



September 13, 2019

William Green
Principal/Department Manager
Natural and Cultural Resource Services
521 Clemson Road
Columbia, SC 29229

Re: Cultural Resources Reconnaissance Survey of Approximately 372 Acres at the Proposed
Croxtan Solar Farm
Laurens County, South Carolina
SHPO Project No. 19-KL0264

Dear William Green:

Our Office received documentation on August 21, 2019 that you submitted as due diligence for the project referenced above, including the survey forms, photographs and revised letter report, *Cultural Resources Reconnaissance Survey of Approximately 372 Acres at the Proposed Croxtan Solar Farm*. This letter is for preliminary, informational purposes only and does not constitute consultation or agency coordination with our Office as defined in 36 CFR 800: "Protection of Historic Properties" or by any state regulatory process. The recommendation stated below could change once the responsible federal and/or state agency initiates consultation with our Office.

Thank you for addressing our technical comments and for conducting revisits to SHPO Site Nos. 0177 and 0178.

The cultural resources reconnaissance survey of the approximately 372-acre project area identified one newly recorded archaeological site (38LU0764), one newly recorded cemetery (Martin Cemetery, Site 38LU0765/SHPO Site No. 2414), one newly recorded historic architectural resource (SHPO Site No. 2413) and revisited two previously recorded historic architectural resources (SHPO Site Nos. 0177 and 0178). SHPO Site No. 0178 was previously determined to be eligible for listing in the NRHP. Martin Cemetery (Site 38LU0765/SHPO Site No. 2414) is recommended as unevaluated, requiring additional research and/or testing to determine its eligibility for listing in the NRHP. Site 38LU0764, SHPO Site No. 2413, and SHPO Site No. 0177 are recommended as not eligible for listing in the National Register of Historic Places (NRHP). Our office concurs with these recommendations.

If the Croxtan Solar Farm were to require state permits or federal permits, licenses, funds, loans, grants, or assistance for development, we would recommend to the federal or state agency or agencies that:

- Additional intensive cultural resources survey is needed of the portion of Area A of the project area

characterized as having a high probability for containing archaeological resources as depicted in Figure 12 (Please see *Technical Comments*).

- Additional historic property identification survey is not needed.
- Martin Cemetery (Site 38LU0765/SHPO Site No. 2414) be avoided by ground-disturbing activities in adherence with South Carolina laws governing cemeteries.

The federal or state agency or agencies will take our recommendation(s) into consideration when evaluating the project and will determine if additional survey and information will be required.

Our office has additional technical comments on the report that we ask to see addressed (please see attached). We will accept the report as final once these comments are addressed; there is no need to send a revised draft. To complete the reporting process, please provide at least three (3) hard copies of a final report: one (1) bound hard copy and a digital copy in ADOBE Acrobat PDF format for the SHPO; one (1) bound and one (1) unbound hard copies and a digital copy in ADOBE Acrobat PDF format for SCIAA. Investigators should send all copies directly to the SHPO. The SHPO will distribute the appropriate copies to SCIAA. Please ensure that a copy of our comments letter is included in the Appendices and Attachments of the final report.

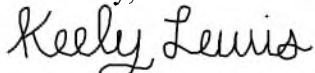
We have made revisions to the submitted survey forms and will provide you with final copies for your records.

Please provide GIS shapefiles for the surveyed area (and architectural sites as applicable). Shapefiles for identified archaeological sites should be coordinated with SCIAA. Shapefiles should be compatible with ArcGIS (.shp file format) and should be sent as a bundle in .zip format. For additional information, please see our [GIS Data Submission Requirements](#).

The State Historic Preservation Office will provide comments regarding historic architectural and archaeological resources and effects to them once the federal or state agency initiates consultation. Project Review Forms and additional guidance regarding our Office's role in the compliance process and historic preservation can be found on our website at: <https://scdah.sc.gov/historic-preservation/programs/review-compliance>.

Please refer to SHPO Project Number 19-KL0264 in any future correspondence regarding this project. If you have any questions, please contact me at (803) 896-6181 or at KLewis@scdah.sc.gov or John Sylvest at (803) 896-6129 or at JSylvest@scdah.sc.gov.

Sincerely,



Keely Lewis
Archaeologist
State Historic Preservation Office

cc: John Sylvest, SHPO

Technical Comments

- Section 4.1.1- The stratigraphy of Area A as described here varies from the depths provided in the previous draft report. Please provide additional clarification as to why the depth of the stratigraphy encountered was changed and which is correct. Additionally, significant disturbance and deflation due to past agricultural and silvicultural activities is noted but the majority of the high probability area in Area A appears to be wooded.
 - Draft, p. 5: “During the survey of Area A, 41 shovel tests, ranging from **15–80 cm** deep, were excavated along six transects (Figures 12 and 13, Table 1). Soils were relatively uniform, with a typical soil profile consisting of 10 cm of dark brown (10YR 3/3) loamy sand (Ap horizon), followed by 10 cm (10–20 cmbs) of yellowish brown (10YR 5/6) clayey loam (Bw2 horizon), overlying **60 cm (20–80 cmbs)** of yellowish red (5YR 4/6) clay subsoil (Bt horizon).
 - Revised Draft, p. 5: During the survey of Area A, 41 shovel tests, ranging from **15–30 cm** deep, were excavated along six transects (Figures 12 and 13, Table 1). Soils were predominantly uniform, eroded, and shallow, with a typical soil profile consisting of 10 cm of dark brown (10YR 3/3) loamy sand (Ap horizon), followed by 10 cm (10–20 cmbs) of yellowish brown (10YR 5/6) clayey loam (Bw2 horizon), overlying **10+ cm (20–30+ cmbs)** of yellowish red (5YR 4/6) clay subsoil (Bt horizon).
- Section 4.2.3 -- the address should be 484 Bramlett Church Road; the “several outbuildings” sentence should be revised to include the SHPO site sub-numbers in parentheses after each recorded outbuilding, and to state “three implements sheds”; and, it would be nice to include photos of the recorded outbuildings in the report with their corresponding SHPO site numbers captioned, beyond that of showing a general outbuilding in just Figure 28.