

November 19, 2007

Diana Wood  
Section of Environmental Analysis  
U.S. Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423-0001

Via email/email filing to:

Re: FB Docket #34384, Comments on the Draft PA

Dear Ms. Wood:

Thank you for sending me, as a consulting party, a copy of the draft Programmatic Agreement (PA), for FB Docket #34384.

As a professional archaeologist who has worked with many private firms, corporations, and agencies, over a 40 year period, there seems to me to be some very curious efforts, within the PA, to let Vulcan/SGB to obfuscate the needed cultural studies for the proposed two (or three) eastern routes. I am certain that Lawrence Oaks of the Texas Historical Commission will ensure that federal (Section 106) regulations are strictly enforced.

My letter concerns the possibility of the two eastern routes (or variations thereof; I frankly cannot tell from the map sent me just where the routes are now proposed to go). However, I am informed that the eastern routes could actually pass through the western section of the Russell Mangold property. The letter submitted to you by the QNFHS provides more detail.

There is a real investigative and research problem in the western portions of the Mangold property. Much of it consists of gravel-capped hills (Uvalde Gravels), some around or near to a major seep spring that has left deposits in a large area around it. Dr. Bruce Albert, consulting palynologist, believes that it is critical that these deposits be cored and subjected to detailed analysis. He has been successful in the past few years in obtaining vegetational sequences, over the last 11,000 years, that are key to the study of ancient environment and climate in this region.

Moreover, as far as I know, only one archaeological site has been studied in this locale. This is 41ME132 (Buddy Mangold site), itself located on one of these knolls

capped with Uvalde Gravels. Detailed geological studies in the area have led to the definition of the Quihi Soils, forming atop the ancient Uvalde Gravels deposits.

The nearby spring and the camping locale provided on this knoll at 41ME132 was used by groups of hunters and gatherers as a campsite for at least 10,500 years. I have included a series of images that illustrate some of the time-diagnostic spear point types of this **Paleo-Indian** era. The occupations continued through the **Archaic** period, 8800 years ago to about 1500 years ago, into the **Late Prehistoric** period (the introduction of the bow and arrow, and with the last use of the site by **Historic**, Spanish Colonial-era Native Americans. Their tiny distinctive triangular points tie them to the missions in South Texas and Northeast Mexico.

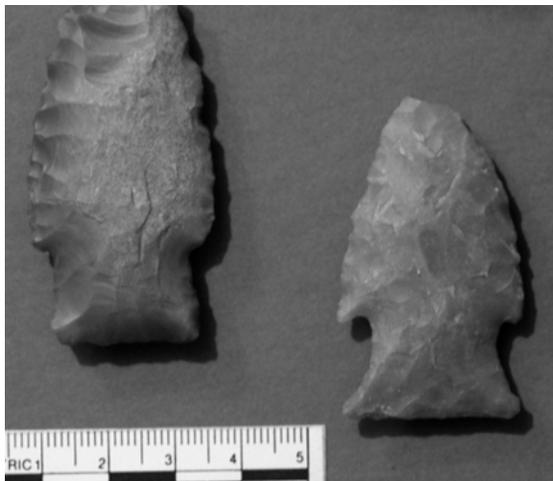


Figure 1. Wilson points, 10,500 years ago. 41ME132.



Figure 2. Angostura point, 8,800 years ago. 41ME132.

While we know a quite a bit about the chronology of ancient peoples at 41ME132, there is no data on the nature of the occupations, the succession of campsite activities, and other key relationships. Despite our “salvage” excavations through the Southern Texas Archaeological Association in July 2004, we were unable to address most of the research questions at hand. The history of the site that preceded our work involved the well-intentioned, but untrained excavations of the late Buddy Mangold. His notes and records are not of the sort that allow us to better define the characteristics of the site.



Figure 3. View of a 2004 excavation unit. The Quihi soils occur overlying bedrock. The soils (behind the scale) have extensive gravels.

