

TEXAS HISTORICAL COMMISSION

ANTIQUITIES PERMIT APPLICATION FORM  
ARCHEOLOGY

GENERAL INFORMATION

I. PROPERTY TYPE AND LOCATION

Project Name (and/or Site Trinomial) Corridor A2-Segment 2  
County (ies) Williamson  
USGS Quadrangle Name and Number Taylor (30097-E4)  
UTM Coordinates Zone 14 E 652648 m N 3377591 m  
Location The proposed project spans west from the existing State Highway (SH) 95 to County Road (CR) 406 in Williamson County, Texas  
Federal Involvement  Yes  No  
Name of Federal Agency USACE Forth Worth District  
Agency Representative Arlo McKee

II. OWNER (OR CONTROLLING AGENCY)

Owner Williamson County  
Representative County Judge Steven Snell  
Address 710 South Main St., Suite 101  
City/State/Zip Georgetown, TX 78626  
Telephone (include area code) 512-943-1550 Email Address ctyjudge@wilco.org

III. PROJECT SPONSOR (IF DIFFERENT FROM OWNER)

Sponsor Same as owner  
Representative \_\_\_\_\_  
Address \_\_\_\_\_  
City/State/Zip \_\_\_\_\_  
Telephone (include area code) \_\_\_\_\_ Email Address \_\_\_\_\_

PROJECT INFORMATION

I. PRINCIPAL INVESTIGATOR (ARCHEOLOGIST)

Name Joey O'Keefe, M.A.  
Affiliation SWCA Environmental Consulting  
Address 4407 Monterey Oaks Boulevard, Suite 110, Bldg. 1  
City/State/Zip Austin, Texas 78749  
Telephone (include area code) 512-476-0891, ext. 111236 Email Address joey.okeefe@swca.com

ANTIQUITIES PERMIT APPLICATION FORM (CONTINUED)

II. PROJECT DESCRIPTION

Proposed Starting Date of Fieldwork October 2025
Requested Permit Duration 5 Years Months (1 year minimum)
Scope of Work (Provided an Outline of Proposed Work) See attached scope of work

III. CURATION & REPORT

Temporary Curatorial or Laboratory Facility SWCA on-site facilities, Austin, Texas
Permanent Curatorial Facility Center for Archaeological Research at UT in San Antonio

IV. LAND OWNER'S CERTIFICATION

I, County Judge Steven Snell, as legal representative of the Land Owner, Williamson County, do certify that I have reviewed the plans and research design, and that no investigations will be performed prior to the issuance of a permit by the Texas Historical Commission. Furthermore, I understand that the Owner, Sponsor, and Principal Investigator are responsible for completing the terms of the permit.

Signature Date

V. SPONSOR'S CERTIFICATION

I, as legal representative of the Sponsor, do certify that I have review the plans and research design, and that no investigations will be performed prior to the issuance of a permit by the Texas Historical Commission. Furthermore, I understand that the Sponsor, Owner, and Principal Investigator are responsible for completing the terms of this permit.

Signature Date

VI. INVESTIGATOR'S CERTIFICATION

I, Joey O'Keefe, as Principal Investigator employed by SWCA Environmental Consultant (Investigative Firm), do certify that I will execute this project according to the submitted plans and research design, and will not conduct any work prior to the issuance of a permit by the Texas Historical Commission. Furthermore, I understand that the Principal Investigator (and the Investigative Firm), as well as the Owner and Sponsor, are responsible for completing the terms of this permit.

Signature Date 9/8/2025

Principal Investigator must attach a research design, a copy of the USGS quadrangle showing project boundaries, and any additional pertinent information. Curriculum vita must be on file with the Archeology Division.

FOR OFFICIAL USE ONLY

Reviewer Date Permit Issues
Permit Number Permit Expiration Date
Type of Permit Date Received for Data Entry



ENVIRONMENTAL CONSULTANTS

Sound Science. Creative Solutions.®

4407 Monterey Oaks Boulevard  
Building 1, Suite 110  
Austin, Texas 78749  
Tel 512.476.0891 Fax 512.476.0893  
www.swca.com

September 9, 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 Corridor A2–Segment 2 in Williamson County, Texas / SWCA Project No. 87699.010**

Dear Rebecca Shelton:

This letter is a request for a Texas Antiquities Permit to conduct cultural resources investigations for the Corridor A2–Segment 2 project (project) in Williamson County, Texas. The project consists of ground-disturbing activities associated with the construction of approximately 1 mile (1.6 kilometers) of a new two-lane road within a 350-foot-wide (106.7-meter-wide) right-of-way, totaling 60.3 acres (24.4 hectares) in area with a maximum depth of impact of 40 feet (12.2 meters). 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).

