

TEXAS HISTORICAL COMMISSION

real places telling real stories

August 22, 2018

Ron Nirenberg
Mayor of San Antonio
100 Military Plaza
San Antonio, TX 78205

George P. Bush
Commissioner, General Land Office
1700 N. Congress, Suite 935
Austin, TX 78701

Dear Mayor Nirenberg and Commissioner Bush,

As plans for the future of the Alamo complex move forward, I thought it might be helpful to clarify the role of the Texas Historical Commission (THC) in the decision-making process. There are several levels of designation, and each carries its own regulatory requirements.

In 1962 the Alamo was designated by the THC as a Recorded Texas Historic Landmark. Pursuant to Texas Government Code Section 442.006 (f), THC must be notified at least 60 days in advance of any alterations to the designated buildings (in this instance including only the chapel and long barracks). THC may extend this waiting period by an additional 30 days, after which the proposed work may proceed.

In 1967-68 the Alamo was designated by the National Park Service as a National Historic Landmark (NHL). Pursuant to 36 CFR Ch. I, Part 65, Section 65.2 (c), federal undertakings potentially affecting the property (whether carried out within the property or visible from the property) must follow the procedures outlined in the National Historic Preservation Act, including consultation with THC and with the Advisory Council on Historic Preservation (ACHP). Federal undertakings can include the use of federal grant funds or the performance of any work requiring a federal permit or license. It is the responsibility of the federal agency to see that all necessary consultations are carried out, although some agencies delegate this responsibility to permit or grant recipients.

In 1977, the Alamo was listed in the National Register of Historic Places. The boundary of the designation was described as "one block bounded on the north by Houston street, on the east by Nacogdoches Street, on the south by East Crockett Street, and on the west by North Alamo Street." As with the NHL designation, any federal undertakings potentially affecting the property (whether carried out within the property or visible from the property) must follow the procedures outlined in the National Historic Preservation Act.

Also in 1977, the Alamo was included within the boundary of the Alamo Plaza Historic District and listed on the National Register of Historic Places. The boundary was described as follows:

Beginning at the southwest corner of the Alamo Plaza Historic District the boundary extends north along south Broadway across Houston street to include the buildings on the north side of Houston. The northern boundary follows the alley behind the 500 block of east Houston for a block, travels north along Alamo Plaza to Travis street, continues east and southeast along Travis street for a block and a half and then turns northeast to an alley to include the Turn Verein Building at 411 Bonham. The boundary continues southeast along the alley beside the Turn Verein building to Bonham street, follows Bonham street southwest, jogging east

to include the Crockett Hotel at 301 East Crockett, extending east and south around the property line of the Crockett Hotel, the boundary then continues south to Commerce street. At the south the district line continues along Commerce from Bonham to South Broadway.

This nomination specifically includes not only the chapel and the long barracks but also the Alamo Defenders Cenotaph which is listed as a “contributing feature” of the historic district. The Crockett Block (317-323 Alamo Plaza), the commercial building at 327 Alamo Plaza, and the Woolworth’s building at 518 E. Houston are also considered historic buildings that “contribute” to the National Register district. The rules mentioned above regarding federal undertakings apply to all projects within the district boundaries.

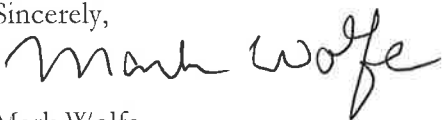
In 1983, the Texas Historical Commission designated the Alamo as a State Archeological Landmark (SAL) under Chapter 191 of the Natural Resources Code (aka the Texas Antiquities Code). That designation applies to all resources (archeological and standing structures) within the boundary, described as “Bound on the west by North Alamo Street; on the north by East Houston Street; on the south [sic, should be west] by East Crockett Street; on the south by Nacogdoches Street.” Work on, or alterations to, SALs requires the issuance of a permit by the THC. Detailed guidance is provided in Texas Administrative Code Title 13, Part 2, Chapter 26. The Alamo Defenders Cenotaph is included within those boundaries and so is subject to the provisions of the Antiquities Code.

Section 191.098 of the Antiquities Code requires state agencies to notify the THC of their intent to “alter, renovate, or demolish” a state-owned building that is at least 50 years old, at least 60 days before the project is set to begin. After receipt of that notice, THC may “institute proceedings to determine whether the building is a state archeological landmark” that would be eligible for such designation. If the THC chooses to pursue designation, the subject alterations would require a permit from the Commission. If not, after 60 days the project could go forward.

All official THC historical markers are the property of the state of Texas. Removal or relocation of markers requires permission from THC.

If you have any questions regarding these designations or the associated regulations, please don’t hesitate to contact me.

Sincerely,



Mark Wolfe
Executive Director, Texas Historical Commission
State Historic Preservation Officer

Cc: John L. Nau, III, Chairman, Texas Historical Commission
Roberto C. Trevino, City Councilman, Alamo Citizen Advisory Committee co-chair
Sue Ann Pemberton, UTSA, Alamo Citizen Advisory Committee co-chair
Lionel Sosa, Alamo Citizen Advisory Committee co-chair
Rhea Roberts, Special Projects Manager, City of San Antonio

