

HEI-26129

617 Broadway Street
Marble Falls, TX 78654

June 27, 2017

Diana Wood
Office of Environmental Analysis
395 E Street SW
Washington, DC 20429

Dear Ms. Wood:

Having been involved in the SGR matter for some years, and having done prehistoric and historic archaeology in and around Quihi during this time, I appreciate the opportunity to offer my comments on "Draft Resolution Plan Comments (DRP), Southwest Gulf Rail Spur, Finance Docket 34284." I want to thank you for emailing me a copy of this document a couple of weeks ago.

Let me offer these following observations and comments:

I assume the THC/SHPO will be the agency to provide on-the-ground approval and verification of the mitigation efforts by SGR, and that THC will send representatives who are knowledgeable archaeologists, architects, and historians – with an appreciation of the antiquity and history of the region, to carry out such verifications. For a contracted firm to tell the THC that "we've finished the eligibility testing" or "mitigation" without ground-truthing by the SHPO would be a gross dereliction of their duty to protect Texas' cultural resources.

It is an annoyance, and evidence of a lack of concern for credentials or scholarship by persons who contribute to this DRP to remain unnamed, either as authors or as representatives of their firms.

This is a DRP document that will need much more work on behalf of all parties. The present document is repetitive, lacks detail, and makes all sorts of promises (by SGR) which the ACHP/SHPO must verify over the long-run. After SGR uses eminent domain (I presume) to secure property to which access was forbidden, detailed survey data will have to be evaluated at the level found in the present DRP.

It is useful to have Table 1, to list the adverse and potentially adverse effects of building the railroad. It is heartening to see that the SHPO has stated that several properties will be adversely impacted, and it is up to them, the ACHP, and other regulatory agencies to see that these impacts are eliminated.

In reviewing some of the recommendations for the archaeological sites, it is obvious that the significance of some have been substantially understated.

For site 41ME261 (p. 6) it is stated that this is a “Transitional Archaic Period” site. One presumes that such a designation comes from Turner, Hester and McReynolds (2011:51), as other Texas chronologies do not use this terminology. In reviewing the site descriptions and artifacts illustrated for site 41ME261 in the Feb.2017 survey report by Fullerton, et al. The Darl point (Fig. 4-69) supports the Transitional Archaic label. The Early Triangular (?) point in Fig. 4-70 would push potential occupations back to the early Middle Archaic. The “knife” (a term for bifaces not used by Texas archaeologists in serious typology since the 1960s-1970s) is a bifacial perform, badly damaged and without chronological link. The site clearly deserves the recommended testing program.

41ME260: survey must be finished, as at 41ME261. Illustrations for 41ME260 (pp. 92-93) of the report illustrate an Edwards arrow point (Fig. 4-39), and a possible mid-section of a Paleoindian St. Mary Hall point (Figure 4-36). The large biface shown in Fig.4-45 may well be a “trade” blank, but it may also be representative of a cache at this site given the flaking and technology. This site needs further exploration.

41ME264: lack of access to 6 acres must be resolved.

41ME263. Though not recommended for testing, the artifact illustrated in Fig.4-6 of the report is a perform for a Scallorn (maybe even Edwards) point. It is not Early Triangular, and patination is no reliable indicator of age! The point shown in Fig. 4-4 is an unfinished Castroville point/very late stage perform and is not related to the Calf Creek series types noted in the description.

Even “deflated ridges” deserve attention; in the Quihi area, they are a large part of the archaeological landscape. More attention to “ridge top” sites would enhance our knowledge of the Quihi-area archaeological landscape.

41ME266. The cores (mistakenly called “choppers”) on p. 58 could relate to any time period? They reflect a lithic procurement or processing site as indicated in the survey report. The “chopper” thought to perhaps be a Late Archaic Kerrville Biface (Turner et al. 2011:235 provide this terminology) is either not illustrated, and neither of the “choppers” shown resemble this tool form. To find a Kerrville Biface in this region would reflect that it is beyond its normal range.

Lithic processing sites have traditionally been ignored by many Texas archaeologists, often described as “quarries”. With few exceptions there have been no reports of merit, particularly in the Quihi area, where the Uvalde gravels are so common. More attention to this type of neglected, but important, site form might well render it “eligible” in the ACHP sense.

4IME262. Survey of the site area needs completion. Yet another “ridge top” site ignored, while the potential for an “open campsite” calls for “presumed NRHP” eligibility.

Other relevant archaeological notes:

The archaeologists and planners need to keep in mind the range of types and time ranges found in the Quihi area. The Mangold collection, which I have documented in detail ranges from Folsom to Perdiz (the entire sequence) and came from a “gravel ridge” (4IME132). It even had a piece of obsidian that came from western Mexico, which I published several years ago.

