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March 26, 2025

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

**Re: Request for Antiquities Permit to Conduct Cultural Resources Investigations for the Wilco Way (Tracy Chambers Lane Extension) Project, Williamson County, Texas / SWCA Project No. 89305-001**

Dear Rebecca Shelton:

This letter is a request for a Texas Antiquities Permit to conduct cultural resources investigations for the proposed Wilco Way (Tracy Chambers Lane Extension) Project in Williamson County, Texas (project). The project consists of extending Wilco Way (Tracy Chambers Lane Extension) by approximately 0.5 mile (0.8 kilometer) in length with the maximum width not being larger than 202 feet (62 meters), totaling 9.6 acres (3.9 hectares) (project area). As the proposed project is being undertaken by Williamson County, a political subdivision of the State of Texas, a Texas Antiquities Permit is required in accordance with the Antiquities Code of Texas (Texas Natural Resource Code, Title 9, Chapter 191) and accompanying Rules of Practice and Procedure (Texas Administrative Code, Title 13, Chapter 26).

If you have any questions or concerns, please contact me at (281) 733-9791 or [analise.hollingshead@swca.com](mailto:analise.hollingshead@swca.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Analise Hollinghead". The signature is fluid and cursive.

Analise Hollinghead, M.S.  
Principal Investigator

## **PROPOSED SCOPE OF WORK FOR CULTURAL RESOURCES INVESTIGATIONS FOR THE WILCO WAY (TRACY CHAMBERS LANE EXTENSION) PROJECT, WILLIAMSON COUNTY, TEXAS**

*Project Landowner and Sponsor – Williamson County  
Project Consultant – SWCA Environmental Consultants  
Principal Investigator – Analise Hollingshead, M.S.  
Date – March 26, 2025*

### **INTRODUCTION**

On behalf of Williamson County, SWCA Environmental Consultants (SWCA) proposes to conduct an intensive archaeological survey in support of the Wilco Way (Tracy Chambers Lane Extension) Project (project), southeast of Georgetown in Williamson County, Texas (Figure 1). The project consists of extending the existing Wilco Way (Tracy Chambers Lane Extension) by approximately 0.5 mile (0.8 kilometer [km]) in length, with the maximum width not exceeding 202 feet (62 meters [m]), totaling 9.6 acres (3.9 hectares [ha]) (project area). Depth of impact for a majority of the project will be 2 feet (0.6 m), with maximum depth of impact to be 5 feet (1.5 m) where the project crosses Smith Branch Creek.

As the proposed project is owned and maintained by Williamson County, a subdivision of the State of Texas, the project will be subject to review under the Antiquities Code of Texas (ACT), and the archaeological field investigation will require a Texas Antiquities Permit. At this time, there is no federal nexus for the project; therefore, Section 106 of the National Historic Preservation Act (54 United States Code 306108) and its implementing regulations (36 Code of Federal Regulations [CFR] 800) are not applicable to these investigations.

SWCA proposes to conduct an intensive archaeological pedestrian survey with subsurface testing of the entire 9.6-acre (3.9-ha) project area (Figure 2). The goal of the work will be to identify any previously recorded prehistoric and historic-age archaeological sites in the project area; locate any previously undiscovered archaeological sites; establish vertical and horizontal site boundaries, as appropriate with regard to the project area; and evaluate the significance and eligibility of any site recorded for listing in the National Register of Historic Places (NRHP) and for designation as a State Antiquities Landmark (SAL). All work will be conducted in accordance with the ACT.

### **Project Description**

The project area appears on the *Round Rock* (3097-134), Texas, U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle maps. The project area is located 0.2 mile (0.3 km) northwest of the intersection of Wilco Way and Southeast Inner Loop, southeast of Georgetown, Texas. The project area is located between the Williamson County Juvenile Services and Williamson County Emergency Services buildings (see Figure 2).

Proposed Scope of Work for Cultural Resources Investigations for the Wilco Way (Tracy Chambers Lane Extension) Project, Williamson County, Texas