Because the project crosses waters of the United States under jurisdiction of the U.S. Army Corps of Engineers, Section 106 of the National Historic Preservation Act is applicable to this project. The project may also receive federal funding through the Texas Department of Transportation (TxDOT); therefore, historic resources fieldwork will be conducted in accordance with TxDOT documentation standards.

If you have any questions or concerns, please contact me at (512) 476-0891, extension 111236, or [Joey.Okeefe@SWCA.com](mailto:Joey.Okeefe@SWCA.com).

Sincerely,

A handwritten signature in black ink that reads "Joey O'Keefe". The signature is written in a cursive style.

Joey O'Keefe, M.A.  
Principal Investigator

Cc:

Claire Parra, Project Manager  
Mitch Ford, Principal Investigator (Architecture/Historic Resources)

## **PROPOSED SCOPE OF WORK FOR CULTURAL RESOURCES INVESTIGATIONS FOR THE CORRIDOR A2–SEGMENT 2, WILLIAMSON COUNTY, TEXAS**

*Project Landowner and Sponsor – Williamson County*

*Project Consultant – SWCA Environmental Consultants*

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

*Architectural Historian – Mitch Ford, M.S.*

*Date – September 9, 2025*

### **INTRODUCTION**

On behalf of Williamson County (County), LJA Engineering, Inc. (LJA), has retained SWCA Environmental Consultants (SWCA) to conduct cultural resources investigations (archaeological and historic) in support of the Corridor A2–Segment 2 project (project) in Williamson County, Texas (Figure 1). The project consists of ground-disturbing activities associated with the construction of approximately 1 mile (1.6 kilometers [km]) of a new two-lane road within a 350-foot-wide (106.7-meter [m]-wide) right-of-way (ROW), totaling 60.3 acres (24.4 hectares [ha]) in area with a maximum depth of impact of 40 feet (12.2 m) (project area) (Figure 2).

As the proposed project is being undertaken by the County, a subdivision of the State, the project will be subject to review under the Antiquities Code of Texas (ACT), and the cultural resources investigation requires a Texas Antiquities Permit. Because the project crosses waters of the United States under jurisdiction by the U.S. Army Corps of Engineers, Section 106 of the National Historic Preservation Act (NHPA) (54 United States Code 306108) and its implementing regulations (36 Code of Federal Regulations [CFR] 800) are applicable to these investigations.

SWCA proposes to conduct an intensive archaeological pedestrian survey with systematic shovel testing of the 1-mile-long (1.6-km-long), 60.3-acre (24.4-ha) project area. 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). SWCA also proposes a reconnaissance-level historic resources survey to evaluate all historic-age resources in the area of potential effects (APE) built in or before 1981, 45 years prior to the anticipated let date of 2026. All work will be conducted in accordance with the ACT and Section 106 of the NHPA. Because the project may receive federal funding through the Texas Department of Transportation (TxDOT), the historic resources survey will be conducted per TxDOT standards.

### **Area of Potential Effects**

The proposed project APE appears on the *Taylor, Texas* (30097-E4), U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map. The proposed project spans west from the existing State Highway (SH) 95 to County Road (CR) 406. The project area crosses a tributary of Battleground Creek and is located within a primarily rural area within agricultural fields in the southern extent of Williamson County, Texas (see Figure 1, Figure 2). The topography of the project area is gently rolling with elevations ranging from 523 feet (159.4 m) above mean sea level at the eastern extent to 565 feet (172.2 m) above mean sea level at the western extent. The direct APE consists of the proposed ROW and any associated easements, and all parcels within 300 feet of the proposed ROW comprise the indirect APE. The proposed direct APE is the archaeological APE, and the combined APE (direct APE plus indirect APE) is the non-archaeological APE for historic resources investigations per TxDOT documentation standards (TxDOT 2025a).

