

TEXAS HISTORICAL COMMISSION

ANTIQUITIES PERMIT APPLICATION FORM
ARCHEOLOGY

GENERAL INFORMATION

I. PROPERTY TYPE AND LOCATION

Project Name (and/or Site Trinomial) Liberty Hill Bypass East
County (ies) Williamson
USGS Quadrangle Name and Number Liberty Hill (30097-F8)
UTM Coordinates Zone 14 E 604896 m N 3392055 m
Location The project is located from intersection of Freedom River Parkway and CR 279 to intersection of Liberty Meadows Drive and TX 29, southeast of Liberty Hill, in Williamson County, Texas

Federal Involvement Yes No
Name of Federal Agency _____
Agency Representative _____

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 Analise Hollingshead, M.S.
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 Email Address analise.hollingshead@swca.com

(OVER)
ANTIQUITIES PERMIT APPLICATION FORM (CONTINUED)

II. PROJECT DESCRIPTION

Proposed Starting Date of Fieldwork January 2026
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, _____, as legal representative of the Land Owner, _____, 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, Analise Hollingshead, 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 12/31/2025

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

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December 31, 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 Liberty Hill Bypass East Project, Williamson County, Texas / SWCA Project No. 87699-007

Dear Rebecca Shelton:

This letter is a request for a Texas Antiquities Permit to conduct cultural resources investigations for the Liberty Hill Bypass East Project in Williamson County, Texas (project). The project consists of ground-disturbing activities associated with the installation of approximately 1.2 miles (1.9 kilometers [km]) of a new location two-lane roadway that would ultimately serve as a frontage road for the State Highway (SH) 29/Liberty Hill Bypass connecting Bagdad Road (County Road 279) and SH 29 within a 300-foot (91.4-meter [m]) wide corridor. With additional water quality detention facilities, the project is an estimated 49.2 acres (19.9 hectares [ha]) in area. As the proposed project is being undertaken by the City of Liberty Hill, 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.

Sincerely,

A handwritten signature in black ink, appearing to read 'Analise Hollingshead'. The signature is fluid and cursive, written over a light gray background.

Analise Hollingshead, M.S., RPA
Principal Investigator

PROPOSED SCOPE OF WORK FOR CULTURAL RESOURCES INVESTIGATIONS FOR THE LIBERTY HILL BYPASS EAST PROJECT, WILLIAMSON COUNTY, TEXAS

*Project Landowner and Sponsor – Williamson County
Project Consultant – SWCA Environmental Consultants
Principal Investigator – Analise Hollingshead, M.S.
Architectural Historian – Mitch Ford, M.S.
Date – December 31, 2025*

INTRODUCTION

On behalf of the City of Liberty Hill (City), LJA Engineering, Inc. (LJA), has retained SWCA Environmental Consultants (SWCA) to conduct an intensive archaeological survey in support of the Liberty Hill Bypass East Project (project) within Williamson County, Texas (Figure 1). The project consists of ground-disturbing activities associated with the installation of approximately 1.2 miles (1.9 kilometers [km]) of a new location two-lane roadway that would ultimately serve as a frontage road for the State Highway (SH) 29/Liberty Hill Bypass connecting Bagdad Road (County Road [CR] 279) and SH 29 within a 300-foot-wide (91.4-meter [m]-wide) corridor. With additional water quality detention facilities, the project is an estimated 49.2 acres (19.9 hectares [ha]) in area (Figure 2).

As the proposed project is being undertaken by Williamson County, a political subdivision of the State of Texas, and will occur on lands owned and managed by the state, a Texas Antiquities Permit is required in accordance with the Antiquities Code of Texas (ACT) (Texas Natural Resources Code, Title 9, Chapter 191) and accompanying Rules of Practice and Procedure (Texas Administrative Code, Title 13, Chapter 26). Additionally, the project may require federal permitting from the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act and may qualify as a federal undertaking. As such, SWCA will conduct cultural resources surveys (archaeological and historic) of the entire project in compliance with the ACT and Section 106 of the National Historic Preservation Act (NHPA) (36 Code of Federal Regulations [CFR] 800). 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.

SWCA proposes to conduct an intensive archaeological pedestrian survey with systematic shovel testing of the 1.2-mile-long (1.9-km-long), approximately 49.2-acre (19.9-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 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.

In addition to the archaeological survey, SWCA will conduct a historic resources survey of the proposed project area. In accordance with Section 106 of the NHPA, SWCA architectural historians who meet the Secretary of the Interior Professional Qualifications (36 CFR 61) will document historic-age buildings, structures, objects, sites, and districts built in or before 1981, 45 years prior to the anticipated let date of 2026. SWCA architectural historians will evaluate each surveyed resource for NRHP eligibility. No NRHP-listed properties or districts are within the APE; therefore, none are eligible for SAL listing.

Proposed Scope of Work for Cultural Resources Investigations for the Liberty Hill Bypass East Project, Williamson County, Texas

