

### Introduction

The City of San Antonio (City) proposes to preserve, reconstruct, repair, and stabilize the historic landscape architectural features at Lambert Beach in Brackenridge Park (**Figure 1**). The project will include underpinning the walls beneath the First Pump House with concrete foundations for stabilization, construction of a new lift station, removal of two floating staircases that are beneath the surface of the San Antonio River, construction of new shadow walls behind the historic walls along the river, rebuilding collapsed sections of historic walls along the river, constructing a new staircase, replacing sidewalks, planting 26 new trees, and removing or relocating 48 trees within an approximately 1.7-acre project area (see Appendix).

As this project will require a permit through the United States Army Corps of Engineers (USACE), compliance with Section 106 of the National Historic Preservation Act will be necessary. In addition, the improvements will take place on land owned by the City, requiring compliance with the Antiquities Code of Texas. Brackenridge Park is a National Register of Historic Places (NRHP)-listed district, as well as a State Antiquities Landmark. Lambert Beach, the bathhouse, and the First Water Works pump house are contributing elements to the NRHP district along with the stone walls lining the San Antonio River. This project will also comply with the Programmatic Agreement (PA) between the USACE, the City, and the Texas Historical Commission (THC).

The project area consists of approximately 1.7 acres of land, and will comprise the archaeological area of potential effects (APE). Most of the project APE will be graded, so that ground disturbance up to 0.5 feet (ft) (0.15 meters [m]) in depth will occur throughout the project area (**Table 1**). Width of other specific impacts will vary according to the type of improvement, with a maximum width of improvements other than grading anticipated to be 28 ft (8.5 m). Depths of impact for the various improvements will range between 0.5 ft (0.15 m) and 15 ft (4.6 m) below ground surface.

Tree removal methods may vary with most trees being cut and roots left in place to avoid extensive ground disturbance. For those trees that may be impacting historic structures, removal will take place under the observation of a historian and an archaeologist, and ground disturbance will be minimized to ensure the historic structures are stabilized during removal. As a result, dimensions for tree removal are likely to be tailored to each tree and type of removal. This proposed scope of work addresses the archaeological component of the project, and will be incorporated into a treatment plan that is in preparation in accordance with Stipulation II of the PA.

Table 1 Proposed footprints for Improvements at Lambert Beach

Improvement	Length	Width	Depth	Plan Set Page Number
Grading	Throughout project area	Throughout project area	0.5 ft	C1.01, C1.41
Concrete Foundation Underpinning at Pump House	40 ft	6 ft on either side of existing foundation	2 ft below existing foundation	S2.01
New Lift Station	37 ft	28 ft	12 ft	C6.01, C6.02
Floating Staircase Removal	Not provided	Not provided	Unknown	C1.01
New Staircase	Variable	3 ft	5 ft	L4.03, L4.05
Shadow Walls	Variable	2 ft	15 ft	L4.03, L4.04
Rebuilding collapsed walls	Variable	1.5-2 ft	3 ft	L4.04
Sidewalk replacement	Not shown	3-5 ft	4 inches (does not show subgrade)	C5.30
Tree planting/relocation	N/A	Between 1-5 ft	Between 1-5 ft	L1.00, L1.01, L5.00
Tree removal	Variable	Variable	Variable	L1.01, L2.01

