

HEI-21098



Re: Programmatic Agreement, STB FD 34284

Thomas Hester

to:

Diana Wood

09/18/2015 09:27 AM

Cc:

Alyne Fitzgerald, Jerry Johnston JJ Ranches, clathi, Bill Martin

Hide Details

From: Thomas Hester <secocreek@swtexas.net>

To: Diana Wood <Diana.Wood@stb.dot.gov>

Cc: Alyne Fitzgerald <afitzgerald100@gmail.com>, Jerry Johnston JJ Ranches <jerry@jjtexasranch.com>, clathi@aol.com, Bill Martin <bill.martin@thc.state.tx.us>

Dear Ms. Wood:

Thank you so much for the prompt response.

The prior Programmatic Agreement of 2008 STB No 34284 is essentially worthless. It was written with so many loopholes that almost anything could be done...or not done correctly. I know it was executed in good faith, but it is highly flawed with regard to the qualifications of archaeologists, to the use of NPS "code for professional standards), statements re: archaeological curation (all of which have since changed), and on and on.

Perhaps I am missing a newer, revised 2015 Programmatic Agreement?

I know the new route is proposed to cross over ranchlands where I have personally done archaeological fieldwork (e.g., 2004).

It is an area that is highly unusual for Texas archaeology, primarily gravel (Uvalde Gravel) hills and valleys, where even archaeologists like myself...with 50 years of experience in the region...would normally pay little attention. But one such gravel hill, site 41ME132, has abundant archaeological remains extending from at least 9-10,000 years ago, up through prehistory, to early Historic times.

According to the ranch owner, who I have known for the past few years, the archaeology was "evaluated" by a team consisting of 3 people who dug "shovel tests" and "screened the deposits", in a day or two, and complained that the Spring 2015 rains made ground cover so thick that they couldn't see anything anyway! If his version is accurate, in any way, then no archaeological survey of merit has been done. Nor has any geomorphological investigation of these gravel hills --- about which so little is known --and which could contain valuable cultural resources. These factors cannot be ignored by any Programmatic Agreement, written by people with no knowledge of the the archaeological patterns of that locale.

I am also told that an extensive spring-fed bog, near ME132, has been wholly ignored by hydrological research. This is such a rarity in the region. That spring and bog have likely been there tens of thousands of years,

and constituted the main attraction for the people who occupied ME132 for millenia! The landowner was told that the SGR track would go right through it. This strikes me as callous disregard for a long-lived water resource in an area known for its aridity! And what data from pollen, and other microscopic traces of plant life, for thousands of years, will be blown away by a railroad track? At the very least, comprehensive studies are needed to insure the right things are done. I've been "stuck" in its periphery many times and know of its contribution to the local water regime.

In 2004-2005, Dr. Bruce Albert, veteran of many such studies in south Texas and northeastern Mexico (and author of many studies with the internationally known geographer, Dr. Karl Butzer at UT-Austin) begged to be permitted to "core" the bog for such data as I have described -- but the funds could not be obtained. I have lost track of him, as I believe he is no longer in academia, but I am sure his devotion to his scholarship remains. He runs a Texas farm and can easily be found.

Again, the 2008 PA is worthless. It was largely formulated by a former THC executive director who seemed, to all involved, to have developed a PA that was very weak (just look at the "standards" for archaeologists) and that highly favored Vulcan, with little protection for any cultural resources.

I do not mean to demean the gentleman; he had many other responsibilities Statewide!

Thank you for allowing my comments. There are many possibilities for the Uvalde Gravel hills and spring bog I described; it may be we've learned all we can, or it may be that we know almost as little as Texas archeologists, geologists and geomorphologists did in 2004. But doesn't this have to be determined before wholesale destruction is inflicted?

With kind regards,

Thomas R. Hester, Ph.D.
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The University of Texas at Austin

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----- Original Message -----

From: Diana Wood <Diana.Wood@stb.dot.gov>

To: Thomas Hester <secocreek@swtexas.net>

Sent: Fri, 18 Sep 2015 07:59:00 -0400 (EDT)

Subject: Re: Programmatic Agreements, STB FD 34284

Dear Dr. Hester:

Yes, I have included you in the PA process as a concurring party. I had sent a third letter to all parties indicating that the date was changed to September 18th because the route that SGR intends to build was not correctly highlighted on the map that was sent with the initial letter. Please note that the route that SGR has chosen to construct is the Modified Eastern Bypass Route and should have been highlighted (so much for my multi-tasking skills).

Good luck with the unpacking!

Best,

Diana Wood

Diana F. Wood

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From:
Thomas Hester <secocreek@swtexas.net>
To:
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Date:
09/17/2015 04:45 PM
Subject:
Programmatic
Agreement, STB FD 34284

Dear Ms. Wood:

I have had the extreme experience of moving all summer long! I first rec'd a letter from Victoria Rutson about an 8/13/2015 deadline for input on a new Programmatic Agreement on the SGR 9-mi RR

alternative. I next rec'd a correction stating that the deadling was Sept. 12.

I then received an e-mail from the MCEAA group at Quihi stating that the date was actually Sept. 18.

Can you clarify for me? Is it too late for me to offer a comment or to be put on the list (that I was one for years back around 2008+) as an "interested party." The shipping tape, boxes, and heat have eroded my brain and I don't currently recall what the actual term was for that list!

I would appreciate your help.

Best regards,

Thomas