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April 22, 2025

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

Re: Request for Antiquities Permit to Conduct a Cultural Resources Investigations for the County Road 201 Improvements Project, Williamson County, Texas / SWCA Project No. 61059

Dear Rebecca Shelton:

This letter is a request for a Texas Antiquities Permit to conduct cultural resources investigations for the County Road (CR) 201 Roadway Improvements Project (project) in Williamson County, Texas. The project consists of ground disturbing activities along approximately 2.0 miles (3.2 kilometers) of roadway beginning at CR 200 and extending north to approximately 1,130 feet (344 meters [m]) northwest of the private road, Umbrella Sky. The project consists of widening CR 201 from the existing two-lane roadway to a four-lane (two in each direction) divided roadway with intersection improvements at CR 200. Overall, the project area encompasses approximately 38.6 acres (15.6 hectares). The maximum depth of impact for the project is 9 feet (2.7 m) below surface.

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). Based on the current project understanding, no federal regulatory compliance is anticipated.

If you have any questions or concerns, please contact me at (512) 476-0891, extension 111236, or joey.okeefe@swca.com.

Sincerely,

A handwritten signature in black ink that reads 'Joey O'Keefe'.

Joey O'Keefe, M.A.
Principal Investigator

PROPOSED SCOPE OF WORK FOR CULTURAL RESOURCES INVESTIGATION OF THE COUNTY ROAD 201 ROADWAY IMPROVEMENTS PROJECT, WILLIAMSON COUNTY, TEXAS

Project Landowner – Williamson County

Project Sponsor – Williamson County

Project Consultant – SWCA Environmental Consultants

Principal Investigator – Joey O’Keefe, M.A., RPA

Date – April 22, 2025

INTRODUCTION

At the request of Williamson County, SWCA Environmental Consultants (SWCA) proposes to conduct an intensive cultural resources investigation of approximately 38.6 acres (15.6 hectares [ha]) of roadway in support of the County Road (CR) 201 Roadway Improvements Project (project) in Williamson County, Texas. The project consists of ground disturbing activities along approximately 2.0 miles (3.2 kilometers [km]) of roadway, beginning at CR 200 and extending north to approximately 1,130 feet (344 meters [m]) northwest of the private road, Umbrella Sky (Figures 1 and 2). The project consists of widening CR 201 from the existing two-lane roadway to a four-lane (two in each direction) divided roadway with intersection improvements at CR 200.

As the proposed project is being undertaken by Williamson County, a subdivision of the state, 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 systematic shovel testing of the 2-mile-long (3.2-km-long), approximately 38.6-acre (15.6-ha) project area (see 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 *Liberty Hill, Texas* (3097-331), U.S. Geological Survey (USGS 1962) 7.5-minute topographic quadrangle map. The project area is located approximately 1.7 miles (2.8 km) north of Liberty Hill, Texas, and approximately 5.9 miles (9.5 km) southeast of Bertram, Texas. The project area consists of the existing two-lane asphalt roadway which will be expanded to a four-lane (two lanes in each direction) divided roadway with intersection improvements at CR 200. The project will be constructed within right-of-way (ROW) that varies between an approximately 100 to 200-foot (30.5 to 61-meter [m]) in width for roadway construction along approximately 2.0 miles (3.2 km) of the existing CR 201 starting from CR 200 and extending north to approximately 1,130 feet (344 m) northwest of the private road, Umbrella Sky. Additionally, the project includes multiple staging areas and locations for side streets, driveways, and reconstruction of existing transportation infrastructures extending from the ROW. Overall, the project area encompasses approximately 38.6 acres (15.6 ha) (see Figure 2). The maximum depth of impact for the project is 9 feet (2.7 m) below surface.