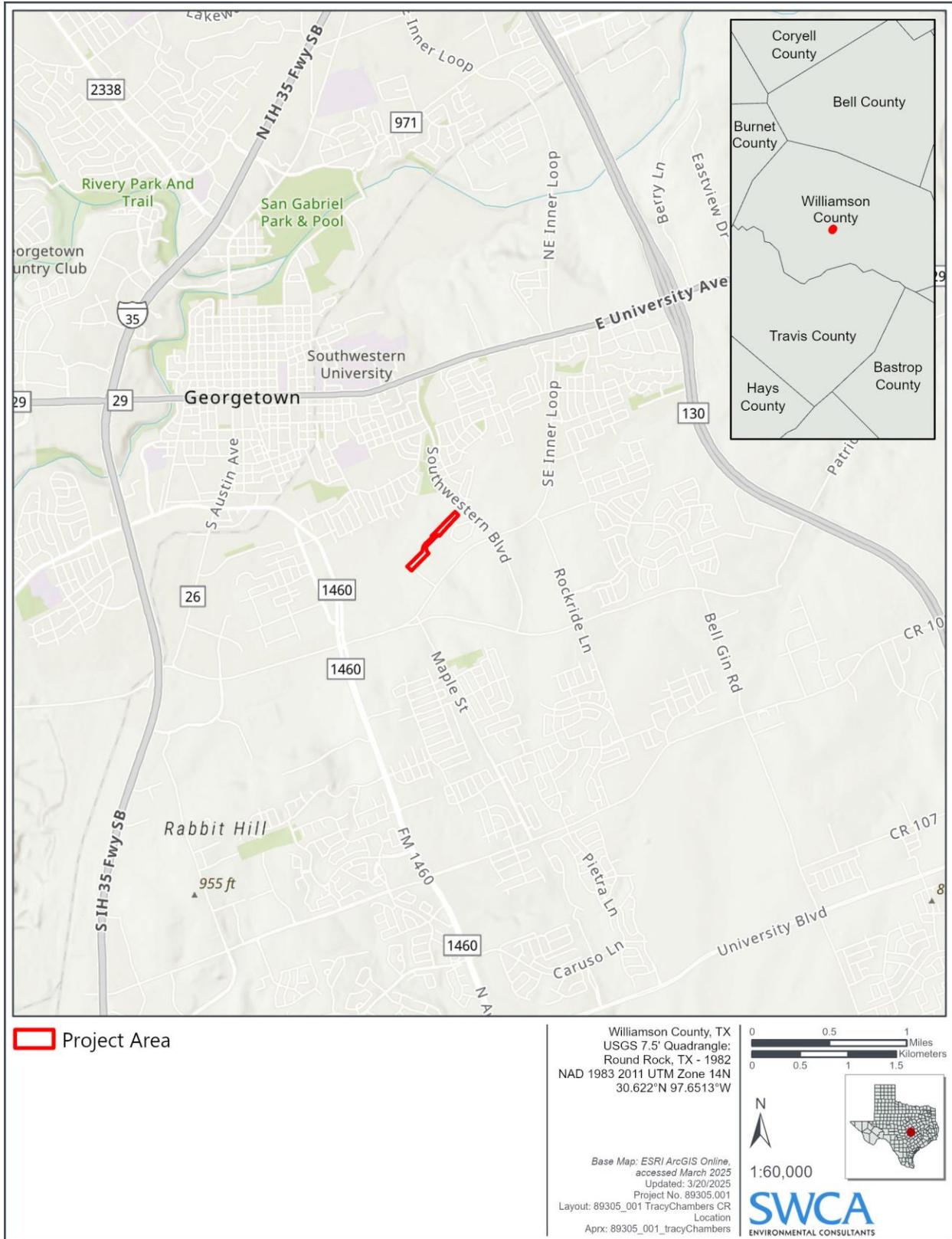


Figure 1. Project location.