Additionally, I have had an opportunity to examine a collection from the Vulcan Quarry area, a locality which I believe never received archeological survey. Among the artifacts found across the landscape in the Quarry property were Paleoindian point fragments (including St. Mary’s Hall), and a range of Archaic Types, including Gower, Nolan, Ensor and Frio. Also found were formal tools, such as a unifacial Clear Fork tool typical of the Early Archaic, and an end scraper characteristic of the Late Prehistoric Toyah phase. There were also Archaic performs, as well as a unique smoothed and polished quartzite round disk, grooved all the way around. It is about 11 mm wide.

It puzzles me why the recent survey found so few, if any, formal tools? I have been on parts of the proposed rail lines many times, and find it unusual not to pick up a distinctive Guadalupe tool (Turner et al. 2011:234-235). These date to the Early Archaic and occur across the landscape. Equally distinctive and fairly common are bifacial Clear Fork tools of Paleoindian age (Turner et al. 2011:225-226

Turning to the Historic sites, it is obvious to the informed and concerned citizens that there remains no comparable constellation of buildings of the mid-19th century anywhere in the broad region. The UQRHD receives little respect in the building of this one-purpose commercial railroad (er, “common carrier”). This lack of historical appreciation and significance is further applied to similar buildings that lie near, but outside the Historic District.

Having lived in Medina County for 15 years, and looked at and excavated the dwellings of early settlers in Medina, Uvalde, and Bandera Counties, there is to my mind nothing at all comparable to the UQRHD

I have a few comments on the Historic sites:

HDR-AR06, FM2676

Having seen, and dug, dog-run cabins, I think this was originally a dog-run. Rather than "missing a bay", I think it was modified at that end, as sometimes happens on dog-run structures. The structure needs to be excavated...at least the foundation exposed sufficient to confirm it was a dog-run...or if it wasn't.

Additionally, the building needs much stabilization, which should be, at a minimum the mitigation responsibilities of SGR under supervision of Historic architects.

In dealing with all of the threatened structures, there is this repetitive blather as to the "resolution of adverse effect, most of which is useless in terms of mitigative efforts. SGR should re-engineer those parts of the line which can be moved farther away from structures. "Vegetative buffers" are long-term efforts, especially if the "buffers" are to be regionally-specific trees. This seems like a good, but silly, mitigative effort. The damage from trains will have already been done before an appropriate buffer can grow up!

A "booklet" for the UQHRD is a silly idea as well. I have been involved with much, much larger projects in which the sponsor was obligated to prepare a "booklet". These were usually poorly done and pathetic. Richland Springs may be an exception.

What is more appropriate is the production of a well-printed book in sufficient numbers for large-scale distribution (minimum 3000 copies). It should balance history, prehistory and abundant illustrative material...as well as photos showing the impact of SGR activities. A real, non-revisionist treatment!

I thought the context issue was settled years ago when 2 THC/THC-hired staffers did an excellent record of the threatened structures in the area. It is pure bull to say that such a "context" could be used to "assess remaining Alsatian (and German; East Frisia) properties in the region. This "context" is a pie-in-sky concept that would never be implemented...or circulated except in big 3-ring notebooks. It would provide a great outlet for revisionist history of Alsatian settlement.

The Steinbach House is totally ill-equipped in terms of space and facilities needed to preserve and conserve materials in reasonable fashion. What would be needed is a temperature-controlled, secure facility in which the heritage of the Quihi settlement can be both archived and displayed in planned exhibits. Placing archives and artifacts in

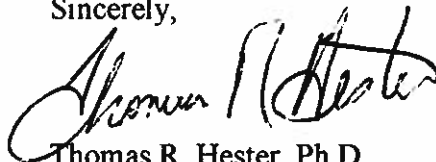
Castroville might be appropriate given better access and the presence of related conservation organizations. Of course, the Steinbach Haus is devoted to Alsatian Culture, while most of the residents of Quihi immigrated from Germany.

The DRP needs incredible additional effort (some of which is in the scholarly realm) and realistic, contracted commitments of funds if there is to be a true "resolution of the (many) adverse effects."

In closing, I basically evaluate the DRP to be a minimal and hastily done document. The final resolution plan must take into account the results of mitigative efforts at sites and structures...and do so in a sound and much more detailed fashion.

Again, thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas R. Hester". The signature is fluid and cursive, with the first name "Thomas" being more prominent and the last name "Hester" following in a similar style.

Thomas R. Hester, Ph.D.
Professor of Anthropology, emeritus
The University of Texas at Austin