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January 10, 2005

Ms. Victoria Rutson, Chief
Section of Environmental Analysis
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20402-0001

Dear Ms. Rutson:

I am writing to provide extended comments on the “Draft Environmental Impact Statement Related to Finance Docket No. 34284, Southwest Gulf Railroad Company...Medina County, Texas.”

Specifically, I address the issue of cultural resources related to the prehistory and early history of the Quihi area. There are significant problems in the DEIS and in the Draft Programmatic Agreement. The superficial efforts made by SGR to do preliminary cultural resource assessments were noted in my oral comments in the December 2, 2004 public meeting in Hondo, TX. The first preliminary report submitted by URS has been found to be lacking in almost all aspects by the Texas Historical Commission and others who have read it. This is most likely due to minimal time for fieldwork and analysis being funded by SGR. In an effort to put a “patch” on the first assessment, SWG and URS sent archaeologist Dr. Daniel Cassedy to the area, again for a very brief period and, unfortunately for him, during a major rain event. Dr. Cassedy appears to have done the best he could in the highly inadequate time frame provided. His experience in dealing with this type of project was, however, evident when in his final recommendations, he advised that SGR should avoid the proposed routes because **of the *unique historical context*** found at Quihi. Furthermore, he quickly recognized the potential importance of a major mid-19th century stone wall that exists on the Lindsey property.

A couple of the errors in Dr. Cassedy’s assessment are noted below. What seem to be “minor” oversights turn out to be critical in terms of cultural resources, including:

(1) a statement that Uvalde Gravels do not occur in the area, when in fact such deposits are extensive and are well published as the **Quihi Soil**. Because of ancient geological processes, the nature of the deposition of this Soil is still unclear. It is even more important to note that archaeological sites as old as 10,500 years ago are buried in Quihi

Soil (Uvalde Gravel). This was clearly shown in July 2004 by excavations at site 41ME132 (Mangold Site; Weimers Ranch). The site and the Quihi Soil are in the uplands, an area ignored by preliminary assessments. It is clear that ME132 is not isolated, but part of a larger archaeological pattern formed by a process that is not well understood. To address such an issue, extensive geological and **geomorphological** research must be done. It is not mentioned in the Draft Programmatic Agreement, although geomorphology is a critical element in modern archaeology.

A perspective on what confronts the funded archaeological research proposed in the DEIS (see below) can be obtained from a brief description of work done in the area by **the Southern Texas Archaeological Association (STAA)**. The STAA is a non-profit organization composed of about 400 members, both avocational (“amateur”) and professional. It was founded in San Antonio over 30 years ago and publishes a widely circulated journal. When I was introduced to the archaeology of the area through working with collections from the 41ME132 and 41ME133 sites from the late Buddy Mangold, I thought there was a need to carry out initial excavations at these sites to obtain a better view of the context and potential at each. In July 2004, the STAA held an tightly-organized, problem-oriented field school on the Weimers Ranch. The STAA funded the work from its own coffers and from fees provided by participants. Six days of excavations at both sites were very revealing, particularly with reference to the formation processes involved in the archaeological record (e.g., the Quihi Soil). The STAA asked a noted geomorphologist to look at the sites and his research is ongoing. Additionally, site 41ME132 is located adjacent to a spring and bog which was likely the reason, 10,500 years ago, that humans began to camp at this site. STAA has arranged for an experienced palynologist to do pollen cores in the bog, with the hope of gaining some insight into local paleoclimate. This researcher has worked extensively in areas of Texas where pollen was supposedly “impossible” to obtain, and has developed techniques that have permitted the formulation of vegetational and climatic sequences in southern and south central Texas.

It is perhaps because so little is known about the Quihi area, so little has been learned by the SGR “assessments,” and so little is expected by THC (based on the Draft Programmatic Agreement) that **neither geomorphology nor climate studies** are included in the Draft PA. I am certain this will be remedied in the Final Draft PA, as the archaeologists at THC are keenly aware how quickly the database changes in Texas archaeology.

(2) a wholly inadequate review of the **American Indian peoples** who were in the area. This topic will be of serious concern among local American Indian organizations and their leaders. At the December 2, 2004, meeting, Mr. Ray Hernandez of the Tap Pilam group in San Antonio spoke eloquently about this problem, and he consulted extensively with the congressional staffers who were there. Mr. Hernandez is well known across southern Texas as a spokesman for American Indians, and his impact has been felt on many construction projects.

The Draft Programmatic Agreement must require that a trained, experienced **ethnohistorian** must examine the historical records. A great deal of data are to be found in the literature, both mid-19th century and Spanish Colonial, on these groups. Just because it has not yet been done in the past does not mitigate the necessity of such ethnohistory being prepared at this time. After a rail bed has been laid, ethnohistorically-sensitive areas will already be gone. A perfect example of the potential of ethnohistory is Dr. Maria F. Wade's published study (University of Texas Press, 2003) on the American Indians of the Edwards Plateau and their interaction with the Spanish. The area of focus was immediately to the west of Quihi. Dr. Wade went through Spanish archives and found data on the Native peoples that had never been found nor fully understood.