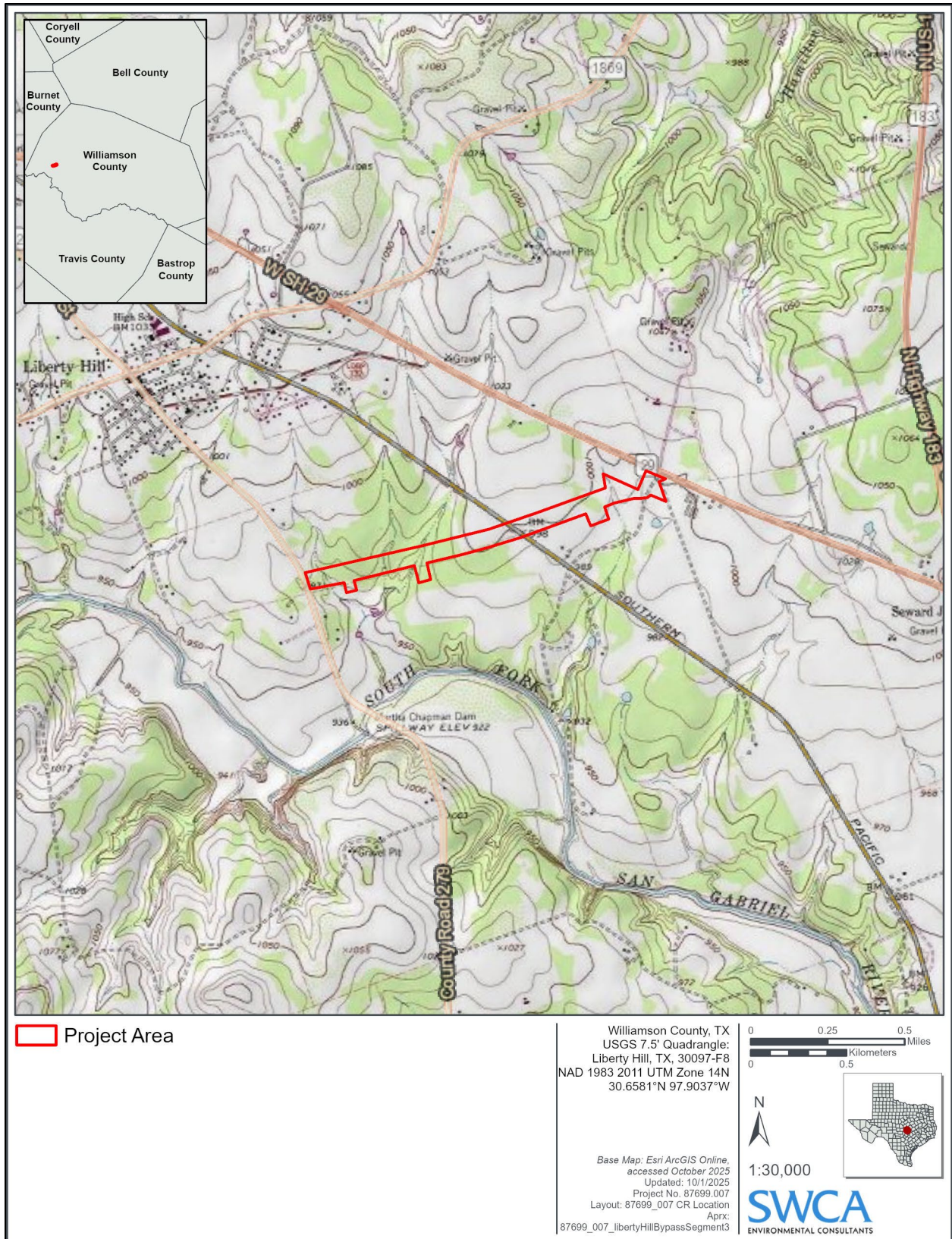


Figure 1. Project location.

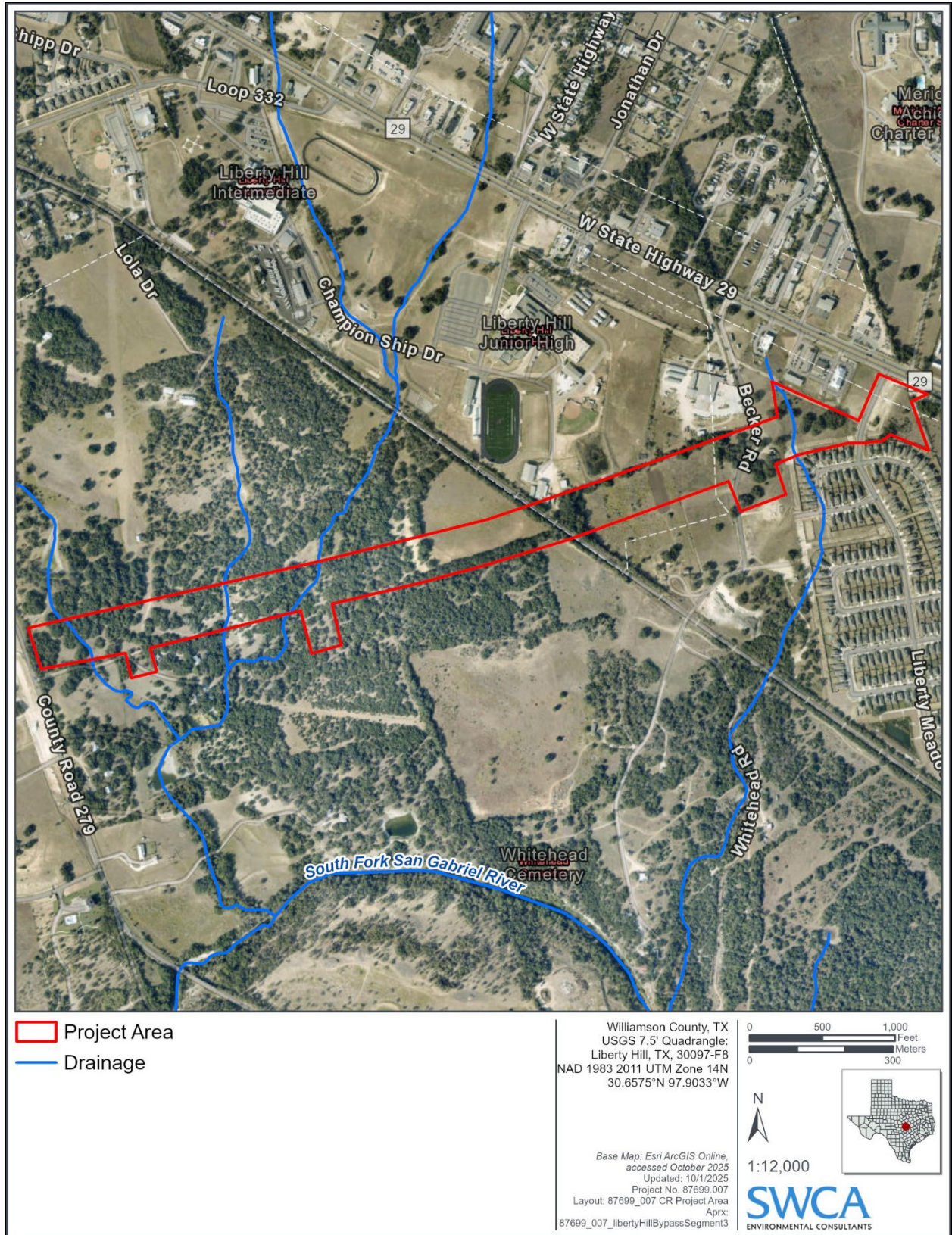


Figure 2. Project area overview.

Project Description

The project area appears on the Williamson County, Texas (30097-F8), U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map. The proposed project is bounded or intersected by West SH 29, CR 279, Becker Road, and Liberty Meadows Drive in Liberty Hill, Texas. The project area is within both semi-rural and residentially developed settings in the western extent of Williamson County, Texas (see Figures 1 and 2). The project area ranges from 965 feet (294 m) above mean sea level at the western extent to 1,002 feet (305 m) above mean sea level at the eastern extent.

Area of Potential Effects

The proposed project area, also known as the proposed right-of-way (ROW), corresponds to the area of potential effects (APE) for direct or physical impacts (i.e., direct APE) and intersecting parcels within 500 feet of the proposed project is the APE for indirect or nonphysical impacts (i.e., indirect APE) (Figure 3). Because portions of the proposed roadway are elevated, SWCA recommends an expanded indirect APE buffer from the standard 300 to 500 feet to ensure compliance with Section 106 of the NHPA.

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 USGS maps two geologic units within the project area: the Upper Glen Rose Formation and Fluvialite Terrace Deposits (Table 1, Figure 4). The Upper Glen Rose Formation comprises 87% of the project area and consists of limestone, clay, and sand alternating, some sandstone of Early Cretaceous age (Barnes et al. 1974; USGS 2025a). Fluvialite Terrace Deposits comprise 13% of the project area and are remnants of old floodplains consisting of mixed sand, silt, gravel, and clay (Barnes et al. 1974; USGS 2025a).