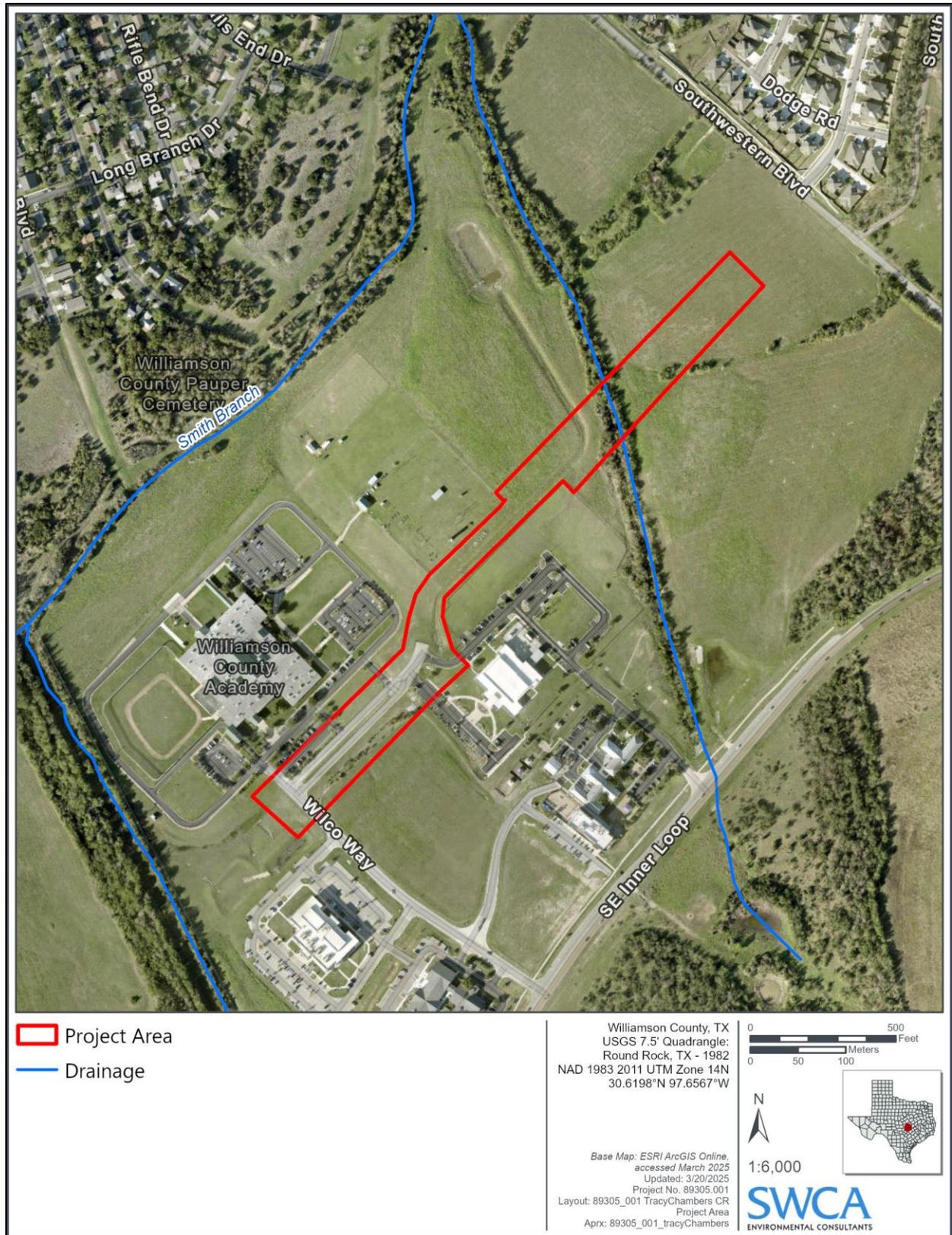


Figure 2. Project area overview.

## **PROJECT SETTING**

The project area crosses the Northern Blackland Prairie subregion within the Texas Blackland Prairie ecoregion (Griffith et al. 2007). The physiography of the area is generally described as light to moderately dissected, irregular plains with low to moderate gradient streams containing silty, clayey, and sandy substrates. Historically, the landscape of these rolling to nearly level plains consisted of tallgrass prairie vegetation predominantly shaped by frequent fires and bison grazing (Griffith et al. 2007:61).

### **Geology**

The underlying geology of the project area consists entirely of Del Rio Clay and Georgetown Limestone, undivided (Figure 3) (Barnes 1974; USGS 2025a). The series primarily comprises marl with major lithologic units of limestone throughout, and minor, unconsolidated amounts of clay deposited in estuarine environments dating back to the Late Cretaceous period (USGS 2025a).

### **Soils**

According to the Natural Resources Conservation Service (NRCS) (2025), three soil series are mapped within the project area: Heiden clay of varying slopes (HeB and HedC2), and Houston Black clays (HoB) (see Figure 3). The Heiden series consists of deep to very deep, well-drained, very slowly permeable soils that formed in clayey residuum weathered from mudstone. These nearly level to moderately steep soils occur on footslopes of base slopes, shoulders of interfluves, and backslopes and side slopes of ridges on dissected plains (NRCS 2025). The Heiden series covers approximately 6.3 acre (2.5 ha) of the project area, or 65.4%. The Houston Black soil series consists of very deep, moderately well-drained, very slowly permeable soils formed in clayey residuum derived from Cretaceous-age mudstone (NRCS 2025). These soils occur on interfluves and side slopes of upland ridges on dissected plains. The Houston Black series covers approximately 3.3 acres (1.3 ha) of the project area, or 34.6%. The project area parallels Smith Branch, a headwater stream that feeds into the San Gabriel River, suggesting any alluvial deposits present with the project area could be recent in age. The soils, geologic data, and topographic location of the project area along ridges suggest the project area has a low to moderate potential to contain buried cultural materials.

## **BACKGROUND REVIEW**

An SWCA archaeologist researched the Texas Archeological Sites Atlas (Atlas), a restricted, online database maintained by the Texas Historical Commission (THC) and the Texas Archeological Research Laboratory, for any previously recorded surveys and historic-age or prehistoric archaeological sites located in the project area or within 0.6 mile (1.0 km) (i.e., study area) (Figure 4) (THC 2025a). In addition to identifying previously recorded archaeological sites, the Atlas review includes the following types of information: NRHP districts and properties, SALs, Recorded Texas Historic Landmarks (RTHLs), Official Texas Historical Markers (OTHMs), cemeteries, and local neighborhood surveys. Listings in Atlas are limited to projects under purview of the ACT; therefore, the Atlas does not necessarily list all previous work conducted within a specific area. However, SWCA made a concerted effort to obtain reports for all previous cultural resources work conducted in the project area.