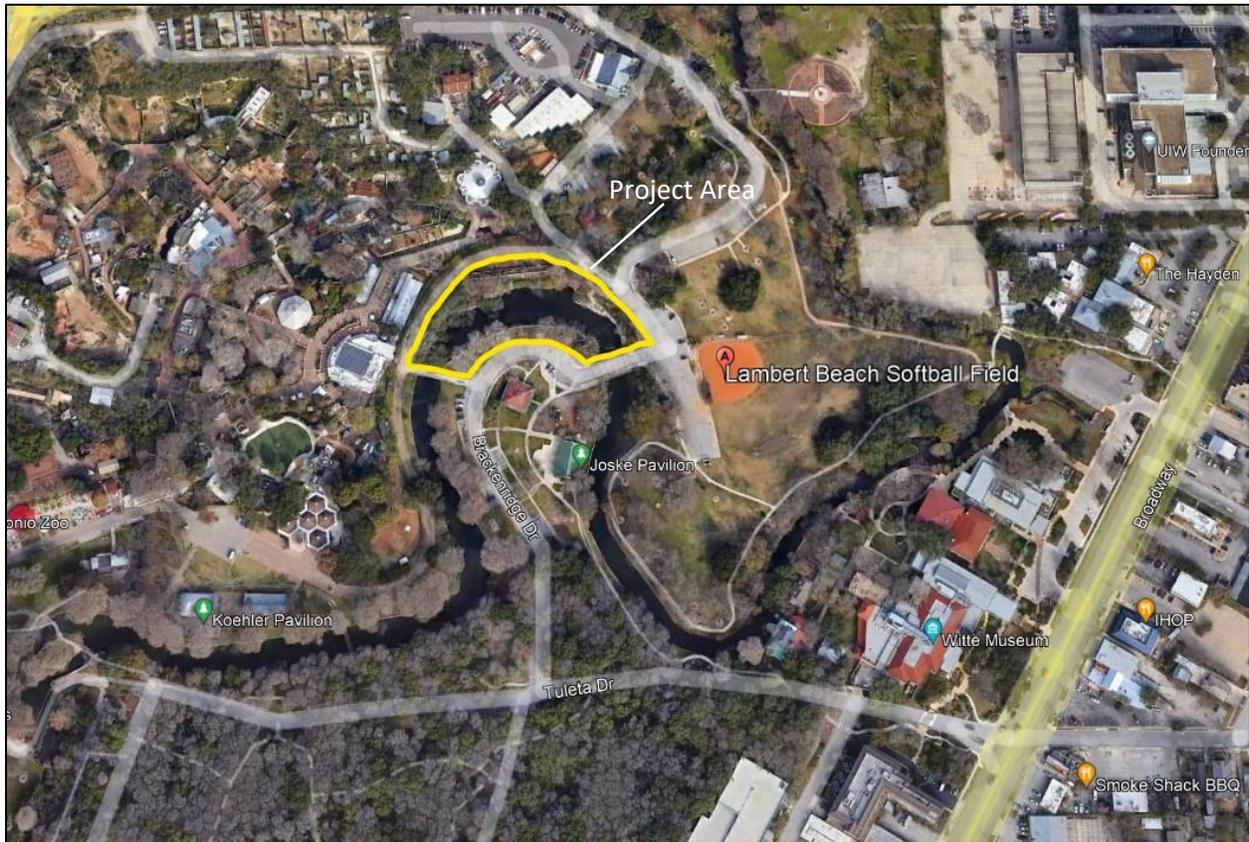


Figure 1 Project Location

## **Soils and Geology**

The underlying geology of the project area is mapped as Holocene-age alluvium (Bureau of Economic Geology [BEG] 1983), indicating there is a possibility of encountering cultural materials within the project area. Soils are mapped as Tinn and Frio soils, 0 to 1 percent slopes, frequently flooded. Tinn and Frio soils are formed in calcareous clayey alluvium and are located floodplains of streams that drain the Blackland Prairies. A typical Tinn soil profile consists of a black clay A-horizon overlying a black clay (B-horizon) at an average depth of 46 cm (18 inches) below the ground surface. A typical Frio soil profile consists of a dark grayish brown silty clay A-horizon that transitions to a grayish brown silty clay B-horizon at an average depth of approximately 102 cm (40 in) below ground surface (United States Department of Agriculture-Natural Resources Conservation Service [USDA-NRCS] 2021). Tinn and Frio soils have the potential to contain deeply buried cultural deposits.