Table 1. Geology in the Project Area (listed in order of Prevalence)

Symbol	Name	Period	Epoch or Series	Group	Acres	Percentage of Project Area
Kgru	Upper Glen Rose Formation	Cretaceous	Comanchean	Trinity Group	46.3	94.1
Qt	Fluvialite terrace deposits	Pleistocene	Pleistocene	Quaternary System	2.9	5.9
Total					49.2	100.0

Source: Barnes et al. (1974); USGS (2025a)

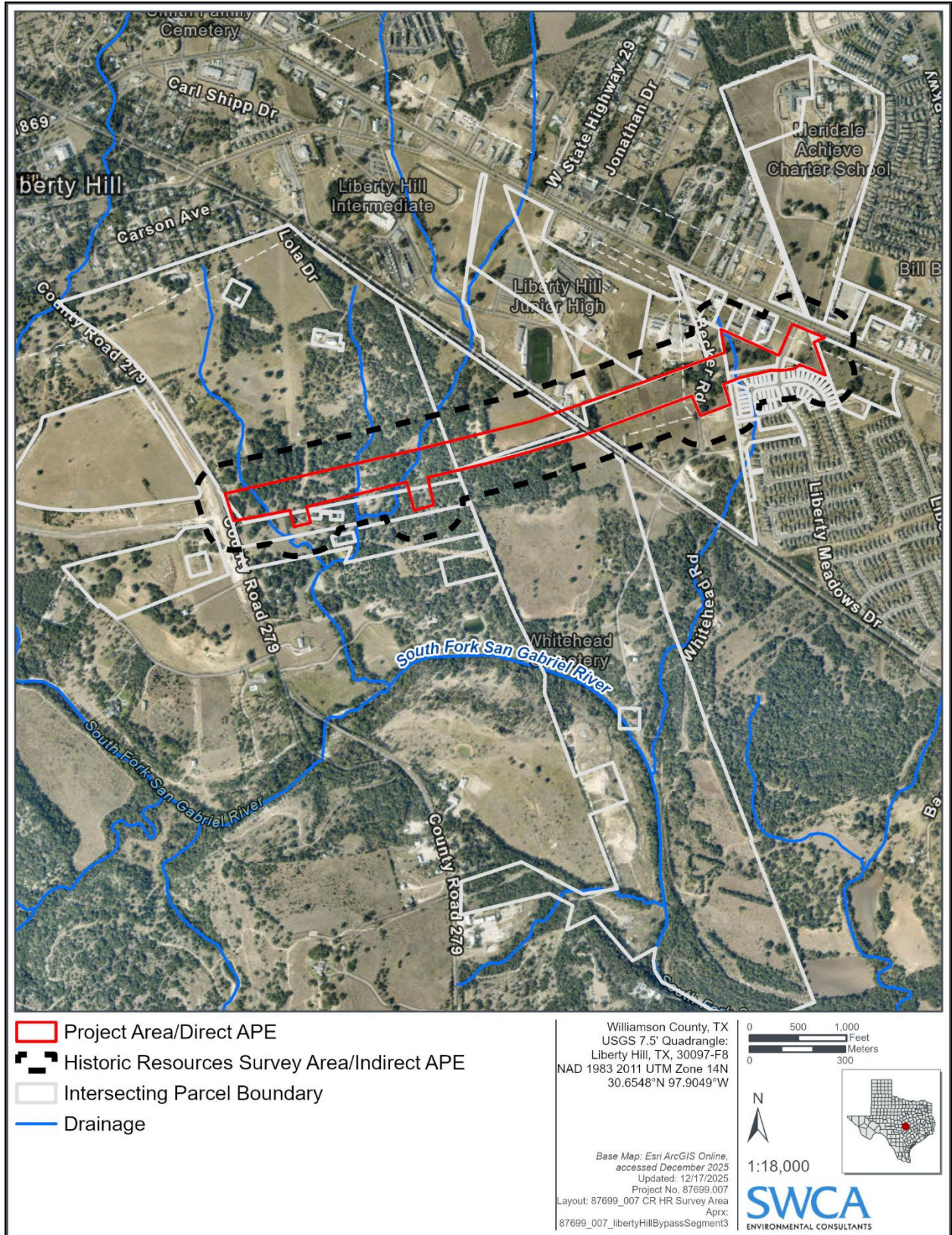


Figure 3. Historic resources survey area map.

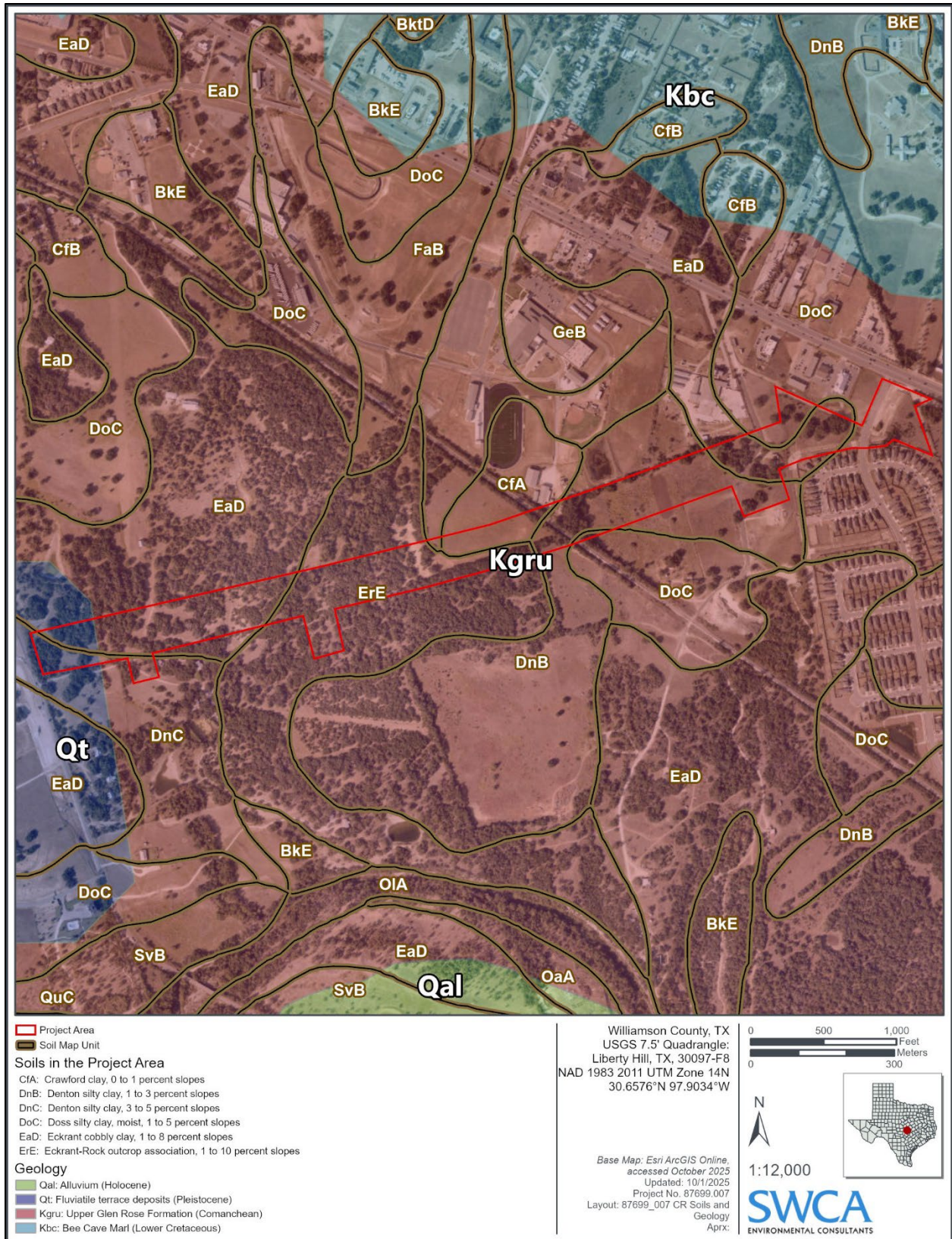


Figure 4. Geology and soils in the project area.

Soils

According to the Natural Resources Conservation Service (NRCS 2019), six soil series are mapped within the project area (Table 2; see Figure 4). Each of the soils are derived from limestone and calcareous materials and have recorded A horizons that terminate between 8 and 13 inches (20–33 centimeters [cm]) below surface. The soils and geologic data together suggest the project area has a low to moderate potential to contain buried cultural materials.