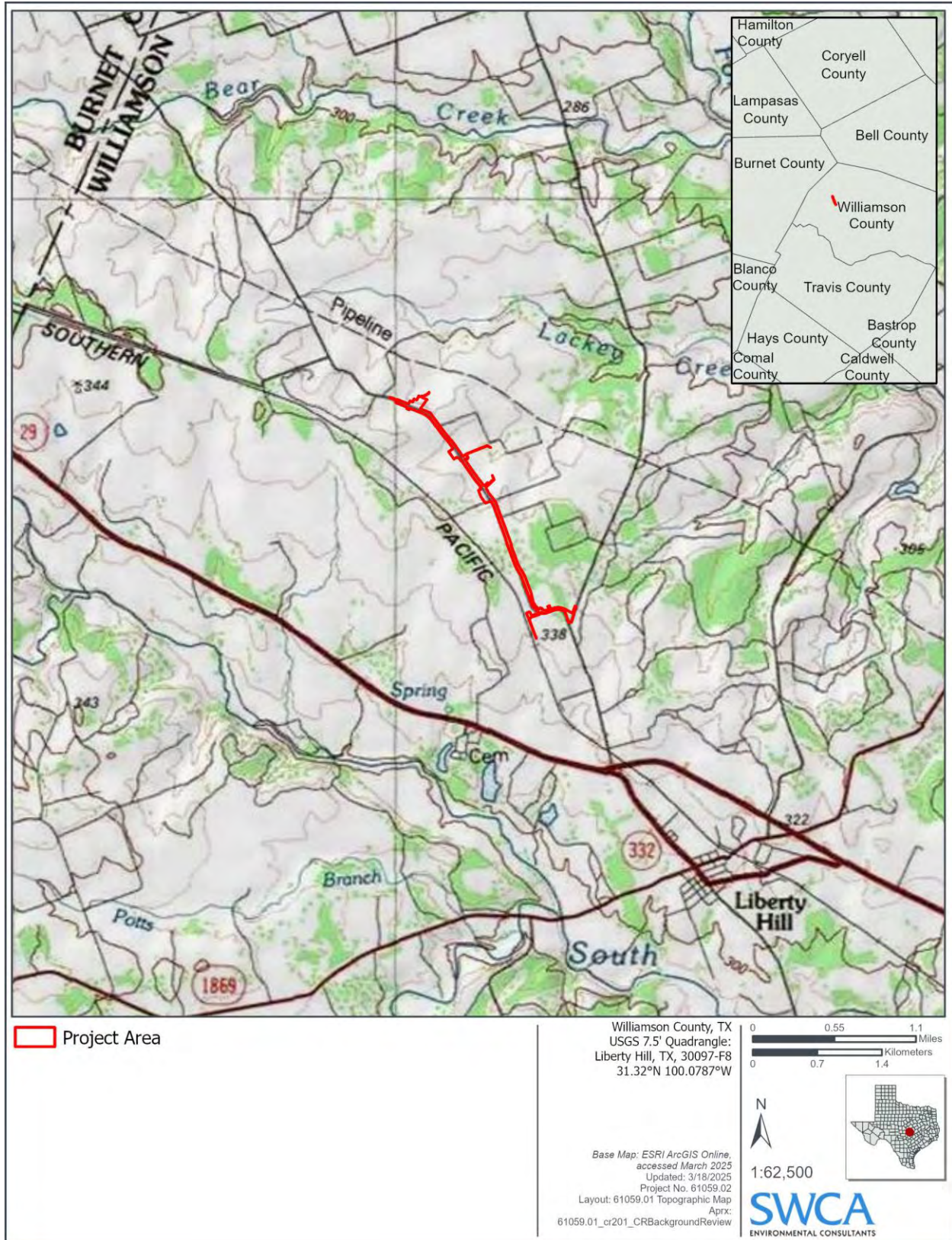


Figure 1. Project location map.