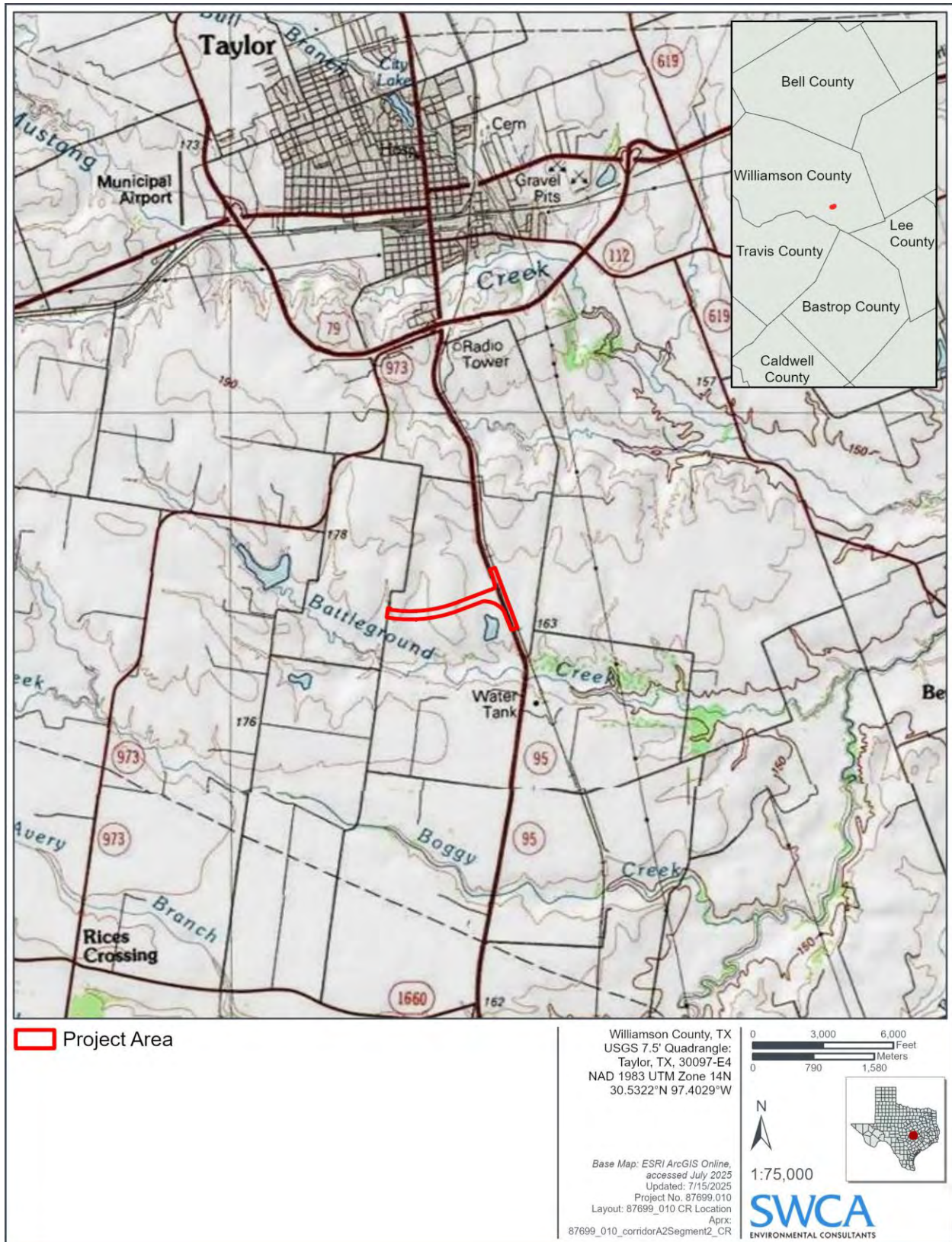


Figure 1. Project location.