Two different mapped units of the Eckrant soil series (ERE, EaD) are present within 54.7% (27.9 acres [11.3 ha]) of the project area (see Table 2). In general, the Eckrant series consists of well-drained, moderately slowly permeable soils that are very shallow to shallow over indurated limestone bedrock. These nearly level to very steep soils formed in residuum derived from limestone and occur on summits, shoulders, and backslopes of ridges on dissected plateaus. Slope ranges from 1% to 60% (NRCS 2019).

Table 2. Soils in the Project Area (Listed in Order of Prevalence)

Symbol	Name	Age/Formation/Parent Material	Acres	Percentage of Project Area
EaD	Eckrant cobbly clay, 1 to 8 percent slopes	Well-drained, moderately slowly permeable soils that are very shallow to shallow over indurated limestone bedrock	15.8	32.0
ErE	Eckrant-Rock outcrop association, 1 to 10 percent slopes	Well-drained, moderately slowly permeable soils that are very shallow to shallow over indurated limestone bedrock	11.3	23.0
DnB	Denton silty clay, 1 to 3 percent slopes	Clayey materials over residuum weathered from limestone bedrock of lower Cretaceous age	10.7	21.7
DnC	Denton silty clay, 3 to 5 percent slopes	Clayey materials over residuum weathered from limestone bedrock of lower Cretaceous age	6.2	12.6
CfA	Crawford clay, 0 to 1 percent slopes	Moderately deep, well-drained, very slowly permeable soils that formed in clayey sediments that are underlain by indurated limestone bedrock	2.8	5.6
DoC	Doss silty clay, moist, 1 to 5 percent slopes	Shallow to weakly cemented limestone, well-drained, moderately slow permeable soils that formed in calcareous loamy and clayey residuum derived from marls and limestone	2.5	5.1
Total			49.2	100

Source: NRCS (2019)

BACKGROUND REVIEW

An SWCA archaeologist and architectural historian performed a background review in December 2025 of cultural resources within a 0.6-mile (1.0-km) buffer surrounding the project area (referred to as the study area; Figure 5). 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), 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.

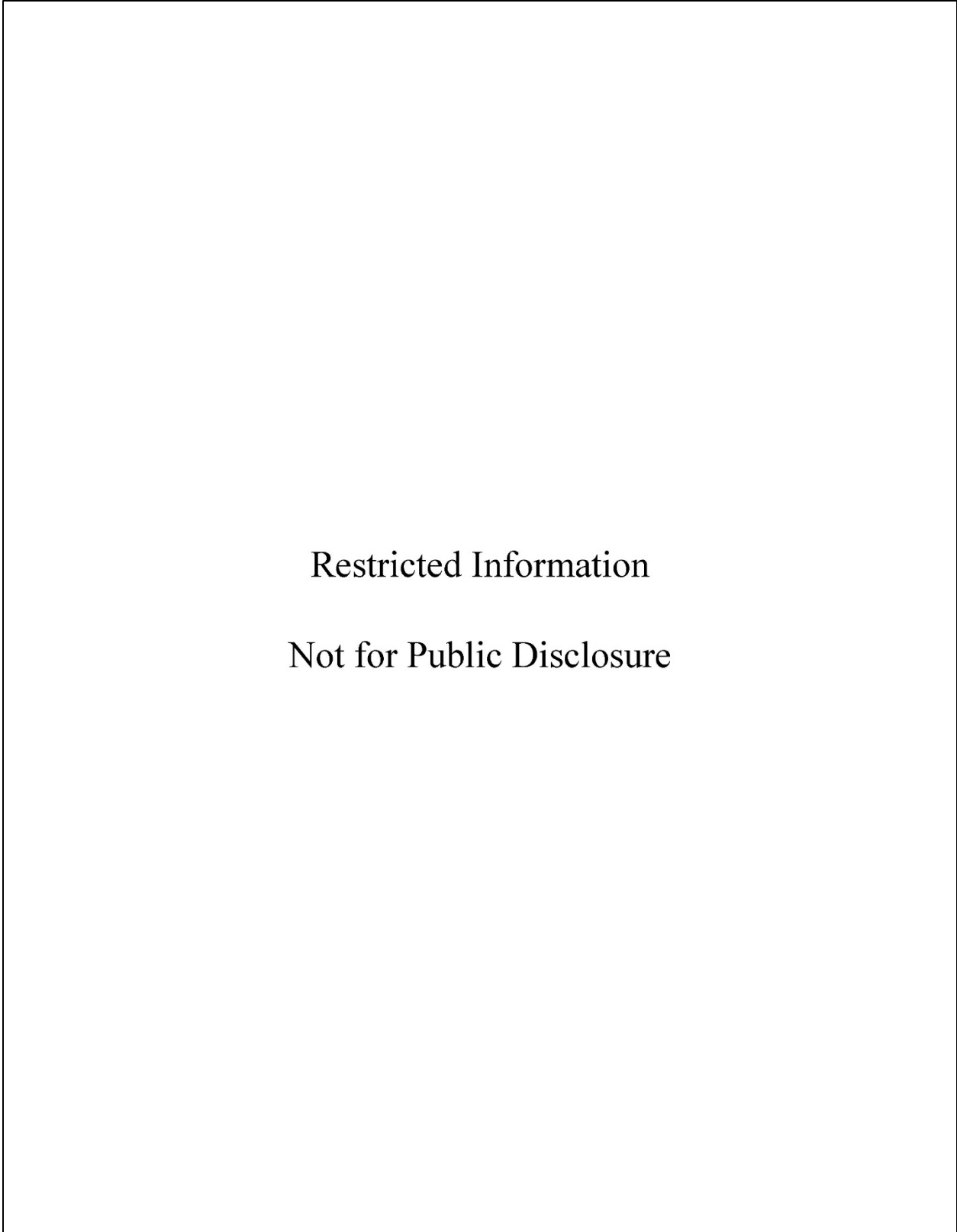


Figure 5. Cultural resources background review results map.

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 Centennial Farms identified by the Texas Department of Agriculture (TDA), cemetery locations on Find a Grave's (2025a) 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 aboveground resources (PHRs) or features, are within the project and study areas.

The review determined that one NRHP-eligible historic district, four previously conducted cultural resources investigations, one historic resources survey, five previously recorded archaeological sites, one known cemetery location, and one TDA Centennial Farm are within the study area (see Figure 5; Ford 2023; THC 2025a; TxDOT 2025). The NRHP-eligible historic district and one previous historic resources survey intersect the proposed project.

One Protected Area of the United States (PAD-US), River Ranch County Park, which is managed by Williamson County, intersects the southwestern terminus of the study area. SWCA reviewed data from the Regrid (2025) and PAD-US (USGS 2025c) to determine whether the project is located on federally owned, state-owned, or other public land. The review of University Lands, Regrid, and PAD-US data indicates that the project is not on university-owned or other public lands (USGS 2025c; Regrid 2025). Additionally, a total of 149 PHRs are within the study area; three of these are within 300 feet (91.4 m) of the project area, but none intersect the project area.

None of the archaeological investigations or cemetery intersect the project area. No SALs, NHLs, RTHLs, OTHMs, or local historic districts were identified within the project or study areas (see Figure 5).

Previous Cultural Resources Surveys

The background review determined four previously conducted archaeological surveys and one historic resources survey have been conducted within the study area (see Figure 5; THC 2025a). The surveys were conducted between 2002 and 2017. Of these, only the historic resources survey intersected the current project area.

In March 2002, Cedar Valley Environmental Services conducted a cultural resources survey on behalf of Williamson County (Voellinger 2002). The investigations included a linear survey of 0.5 mile (0.8 km). No sites were recorded during this survey. This survey was northeast of Stubblefield Lane within the westernmost portion of the current study area (see Figure 5).