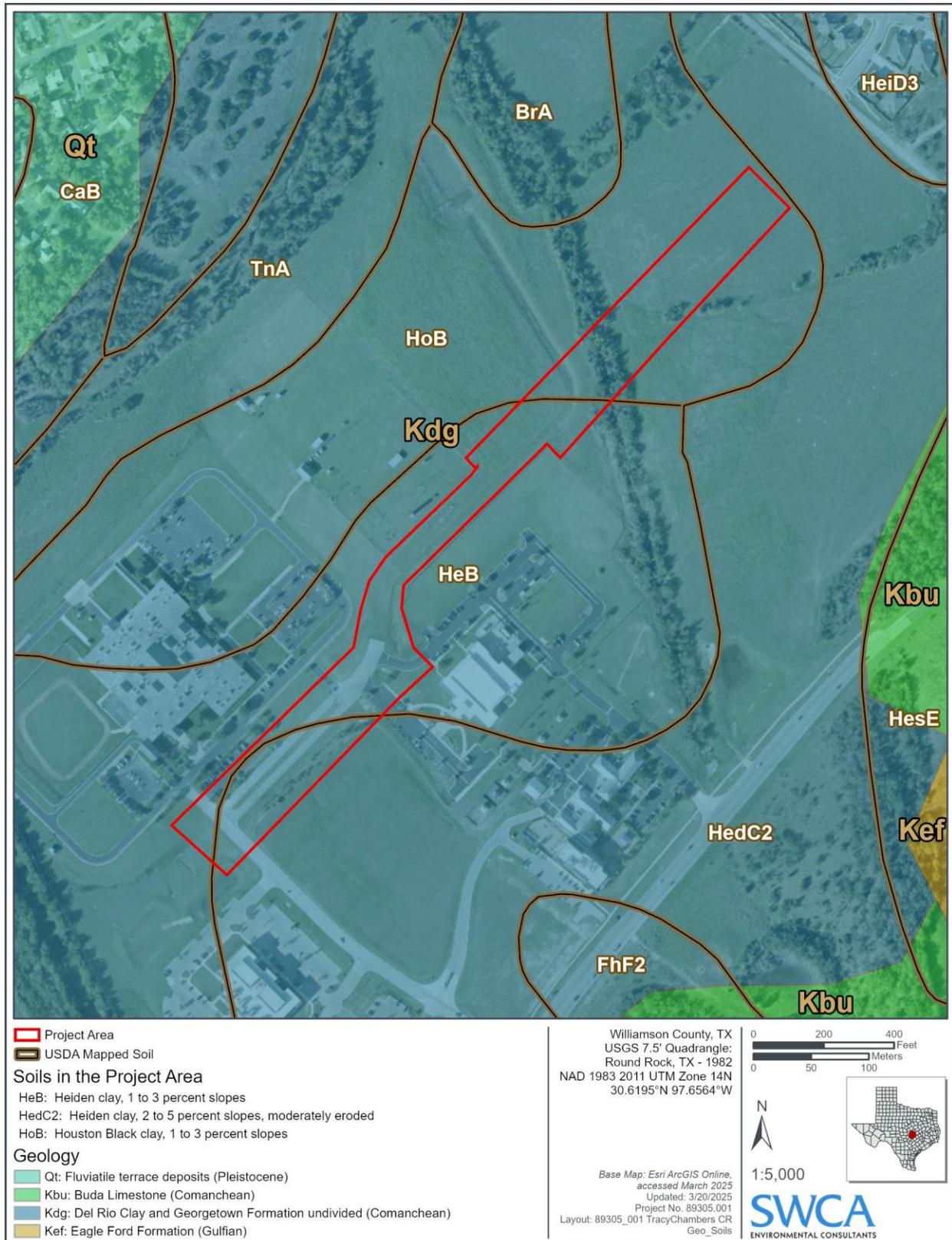


Figure 3. Geology and soils in the project area.

An SWCA architectural historian reviewed the Texas Department of Transportation (TxDOT) Historic Resources Aggregator (Aggregator), which maps resources and districts determined eligible for the NRHP, National Historic Landmarks (NHLs), and local historic districts (TxDOT 2025). The Aggregator also has a data set for the 1936 Texas Centennial Markers, which are eligible for the NRHP under Criterion A for Social History in the *Monuments and Buildings of the Texas Centennial Multiple Property Submission Documentation Form* (TxDOT 2025; Wilson and Smith 2018). SWCA also reviewed the study and project areas for Family Land Heritage (FLH) Centennial Farms identified by the Texas Department of Agriculture (TDA), as well as cemetery locations on Find a Grave’s (2025) online database, and relevant locations in the Texas Freedom Colonies Project (TDA 2025; Texas Freedom Colonies Project 2025).

As part of the review, SWCA also examined the TxDOT Historic Overlay, a mapping/geographic information system (GIS) data set with historical maps and resource information covering most portions of the state (Foster et al. 2006), historical USGS quadrangle maps available on the USGS TopoView website (USGS 2025b), and historical aerial photography contained on the Nationwide Environmental Title Research (NETR) Historic Aerials website (NETR 2025) to determine if any historic-age resources such as potential historical features, and/or potential historical resources (PHRs) are located within the study and project areas.

The background review identified eight previously conducted archaeological surveys, three previously recorded archaeological sites, and one cemetery located within the study area (see Figure 4). No NHLs, NRHP-listed or -eligible districts or properties, SALs, RTHLs, OTHMs, freedom colonies, or local neighborhood surveyed resources are in the study area (TDA 2025; Texas Freedom Colonies Project 2025; THC 2025a; TxDOT 2025). Based on historical map analysis, 23 PHRs are within the study area (Figure 5) (NETR 2025; USGS 2025b). None of the PHRs are located within the project area; however, one PHR is located adjacent to (within 300 feet [91.4 m] of) the project area.

