Stantec

Memo

To:	Holly Smith USACE Galveston District 2000 Fort Point Road Galveston, TX 77550	From:	Diana Gonzalez-Tennant San Antonio
Project/File:	Raymondville Drain Project, Hidalgo and Willacy Counties, Texas	Date:	October 20, 2025

Reference: Raymondville Drain Project – Cultural Resources Fieldwork Summary

Between May 13th and October 16th, 2024, Diana Gonzalez-Tennant (Project Archaeologist), Walker Van Item (Archaeology Team Lead), Steven Lopez, Katelyn Morkovsky, Amani Bourji, and Alex Bentley of Stantec conducted cultural resources fieldwork under the supervision of Scotty Moore (Principal Investigator) for the proposed Raymondville Drain (RVD) Project in Hidalgo and Willacy Counties, Texas. The survey was conducted over seven mobilizations from May 13th – 16th and 20th – 24th, June 3rd – 6th and 10th – 14th, July 17th, August 19th – 23rd and October 15th – 16th. Hidalgo County Drainage District No. 1 (HCDD1) proposes to construct new location drains and a detention basin as well as expand the existing drainage system in Hidalgo and Willacy Counties, Texas. The project measures approximately 60 miles (96.6 kilometers) in length and occupies a right-of-way that is typically 350 feet (106.7 meters) wide. The proposed drain begins approximately 5.6 miles (9 kilometers) north of Edinburg, Texas, and ends approximately 4.5 miles (7.2 kilometers) southwest of Port Mansfield, Texas. The archeological area of potential effects (APE) for this project is defined as the entire maximum footprint of ground disturbance, which consists of approximately 2675.52 acres (an acreage that includes the existing drain). The maximum depth of impacts is expected to range from 5 to 10 feet (1.5 to 3.05 meters) along benches flanking the main drain, then another 10 to 20 feet (3.05 to 6.1 meters) to the base of the drain. In total, depths will range from 15 to 35 feet (4.57 to 10.67 meters) below the ground surface. Stantec has been subcontracted by RRP Consulting Engineers (formerly S&B Infrastructure), HCDD1's prime consultant, to conduct an archeological survey of the APE.

The primary proponent of the project is HCDD1, a political subdivision and/or special utility district of the State of Texas, rendering the project subject to the Antiquities Code of Texas. Per the provisions of the Antiquities Code of Texas, this investigation included an intensive archeological pedestrian survey supplemented with mechanical augering and trenching. This investigation will evaluate the eligibility of identified resources for listing on the National Register of Historic Places (NRHP) and for designation as State Antiquities Landmarks (SAL; 9 Texas Natural Resources Code [TNRC] 191; 13 Texas Administrative Code [TAC] 26.12). The project is also considered to be subject to Section 106 of the National Historic Preservation Act (NHPA), as amended (36 CFR 800), due to oversight by the United States Army Corps of Engineers (USACE) and partial federal funding allocated via Congressional earmark.

The depths of impact and generally deep Holocene deposits in the region will exceed standard shovel testing depths. Consequently, Stantec proposed the mechanical excavation of trenches throughout the project footprint and power augers in lieu of shovel testing in locations with at least moderate deep potential for

cultural deposits. Due to the APE's footprint being greater than 200 acres, survey methodologies were discussed with the THC regional reviewer and USACE. The team estimated that approximately 2,000 smaller units (shovel tests and auger bores) would need to be excavated throughout the APE. A strict reading of the CTA's standards for trenches relative to shovel testing (2:1) would require nearly 1,000 trenches throughout the project footprint, which is untenable. Per the discussion with the THC regional reviewer and USACE representative, Stantec proposed to reduce this to approximately 100 to 150 judgmentally placed trenches, or a minimum of 20% of the standard 2:1 ratio required for mechanical testing relative to shovel tests, focusing in areas with the highest potential for cultural deposits. Geomorphologic features unique to the Lower Rio Grande Valley were considered in trench placement decisions, including the active landscape, large-scale sheet-flow, understanding that there is little surface expression of recorded sites, and the thin archeological record in the region. Predictive modeling data was used as general guidance. However, areas marked as having low or low-moderate probability for cultural deposits were not excluded but were instead treated as "unclassified" probability.

This memo describes the intensive survey conducted in areas that were granted right of entry as of October 16th, 2024. In total, 55 backhoe trenches and 15 power down auger tests were excavated within the APE, amounting to approximately 55 percent of the minimum number of trenches required by the Texas Antiquities Permit # 31189. This percentage is equivalent to the percentage of the APE for access was granted as of October 16th, 2024. A minimum of 45 judgmentally placed trenches and a site revisit for 41HG8, all in areas where access was denied, is anticipated to fulfill the requirements of the Permit.

During the 2024 survey, two backhoe trenches and one power down auger test yielded positive results for cultural materials. One of the two previously documented sites was revisited (site 41HG25); access was denied to the parcel in which 41HG8 was recorded. Two isolated finds were documented, and no new sites were recorded during this survey.

Previously Recorded Site 41HG25

Site 41HG25 was recorded as a prehistoric-age lithic scatter. No other site information exists on the Atlas and no file for this site exists at TARL.

During the 2024 survey, surface inspection revealed that the site had been disturbed by agricultural activities in the past (**Photo 1**). There was moderate ground surface visibility (GSV) for much of the site. One surface flake was observed approximately 63.9 meters (209.7 feet) northeast of the recorded site centroid. In total, 6 mechanical trenches (BHT48, BHT49, BHT50, BHT51, BHT52, and BHT55) were excavated during the survey of the site, all of which were negative for cultural materials. There was no evidence for the site on the surface or during trenching, thus the site is recommended as not eligible due to the lack of cultural materials.

Photo 1. Site 41HG25 ground surface visibility and evidence of plowing. View facing southeast.

Previously Recorded Site 41HG8

Site 41HG8 was inaccessible during the 2024 mobilizations due to landowner constraints and was not revisited.

Isolated Finds (IF)

IF01

Isolated Find IF01 consists of one solarized glass shard and two green glass shards between 0 and 30 centimeters below surface, observed in BHT017. Due to space constraints caused by the levee outside the existing drain, BHT017 was delineated with seven auger tests; only AUG010 yielded an early- to mid-20th century bullet casing.

IF02

Isolated Find IF02 consists of a chert scraper observed in BHT036. No other cultural materials were observed in BHT036 or in any of the backhoe trenches used to delineate the find.

Reference: **235300992**

Since the project occurs on a combination of existing publicly owned right-of-way and private land anticipated for right-of-way and/or easement acquisition, a mixed and limited artifact collection policy was assumed. Diagnostic artifacts found on public land would have been collected and curated, while diagnostic artifacts found on private land were photographed in the field and returned to their original locations. No artifacts were collected during the investigation; all materials and forms generated by this project will be made available to future researchers through curation at the Center for Archeological Studies (CAS) at Texas State University in San Marcos, Texas per 13 TAC 26.16 and 26.17. A curation form filed at both CAS and THC will accompany the collections.

Respectfully,

Stantec Consulting Services Inc.

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Attachment: Backhoe trench and auger test location shapefiles (235300992_RaymondvilleDrainTrenchesAugerFiles.zip)