In June 2008, Mercyhurst Archaeological Institute conducted a 3.5-acre (1.4-ha) area survey on behalf of Williamson County under Texas Antiquities Permit (TAP) No. 4519 (Thomas 2016). This project was in the south-central portion of the study area (see Figure 5). Site 41WM1077 was recorded during the investigation but does not intersect the current study area.

In October 2017, ACI Consulting conducted a cultural resources survey on behalf of Williamson County under TAP No. 7793 for the proposed River Ranch County Park Phase I Project (Shipp 2017). The investigations included an area survey of 1,003.6 acres (406.1 ha). Two sites were recorded (i.e., 41WM1356 and 41WM1357) during this survey. The easternmost portion of this survey area overlaps with the westernmost portion of the current study area (see Figure 5).

In December 2020, SWCA conducted a cultural resources survey on behalf of Williamson County under TAP No. 9694 for the proposed Liberty Hill Bypass Project (Morton 2021). The investigations included survey of 1.2 miles (1.9 km) of proposed new location roadway south of the City of Liberty Hill from Ranch-to-Market Road (RM) 1869 to CR 279/Bagdad Road, just west of the current project area (see Figure 5). No cultural materials were identified during the investigation.

In 2023, Stantec Consulting Services (Stantec) conducted a reconnaissance-level historic resources survey for the CR 279 Improvements Project on behalf of Williamson County (Ford 2023). Stantec documented 35 historic-age resources built in or before 1978, one of which was recommended eligible for the NRHP (ca. 1930 Liberty Chapel African Methodist Episcopal [AME] Church) under Criterion A for Community Planning and Development and Ethnic Heritage/Black at the local level (Ford 2023). Stantec also identified the 1873 Indian Mound Ranch as potentially eligible for the NRHP under Criterion A for Agriculture and Exploration and Settlement at the local level. The THC concurred with these recommendations. This survey is not on Atlas or the TxDOT Aggregator but was conducted along Bagdad Road (CR 279) between the city limits of Liberty Hill and Leander, from 600 feet (183 m) south of Aynsworth Street to Spivey Road (Ford 2023).

Potentially NRHP-Eligible District and TDA Centennial Farm

One potentially NRHP-eligible historic district, the 1873 Indian Mound Ranch, is within the project area. The boundary for this is not on Atlas or the TxDOT Aggregator; however, an approximate boundary has been drawn in based on Stantec's CR 279 historic resources survey report (see Figure 5; Ford 2023).

Henry Swepson Whitehead (1820–1892), a Confederate soldier and planter, and his wife Elizabeth Ann Veal (1832–1880) established the ranch (Ford 2023; TDA 2025). A Virginia-native, Whitehead settled in Lavaca County in the 1850s, where he operated a plantation near Yoakum prior to moving to the Indian Mound Ranch in Williamson County during the 1870s (Ford 2023). In 2000, the property was entered into the TDA Family Land Heritage Centennial Farm program (TDA 2025). In 2023, the property was identified as potentially eligible for the NRHP under Criterion A for Agriculture and Settlement and Exploration (personal communication with the THC, 2023; Ford 2023).

Previously Recorded Archaeological Sites

A total of five archaeological sites (i.e., 41WM1078, 41WM1088, 41WM1153, 41WM1356, and 41WM1357) are located within the study area; however, none are within 300 feet (91.4 m) of the project area (see Figure 5; THC 2025a). Two sites (41WM1078 and 41WM1088) have been determined eligible for the NRHP, two sites (41WM1356 and 41WM1357) have been determined ineligible for the NRHP, and one site (41WM1153) remains undetermined for the NRHP. While they are all well outside the currently defined project area, it is noted that all sites eligible or undetermined for the NRHP warrant avoidance or further investigations.

Site 41WM1078, or the James Whitehead site, is approximately 1,648 feet (502 m) south of the proposed project area and 2,901 feet (884 m) south of West SH 29 (see Figure 5). This site is a historical farmstead and was recorded and excavated in 2003 by Kay E. Clarke on behalf of the Texas Archeological Stewardship Network (TASN; Clarke 2003a). The site includes two features, a base of a fireplace, and a

hand-dug cistern. Multiple glass shards, metal fragments, and square nails were identified around the fireplace base. The site was determined eligible for the NRHP in October 2003 (THC 2025a).

Site 41WM1088, or the Allye Bell Farmstead site, is approximately 2,743 feet (836 m) southeast of the proposed project area and 2,112 feet (644 m) east of CR 270 (see Figure 5). This site is a burned rock midden first recorded in the 1960s by C. K. Chandler with field notes but was not given a trinomial. The site was formally recorded in 2003 by Kay E. Clarke on behalf of the TASN (Clarke 2003b). The prehistoric site assemblage includes a burned rock scatter with original excavation pits by C. K. Chandler in the center surrounded by many chert flakes. The site was determined eligible for the NRHP in February 2005 (THC 2025a).

Site 41WM1153, or the Jones Oven site, is approximately 3,008 feet (917 m) southeast of the proposed project area and 1,890 feet (576 m) east of CR 270 (see Figure 5). This site is a buried earth oven recorded in 2006 by members of the TASN and THC archaeologists Kay E. Clarke and Daniel Potter (Potter and Clarke 2006). The site consists of an earth oven buried 5 m deep exposed by a cutbank with fire-cracked rock and a burned sediment/ charcoal lining. Site 41WM1153 was recommended as having high research value, with additional work needed to fully assess NRHP and SAL eligibility but does not have an official determination and therefore is considered undetermined (Potter and Clarke 2006).

Site 41WM1356, or the JS1 site, is approximately 2,017 feet (615 m) west of the westernmost end of the proposed project area and 2,278 feet (694 m) southwest of CR 270 (see Figure 5). This site is a historical-period domestic site and was recorded in 2016 by ACI Consulting archaeologist Katie Canavan (Canavan 2016a). The artifact and feature assemblage of the site includes a depression from a possible well or burn pit, the remains of a brick and limestone chimney, a stone-lined pathway, a concrete slab, as well as a surface scatter of historic-age artifacts. Site 41WM1356 was recommended as having no research value, with the site being a single component site that is 20% intact and was therefore determined ineligible for the NRHP in April 2016 (THC 2025a).

Site 41WM1357, or the Rock Walls site, is approximately 2,433 feet (742 m) southwest of the westernmost end of the proposed project area and 2,755 feet (840 m) southwest of CR 270 (see Figure 5). This site is a farmstead and was recorded in 2016 by ACI Consulting archaeologist Katie Canavan (Canavan 2016b). The feature assemblage of the site includes three rock walls with similar architecture. The first wall sits on the floodplain of the South San Gabriel River, while the other two sit on a terrace above the floodplain. Site 41WM1357 was recommended as having no research value, with the site being a single component site that is 20% intact but does not have an official NRHP determination and therefore is considered undetermined (THC 2025a).

Cemeteries/Gravesites

There is one known cemetery (i.e., Whitehead Cemetery) within the study area (see Figure 5). The cemetery is approximately 2,038 feet (621 m) southeast of the proposed project area and 2,040 feet (622 m) southwest of CR 279. Henry Swepson Whitehead and Elizabeth Ann Vael established the graveyard after their daughter Minnie, who was dying of tuberculosis, requested to be buried under two trees on an adjacent lot, prompting the parents to buy the land for the cemetery. There are 41 recorded memorials ranging in dates from 1877 to 2015 in the cemetery, most still carrying the name Whitehead. Veterans of World War I and II are honored there, and the property continues to be cared for by the Whitehead family descendants (Find a Grave 2025b). This cemetery is within the NRHP-eligible Indian Mound Ranch.