## **Previous Investigations**

Archaeologists consulted the THC's online Texas Archeological Sites Atlas (Atlas) to locate previously recorded cultural resources, including NRHP-listed properties and districts, State Antiquities Landmarks (SALs), Official State of Texas Historical Markers (OTHMs), Recorded Texas Historic Landmarks (RTHLs), cemeteries, and archaeological sites and surveys. They also consulted the City's list of Local Historic Landmarks to find local historic landmarks located within and adjacent to the project APE. Prior to field investigations, archaeologists will perform a more extensive literature review of previous cultural resources work within and in the vicinity of the project area in compliance with Stipulation II(A). This review will provide a discussion of previously recorded cultural resources within the project area, previous investigations, assessments, conclusions, and concurrences. In addition, the literature review will provide an assessment of areas where there may be a potential for intact deposits to exist within the project area. The literature review will be incorporated into the treatment plan and into the research design for the Antiquities Permit.

The results of the preliminary cultural resources background review revealed that the project area is located within the Brackenridge Park Historic District, which is an NRHP-listed district, an SAL, and a Local Historic Landmark (Atlas). Lambert Beach, the bathhouse, the stone walls lining the river, and the First Water Works pump house are contributing elements to the NRHP District (Pfeiffer and Tomka 2011). There are no individual NRHP-listed or individual SAL properties, OTHMs, RTHLs, cemeteries, or previously recorded archaeological sites within the project APE (Figure 2).

The entire project APE is situated within the 344-acre NRHP-listed and designated SAL Brackenridge Park Historic District. The NRHP district includes 108 cultural resources that include historic structures, buildings, sites, objects, and archaeological resources within its 344-acre boundary. Eighty-two of these resources are contributing to the district under Criteria A, C, and D. The district's period of significance extends from the Paleoindian period through the Late Prehistoric and from 1719-1961. Lambert Beach was one of the first projects associated with the development of Brackenridge Park in 1915. The gravel-lined swimming area was transformed in 1925 when the concrete stairs and landings were added. The bathhouse, designed by Emmett Jackson, remains in place, though the roof was removed in 1992. An associated stone retaining wall is also mentioned as serving as a divider between the bathhouse and the river. The pump house is the oldest intact industrial property in the city, and is a single-story cut limestone building (Pfeiffer and Tomka 2011).

While no archaeological sites are present within the project area, nine archaeological sites have been recorded within the vicinity of the project APE (Table 2). Prehistoric sites range from surficial to deeply buried campsites that span the time periods from the Early Archaic to the Late Prehistoric while historic-age archaeological sites span from the early 1700s through the early 1900s. Historic sites include water control features such as acequias and dams as well as historic-age artifact scatters. Many of these sites are significant and have historic designations.

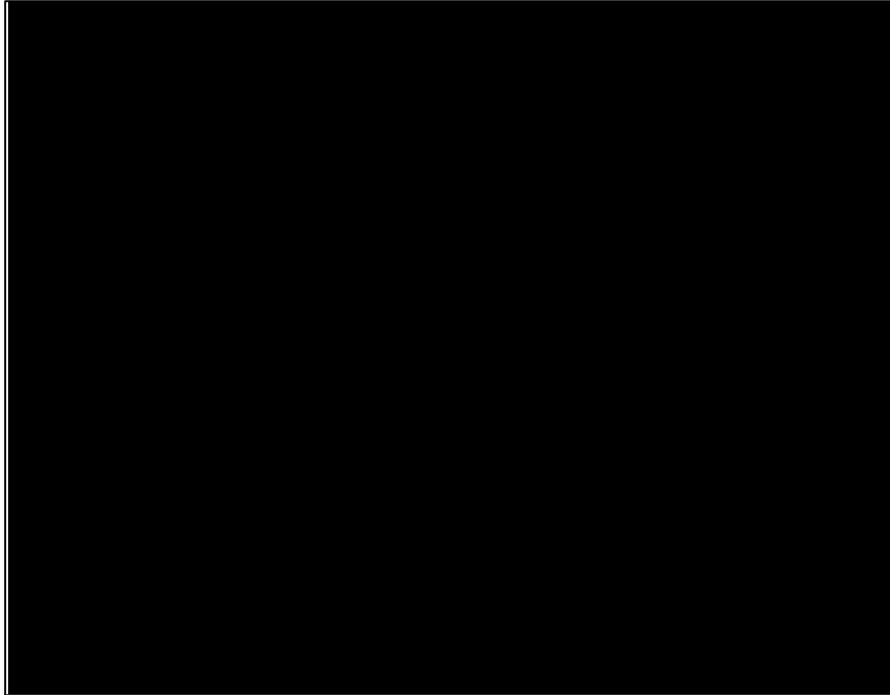


Figure 2 Previously recorded cultural resources in the vicinity of the project APE.