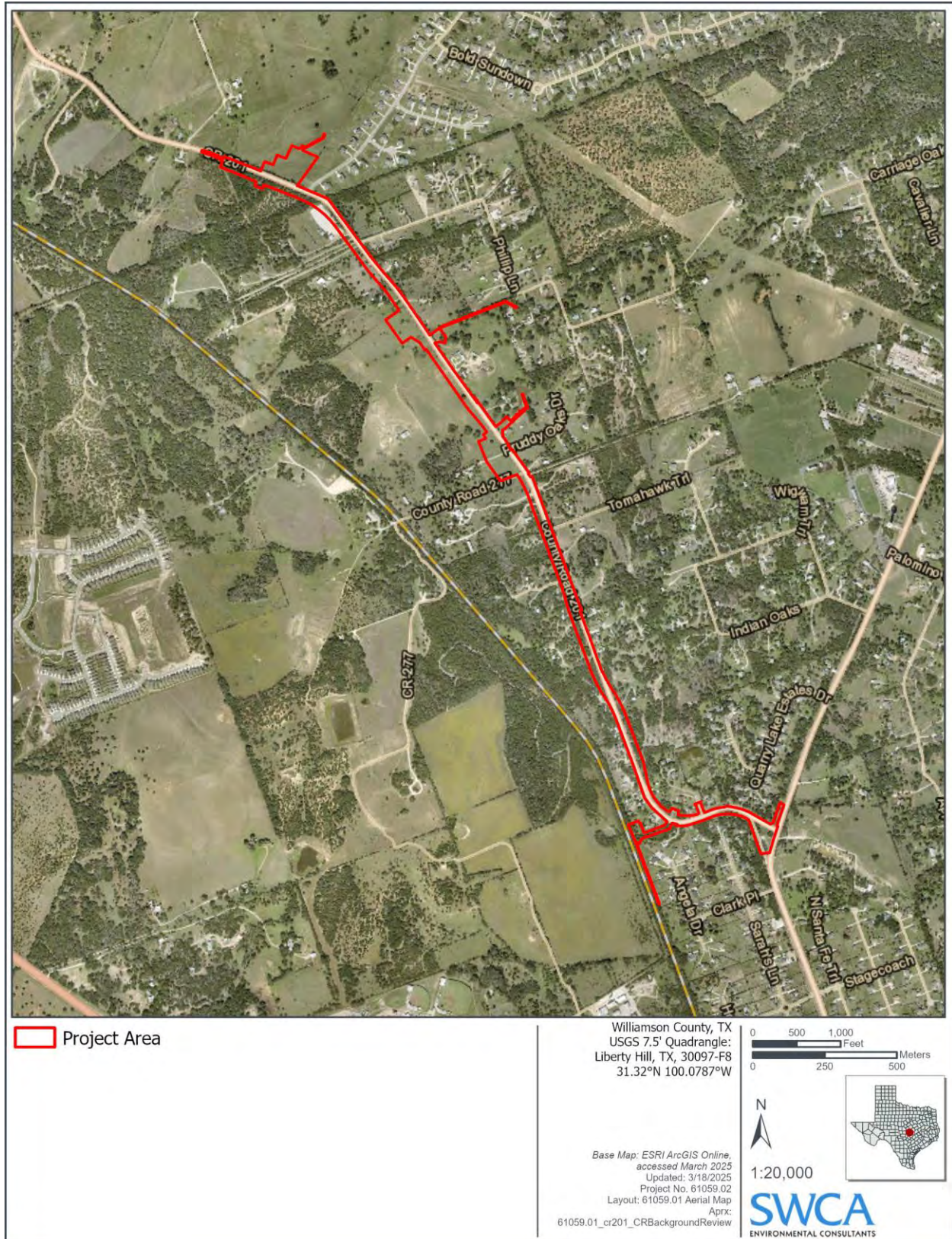


Figure 2. Project area overview map.

PROJECT SETTING

The project area crosses the Balcones Canyonlands subregion within the Edwards Plateau ecoregion (Griffith et al. 2007). The physiography of the area is described as dissected plateaus and escarpments with stair-stepped topography. Additionally, physiography includes moderate to high gradient streams with bedrock, cobble, and gravel substrates (Griffith et al. 2007:63).

Geology

The underlying geology throughout the project area consists predominantly of Cretaceous-age Walnut Clay formations including Bee Cave Marl (28.1 acres [11.4 ha]), Cedar Park (8.0 acres [3.2 ha]), and the Upper Glen Rose Limestone formation (2.5 acres [1.0 ha]) (Figure 3) (Barnes 1974; USGS 2025a). These marl formations are typically soft, white marls containing megafossils. The Upper Glen Rose Limestone formation consists of alternating beds of limestone, dolomite, and marl in a resistant and recessive pattern to form a stair-stepped topography. The upper part of this formation consists of thin beds with the lower part of the formation consisting of thicker fossiliferous beds (USGS 2025a).

Soils

According to the Natural Resources Conservation Service (NRCS 2025), there are five soil series mapped within the project area including: the Fairlie clay; Doss silty clay, moist; Eckrant cobbly clay; Denton silty clay; and Brackett association (see Figure 3; Table 1). None of the mapped soils are alluvial or aggrading, suggesting almost no potential to contain buried archaeological resources.

- The Fairlie clay soil series consists of deep, moderately well-drained soils that formed on nearly level to gently sloping uplands. The slope is typically 1 to 3 percent but ranges from 0 to 5 percent (NRCS 2025).
- The Doss silty clay soil series consists of shallow to weakly cemented limestone. The series is a well-drained, moderately slow permeable soil that forms in calcareous loamy and clayey residuum derived from marls and limestone. These gently to moderately sloping soils occur on hill slopes on dissected plateaus (NRCS 2025).
- The Eckrant cobbly clay consists of a well-drained, moderately slowly permeable soils that are very shallow to shallow over indurated limestone bedrock. These soils are nearly level to very steep and form in residuum derived from limestone. These soils occur on summits, shoulders, and backslopes of ridges on dissected plateaus (NRCS 2025).
- The Denton silty clay consists of deep, well-drained, slowly permeable soils located on gently sloping backslopes and footslopes of ridges. They formed in clayey materials derived from weathered residuum over limestone bedrock (NRCS 2025).
- The Brackett soil series consists of shallow to paralithic bedrock. The soil is well-drained and is derived from residuum from weathered Cretaceous-aged Glen Rose limestone. These soils vary from nearly level to very steep and are located on the backslopes of ridges on dissected plateaus in the Edwards Plateau physiographic region (NRCS 2025).

