



January 18, 2019

Laura Boos
U.S. Army Corps of Engineers
1835 Assembly Street, Room 865 B-1
Columbia, SC 29201

Re: I-85 Widening, Gilkey Creek Tract Phase II Mitigation Site
(SAC-2017-00184)
Cherokee County, South Carolina
SHPO Project No. 15-SS0017

Dear Laura Boos:

Thank you for the public notice of December 12, 2018 regarding the above-referenced undertaking. Staff from our office also participated in an interagency site visit for this undertaking on January 11, 2019. The State Historic Preservation Office (SHPO) is providing comments to the Federal Highway Association and the U.S. Army Corps of Engineers (Corps) pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR 800. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public.

Our office previously reviewed the draft report *Historic Property Identification Survey for the Gilkey Creek Tract* (Herrnstadt and Silliman 2018) in our previous correspondence dated January 23, 2018. The survey identified SHPO Site Nos. 0270 and 0271 within the project area for the Gilkey Creek Tract Phase II Mitigation Site. SHPO Site Nos. 0270 and 0271 were determined to be unevaluated, requiring additional work to determine their eligibility for listing in the National Register of Historic Places (NRHP). Additionally, another previously unrecorded historic structure was identified within the project area during the interagency site visit.

In order for the proposed undertaking to avoid adverse effects to historic properties, we recommend that:

- The technical comments on the draft report provided by our Office in correspondence dated January 23, 2018 be addressed with a revised final report submitted to our office. We recommend that the previously unrecorded structure identified during the site visit be recorded and evaluated in the revised report. Following information obtained during the site visit, our office believes SHPO Site No. 0270 is eligible for listing in the NRHP and

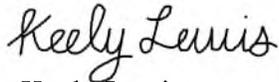
requests that this determination be reflected in the report. We also request that a determination of eligibility be included for SHPO Site No. 0271 or that the resource be treated as a historic property.

- All above-ground resources (SHPO Site No. 0270, 0271 and the previously unrecorded structure) be recorded on SHPO Survey Forms submitted to our office.
- The boundaries of SHPO Site No. 0270 be fully delineated. We recommend avoidance of all ground-disturbing activities within a 25-ft buffer area around the property and that access be provided to the cemetery as stipulated by SC laws governing cemeteries.
- As an alternative to archaeological survey, we recommend that language in the easement state that: 1) Ground-disturbing activities be avoided in the project area located within the project tract north of Gilkey Creek as it contains areas with high probability for cultural resources; and/or 2) Should any ground disturbance occur or be planned to occur within this portion of the tract, that our office be consulted for review of the project's effects on cultural resources.

Contingent on the fulfillment of the above-stated recommendations, and based on the description of the APE and the identification of historic properties within the APE, our office would concur with the assessment that no properties listed in or eligible for listing in the National Register of Historic Places would be adversely affected by this undertaking.

Please refer to SHPO Project Number 15-SS0017 in any future correspondence regarding this project. If you have any questions, please contact me at (803) 896-6181 or klewis@scdah.sc.gov.

Sincerely,



Keely Lewis
Archaeologist
South Carolina State Historic Preservation Office

cc: Joe Wilkinson, SHPO
Bill Jurgelski, SC DOT

Technical comments

- Survey cards should be created for both properties and submitted to our office. Digital survey cards should be OK.
- Throughout the report, the references to the resources should be updated to the four digit SHPO Site Number (i.e. from U/21/556-0270 to 0270).
- At times (e.g., p. 11, *Recommendations*) the report states there is an association between the cemetery and the cabin, but apart from being part of the same plantation, it is unclear whether there is any direct association between the two.
- The report also seems to tie the archaeological potential of the cabin to the cemetery (p. 11), and it is unclear why this is the case.

Evaluation of the cemetery (0270):

- This report strongly implies the cemetery is eligible under Criterion C. If the authors believe the design and funerary art of this cemetery is significant, they should explain why and recommend it eligible under C.
- Regarding the use of Criteria Considerations: If the resource does not meet one of the four criteria for listing, it cannot meet the criteria consideration. I.e., the cemetery cannot be both unevaluated and meet Criteria Consideration D.

Evaluation of the cabin (0271):

- The report should clarify what evidence exists for the c. 1830 construction date (apart from just the nails). What are its core stylistic elements?
- What attributes define the nails as “Type 6”? On p. 10 under “Data Gaps,” the authors cite Wells (1998) for typology, but this citation is not listed in the references at the end of the report.

- The report states the cabin is modified, but it does not specify how, when, to what extent, etc. Doing so would make a stronger argument for its integrity.
- This is a small, modest, antebellum house on old plantation land. If additional research is conducted on the property, the possibility that it was a slave dwelling should be explored.
- If the cabin is as old as the authors estimate, there could be some archaeological potential (and therefore research potential) for the area surrounding the cabin; however, the authors need to make a stronger argument for that being the case. It remains unclear what about the cabin itself may have research potential.