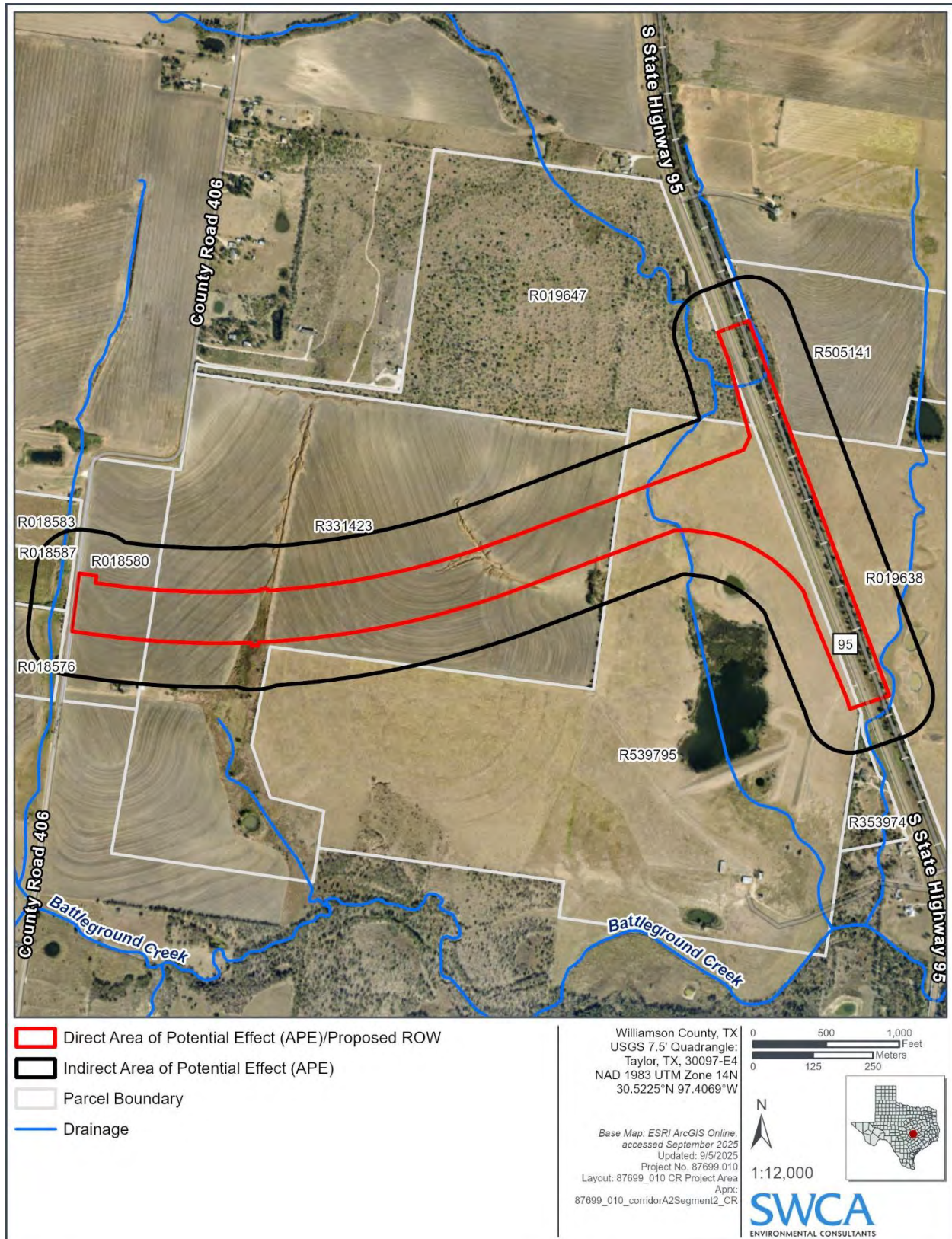


Figure 2. Area of potential effects overview.

## 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 mainly consists of the Cretaceous-age Upper Taylor Marl formation (Kknm), as well as the Pleistocene-age High Gravel Deposits (Qhg) (Barnes 1974; USGS 2025a). These formations are composed predominantly of gravels and marls up to 600 feet (182.9 m) thick (Table 1, Figure 3).

**Table 1. Geology in the Project Area**

Symbol	Name	Period	Epoch or Series	Group	Acres	Percentage of the Project Area
Kknm	Navarro Group and Marlbrook Marl ("upper Taylor marl")	Cretaceous	Gulfian	Taylor Group	54.5	90.5
Qhg	High Gravel Deposits	Quaternary	Pleistocene	Not applicable	5.8	9.5
<b>Total</b>					<b>60.3</b>	<b>100.0</b>

Sources: Barnes (1974); USGS (2025a)

Note: listed in order of prevalence

## Soils

According to the Natural Resources Conservation Service (NRCS) (2019), four soil series are mapped within the project area (Table 2; see Figure 3). These soils are mainly derived from calcareous materials and mudstones and have recorded A horizons that terminate between 3.1 and 18.1 inches (8–46 centimeters [cm]) below surface.

The project area is mapped predominantly as two soil series: Ferris-Heiden complex, 5 to 15 percent slopes, moderately eroded (FhF2; 48.6%), and Houston Black clay, 1 to 3 percent slopes (HoB; 28.7%) (see Table 2, Figure 3). The Ferris-Heiden series generally consists of deep and 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 of side slopes of ridges on dissected plains, with slopes ranging from 0.5 to 20 percent (NRCS 2019).

The Houston Black clay series consists of very deep, moderately well-drained, very slowly permeable soils that formed in clayey residuum derived from Cretaceous-age calcareous mudstone. These nearly level to moderately sloping soils occur on interfluves and side slopes on upland ridges and on dissected plains. Generally, slopes range from 1 to 3 percent with instances of slopes ranging from 0 to 8 percent (NRCS 2019). The soils and geologic data suggest the project area has a low to moderate potential to contain buried cultural materials.