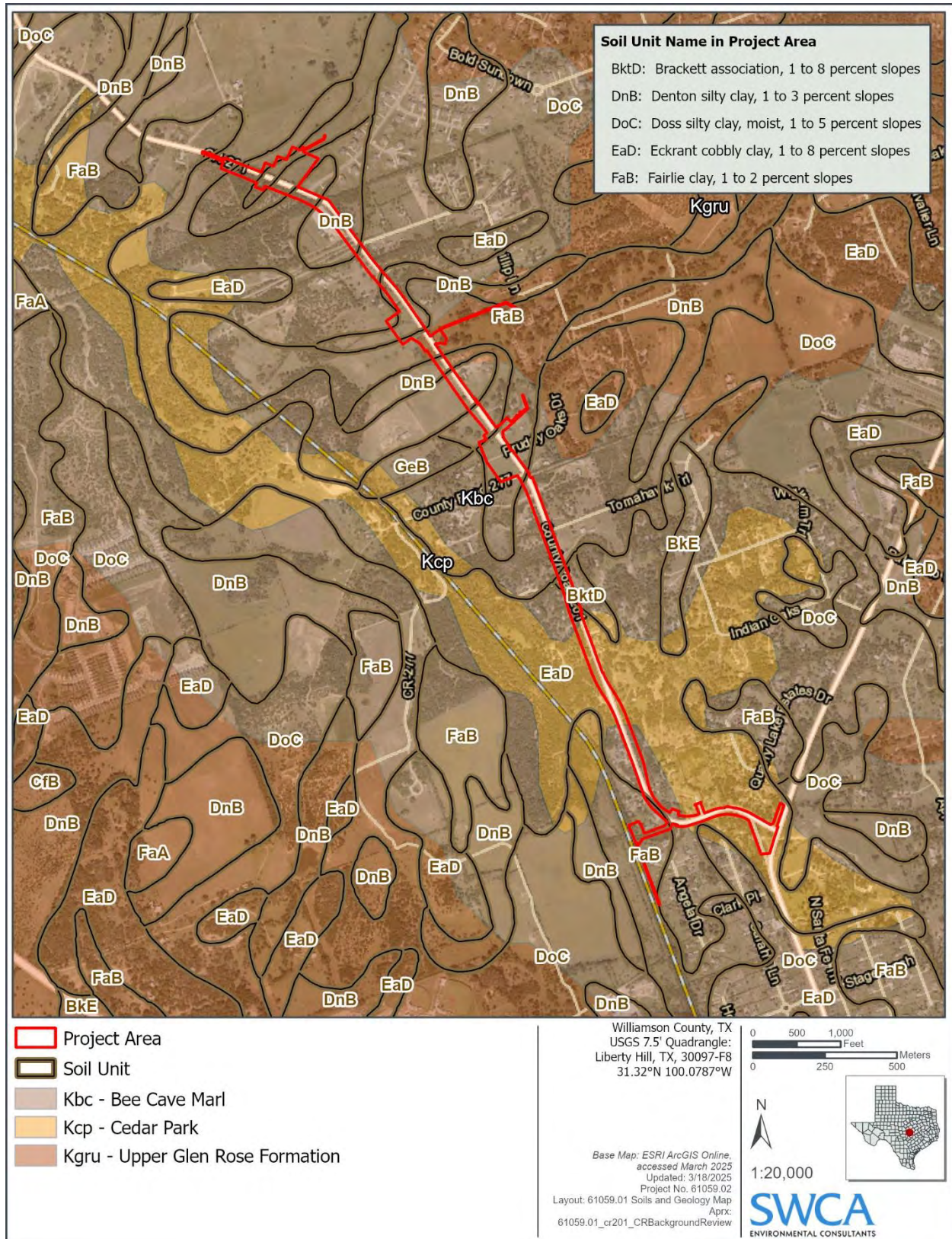


Figure 3. Project area soils and geology map.