## Previous Cultural Resources Surveys

The background review identified eight previously conducted cultural resources surveys, one of which intersects the western half of the project area (Table 1; see Figure 4) (THC 2025a). This survey was conducted in 2021 by Blanton & Associates, Inc. (Blanton), on behalf of Williamson County for the Juvenile Justice Center Smith Branch Flood Control project (Burden and Goodson 2021). Although the project was mainly focused on investigations along Smith Branch Creek, outside of the project area, they did conduct pedestrian survey of Wilco Way. No shovel testing was conducted within the Wilco Way (Tracy Chambers Lane Extension) portion due to the level of previous disturbances. The project documented sites 41WM1434 and 41WM1435, discussed in further detail below. However, no cultural materials or sites were identified within the proposed project area (Burden and Goodson 2021). The remaining seven previously conducted cultural resources surveys are discussed in Table 1.

**Table 1. Previously Conducted Cultural Resources Investigations within the Study Area**

| Year | Survey Type | Atlas No.  | Distance to Project area | ACT Permit | Investigating Firm | Agency                               | Comments   |
|------|-------------|------------|--------------------------|------------|--------------------|--------------------------------------|--|
| 1977 | –           | 8500004851 | Within 0.6 mile (1.0 km) | –          | –                  | U.S. Environmental Protection Agency | No further information available on the Atlas (THC 2025a). |
| 1999 | –           | 8400000779 | Within 0.6 mile (1.0 km) | –          | –                  | City of Georgetown                   | No further information available on the Atlas (THC 2025a). |

| Year | Survey Type   | Atlas No.  | Distance to Project area | ACT Permit | Investigating Firm                   | Agency             | Comments  |
|------|---------------|------------|--------------------------|------------|--------------------------------------|--------------------|---|
| 1999 | Linear survey | 8400000780 | Within 0.6 mile (1.0 km) | –          | –                                    | City of Georgetown | No further information available on the Atlas (THC 2025a).                            |
| 1999 | Linear survey | 8400000782 | Within 0.6 mile (1.0 km) | –          | –                                    | City of Georgetown | No further information available on the Atlas (THC 2025a).                            |
| 2006 | Area survey   | 8500013663 | Within 0.6 mile (1.0 km) | 3760       | Horizon Environmental Services, Inc. | TxDOT              | Survey of Farm-to-Market Road 1460.   |
| 2010 | Area survey   | 8500020244 | Within 0.6 mile (1.0 km) | 4992       | American Archeology Group            | City of Georgetown | Survey for extension of the southeast inner loop in Georgetown.                       |
| 2011 | Area survey   | 8500019901 | Within 0.6 mile (1.0 km) | –          | American Archeology Group            | City of Georgetown | No further information available on the Atlas (THC 2025a).                            |
| 2021 | Area survey   | 8500082047 | Within project area      | 9314       | Blanton & Associates Inc.            | Williamson County  | Within western half of project area, documented Williamson County Poor Farm Cemetery. |

Source: THC (2025a)

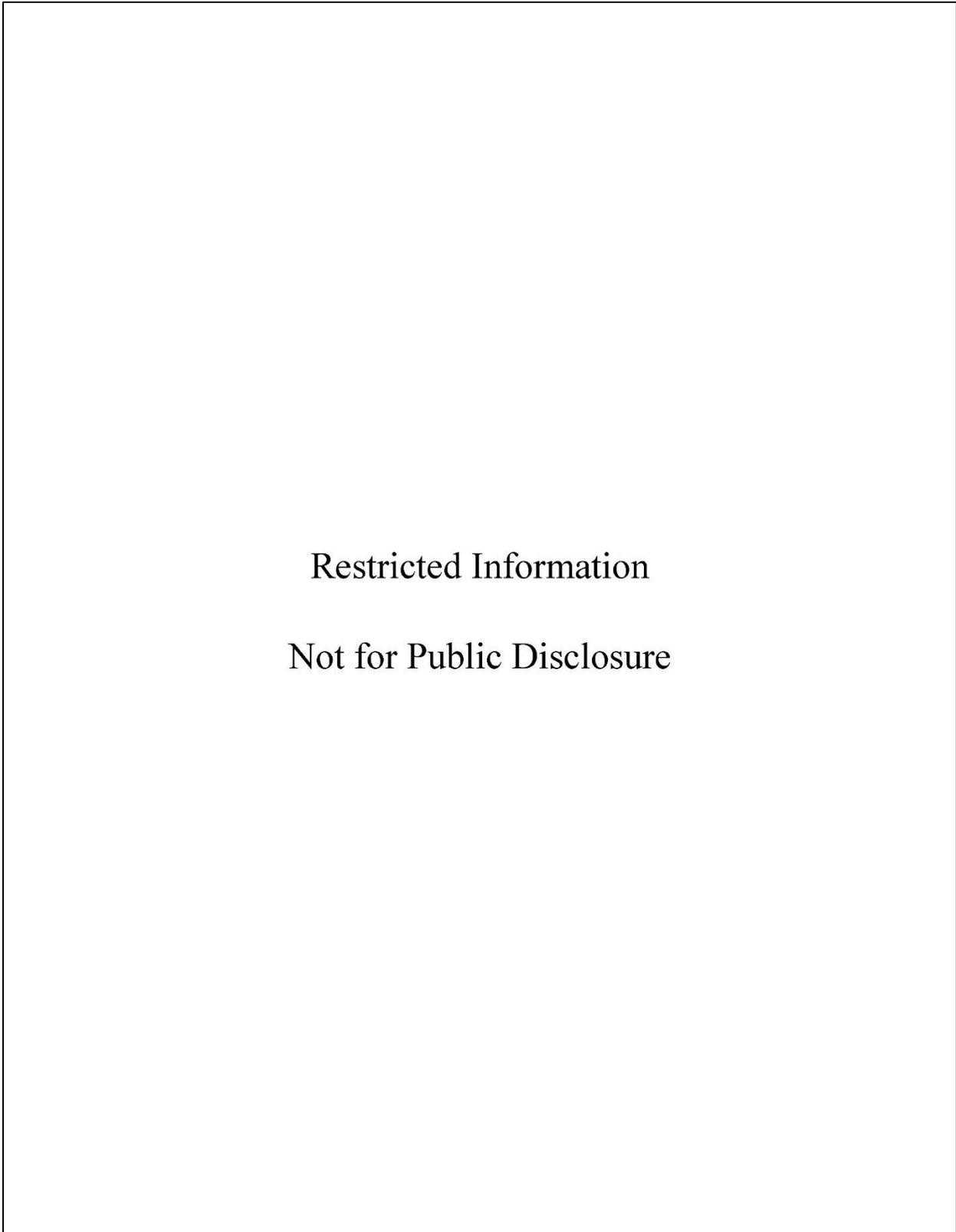
Note: Light gray indicates surveys that intersect project area.

