



**TEXAS
HISTORICAL
COMMISSION**

The State Agency for Historic Preservation

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February 1, 2008

William Fickel, Jr.
Department of the Army
Fort Worth District, Corps of Engineers
P.O. Box 17300
Ft. Worth, TX 76102-0300

Re: Project review under Section 106 of the National Historic Preservation Act of 1966, Tarrant County College, Fort Worth, Tarrant County, Texas (COE-FWD)

Dear Mr. Fickel:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

We appreciate the opportunity for all of the consulting parties to come together on January 8th to discuss the requirements for the project as they relate to the National Historic Preservation Act. We believe that the dialogue was constructive and only wish it could have taken place prior to the commencement of construction and the college's enormous investment of time and money.

This past November we concurred in general with the USACE findings that the alteration to the levy system and the resulting construction of the Tarrant County College downtown campus would result in adverse effects to historic resources listed in or eligible for the National Register of Historic Places. Having had the opportunity to hear and consider the variety of positions and information regarding the resources in the vicinity of the project we concur with the USACE specific determinations of eligibility and effect with the caveat that we believe the undertaking has the potential to adversely effect the former power plant as well. We also believe that there is adequate justification for the USACE's determination that the bluff is eligible for the National Register as a traditional cultural property. Additional research and documentation would be required to formally nominate the bluff to the register.

It is our understanding that no permit has yet been applied for by the college for this undertaking but that the USACE is continuing the consultation in anticipation of the application. We wish to note that our request for architectural documentation from the college regarding the specific and current design of the bridge and associated construction has still not been fulfilled. To date, we still do not have any documents that provide us an accurate indication of the physical dimensions, location, detailed design or materials for the bridge, levy alterations, or campus beyond the photographs of the conceptual model. Our staff requested the information during the meeting and made suggestions regarding the content and transmittal of the documents to the architects after the meeting. We were led to believe this information would be forthcoming given the urgency of the college's construction schedule. Lacking this information, it remains difficult to adequately address methods to avoid or minimize the adverse effects and given the late initiation of consultation, we largely appear to be limited to discussions of mitigation.

We believe that it is essential that the former North Main Power Plant which is under the college's control be protected and preserved as mitigation for the adverse effect of this

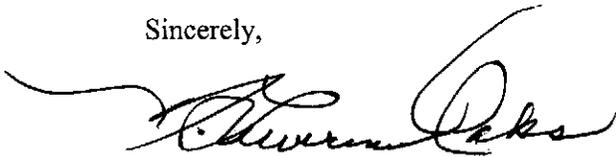
undertaking on historic resources. This important landmark for the city can be an asset for the college and community. Ideally, the building should be professionally "mothballed" according to nationally accepted preservation standards in order to ensure that it remains structurally sound, weather tight and secure until the college and community can determine its future use. The future preservation of the historic plant must be guaranteed with an appropriate combination of preservation easements and/or local or state designations.

Preservation of the remaining portions of the bluff that are under the control of the college is crucial. It is our understanding that much of the bluff is outside the public domain and we believe that the campus construction when combined with the plans to be implemented as part of the Central City undertaking, will spur private development of the bluff itself. The college's needs as well as the potential for public access will have to be accommodated in any solution.

At the meeting, the issue of Heritage Park was brought up. Our office does not have specific information or knowledge regarding that park. It is our understanding that it was designed by Lawrence Halprin a very influential landscape architect. We do not know enough to understand how this park compares to his most significant works, what kind of architectural integrity the park retains, and if the park would meet the required exceptional significance criteria for the National Register given that it is less than 50 years of age. Due to its location within the APE, it may behoove the USACE to evaluate the park's historic significance but it should not need to delay the consultation.

We look forward to further consultation with your office, the college, and the other interested parties. We hope to maintain a partnership that will foster effective historic preservation. Thank you for your participation in this federal review process. **If you have any questions concerning this review or if we can be of further assistance, please contact Bradford Patterson at 512/463-6167.**

Sincerely,

A handwritten signature in cursive script, appearing to read "F. Lawrence Oaks". The signature is written in black ink and is positioned above the typed name.

F. Lawrence Oaks, State Historic Preservation Officer

FLO/BP

cc: Joseph Murphey, US Army Corps of Engineers