Table 1. Project Area Soils

Soil Name	Symbol	Acres	Percentage
Fairlie clay, 1 to 2 percent slopes	FaB	7.4	19.2
Doss silty clay, moist, 1 to 5 percent slopes	DoC	8.0	20.7
Eckrant cobbly clay, 1 to 8 percent slopes	EaD	13.8	35.7
Denton silty clay, 1 to 3 percent slopes	DnB	8.4	21.8
Brackett association, 1 to 8 percent slopes	BktD	1.0	2.6
Total		38.6	100

Source: NRCS (2025).

BACKGROUND REVIEW

An SWCA archaeologist performed a background review in April of 2025 for cultural resources within a 0.6-mile (1.0-km) buffer surrounding the project area (study area) (Figure 4). SWCA reviewed the Texas Archeological Sites Atlas (Atlas), a restricted, online database maintained by the THC and the Texas Archeological Research Laboratory, for any previously conducted archaeological surveys and previously recorded historic-age or prehistoric archaeological sites located in or near the project area (THC 2025a). The Atlas also provides data on NRHP properties and districts, SALs, Official Texas Historical Markers (OTHMs), cemeteries, historic trails, and local neighborhood surveys. Listings are limited to projects under purview of the ACT or the National Historic Preservation Act (NHPA) of 1966; therefore, all previous work conducted in an area may not be available. The background review included a review of the Texas Department of Transportation (TxDOT) Aggregator (Aggregator), which maps resources and districts determined eligible for the NRHP, National Historic Landmarks (NHLs), Recorded Texas Historic Landmarks (RTHLs), 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 project and study areas for Family Land Heritage (FLH) Centennial Farms identified by the Texas Department of Agriculture, cemetery locations on Find a Grave’s (2025) online database, and relevant locations in the Texas Freedom Colonies Project (Texas Department of Agriculture 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 historic resources (PHR) and/or features are located within the project and study areas.

The review determined that two previously conducted cultural resources investigations, one known cemetery, and one NRHP district are within the study area (see Figure 4). Additionally, a total of 29 PHR are within the study area; none of which are within the current project area.

No archaeological sites, SALs, NHLs, RTHLs, OTHMs, local historic districts, recorded freedom colonies, or FLH Centennial Farms were identified within the project or study areas (see Figure 4).

