



TEXAS HISTORICAL COMMISSION

The State Agency for Historic Preservation

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January 21, 2009

Donald R. Fairley, Regional Environmental Officer
U.S. Department of Homeland Security
Federal Emergency Management Agency, Region VI
800 North Loop 288
Denton, TX 76209-3698

*Re: Project review under Section 106 of the National Historic Preservation Act of 1966,
Draft Programmatic Environmental Assessment, Alternative Housing Pilot Program,
Permanent Housing, State of Texas (FEMA/106)*

Dear Mr. Fairley,

Thank you for providing additional information regarding the draft Programmatic Environmental Assessment (PEA) for Alternative Housing Pilot Program (AHPP) Activities in Texas. This letter serves as further comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Elizabeth Butman, has completed its review of your letter and the design of the "Texas Vernacular" cottage, which were received December 22, 2008. The consultation process outlined in your letter should provide adequate information for our review and ensure Section 106 compliance for this program. Additionally, thank you for clarifying the applicable stipulation for project review under the Programmatic Agreement in the final PEA.

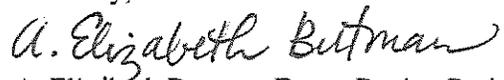
The design of the permanent housing, as shown in the enclosed drawings and photographs, would not be compatible with many historic districts in the program area. In particular, we are concerned that the low-pitched roof, small windows, and other elements are not in keeping with the form and character of many historic homes in this region. In addition, the configuration of the plan does not allow the house to be rotated, and the wide front elevation may not be suitable for some small urban lots.

We agree that the proposed cottage may be placed on lots that are not within or adjacent to National Register-listed or eligible historic districts, or individually listed or eligible historic properties, without further consultation regarding the design. However, in instances where a cottage will be placed within or adjacent to a historic district or property, consultation regarding the visual effects of the design will be necessary. This consultation should occur on a case-by-case basis, as the form, style, materials, and architectural features of historic houses vary, and new construction should be evaluated based on its individual context. In general, however, we recommend that the Katrina Cottages or similar manufactured housing designs be considered for placement near historic properties. Additionally, the Galveston Historical Foundation currently intends to design manufactured housing for use in Galveston's historic districts, which may also be appropriate elsewhere in southeast Texas.

Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. We look forward to further consultation with your office and

hope to maintain a partnership that will foster effective historic preservation. **If you have any questions concerning our review or if we can be of further assistance, please contact Elizabeth Butman at 512/463-7687.**

Sincerely,

A handwritten signature in cursive script that reads "A. Elizabeth Butman".

A. Elizabeth Butman, Forest Region Project Reviewer

For: F. Lawrence Oaks, State Historic Preservation Officer

FLO/eb