Table 2 Recorded archaeological sites in the vicinity of the project APE

Trinomial	Site Type	Landform	Depth of Deposits	NRHP/SAL Eligibility
<b>41BX283</b>	Historic quarry	Shoulder ridge	Unknown	Unknown/Located in Source of the River NRHP district.
<b>41BX323 Paddle Boat Site</b>	Early Archaic through Late Prehistoric campsite	Upper and lower terraces	0-100 cmbs	NRHP eligible. Designated SAL/Located within the Brackenridge Park NRHP district.
<b>41BX1273 Upper Labor Acequia</b>	Historic Stone-Lined Acequia	Upper terrace	27-75 cmbs	NRHP eligible. National Historic Civil Engineering Landmark. Located within the Brackenridge Park NRHP district.
<b>41BX1425</b>	Transitional Archaic campsite;	Floodplain	0-75 cmbs	Undetermined/ Located within the Brackenridge Park NRHP district.

Trinomial	Site Type	Landform	Depth of Deposits	NRHP/SAL Eligibility
	Historic artifact scatter			
<b>41BX1754</b>	Historic (1920s) Miraflores Park; Unknown Prehistoric campsite	Floodplain	0-244 cmbs	NRHP eligible. Designated SAL
<b>41BX1773</b>	Unknown Prehistoric	River bank	20-100 cmbs	Undetermined
<b>41BX1798</b>	Historic water control feature, Early Archaic campsite	Floodplain	120-190 cmbd	NRHP eligible/Located within the Brackenridge Park NRHP district.
<b>41BX2043 Upper Labor Ditch</b>	Historic Acequia	Tidal flat	0-200 cmbs	Unknown/Partially Located within the Brackenridge Park NRHP district.
<b>41BX2056 Alamo Dam</b>	Historic Dam	Upper terrace	100-Unknown cmbs	Located within the Brackenridge Park NRHP district.

**Historic Map Review**

The project APE is located in a distinctive bend in the San Antonio River, which shows up on several early maps of the project area. A mid-nineteenth century map of the Confederate Tannery located south of what is now Lambert Beach shows that while there were improvements upstream and downstream of the project APE, that overall the area appears to have been undeveloped (**Figure 3**). By 1890, the pump house and raceway had been added to the landscape (**Figure 4**). The map also shows that two structures appear to have been present within the project APE, suggesting there could be historic-age archaeological deposits present that would be associated with the late nineteenth century.

By 1908, the City had acquired the property (**Figure 5**), and within the next decade, would develop the area as Lambert Beach. A 1912 Sanborn map (**Figure 6**) shows an inset of the pump house, but the remainder of the project APE is not depicted. Subsequent Sanborn maps are unavailable online at the Library of Congress.

This map review indicates that historic-age archaeological deposits associated with the nineteenth century structures on the 1890 map could be present within the project area. In addition, deposits associated with the development of Lambert Beach may be present. As a result, there is a high probability for historic archaeological deposits to be present within the project APE.