## Previously Recorded Archaeological Sites

According to the background review, three previously recorded archaeological sites are located within the study area (i.e., 41WM1265, 41WM1434, and 41WM1435) (Table 2; see Figure 4) (THC 2025a). Discussion is limited to sites 41WM1434 and 41WM1435, with site 41WM1265 discussed in Table 2.

Site 41WM1434 is the Williamson County Pauper or Poor Farm Cemetery, recorded during Blanton’s investigation in 2021. The cemetery contains at least 27 unmarked graves, with more suspected outside the currently mapped boundaries based on archival research (Burden and Goodson 2021). The cemetery was used in association with the Williamson County Poor Farm, serving as the resting ground of paupers, orphans, convicts, and inmates who worked at the farm from 1883 to 1941 (Burden and Goodson 2021). The proposed project area is located within the former Williamson County Poor Farm, according to archives (Burden and Goodson 2021). Due to limits of Blanton’s investigation, further work could not determine if the site is eligible for NRHP or SAL. As such, the site remains undetermined for the NRHP or SAL eligibility (THC 2025a). The proposed project is located 1,350 feet (411 m) southeast of the cemetery, and therefore will not be negatively impacted by the proposed project.

Site 41WM1435 is the remnant railroad grade of the former Missouri, Kansas, and Texas railroad line dating back to the early twentieth century (Burden and Goodson 2021). The site was originally recorded by Blanton in 2021, who recommended the site as ineligible for the NRHP and as a SAL, with the THC concurring in September 2017 (Burden and Goodson 2021; THC 2025a).



**Figure 4. Cultural resources background review results map.**

**Table 2. Previously Recorded Archaeological Sites within the Study Area**

| Trinomial | Site Type              | Distance to Project Area | Description  | NRHP Eligibility             |
|-----------|------------------------|--------------------------|--|------------------------------|
| 41WM1265  | Historic-age homestead |                          | Six structures associated with the Booty family homestead dating from the early to mid-twentieth century.  | Undetermined                 |
| 41WM1434  | Historic-age cemetery  |                          | Williamson County Poor Farm Cemetery, dating from 1883 to 1941. Cemetery includes 27 unmarked graves, historically served as the county's primary burial ground for paupers, orphans, convicts, and inmates of the nearby poor farm (Burden and Goodson 2021). | Undetermined (THC 9/27/2021) |
| 41WM1435  | Historic-age railroad  |                          | Remnant of the former Missouri, Kansas, and Texas railroad line. Raised embankment remains.  | Ineligible (THC 9/26/2017)   |

Source: THC (2025a)

## Historical Map Review

A total of 23 PHRs and one historical linear feature (i.e., the Missouri, Kansas, and Texas railroad) were identified within the study area. None of the PHRs are within the project area; however, one PHR is adjacent to (within 300 feet [91.4 m] of) the project area (see Figure 5). All resources are depicted on reviewed historical maps and aerial imagery dating from 1893 to 1982 (Foster et al. 2006; NETR 2025; USGS 2025b).

## PROPOSED SCOPE OF WORK

### Intensive Archaeological Survey

Once an Antiquities Permit has been obtained, SWCA will conduct an archaeological field survey of the 9.6-acre (3.9-ha) project area. The field survey will be performed by a team of two SWCA archaeologists walking the proposed project area. SWCA archaeologists will survey two, 100-foot-wide (30.5-m-wide) transects along the project area, examining the ground surface for artifacts and features. The survey will be of sufficient intensity to determine the nature, extent, and, if possible, potential significance of any cultural resources located within the proposed project area. Subsurface explorations will be accomplished through shovel testing. The placement and quantity of these excavations will depend on the level of disturbance within the proposed project boundary and the nature of the soils, geology, and topography. Although the western half of the project area has been previously investigated, no shovel testing was conducted within this portion (see Figure 4) (Burden and Goodson 2021). As such, SWCA proposes to shovel test the entire 9.6-acre (3.9-ha) project area.