Historical Map Review

Archaeologists reviewed historical maps and aerials dating from 1885 to 1966 to determine if any historical resources are within the project area (Foster et al. 2006; NETR 2025; USGS 2025b). SWCA identified 103 PHRs within the study area, two of which (a railroad and a general building/structure) are within the project area (Figure 6). The Southern Pacific railroad bisects the proposed project area from northwest to southeast and is visible on historical aerial imagery as early as 1937 and on topographic maps as early as 1966 (NETR 2025). The railroad appears extant and in use (Google Earth 2025). The general building/structure is at the eastern end of the proposed project area and is visible on aerial imagery as early as 1962. The structure is gone by 2005 and the area appears to have been graded by 2024 (Google Earth 2025; NETR 2025).

UNRECORDED HEADSTONE DISCOVERY

During SWCA's natural resources surveys, the landowner (Tim Harlow) informed the crew that there is a headstone on the property in the proposed project area. SWCA biologists visited the location with the landowner and took some photographs. This headstone is not recorded on Atlas or in deed records and does not appear to be associated with a known cemetery or vicinity cemetery. The headstone does not appear on Light Detection and Ranging (LiDAR) imagery.

There is a single known headstone present on the land, with large rocks piled in front of it, resembling a potential cairn (Figure 7). The headstone is illegible with current photographic documentation, and further recording of the headstone will occur once the Antiquities Permit has been acquired.

The headstone is an intact, single, flat tablet with decorative carving at the top. The headstone is inscribed though the writing is worn to the point that is nearly illegible. The stone has some biological growth on it which further obscures the writing and decoration. Based on its style it is thought to date to the late nineteenth or early twentieth century. Though the stone is still upright, it is leaning heavily. The stones covering the possible gravesite show signs of previous disturbance.

Preliminary Archival Research

An SWCA architectural historian conducted archival research for the unrecorded headstone. Preliminary results did not identify mention of a headstone or cemetery within the reviewed deeds. SWCA will conduct additional research for this resource during the future archaeological investigation and historic resources survey.

The Fields Headright, on which the unrecorded headstone is located, originated with a land grant made to Henry Fields in 1838 by the Republic of Texas (Texas General Land Office [GLO] 2025). To encourage immigration and settlement in the early days of the Republic of Texas (1836–1845), generous land grants were offered to those willing to emigrate there. The acreage offered in a grant was contingent on several conditions, one being the date of the settler's arrival in Texas (Texas GLO 2025).

Henry Fields (1806–1890), a veteran of the Battle of San Jacinto (April 21, 1836), was a recipient of a first-class headright of land containing 1,476.1 acres (or 1/3 of a league) as a single male who arrived in Texas before the Texas Declaration of Independence was signed on March 2, 1836 (Texas GLO 2025). Fields was born May 8, 1806, in Fort Mill, South Carolina (San Jacinto Museum and Battlefield 2025). A headright certificate was issued to Fields in 1838 by the Board of Land Commissioners. According to this grant, Fields arrived in Texas before March 2, 1836, but after May 2, 1835. By 1850, W. C. Dalrymple, the first assessor and collector of taxes in Georgetown, owned the entirety of the Fields Headright (Williamson County Clerk 2025a).

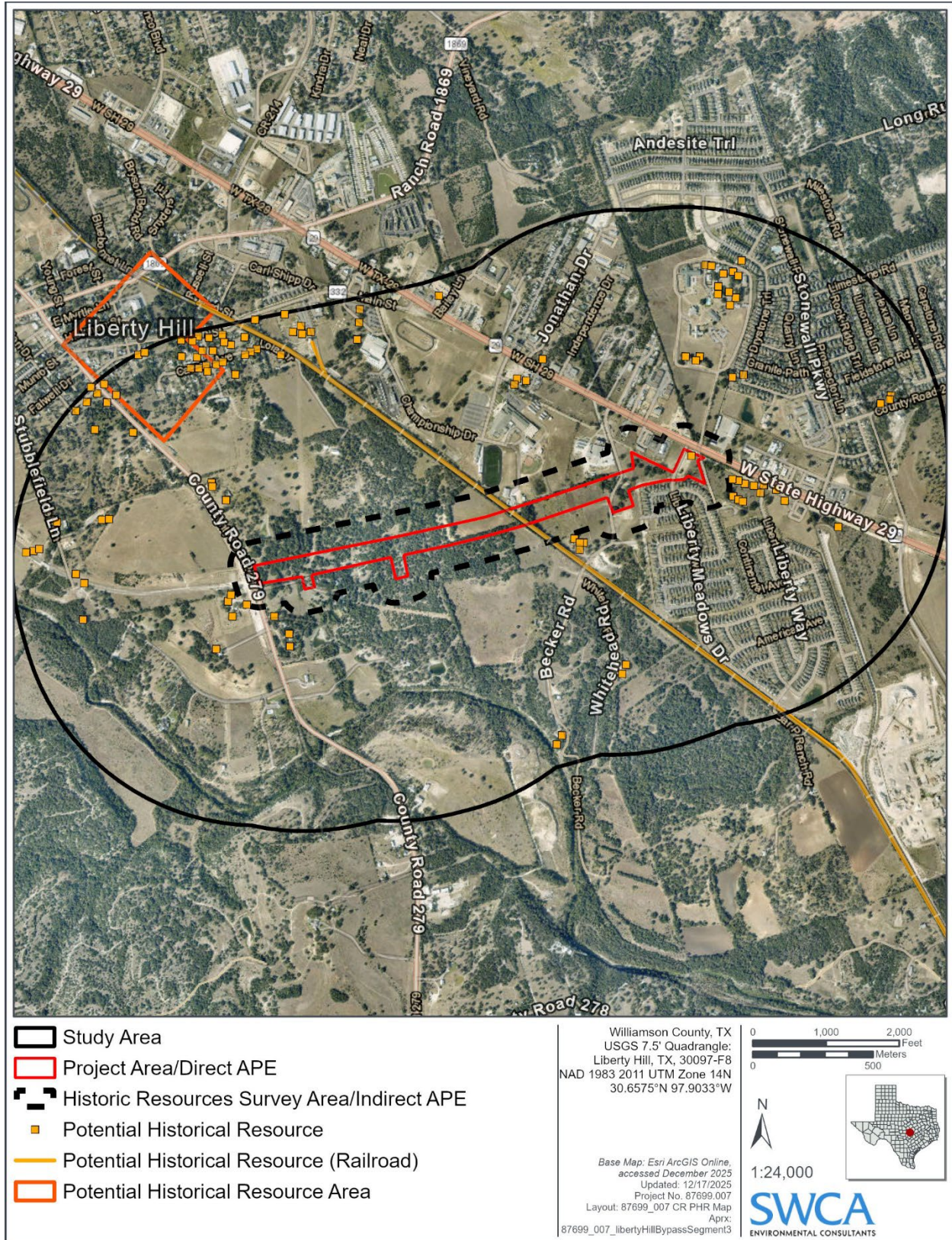


Figure 6. Potential historical aboveground resources map.



Figure 7. Previously unrecorded headstone and rock pile/cairn in proposed project area; recorded by SWCA biologists during natural resources surveys.

