Ms. Pat Mercado-Allinger  
Archeology Division Director/State Archeologist  
Texas Historical Commission  
P.O. Box 12276  
Austin, TX 78711-2276

Re: Destruction of Undecorated Ceramic Sherds from Sites 41CP220 and 41CP21 (Camp County) Investigations for Experimental Archeology; TAC Permit 3833; TxDOT CSJ: 1019-02-016, FM 557 at Prairie Creek, TxDOT Atlanta District.

Dear Ms. Mercado-Allinger,

AmaTerra Environmental, Inc. (AmaTerra) is submitting this letter on behalf of the Texas Department of Transportation’s Environmental Affairs Division (TxDOT-ENV) to request the Texas Historical Commission’s (THC’s) permission to destroy a sample of archeological ceramic sherds collected from excavations at two Titus Phase (15th-16th century A.D.) Caddo sites in Camp County, Texas for use in experimental archeological ceramic production and analysis (approved Research Design is on file at TxDOT-ENV and THC). AmaTerra is working as the prime contractor on the analysis and final reporting of Data Recovery excavations from Site 41CP220 under TAC Permit 3833 with Mason Miller (of AmaTerra) and Tim Peruttula (of Archeological and Environmental Consultants, Inc.) overseeing the project. Results of the experimental ceramic production and analysis will be included in the analysis and final report for both sites.

Site Summaries

Site 41CP220 is a multi-component historic through Paleoindian archeological site located on the northern terrace overlooking the Kitchen Branch of Cypress Creek. The site was first documented in 1989 by TxDOT archeologists but was expanded in 2005 during survey for the FM 557 expansion project for TxDOT. Subsequent NRHP-eligibility testing excavations later in 2005 revealed a likely intact Late Caddo, Titus Phase (ca. AD 1430-1680) occupation on a low knoll overlooking the creek to the south. This component was determined eligible for NRHP listing and was subjected to additional data recovery excavations in 2007. The data recovery efforts included 40.5 square meters of hand-excavated block excavations in largely 1 x 1-meter test units and 474.5
square meters of backhoe scrapes in areas surrounding the main excavation block. The Titus phase components, the target of the excavation and current analysis, include a possible house site with several additional, smaller exterior structures and storage pits. Overall, 229 individual features were identified including post holes (n=190), post holes or pits (n=18), pits (n=16), and possible smudge pits (4) along with one burned rock concentration. The features were primarily concentrated at a vertical range of 32-52 centimeters below the ground surface (32-52 cmBgs) indicating that this is the likely living surface. An interim report was completed and submitted to TxDOT-ENV in 2007, subsequent to excavations and final analysis and reporting tasks have recently been approved.

Site 41CP21 is a small occupation site located on an upland slope in the upper Prairie Creek basin that was investigated and tested by TxDOT archeologists back in 1974 as part of the US 271 expansion project. The excavations were not completed under a known permit. While the site contained Middle-Late Archaic and Woodland components, its Late Caddo, Titus Phase occupation was the most artifact-rich and likely the most intensive use of the site. The archeologists excavated eight 5 x 5-foot test units and several Gradall trenches, took brief field notes and photographs, and collected all artifacts and labeled them. The site excavations were never formally published and the field materials and artifacts have remained boxed up at TxDOT archives until the present. As part of our analysis of Site 41CP220, TxDOT has charged our team with including a brief excavation summary analysis from the 1974 investigations in the final report.

Neither site (41CP220 or 41CP221) contained evidence of burials during investigations and therefore the artifact assemblage does not fall under federal regulations outlined in the Native American Graves Protection and Repatriation Act (NAGPRA).

Experimental Archeology Plan

In the approved research design, AmaTerra proposes to use plain ceramic sherds from both excavations as temper for the production of eight Caddo vessels consistent with the kinds of decorated utility ware and fine ware vessels made and used at the site during the Titus Phase. Mr. Chase Earles, a Caddo Nation of Oklahoma member would be creating the pots. Each vessel would be made and decorated under controlled and documented conditions, using local clays collected at the site. After the vessels have been documented, they will be broken into sherds which will be analyzed in detail using the sherd analysis approach employed on this project. The results of the analysis will be compared to the manufacturing data gathered during the replication to then extend the comparisons to the archeological samples from the site, where manufacturing practices can only be inferred on the basis of observed physical and petrographic data.
The tempering material AmaTerra proposes to use for the experimental vessels will be grog (crushed sherds), as this is the most common tempering material used by Titus phase potters. Approximately 7,500 grams of temper are needed to complete the eight vessels, according to Mr. Earles, or approximately 940 grams per vessel.

AmaTerra proposes to use a sample of plain sherds (Table 1) from the 41CP220 site ceramic assemblage as well as certain proveniences (surface or unknown proveniences) from 41CP21 as the source of temper for the experimental vessels. The plain sherds proposed for destruction from both sites have been analyzed in detail (i.e., information gathered on sherd type, temper, paste, firing conditions, surface treatment, thickness, vessel form, if known, and presence of organic residues) according to the protocol specified in our research design. With an average weight of 3.8 grams per sherd, the 1,974 sherds listed in Table 1 weigh approximately 7,500 grams. These materials will, needless to say, not be included in the final curated materials for the site, but experimental archeological ceramic sherds derived from them will be permanently curated at the Texas Archeological Research Laboratory.

Table 1. Plain Sherd Sample Proposed for Destruction from 41CP220 and 41CP21.

<table>
<thead>
<tr>
<th>Site</th>
<th>No. of Plain Sherds</th>
<th>Provenience</th>
<th>No./% analyzed in Detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>41CP220</td>
<td>1790</td>
<td>all levels and units from testing and data recovery</td>
<td>468/26.1%</td>
</tr>
<tr>
<td>41CP21</td>
<td>184</td>
<td>Lots 0-3</td>
<td>74/40%</td>
</tr>
</tbody>
</table>

AmaTerra requests the THC’s concurrence that the proposed destruction of approximately 7,500 grams of plain ceramic sherds from Sites 41CP220 and 41CP21 is an acceptable use of the archeological materials for the purposes of experimental archeological investigations of Caddo ceramic manufacture as described above and in the approved research design. If you require additional information, please feel free to contact me by telephone...
(512-329-0031) or email (mmiller@amaterra.com) or Tim Perttula (tkp4747@aol.com) and we will be happy to provide additional information.

Thank you very much for your assistance with this. We look forward to your response.

Sincerely,

[Signature]

Mason D. Miller
Principal Investigator

CC: Waldo Troell, Texas Department of Transportation – Environmental Affairs Division

Attachment: Map of 41CP220 and 41CP21 Locations