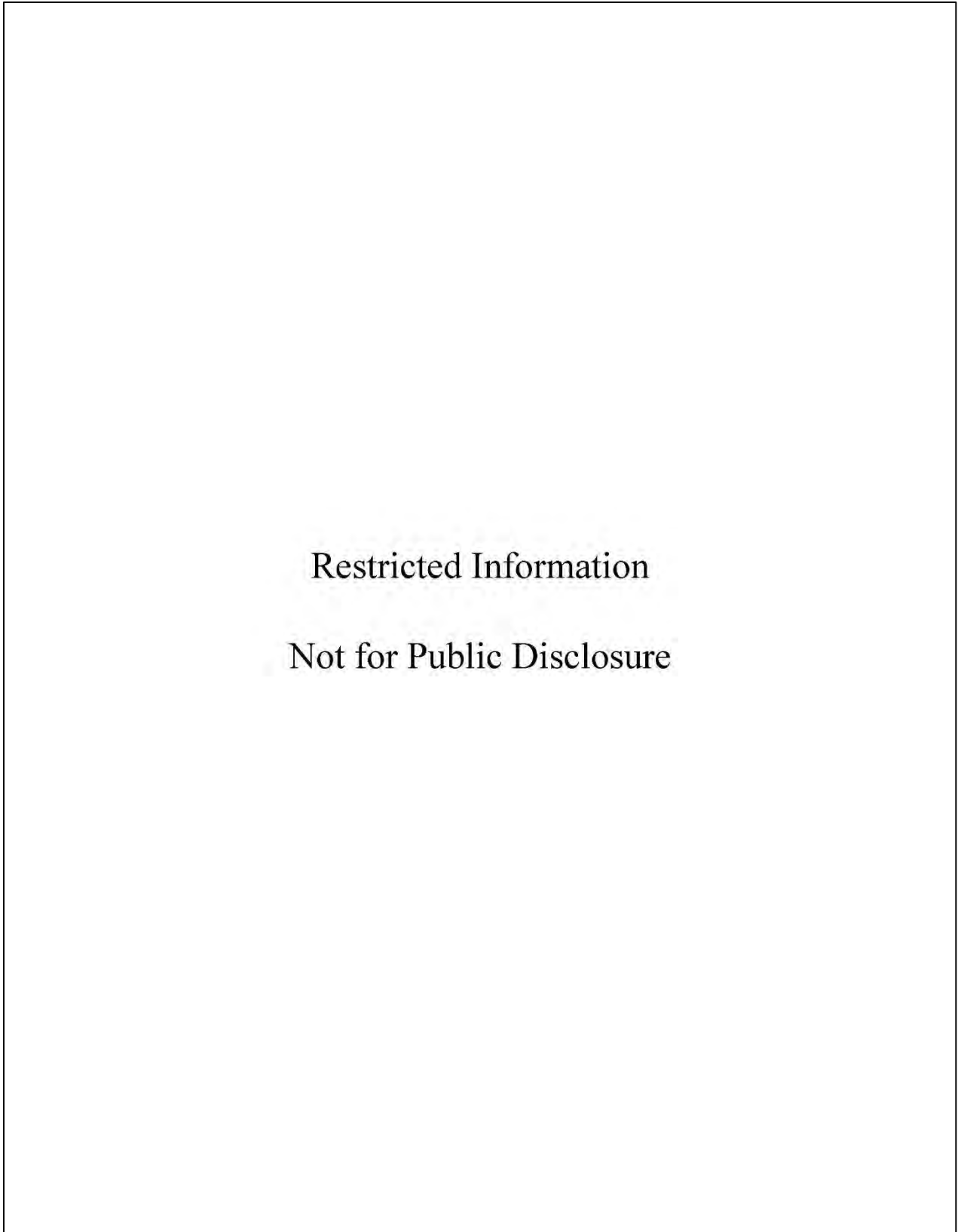


Figure 4. Cultural resources background review results map.

Previous Cultural Resources Surveys

During the background review, two previously conducted cultural resources surveys were identified within the cultural resources study area, one of which intersects with the southern extent of the project area (Atlas No. 8500081710) (see Figure 4). The previous survey that intersects the project area was conducted in 2019 by Blanton and Associates, Inc., under Texas Antiquities Permit No. 8916 for the purpose of improving the CR 200 roadway; no new cultural materials were observed (Burden 2020). The second survey is located east of the project area (Atlas No. 8500011798). This survey was conducted in 2005 by Antiquities Planning and Consulting along the western right of way (ROW) of CR 200. No additional information is provided on the Atlas (THC 2025a).

Previously Recorded Archaeological Sites and Cultural Resources

The background review determined that there are no archaeological sites identified within the cultural resources study area. The Lincecum Family Cemetery is located near the northwestern extent of the project area (see Figure 4). There is no additional information on the Lincecum Cemetery; however, the project will not impact the cemetery (THC 2025a).

The Bryson Stage Coach Stop NRHP district is located at the southern extent of the study area (see Figure 4). John T. Bryson (d. 1894) and his wife Amelia (d. 1897), early settlers of the Liberty Hill community, constructed the home in 1854. The residence was constructed using a frame of notched and fitted hewn cedar logs and features chimneys of native stone and the original open dog-trot construction typical of pioneer Texas houses. The Bryson residence also served as a stop on the stagecoach route between Austin and Fort Croghan, near present Burnet. Also included in the district are original stone-lined wells, and a log barn used to harness, unharness, and feed horses used by stagecoaches. The district was nominated for the NRHP in 1978 (THC 2025b).

The historical map review identified 29 PHR within the cultural resources study area, none of which intersect within the project area (see Figure 4). Current aerial imagery indicates that some of these structures are still extant. Ten of these structures, however, lie immediately adjacent to (within 300 feet [91.4 m] of) the project area. Of these 10 adjacent structures, three are extant (see Figure 4) (Google Earth 2025; USGS 2025b). All structures are depicted on the 1962 *Liberty Hill* USGS topographic quadrangle map, most of which are restricted to the periphery of the cultural resources study area (see Figure 4) (USGS 1962, 2025b).

Geoarchaeological Assessment

A review of the proposed CR 201 project alignment was conducted to determine possible deep test (i.e., mechanical excavation) locations. The project alignment does not cross any named waterways but does cross three tributary channels that eventually drain into the North Fork of the San Gabriel River, which is located approximately 2.6 miles (4.2 km) northeast of the project area.

The focus of this review for each of these drainages was to determine whether deep mechanical investigations (i.e., backhoe trenching) are warranted and, if so, to what extent. The information used for the review of each of the areas included, but is not limited to, soil survey maps from the NRCS, the Austin District TxDOT Hybrid Potential Archeological Liability Map (HPALM) (Figure 5), and geological data (Abbott and Pletka 2015; NRCS 2025; USGS 2025a). Additionally, the review considered the position of the proposed crossing in the context of the drainage. For example, areas where an alignment crosses near the headwaters of a drainage typically do not have sufficient deposits capable of containing deep alluvium containing buried cultural resources. Finally, topographic and aerial imagery and Google Earth Streetview were reviewed to gauge the size and thickness of alluvial landforms in proximity to the project crossing.