Dalrymple issued ‘An Assessor and Collection Deed’ for the full 1,476-acre tract of land of the Fields Headright to Taylor Smith (1799–1869) on February 21, 1853, who won the land at public auction for \$4.70 (Williamson County Clerk 2025a). Numerous deed records show that Smith sold the land in smaller tracts to several individuals over the years, many of whom were family. In 1858, Smith sold 150 acres of the Fields Headright to his daughter, Rebecca Goats, and 114 acres to his brother, Wiley Smith (Williamson County Clerk 2025b–c). The following year, Smith deeded 35.5 acres of the Fields survey lands to his son Ben (Williamson County Clerk 2025d). Further deed records show that Smith continued to sell off portions of his land until his death in 1869, at which point his son, Taylor Smith, Jr., took over management of the land (Williamson County Clerk 2025e).

David Luke Simmons received 100 acres of the Fields Headright in 1874 from his uncle, William Simmons for \$10.00 (Williamson County Clerk 2025f). Simmons emigrated to Texas from Louisiana with his aunt and uncle, the Forman family, who is also associated with the Fields Headright land (Williamson County Clerk 2025g). Deed records show that David Simmons began buying more portions of the Fields Tract from several families throughout the 1890s. In 1892, Simmons sold 98 acres of the original Fields land grant to Dudley Hastings Collier (1861–1949), a grandson of Taylor Smith through Smith’s daughter Elizabeth (1839–1876) (Ancestry 2025a; Williamson County Clerk 2025h). Around this time, Warren Bryson (1871–1950), presumably associated with the Bryson settlers of Liberty Hill, began buying large amounts of the original Fields survey (Ancestry 2025b). From the late 1880s until the 1940s, Warren Bryson bought numerous tracts of this land in large and small pieces, often from the same families over a period of many years. In 1942, Bryson sold 179 acres of this land to J.J. and Emma Gregg. In 1945, the Greggs bought a further 106.5 acres from Warren Bryson. Also in 1945, the Greggs sold 164.9 acres to Pat and Betty Malone (Williamson County Clerk 2025i). Then in 1947, they sold another 64.5 acres to Cynthia and John McMahan (Williamson County Clerk 2025j). Also in 1947, the McMahans bought 164.9 acres of the Fields Tract from Pat and Betty Malone (Williamson County Clerk 2025k).

In April 1963, Cynthia and John McMahan deeded the full 229.35 acres of the land to their son, John Noel and his wife Marion McMahan (1911–1996) for \$10.00 (Williamson County Clerk 2025l). John Noel died in 1982, and in April 1996 his widow Marion McMahan placed the full amount of land in a trust (Williamson County Clerk 2025m). Marion McMahan died on June 2, 1996 (Christeson 2005). On July 26, 1996, the revocable trust granted 216.967 acres to Dale Dunteman and his wife, Janice, co-trustees of the McMahan Trust (Williamson County Clerk 2025n). On the same day, the Duntemans deeded the same amount of land to Lisa M. and James Patrick Harlow for \$335,200 (Williamson County Clerk 2025o). The Harlows are the present owners of the land.

Landowner Questionnaires

SWCA sent landowner questionnaires to the property owner and adjacent property owner in November of 2025 to gather additional information on the unmarked gravestone. The adjacent property owner did not know anything about this unmarked gravestone. The owner where the grave is located has not responded to the questionnaire at the time of this scope.

PROPOSED SCOPE OF WORK

Cemetery Scraping

Based on the results of preliminary archival research, the unmarked headstone does not appear to correspond with any recorded or nearby cemetery. Once an Antiquities Permit has been obtained, SWCA proposes conducting a pedestrian survey, aided by cadaver dogs to determine if there is a burial and/or a cemetery located within a 100-foot (30.5-m) radius of the unrecorded headstone, for a total of a 0.65-acre [0.3-ha] area (Figure 8). The cadaver dog survey will be conducted by F.I.R.S.T Detection K-9.

Based on the pedestrian survey, SWCA proposes focusing mechanical scraping within a 100-foot (30.5-m) radius of the unmarked headstone to locate possible human remains (see Figure 8). The headstone and associated rock cairn will not be disturbed or displaced during the mechanical scraping. However, additional mechanical scraping might need to be conducted outside this area and/or the proposed scrape area might need to be adjusted based on field conditions and results from both the cadaver dog survey and mechanical scraping. The proposed mechanical scrape area will be investigated with parallel, 5-foot (1.5-m) wide trenches running perpendicular to the project alignment, with approximately 2-foot (0.6-m) unexcavated balks separating them. Trenches will be backfilled prior to beginning the next row to prevent collapse of the balk walls. Due to the presence of some large trees and stumps, the direction of trenches and size of balks might need to be adjusted in the field.

Mechanical scraping will be conducted using a backhoe or excavator with a smooth-edged bucket. Sediment will be scraped in approximately 3-inch (7.6-cm) deep passes until a grave shaft is identified, or a determination is made that a shaft is not present. An SWCA archaeologist and bioarchaeologist will monitor the work at all times, and any anomalies (e.g., stains, nonconformities in sediment texture) encountered will be investigated by hand to verify whether the anomalies indicate a grave shaft. Each identified grave shaft will be mapped, measured, photographed, and assigned a unique feature number. The color and texture of the grave shaft fill, and surrounding matrix, will also be recorded. Once fully documented, the trenches will be carefully backfilled.