Shovel tests will be approximately 12 inches (30 centimeters [cm]) in diameter and excavated in arbitrary 8-inch (20-cm) levels to 31 inches (80 cm) below surface unless the bottom of Holocene deposits in depositional areas, subsoil in upland areas, or bedrock are encountered which preclude reaching that depth. The matrix will be screened through ¼-inch mesh. The location of each shovel test will be plotted using a submeter accurate GPS receiver, and each test will be recorded on appropriate project field forms. Shovel tests will be excavated according to Council of Texas Archaeologists (CTA) standards (CTA 2020) promulgated by the THC.

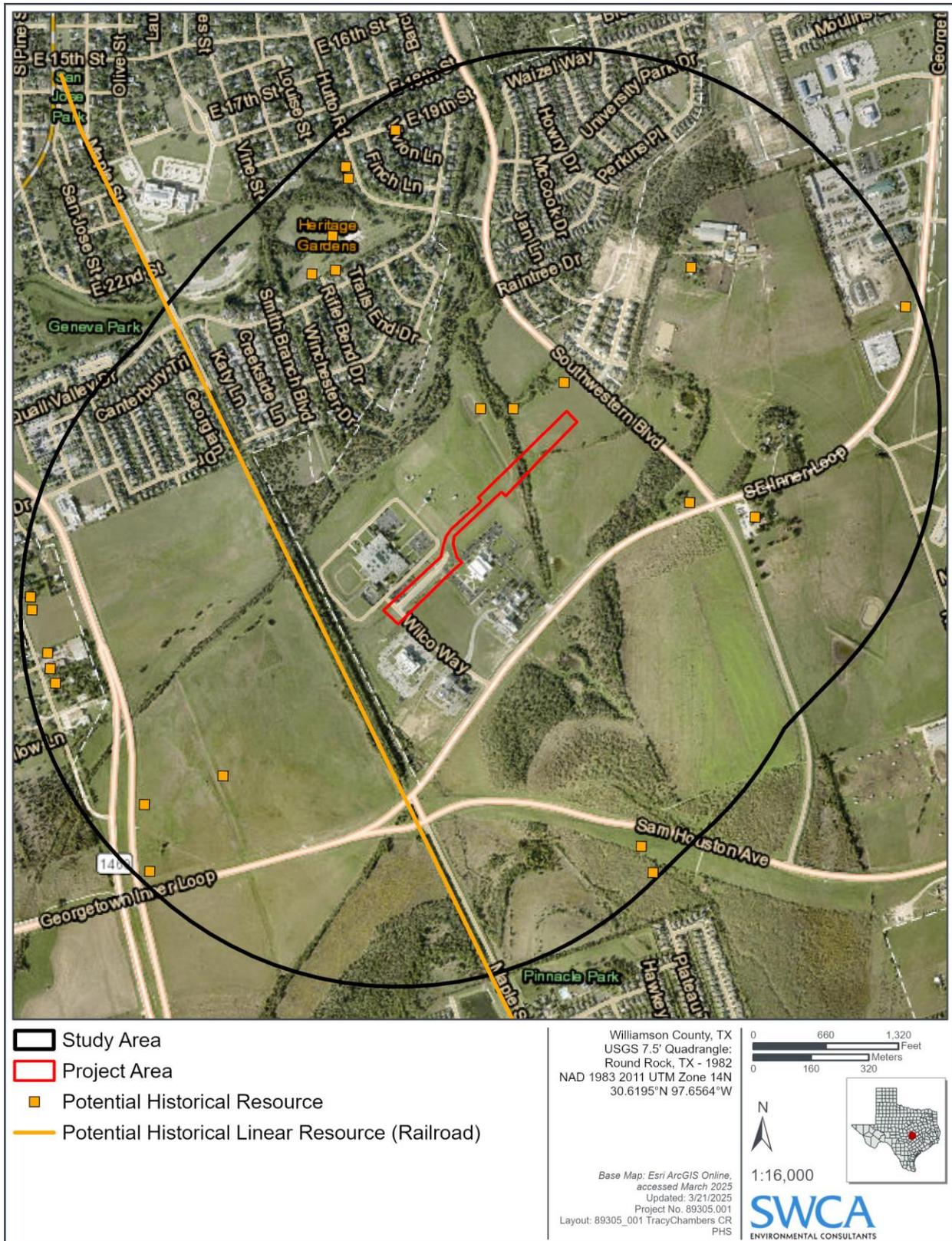


Figure 5. Potential historical resources map.

For projects less than 25 acres (10.1 ha) in size, standards require a minimum of two shovel tests per acre. Based on these standards, a minimum of 20 shovel tests are required for this project. Any deviations from these standards will be clearly discussed and explained in the resulting report for the investigation.