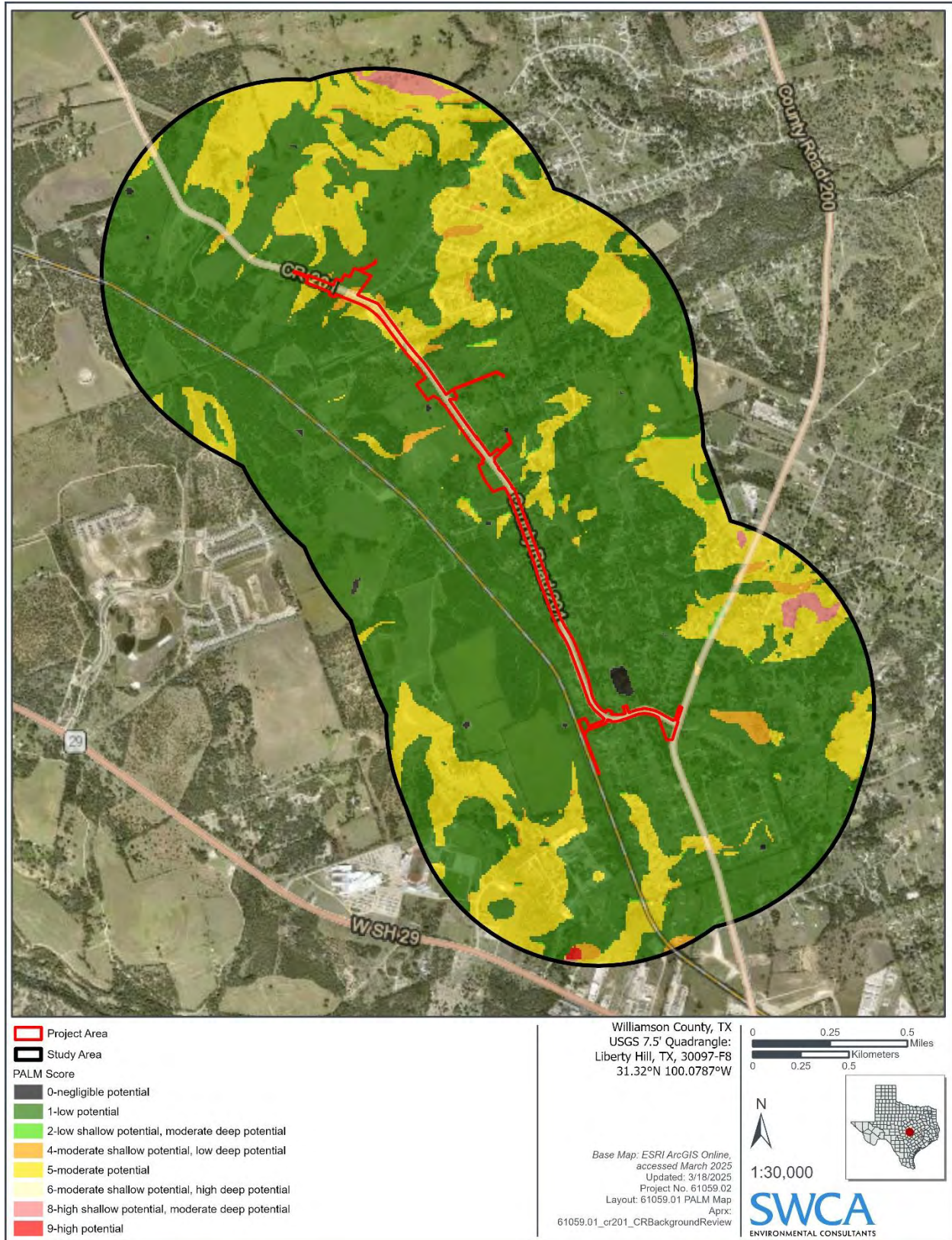


Figure 5. TxDOT HPALM data and the project area (Abbott and Pletka 2015).

The review conducted by SWCA geoarchaeologist Analise Hollingshead, M.S., determined that no crossings warranting deep test investigations are present within the proposed project area. The project area is located within a broad, dissected limestone plateau located east of the drainage divide between the major Colorado and Brazos Rivers. The soils and geology data do not indicate the presence of deep Holocene-aged deposits, but rather shallow, rocky soils primarily derived from colluvial slope wash overlying shallowly buried bedrock.

