



April 3, 2019

Sean Norris
Program Manager – Archaeology
TRC
621 Chatham Ave
Columbia, SC 29205

Re: Edison Solar, Revised Cultural Resources Survey
Barnwell County, South Carolina
SHPO Project No. 15-ED0130/17-JS0239

Dear Sean Norris:

Thank you for the supporting documentation that we received on March 12, 2019, regarding the above referenced proposed undertaking, including the revised report, *Cultural Resources Survey of 39 acres at the Edison Solar Site, Barnwell County, South Carolina*. The State Historic Preservation Office is providing comments to USDA-Rural Development 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.

The survey examined the approximately 39-acre project tract. At the time of the survey, solar arrays were built on approximately 29 acres of the 39-acre tract and the remainder of the tract had been leveled and compacted. No archaeological sites were identified during the survey. The architectural survey identified three architectural resources (SHPO Site Nos. 0502, 0503, 0504). SHPO Site No. 0502 (Barnwell Heights Neighborhood Historic District) is recommended as eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and C. SHPO Site No. 0503 (Apple Street Neighborhood) and SHPO Site No. 0504 are recommended as not eligible for listing in the NRHP. Our office concurs with these recommendations. Thank you for the additional research and evaluation for the Barnwell Heights Neighborhood Historic District.

Based on the description of the undertaking's Area of Potential Effect (APE) and the identification of historic properties within the APE, our office concurs with the assessment that no properties listed in or eligible for listing in the National Register of Historic Places will be adversely affected by this undertaking.

If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include, but are not limited to, stone projectile points (arrowheads),

ceramic sherds, bricks, worked wood, bone and stone, metal and glass objects, and human skeletal materials. The federal agency or the applicant receiving federal assistance should contact our office immediately.

Our office has additional technical comments on the report and survey forms that we ask to see addressed (please see attached). We will accept the report and survey forms 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 letters are included in the Appendices and Attachments of the final report.

Please provide GIS shapefiles for the surveyed area and architectural resources. Shapefiles should be compatible with ArcGIS (.shp file format) and should be sent as a bundle in .zip format. Please see our GIS Data Submission Requirements and shapefile templates, available on our website at: <https://scdah.sc.gov/historic-preservation/historic-properties-research/archsitegis>. SHPO recommends e-mailing the shapefiles to the address link on the noted webpage or using a File Transfer Protocol website such as WeTransfer.com to send large files.

Please provide final electronic copies of the survey forms and photographs for the above-ground resources following the [Electronic Submission Requirements for Planning Surveys and Review & Compliance Surveys](#).

Please refer to SHPO Project Number 15-ED0130/17-JS0239 in any future correspondence regarding this project. If you have any questions, please contact Keely Lewis at (803) 896-6181, KLewis@scdah.sc.gov; or me at (803) 896-6129, JSylvest@scdah.sc.gov.

Sincerely,



John D. Sylvest
Project Review Coordinator
State Historic Preservation Office

cc: Anne Mathis and Matt Asher, USDA-RD

Technical Comments

Report

The third paragraph of the Executive Summary needs to be revised to reflect the revised survey findings and National Register determinations. Ditto, second to last paragraph of the Introduction.

Figures: Contains “Error! Bookmark not defined.” language that should be deleted.

p. 11, 4.3, “As you requested in correspondence dated January 30, 2019.” should be re-worded into a clearer sentence for the cold reader. Ditto, last sentence “Your comments....”

Survey Forms

0502:

Please see the Guidelines for Representative Survey section (p. 40) of our [Survey Manual](#) as well as our prior technical comments. In particular, a representative survey should:

- Determine the typology of buildings (typically residences), structures, objects, or sites in the area/neighborhood/subdivision, and record the number of each type.
- Photograph and record on a survey form one or two examples of each type of property in the potential district.
- Photograph and record on a survey form all historic community resources in the potential district (such as commercial, religious, and institutional properties as well as parks, cemeteries, or other historically notable properties).

Additional typology and individual survey forms using sub-numbers of 0502 (i.e., 0502.01, 0502.02, and so on) should be provided for this district and its resources. 001 and 002 under Digital Photo ID(s) may be retained on the Form for 0502 and should be better described as “Streetscape ---- St.” under the Other field. The other images (003 – 010) should be deleted from the Form for 0502 and used to complete sub-number survey forms for each of nine resources captured in the images provided, provided that these are the examples of each type of property in the district. We note that 12 total images were provided, though the form fields only provide for 10 images. The church and representative resources must be recorded individually.

We question whether the Legend numbers in the Figure 8 plat map denote the different typology of houses available in the Barnwell Heights Neighborhood (i.e., 756A, 900C, etc.). Further comparison of resources will be needed to determine this.

0503:

Change Construction Date to “c. 1940 - c. 1950”.

As above, please see the Guidelines for Representative Survey section (p. 40) of our Survey Manual as well as our prior comments. The representative resources in the neighborhood are to be recorded with a SHPO site sub-number on a survey form. However, we will let this standard slide for this time for this resource provided that you add additional description to the Other field under Digital Photo ID(s) such as for 001-“Streetscape Apple St.”, and add the address recorded in the photo, e.g., 002-“123 Apple St.”

0504:

The site number on both pages reads 0503--please renumber 0503 to 0504.

Please see the Site Numbering-Primary vs. Secondary Numbers section (p. 17) of our Survey Manual. All resources on a property are to be recorded with a SHPO site number on a survey form. In the future please use secondary numbers to record the outbuildings on a property. We will let this standard slide for this time for this resource provided that you make the following additions to the Form:

- One, change the Historic Name to "House; Outbuildings";
- Two, change Construction Date to "c. 1890 - c.1940";
- Three, add additional description to the Other field under Digital Photo ID(s) such as for 001-Right oblique, 002-Rear oblique, 003-c. 1940 house, 004-Pole Barn, 005-Wood Frame Sheds.