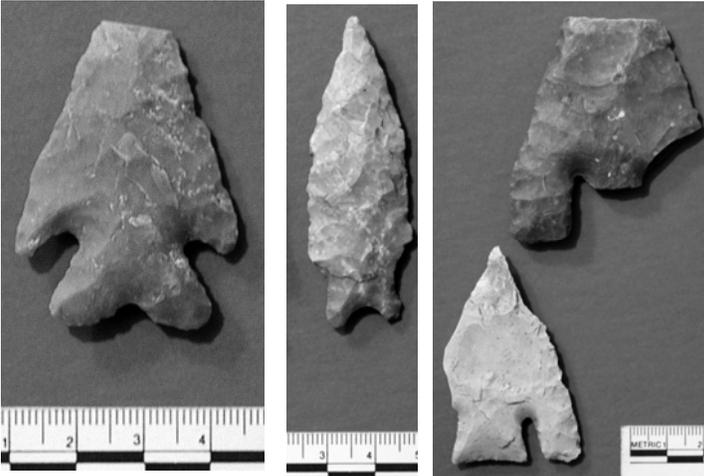


Figure 4. Early Archaic points from 41ME132. left to right, Martindale; Uvalde, Andice, and Bell (lower)



Figure 5. Middle, Late and Transitional Archaic point types from 41ME132.  
 Left, Bulverde points (Middle Archaic, ca. 4500 years ago), right, Darl points (Transitional Archaic; ca. 2000 years ago). Of particular note is the sizable numbers of Darl, a type that occurs much more commonly in the Austin area and north.

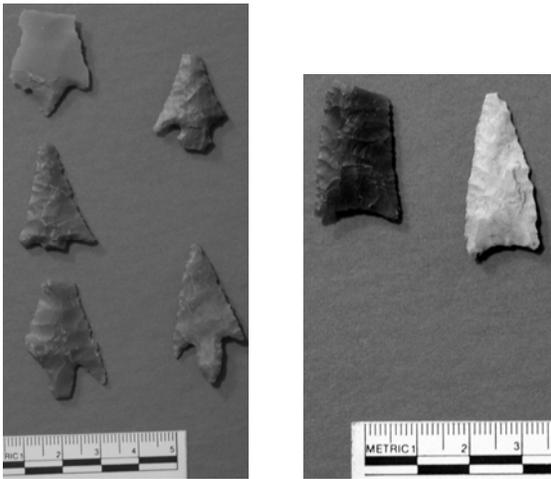


Figure 6. Arrow Points of Late Prehistoric and Historic Age.  
 Left, Perdiz points (around 500-700 years ago); right, Guerrero points, dating to the 18<sup>th</sup> century “mission Indians”

Thus, while the Mangold site (41ME132) has given us some important insights to the long cultural record of prehistoric and early historic times, we know very little about the formation processes at that site --- and even more significantly, we know absolutely nothing of the western area of the Russell Mangold property. The sites will be hard to find; I would have probably walked right over 41ME132 prior to its amateur excavation

in the 1990s. But, now we are armed with these data, and these should inform archaeological field crews (experienced ones, I trust) as to what to look for and where!

The best possible resolution to the issue of the western Mangold property would be for all potential railroad routes to be moved slightly to the east, thus leaving this particular area of interest (and of potential National Register quality) wholly untouched.

I would close by re-stating my view that **no** railroads should be built at Quihi. Any route that is “chosen” (after all these years of mind-numbing end runs and misinformation) will damage the Quihi Rural Historic District. The District was inexplicably divided into two “sections.” It is incredible that the area that is and was Quihi, an area of immense historical significance and of tremendous note in the history of early Texas, could be considered anything other than “Quihi.” Additionally, there have been no definitive archaeological surveys or studies of any route, and the well-meaning tidbits assembled by URS, by STAA (not linked with this issue), and a couple of Austin-area consulting firms have not provided any sort of comprehensive picture of the local prehistory.

Thank you for the opportunity to provide these comments.

Sincerely yours,

Thomas R. Hester, Ph.D.  
Consulting Party

Professor of Anthropology, emeritus  
The University of Texas at Austin