Further, a review of the project area with Google Earth indicates that there are no discernable terraces within the project area. Additionally, review of the closest drainages to the project displays shallow, incised creeks with bedrock (i.e., limestone) readily available. Finally, a review of TxDOT's Austin HPALM data indicates that the project crosses low potential deposits across most of the roadway (Abbott and Pletka 2015). Two areas just north of CR 277 extending to the northern terminus of the project are mapped as having moderate potential (see Figure 5). Based on the position of these two areas of moderate potential (i.e., footslopes) in combination with the previously mentioned data, these locations are not interpreted to have deep Holocene-aged deposits. Accordingly, no areas warranting deep test investigations are interpreted to be present within the proposed project area.

PROPOSED SCOPE OF WORK

Once an Antiquities Permit has been obtained, SWCA will conduct an archaeological field survey of the 2.0-mile-long (3.2-km-long) project area; the total acreage of the project area is 38.6 acres (15.6 ha). The field survey will be performed by a team of SWCA archaeologists walking the proposed project area. SWCA will incorporate approximately 100-foot-wide (30.5-m-wide) transects with archaeologists 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.

Shovel tests will be excavated according to Council of Texas Archeologists (CTA) standards (2020) promulgated by the THC. For linear projects, THC standards require a minimum of 16 shovel tests per linear mile of approximately 100-foot-wide (30.5-m-wide) ROW. Based on these standards, a minimum of 66 shovel tests will be required for this project. Any deviations from these standards will be clearly discussed and explained in the resulting report for the investigation. 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 or culturally sterile deposits, whichever comes first. The matrix will be screened through ¼-inch mesh. The location of each shovel test will be plotted using a sub-meter accurate global positioning system (GPS) receiver, and each test will be recorded on appropriate project field forms. Areas with previously recorded sites or other cultural resources revealed in the archival research will require additional shovel testing to explore the nature of the cultural deposits. 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 future impacts from the proposed project are anticipated to be deeper than 31 inches (80 cm) below surface.

Should the shovel test investigations determine that deep test excavations are warranted, the trench placement in those areas will be determined by the level of existing disturbance, the location of any impacted areas (such as construction), and the best potential to contain deep alluvial deposits relevant to the current study as determined by the SWCA Geoarchaeologist. Backhoe trenches would be excavated to a depth sufficient to safely allow the complete recording of all geomorphic information and sampling to depths of the current study. Typically, the trenches will be 1.8 to 2.4 m (6–8 feet) deep, 5 m (16 feet) long,

and 0.75 m (2.5 feet) wide. All mechanical trenching will be monitored by an experienced archaeologist while excavations are underway. Once the trench has been excavated, an SWCA archaeologist will clean and examine the available exposures in the excavation, inspecting the profiles for artifacts, features, and appropriate materials (e.g., organic materials) for chronometric analyses. Stratigraphic descriptions will be recorded for each trench using modified criteria advocated by Birkeland (1999) and Schoeneberger and others (2012). All features encountered during trenching will be mapped and photographed.

If necessary, all work will be performed in accordance with Occupational Safety and Health Administration (OSHA) regulations (29 CFR Part 1926) and overseen by an OSHA competent archaeologist. When excavations exceed five feet below surface, the excavations will be benched back in accordance with regards to the appropriate soil type (i.e., Type A, B, or C) as indicated in OSHA regulations (29 CFR Part 1926.652(b)(2)). The entire process will be thoroughly documented and photographed. Upon completion of excavation, all trenches will be backfilled, leveled, and returned, as much as possible, to their original state.

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, sub-meter accurate GPS unit and appropriate project maps for planning purposes. All discovered 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 discovered cultural resources will be delineated and recorded following CTA standards 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; or
- A single undatable feature with associated artifacts.

If an archaeological site is discovered during the investigation, SWCA will excavate a minimum of six shovel tests within the site to define horizontal and vertical site boundaries. Site delineation shovel tests will be excavated in a cruciform pattern at 50-foot (15-m) intervals or less until two negative shovel tests are encountered in each direction or landform limits are reached. All discovered sites will be assessed for their potential significance so that recommendations can be made for proper management (i.e., avoidance, non-avoidance, or further work). 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 aforementioned archaeological site criteria will be considered Isolated Occurrences (IO). 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 19th-Century and*

Early 20th-Century Sites (THC 2025c) 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.

Reporting and Curation

SWCA will prepare a draft report of the investigation detailing the results of the archaeological survey. The report will conform to THC and CTA reporting standards (CTA 2024). 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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