Dr. Cassidy is to be commended, to be sure, for his effort to provide a predictive model of cultural resources based on soil types in the Quihi area. This is an admirable first step. He realizes, as do other serious scholars, that the Quihi area constitutes a **unique historical context**. As I noted above, this second URS report recommends that all proposed rail routes in the Quihi area be abandoned and a new effort made to use the old Dunlay route.

Indeed, the **historic context is what is in peril** in the plans of SGR. Geographers, archaeologists, historians and other researchers have long worked with the concept of a "landscape." Within the landscape, there can be certain elements that pull together a significant moment in the development of a region. At Quihi, there is an archaeological landscape about which we know very little. Is it an important and integrated set of sites without parallel in this part of Texas? We cannot determine this with the extant data. However, **STAA surveys** done in July 2004 and shovel test excavations in 2005, suggest that there are a lot of sites out there, perhaps within proposed SGR routes, or outside the proposed routes. For example, in the 2004 STAA survey, additional sites were found on the Weimers Ranch, and a series of extremely interesting sites were documented along Elm Creek. These sites have been formally recorded at the Texas Archeological Research Laboratory, UT-Austin. They are likely just a drop in the bucket in terms of the local site inventory. In January, 2005, a team of **STAA members carried out shovel-test research** at the Renken Site, in the Elm Creek drainage. Thirteen shovel tests were dug to help ascertain the extent of the site and buried deposits. The site turns out to be at least 200 meters in length. The shovel tests, 1 meter deep, revealed layers of silt and burned rock, flint flakes, a Bulverde point (Middle Archaic), and extremely well preserved animal bones (probably deer). While this site and others on Elm Creek may well be outside proposed SGR activities, they illustrate the **potential for important sites within the whole area**.

While both of the SGR assessments are useful in getting an idea of the mid-19th century cultural record in the Quihi area, much more must be done. It is not enough to simply "move" a house to a new location. That saves the house, but destroys **the historic context**. The constellation of early stone homes and buildings around Quihi are without

parallel in this part of Texas. Not even in Castroville is such a unique settlement preserved -- and Castroville received First Lady Laura Bush's recognition in **the Preserve America** federal program. Houses can't just be picked up and "moved." **Their context must be studied through historical archaeology and by architectural historians.** While one of the houses that will be impacted by an SGR route, the Saathoff-Scheule home, is on the National Register of Historic Places, there are many such potential Register buildings in the area. The local historical group is working toward the designation of a National Register District, a designation that is clearly warranted.

The Quihi area represents, I would argue, *a unique, unparalleled rural historical landscape*. Though "progress" has modified this area of pre-Civil War settlement, it remains remarkably intact in comparison to similar early settlements in Texas and elsewhere. Quihi is not "unique" simply because of its old buildings. Quihi had a key role in the settlement and development of south central Texas, and is a prominent part of chronicles of early commerce (cf. the Chihuahua Road) and early military explorations. Even the natural landscape, such as the stream drainages, is little modified, and the processes of deposition within the drainages may well have preserved a pollen record of environmental change for at least the last 15,000 years.

Railroads are not new to the towns lying south of the Edwards Plateau. Knippa, D'Hanis, and Hondo (and to a certain extent, Uvalde) grew up along the 19th century rail lines. Their historical landscape includes these railroads, which are a key part of their development. However, there is **no rationale for the serious disturbance, if not destruction, of the Quihi historical landscape** by building new, short railroads for the profit of private, non-local corporations. In essence, the STB is being asked to provide a permit (and it has never failed to provide such a permit!) so that a rail line can be built through the Quihi historical landscape in order to haul limestone to consumers in Houston! To put it more bluntly, your Federal agency could well end up approving a short term, private profit objectives that will significantly degrade the long term viability of an unequaled cultural and historical resource.

Though I have done research in the Quihi region for only a brief time, I have carried out fieldwork and publication in southern Texas for 40 years. As detailed in an earlier letter, these investigations have also included sites in Medina County, Bandera County, Uvalde County, Kendall County and Bexar County. It is unlikely that any other archaeological researcher can match this experience and the perspective which it provides. I also directed the largest archaeological research laboratory in the State, at UT-Austin, for 17 years, as well as carrying out fieldwork and publication in other parts of the State. I am also a member of the Medina County Historical Commission and have participated in the Commission's review of this proposed project. I note these factors not to boost my ego, but simply to point out that I am well aware of what sorts of landscapes are worthy of preservation. And, I am well aware of the earlier destruction of such landscapes through ill-advised subdivisions, rail lines, and commercial activities.

I have never seen such a culturally-significant landscape as the one which incorporates the Quihi area. The STB staff and commissioners in Washington must understand that the destruction of cultural resources is a nationwide concern and a nationwide disaster. Why must the destruction of such a landscape be of such a “national interest” (STB is in the business of permits for railroads across the United States) that the Quihi area must be the next, and totally unnecessary, victim? This is not a narrow, “tree-hugger- environmentalist- preservationist” view. It is a reality based on the science and history that is already known, and which is so clearly evident, from the Quihi landscape.

Sincerely yours,

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