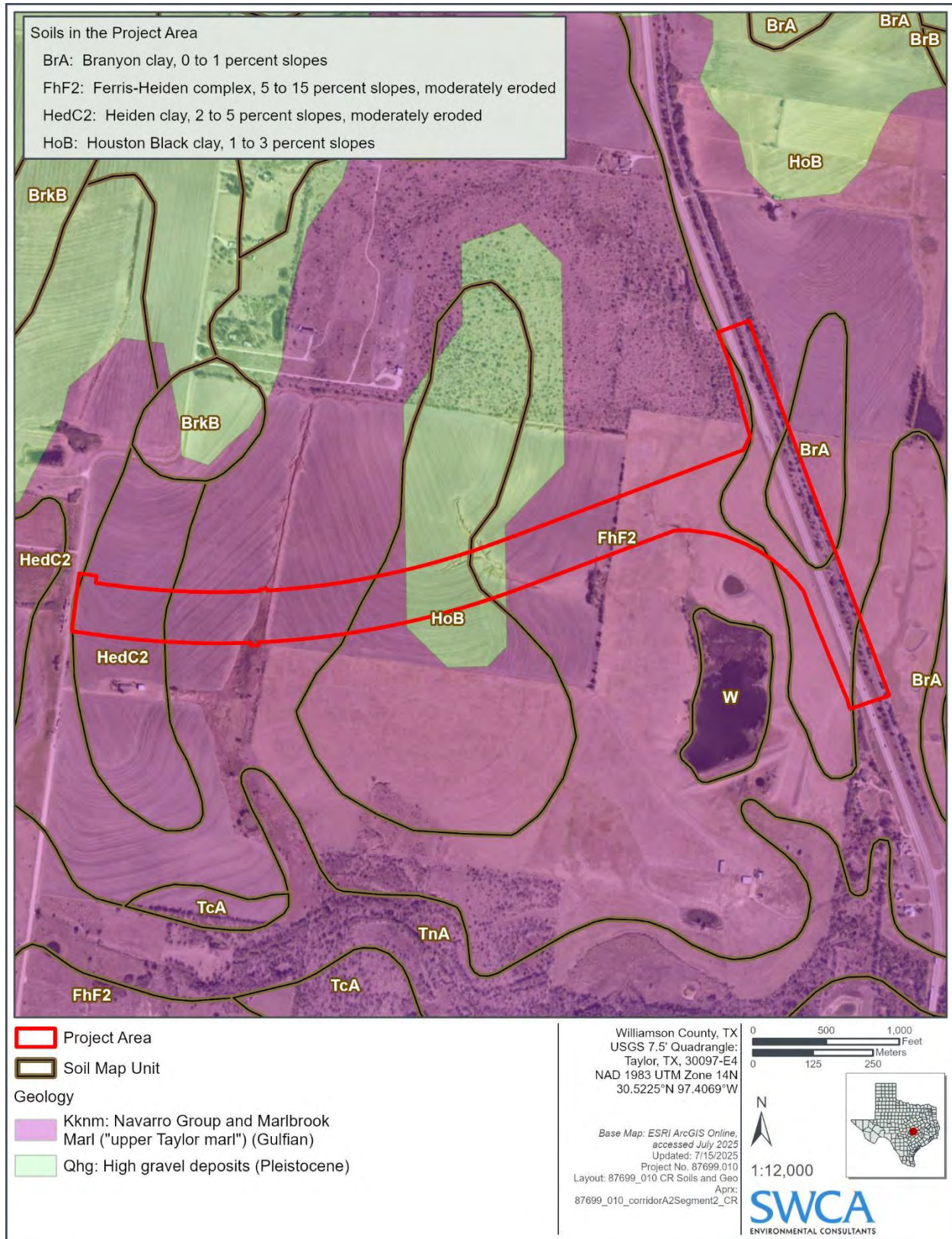


Figure 3. Geology and soils in the project area.

**Table 2. Soils in the Project Area (listed in order of prevalence)**

Symbol	Name	Age/Formation/Parent Material	Acres	Percentage of the Project Area
FhF2	Ferris-Heiden complex, 5 to 15 percent slopes	Clayey residuum/calcareous mudstone	29.3	48.6
HoB	Houston Black clay, 1 to 3 percent slopes	Clayey residuum/calcareous mudstone	20.7	34.4
HedC2	Heiden clay, 2 to 5 percent slopes	Clayey residuum/mudstone	5.2	9
BrA	Branyon clay, 0 to 1 percent slopes	Pleistocene/calcareous clayey alluvium/mudstone	5.1	8
<b>Total</b>			<b>60.3</b>	<b>100.0</b>

Source: NRCS (2019)

## BACKGROUND REVIEW

An SWCA archaeologist and architectural historian performed a background review of cultural resources within a 0.6-mile (1.0-km) buffer surrounding the project area (study area) in September 2025 (Figure 4). The review included assessment of a 1,300-foot historic resources survey study area per TxDOT standards (TxDOT 2025a). SWCA reviewed 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 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), Protected Areas Database of the United States (PAD-US), cemeteries, historic trails, and local neighborhood surveys. Listings are limited to projects under purview of the ACT or the NHPA of 1966; therefore, all previous work conducted in an area may not be available. The background review included a review of the TxDOT Historic Resources Aggregator (Aggregator), which maps resources and districts determined eligible for the NRHP, National Historic Landmarks (NHLs), Recorded Texas Historic Landmarks (RTHLs), and local/potential historic districts (TxDOT 2025b). 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 2025b; 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 (TDA), 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 potential historical aboveground resources (PHRs) and/or features are located within the project and study areas.