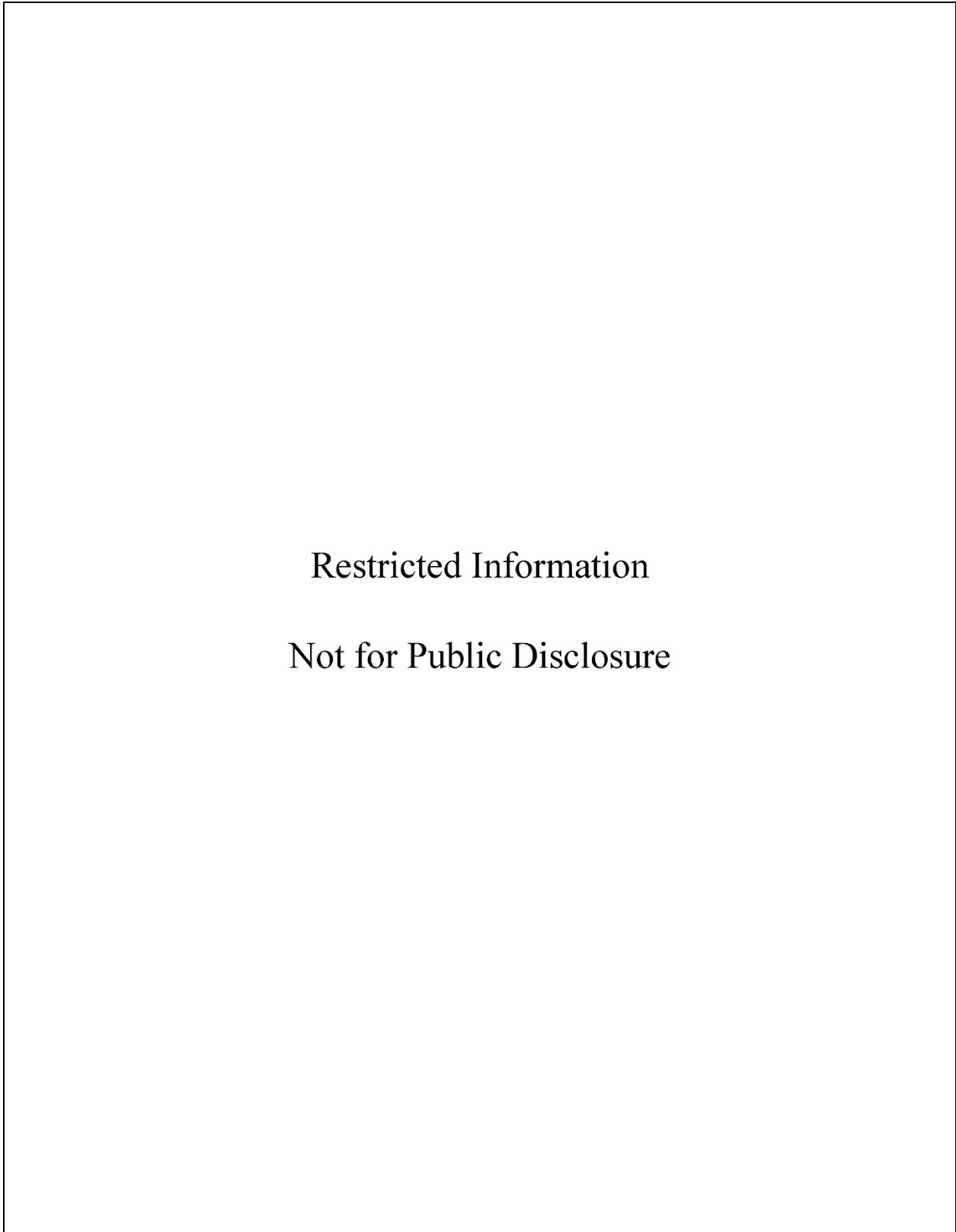


Figure 8. Proposed mechanical scrape area surrounding the previously unrecorded headstone.

Where grave shafts are not present, the mechanical scrapes will be excavated into the C horizon which is approximately 4 to 12 inches (10–30 cm) below surface across the mechanical scrape area, although bedrock might be encountered at a shallower depth in some areas (NRCS 2019). An SWCA geoarchaeologist will review the profile notes and field observations to help with interpretation of the soils encountered during the scraping.

If human remains are encountered, SWCA will comply with the Texas Health and Safety Code and notify the County Sheriff's Office. Work in a 10-foot (3.1-m) radius of the finds will cease until the sheriff determines the remains are not an active crime scene. Verbal or email permission from the sheriff is necessary to resume investigations in the 10-foot (3.1-m) radius of the remains. SWCA will not remove any human remains from the mechanical scrape area. The evidence will be photographed and recorded by a global positioning system (GPS) unit with sub-meter accuracy. The depth below surface also will be recorded. Evidence for the presence of burials will be left in place, protected by Geotech fabric or equivalent, and covered by a layer sediment, sand, or gravel deep enough to cover and secure the remains.

All work will be performed in accordance with the Occupational Safety and Health Administration (OSHA) (29 CFR 1926) and the Texas Trench Safety Act. All scrape areas will be photographed, mapped with GPS, and backfilled daily. SWCA will ensure that excavation locations are returned to pre-excavation condition. The cemetery investigations are a non-collection excavation and SWCA assumes no artifacts or samples requiring curation will be collected; however, field records will be curated along with the rest of the project documents. SWCA will also file a Notice of Existence of Cemetery within 10 days of discovery of any grave shafts or human remains.

Intensive Archaeological Survey

Once an Antiquities Permit has been obtained, SWCA will conduct an archaeological field survey of the 1.2-mile-long (1.9-km-long), approximately 49.2-acre (19.9-ha) project area. The field survey will be performed by a team of three SWCA archaeologists walking the proposed project area. SWCA archaeologists will survey 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 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 approximately 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 Archaeologists (CTA) standards (CTA 2020) promulgated by the THC. For linear projects, the THC/CTA fieldwork standards require a minimum of 16 shovel tests per 100-foot-wide (30.5-m-wide) survey corridor; this equates to no fewer than 69 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

SWCA geoarchaeologist, Analise Hollingshead, M.A., 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-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. Upon encountering an archaeological site in the proposed project area, it will be explored as much as possible with consideration of land access constraints. 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 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 Antiquities Permit, all paperwork and photographs generated during the field investigation must be curated at an approved repository.

Historic Resources Survey

Since the proposed project may be subject to federal permitting with the USACE, Section 106 of the NHPA likely applies to the proposed project. At this time, the proposed project does not have federal funding, nor does it have funding from the U.S. Department of Transportation (DOT); therefore, Section 4(f) of the DOT Act does not apply to this effort. SWCA architectural historians who meet the Secretary of the Interior Professional Qualifications (36 CFR 61) for Architectural History and/or History will complete a reconnaissance-level historic resources survey for the proposed project according to NPS and THC documentation standards.

Site Documentation

SWCA architectural historians will document all historic-age resources within the APE built in or before 1981. Resources will include any districts, buildings, structures, objects, and sites identified in the APE. Resource documentation will adhere to the following parameters:

- Resources are numbered sequentially from north to south in accordance with TxDOT documentation standards. Historic-age resources were numbered with the first alpha-number (i.e., 7A, 7B). Nonhistoric-age resources were included on the primary 'A' record and were assigned alpha-numbers after historic-age resources (i.e., 7C, etc.).
- Each historic-age resource will be documented on an inventory form with at least two photographs. Photographs have a minimum resolution of 1200 x 1600 pixels. A front façade and oblique photograph of each historic-age resource will be captioned with photographic direction.
- Agricultural complexes with at least one historic-age domestic work zone and one historic-age agricultural work zone were documented according to the *Agricultural Theme Study for Central Texas* (Moore et al. 2013).
- If a resource is not visible from the ROW, oblique and orthographic aerial imagery will be used to supplement documentation of the resource (i.e., Bing 2025; Esri 2025; NETR 2025, etc.).

SWCA has preliminary identified approximately five survey locations with historic-age resources. SWCA anticipates the historic-age resources within the APE to have associations with agriculture and domestic historical uses. SWCA will summarize each documented historic-age resource with a brief architectural description, research findings, integrity assessment, and an NRHP evaluation. SWCA will use the following literature review 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 (McAlester 2013)
- *Agricultural Theme Study for Central Texas* by David W. Moore, Jr., Martha Freeman, and Maryellen Russo (Moore et al. 2013).
- *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* by NPS Cultural Resources (NPS 1997)

- *Guidance for Studying Late 19th-Century and Early 20th-Century Sites and Dealing with Late-19th and Early-20th-Century Sites* (THC 2025b; Denton 1999)
- *CR 279 Improvements Historic Resources Survey Letter Report* (Ford 2023)

SWCA architectural historians will supplement archival research with these additional tools:

- Archival records available on Ancestry.com subscription service (Ancestry 2025c).
- Williamson Central Appraisal District (CAD) and Williamson County Clerk records.
- Historical aerial imagery and USGS topographic maps available from the NETR Historic Aerials database (NETR 2025).
- Newspaper articles from the Newspapers.com subscription service and historical newspapers available on *The Portal to Texas History*.

SWCA architectural historians may also complete in-person research at Williamson County public libraries in Liberty Hill and Georgetown.

Reporting and Curation

Once the scraping investigations are complete, and if graves and/or a cemetery are identified, an interim report with a summary of the investigations and proposed avoidance plans or burial exhumation plans, if needed, will be prepared and submitted to Williamson County and the THC for review and comment. If it is determined that exhumation and burial relocation is needed, SWCA will submit a permit amendment with proposed methodology to Williamson County and the THC for approval.

Once all project investigations are complete, SWCA will prepare a single draft report detailing the results of the archaeological and historic resources surveys. 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.

SWCA will submit a digital copy of the draft report to Williamson County 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 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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