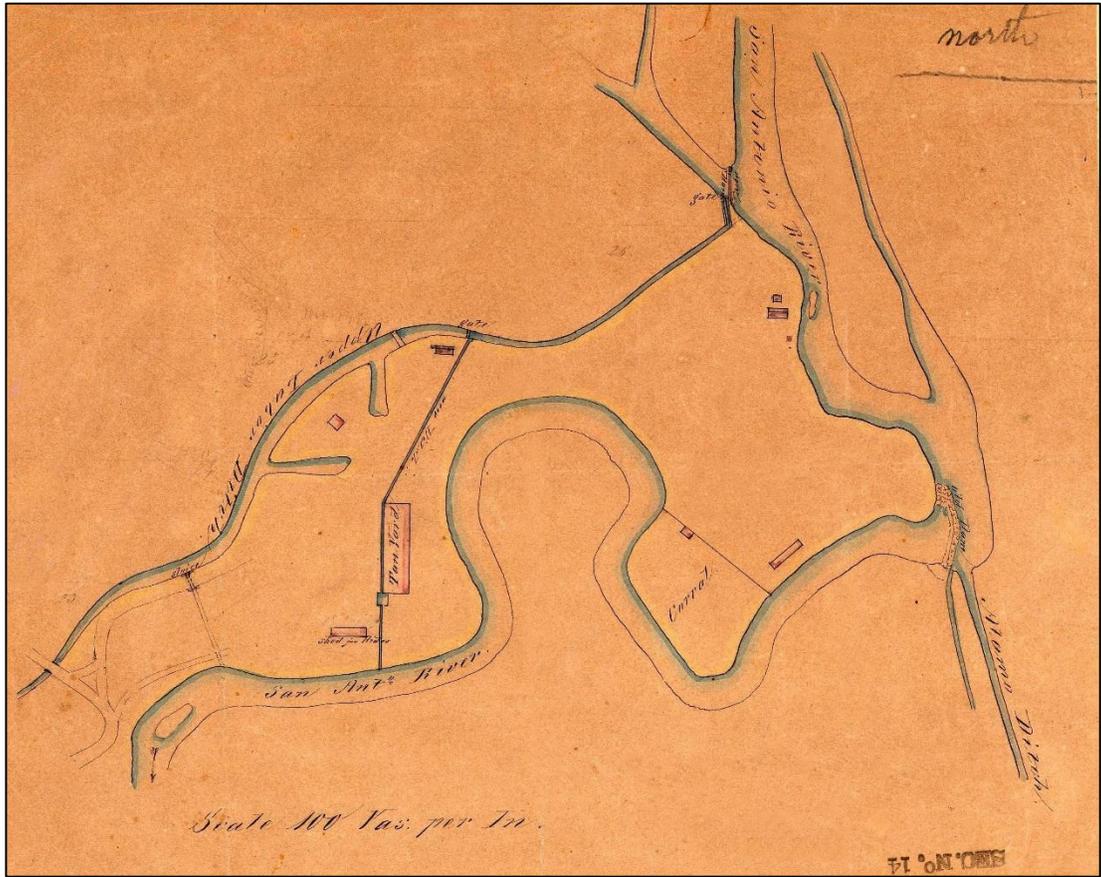


Figure 3 1865-1869 Friesleben map of Confederate Tannery



Figure 4 1890 Map showing project APE with Pump House

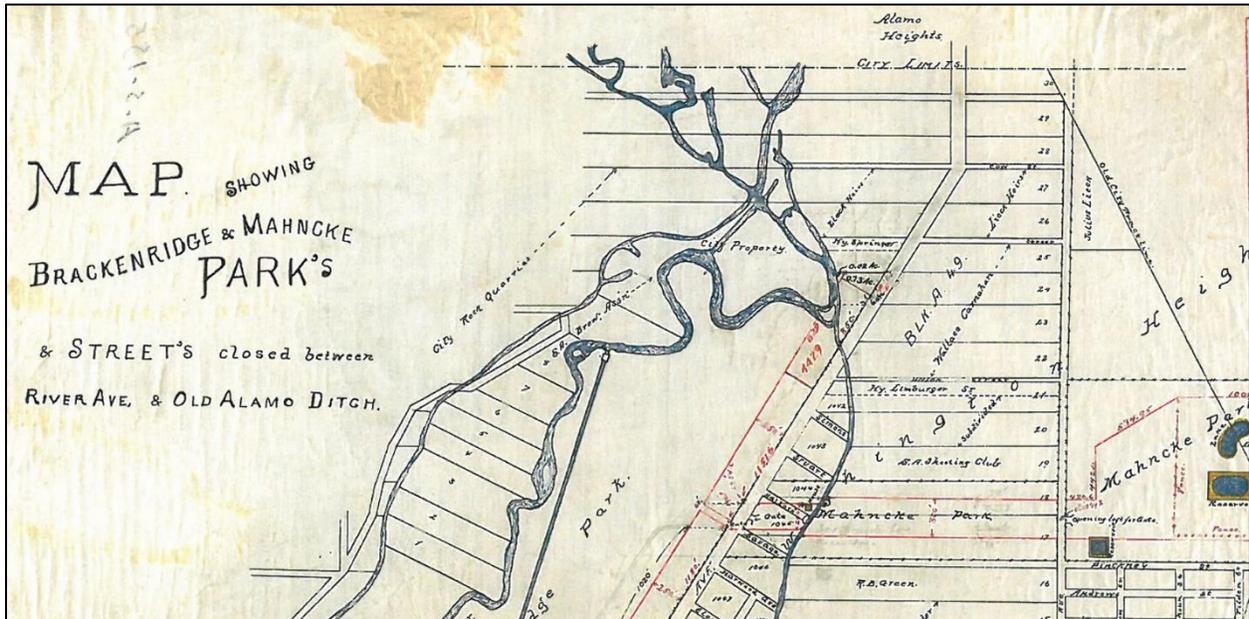


Figure 5 Portion of a 1908 City Map showing the project APE

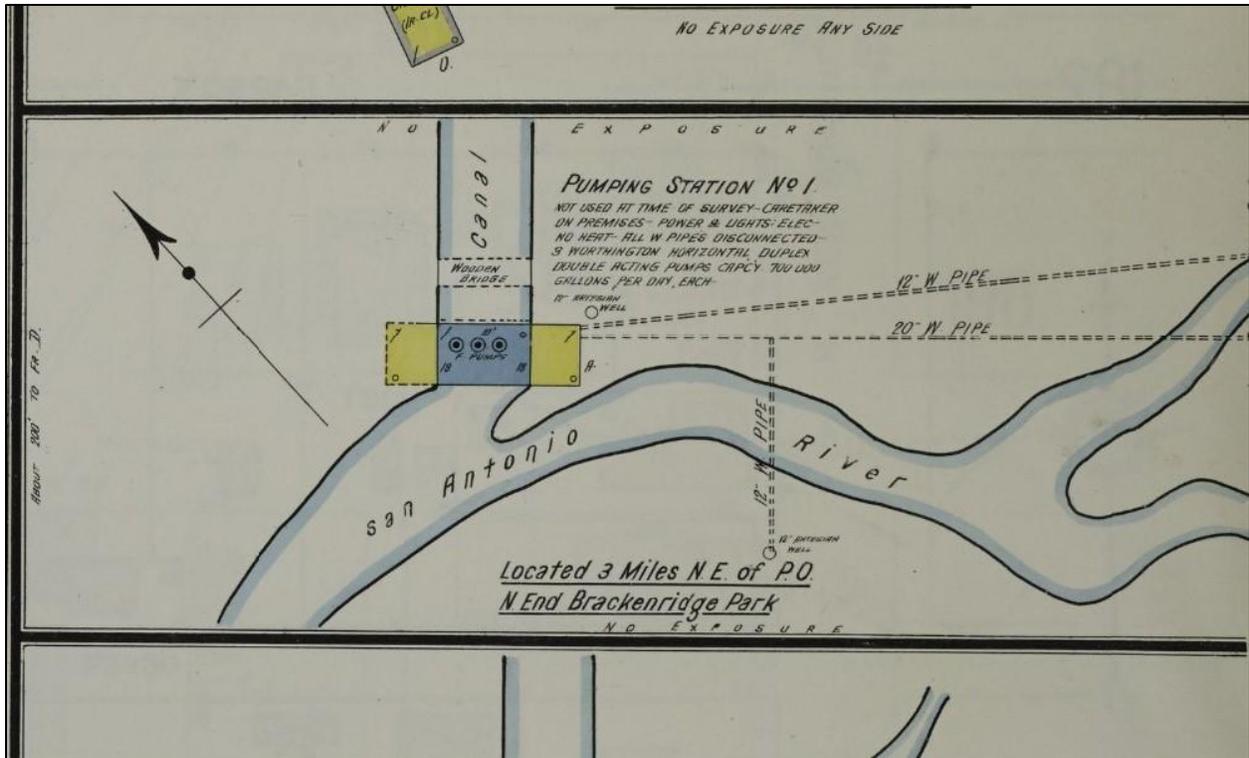


Figure 6 1912 Sanborn map showing the pump house within the project APE

### Proposed Methods

In accordance with Stipulation III of the PA, field investigations will be designed to identify cultural resources within the project area. Proposed work will include backhoe trenching and archaeological monitoring. Field investigations will be designed to avoid impacting the drip lines of trees within the project area.

Archaeologists will coordinate with THC and the City archaeologists to identify locations within the project area for backhoe trenching prior to construction. These locations will be on both sides of the river, but limited to areas that are outside the tree drip lines. Working with an operator and backhoe with a smooth blade bucket, archaeologists will supervise soil scraping in 4 inch (10 centimeter) levels, screening a 5-gallon bucket of soil from every third bucket, in accordance with the Council of Texas Archeologists' Survey Standards for mechanical trenching. Trench walls will be scraped and photographed, basic soil profiles will be recorded, and trench locations will be mapped with a handheld GPS unit. Archaeologists will adhere to OSHA trench safety standards, and trenches over 4 ft in depth will be benched for safety. Trenches may terminate at the water table, subsoil, or depth of proposed impacts.