The review determined that five previously conducted cultural resources investigations, two previously recorded archaeological sites, and one OTHM are within the study area; none of these intersect the project area (see Figure 4) (THC 2025a). Additionally, a total of 47 PHRs are within the study area. One of the

47 PHRs intersects the northeastern extent of the project area, and one is located within 300 feet (91.4 m) of the project area.

No SALs, NHLs, NRHP-listed or -eligible properties, RTHLs, PAD-USs, local historic districts, known cemeteries, vicinity cemeteries, or recorded freedom colonies were identified within the project or study areas (see Figure 4) (TxDOT 2025b; THC 2025a).

### Previous Cultural Resources Surveys

The background review determined that five previously conducted archaeological surveys have been conducted within the study area, none of which intersect the project area (Table 3; see Figure 4) (THC 2025a). One of the surveys is adjacent to the western extent of the project area. The surveys were conducted between 1974 and 2020.

No Texas Antiquities Permit numbers are available for three of the previous investigations that intersect the study area, and limited contextual information is available on the Atlas. No information is available as to whether the previous surveys within the study area included aboveground/historic resources surveys (THC 2025a).

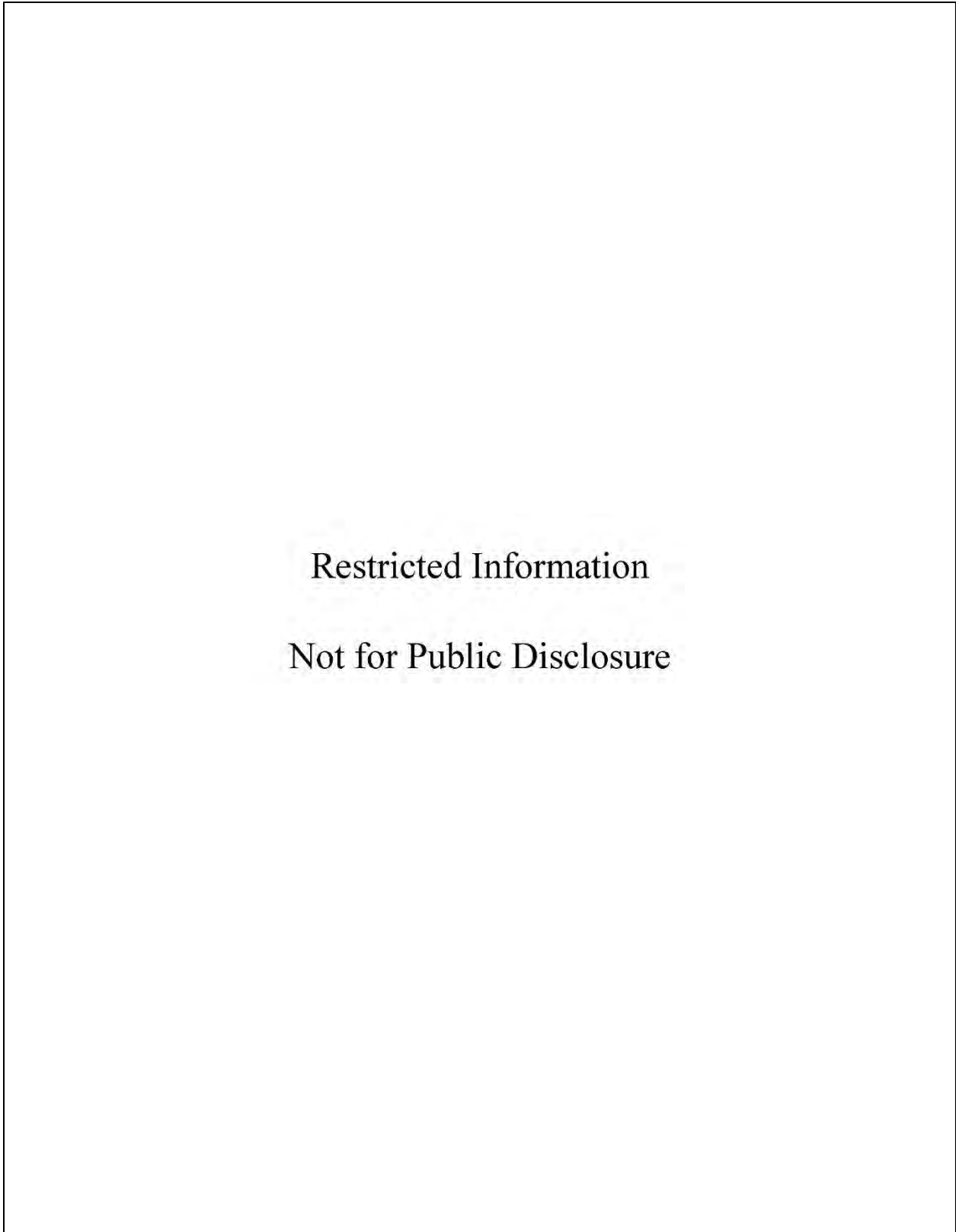
**Table 3. Previous Cultural Resources Surveys within the Study Area**