## **Potential Deep Testing Area Review**

SWCA geoarchaeologist and Principal Investigator Analise Hollingshead, M.S., reviewed the project area to determine if deep mechanical investigations (i.e., backhoe trenching) are warranted and, if so, to what extent. The soils, geology, and lack of significant terrace development along the adjacent first-order creek in the project area precludes the likelihood of intact, deeply buried cultural deposits; therefore, deep testing investigations are not warranted within the project area, as currently defined. In the event that shovel test excavations determine the potential for cultural deposits deeper than 31 inches (80 cm) below surface, SWCA will make recommendations for any areas that would require deep testing (i.e., backhoe trenching). If deep testing is determined to be necessary, an ACT permit amendment detailing this proposed methodology will be submitted to the THC for review and approval.

## **Site Documentation**

If an archaeological site is encountered during the investigation, it will be explored as much as possible with consideration to land access constraints. All recorded sites will be mapped in detail and plotted on USGS 7.5-minute topographic quadrangle maps with a hand-held, submeter accurate GPS unit and appropriate project maps for planning purposes. All identified sites will be assessed regarding potential significance so that recommendations can be made for property management (i.e., avoidance, non-avoidance, or further work).

All identified cultural resources will be delineated and recorded following CTA standards (CTA 2020) promulgated by the THC. An archaeological site is defined as physical evidence of human activity that is at least 50 years old and contain, or are characterized, by one or more of the following criteria:

- Ten or more artifacts (of any class and type) within a 50-foot (15-m) diameter area. Fire-cracked rock or artifacts that all appear to originate from a single source (e.g., one ceramic pot drop, one broken glass bottle) are not considered a site; however, discrete, single knapping episodes (activity areas) are also treated as a site.
- One or more datable archaeological features (with or without associated artifacts).
- Two or more undatable archaeological features within 100 feet (30.5 m) of each other.
- A single undatable feature with associated artifacts.

If an archaeological site is identified during the investigation, SWCA will delineate the site according to CTA standards (CTA 2020). Cultural manifestations observed greater than 100 feet (30.5 m) apart will be considered spatially unrelated, and cultural materials that do not fit within the archaeological site criteria will be considered Isolated Occurrences. As such, occurrences will be recorded noting the type and quantity of materials, as well as the size and shape of any features, architectural/construction details, possible function, and any potential relationship to nearby cultural materials. Additionally, guidelines set forth by the THC's *Guidance for Studying Late nineteenth-Century and Early twentieth-Century Sites* (THC 2025b) will be followed for any historic-age sites documented within the project area.

SWCA proposes a non-collection survey. Artifacts will be tabulated, analyzed, and documented in the field but not collected. Temporally diagnostic artifacts will be described in detail and photographed in the field. This policy will reduce curation costs once the fieldwork is concluded; however, as per the

stipulations of the Antiquities Permit, all paperwork and photographs generated during the field investigation must be curated at an approved repository.

The following procedures will be initiated in the event unanticipated human remains are discovered. Should human remains be encountered during construction, work in the immediate area will cease, and the archaeological survey crew and Principal Investigator will evaluate the finding(s) and provide recommendations for how to manage the resource under Texas Health and Safety Code and Chapter 49 of the Texas Code of Criminal Procedure. Upon discovery of human remains by the Principal Investigator, the appropriate law enforcement officials, Williamson County representative, and the THC will be notified immediately. In all cases, the location will be immediately secured with all work to cease within the project area and a buffer zone of at least a 100-foot (30.5-m) radius from the discovery. Any human remains will be carefully covered with muslin fabric, geotextile and lightweight plastic sheeting, and reburied under a shallow blanket of soil to prevent unnecessary exposure. Care will be taken to prevent any disturbance of the potential human remains during removal of vehicles and equipment. Until appropriate consultation has occurred, the discovery shall remain protected from any disturbance, such that no human remains, or associated artifacts are touched, moved, or collected. Until consultation is complete, and a removal strategy is defined, the human remains will remain in place (in the ground), protected from natural forces, vandalism, and looting. Construction in the area of discovery may resume only upon approval and/or clearance by the THC (and law enforcement, if applicable).

## **Reporting and Curation**

SWCA will prepare a draft report of the investigation detailing the results of the archaeological and historic resources surveys. The report will conform to THC and CTA reporting standards (CTA 2025). The report will document the general nature of the project area, the methodology used in the investigation, the presence and condition of any previously recorded sites revealed in the records review, the general nature and extent of cultural resources encountered during the archaeological survey, recommendations on the need for further work, and the potential significance of the cultural resources regarding future development and NRHP/SAL status.

SWCA will submit a digital draft copy of the report to Williamson County for review and comment. Once this has been accomplished, SWCA will incorporate any appropriate edits and will submit a final draft report to the THC for review and comment. As part of completing Antiquities Permit requirements, SWCA will furnish two electronic copies of the final report on a tagged PDF formatted CD, as well as project area shapefiles, to the THC, and complete an Abstracts in Texas Contract Archeology Summary form and abstract text online. Field records will be curated at an approved curatorial facility which, in this case, is the Center for Archaeological Research at The University of Texas at San Antonio, per requirements of the ACT.

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