During construction, archaeologists will work with the construction contractor to monitor all ground-disturbing activities. This will include excavations associated with tree planting/relocation, shadow wall construction, stair construction, sidewalk replacement, staircase removal, and grading. Archaeologists will inspect the excavations for artifacts and cultural deposits; if found, work will halt temporarily in that location so that the archaeologist may assess the discovery. If the deposits appear to be potentially

significant, archaeologists will notify City Archaeologists, THC, and USACE of the discovery. Work in this location will cease until the regulatory archaeologists have given concurrence to proceed. Monitoring locations and cultural deposits or artifacts will be mapped with a handheld Trimble GPS unit.

Certain trees identified for removal will require historian oversight in order to avoid impacting historic structures. Archaeologists will also monitor these areas for potential archaeological deposits. Trees located close to the pump house, stairs, and walls may have builders trenches or other cultural deposits associated with the historic structure construction.

If an archaeological site is discovered during the course of fieldwork, a TexSite form will be filled out in the field and submitted to the Texas Archeological Research Laboratory (TARL) to obtain a trinomial. Artifacts will be documented and photographed in the field, and diagnostic artifacts will be collected for curation.

In the event that human remains are discovered during construction, all work within 25 feet of the discovery shall immediately cease. This discovery should only be communicated to the USACE, THC, City Archaeologists, and representatives of Parks & Recreation and Public Works. Work will not recommence in this location until the contractor is provided with notice it is safe to do so. Archaeologists will follow Stipulation VII Treatment of Human Remains, Parts A and B in the PA and will work with the contractor to protect remains from further disturbance after discovery.

A report meeting the Council of Texas Archeologists report guidelines will be produced after fieldwork has been completed. The report will include maps that show trench and monitoring locations as well as the locations of any discovered archaeological sites. Archaeologists will also include NRHP evaluations (both individual and as contributing to the Brackenridge Park NRHP District) and SAL recommendations for any located resources as well as effects assessments. Collected artifacts and field paperwork will be cleaned, analyzed, and prepared for curation at a state-approved curation facility.

## References

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1983 Geologic Atlas of Texas, San Antonio Sheet. The University of Texas, Austin.

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