Survey Date	Location	Sponsor / Agency	Investigating Firm	THC Atlas Number	ACT Permit	Sites Recorded within Study Area
1974	Within study area	Soil Conservation Service	–	8500004707	–	41WM276, 41WM278
1980	Within study area	Soil Conservation Service	–	8500004705	–	None
1980	Within study area	Soil Conservation Service	–	8500004706	–	None
2020	Within study area	U.S. Army Corps of Engineers, City of Hutto	Integrated Environmental Services, LLC (IES)	8500081970	9197	None
2020	Within study area	USACE, City of Hutto	IES	8500082304	9197	None

Source: THC (2025a)

### Previously Recorded Archaeological Sites

Two archaeological sites (i.e., 41WM276 and 41WM278) are located within the study area (see Figure 4) (THC 2025a). Site 41WM276 was originally recorded in 1975 during a survey sponsored by USACE for the Brushy Creek Watershed Structures No. 31 project: a proposed reservoir project. The site was recorded as a surficial lithic scatter located approximately 1,000 feet (305 m) east of SH 95 on an upland setting adjacent to Battle Ground Creek (Shafer 1975). Artifacts identified during the 1975 investigation included one biface, four lithic flakes, and sparse burned rocks. The investigator did not provide an assessment of eligibility for the NRHP or as a SAL for the site, and the site has not been evaluated for eligibility by the THC (Shafer 1975; THC 2025a).



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

Site 41W278 was originally recorded in 1974 during the USACE sponsored survey for the Brushy Creek Watershed Structures No. 31 project. The site is recorded as the original location of the historic marker for the Battle of Brushy Creek (Shafer 1974). The investigator recommended the marker be relocated to an area that would be higher than the maximum water level for the proposed reservoir (Shafer 1974).

## **Historical Marker**

One OTHM, Battle of Brushy Creek, was identified within the study area (see Figure 4). The OTHM is located 0.9 mile (1.4 km) southwest of the intersection of SH 31 West and NW 3180 Road. The Battle of Brushy Creek OTHM commemorates a skirmish between Comanche raiders and a local militia near the location of the marker in mid-winter of 1839, which ultimately led to the last major battle between Anglo settlers and indigenous populations in Williamson County. The Comanche retaliated on February 18, 1839, by attacking several area homes including those of Mrs. Robert Coleman and Dr. J. W. Robertson. Mrs. Coleman and her son, Albert, were killed, and another son, Tommy, and seven of Robertson's slaves were taken captive. The ensuing battle along nearby Brushy Creek claimed the lives of Jacob Burleson, Edward Blakely, the Reverend James Gilleland, and John B. Walters (THC 2025c).

## **Historical Map Review**

Archaeologists reviewed maps and aerial images dating from 1885 to 1964 to determine if any historical resources are within the project area (Foster et al. 2006; NETR 2025; USGS 2025b). SWCA identified 47 PHRs within the study area, one of which, the current alignment of the Missouri Kansas Texas Railroad, is within the project area, and another is within 300 feet (91.4 m) of the project area (see Figure 4). In general, PHRs consist of wells, water towers, and outbuildings associated with agriculture and ranching.

## **PROPOSED SCOPE OF WORK**

SWCA proposes an intensive archaeological survey and a reconnaissance-level historic resources survey for this project. Each investigation methodology is discussed below.

### **Intensive Archaeological Survey**

Once a Texas Antiquities Permit has been obtained, SWCA will conduct an archaeological field survey of the 1-mile-long (1.6-km-long), 60.3-acre (24.4-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 30-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.

Shovel tests will be 12 inches (30 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 Archeologists (CTA) standards (2020) promulgated by the THC. For linear projects, the THC/CTA fieldwork standards require a minimum of 16 shovel tests per mile of 30-m-wide survey corridor; this equates to no fewer than 64 shovel tests within the proposed project area. 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, per CTA standards (CTA 2020).

### **Potential Deep Testing Area Review**

An SWCA geoarchaeologist 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 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 handheld, 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). Existing standing structures more than 45 years in age in the project area will be photographed and documented. A review of historical aerial maps will be conducted, and a preliminary assessment of the structures will be conducted by a Secretary of the Interior (SOI)-qualified architectural historian to determine their potential significance and age. The analysis will follow National Park Service (NPS) guidelines (Little et al. 2000; NPS 1983).

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 contains, 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 19th-century and Early 20th-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 Texas 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, representatives from Williamson County, 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).

## **Historic Resources Survey**

Because of permitting with the USACE, SWCA understands the proposed project is subject to Section 106 of the NHPA. Additionally, SWCA understands the project is likely to receive federal funding through the Federal Highway Administration; therefore, all fieldwork will be conducted according to TxDOT standards (TxDOT 2025a). Additional TxDOT documentation (i.e., project coordination request, research design, and historic resources survey report) will be completed in the future once federal funding is finalized. Because the proposed project is sponsored by the County, a political subdivision of the State of Texas, the proposed project is also subject to the ACT. Because no historic properties are within the APE, none of the anticipated surveyed historic-age resources will be eligible for SAL designation as aboveground non-archaeological resources.

To ensure compliance with the NHPA and ACT, SWCA proposes a reconnaissance-level historic resources survey (also known as architectural or built environment survey) of the APE defined as the proposed ROW (also known as the direct APE or APE for physical impacts) and intersecting Williamson Central Appraisal District (CAD) parcels within 300 feet of the proposed ROW (also known as the indirect APE or APE for nonphysical impacts). SWCA proposes documentation of all historic-age resources (i.e., 45 years of age or older from the project let date), including buildings, structures, objects, sites, and districts built in or before the let date of 1981, based on an estimated let date of 2026, within the APE.

Following the approval of the scope of work and issuance of the ACT permit, an SWCA architectural historian who meets the SOI Professional Qualifications (36 CFR 61) will complete documentation of historic-age resources according to TxDOT, THC, and NPS documentation standards. The survey will also meet THC and NPS standards. Following completion of fieldwork, SWCA architectural historians will compile a report with survey results and recommendations. Each historic-age resource will be evaluated for NRHP eligibility. It is SWCA's understanding that Section 4(f) of the U.S. Department of Transportation Act does not apply to this project. If a historic property is listed in or eligible for the

NRHP, SWCA will also complete an effects analysis. SWCA anticipates approximately 15 historic-age resources within the APE.

### **Site Documentation**

An SWCA architectural historian who meets the SOI Professional Qualifications (36 CFR Part 61) will complete survey documentation according to NPS, THC, and TxDOT documentation standards (Denton 1999; NPS 1997; TxDOT 2025a). The architectural historian will document historic-age resources on intersecting parcels within the indirect APE. Nonhistoric-age resources on historic-age resource parcels will be documented with the primary historic-age resource. Historic-age resources include any districts, buildings, structures, objects, and sites identified in the APE. Resource documentation will adhere to the following parameters:

- Agricultural complexes will be documented according to the *Agricultural Theme Study of Central Texas*, in that they will include extant domestic and agricultural work zones (Moore et al. 2013).
- Each historic-age resource will have at least two photographs. Nonhistoric-age resources will have at least one photograph. Photographs will have a resolution of 1200x1600 pixels. A front façade and oblique photograph will be taken of each historic-age resource and will be captioned with photographic direction. Aerial imagery will be used to supplement documentation of obstructed resources.
- Each historic-age resource will be documented on an inventory form with at least two photographs. Nonhistoric-age resources will be documented alongside the primary historic-age resource.
- Livestock tanks will only be documented if they are part of a historic-age agricultural complex.
- Manufactured homes will not be documented, but mobile home parks will be documented as a single historic-age resource.
- Resources will be numbered from west to east. For parcels with multiple resources, the primary historic-age resource will be numbered ‘1A’ and subordinate and/or nonhistoric-age resources will be numbered subsequently (i.e., 1B, 1C, etc.).
- Survey results will have corresponding map figures, which will include the project location, the APE and intersecting parcels, and surveyed resources. If a resource is recommended eligible for the NRHP, a map figure depicting the recommended NRHP boundary for the resource and contributing/noncontributing resources to the NRHP property or district will be provided.

SWCA anticipates the historic-age resources within the APE to have associations with agricultural, domestic, and landscape historical uses. SWCA will summarize each documented historic-age resource with a brief architectural description, research findings, integrity assessment, and an NRHP evaluation. SWCA historians will use the following literature review and sources to guide documentation and evaluation efforts:

- *A Field Guide to American Houses (Revised): The Definitive Guide to Identifying and Understanding America's Domestic Architecture* by Virginia Savage McAlester (2015).
- *Agricultural Theme Study for Central Texas* by David W. Moore Jr., Martha Freeman, and Maryellen Russo (Moore et al. 2013).
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- *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* by NPS Cultural Resources (NPS 1997).
- *National Register Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes* by Linda Flint McClelland, J. Timothy Keller, Genevieve P. Keller, and Robert Z. Melnick (McClelland et al. 1999).

SWCA architectural historians will compile report sections for the historic resources survey methodology, survey results, recommendations, and (if applicable) an effects analysis. These report sections will be integrated into the singular report deliverable alongside the archaeological investigation.

## **Reporting and Curation**

SWCA will prepare a single draft report of the investigation detailing the results of the cultural resources survey. 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 the County, LJA, and the THC 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 Texas 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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