



January 30, 2019

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

Re: Edison Solar, draft CRS  
Barnwell, Barnwell County, South Carolina  
SHPO Project No. 15-ED0130/17-JS0239

Dear Sean Norris:

Our Office received the documentation on December 28, 2018 that you submitted as due diligence for the project referenced above, including the Section 106 Project Review Form, site plan, survey forms and draft report, *Cultural Resources Survey of 39 acres at the Edison Solar Site, Barnwell County, South Carolina*. 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.

The survey examined the approximately 39-acre project tract. At the time of the survey, solar arrays had been 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 two newly recorded districts (SHPO Site Nos. 0502, 0503) and one historic architectural resource (SHPO Site No. 0504).

Please see our below technical comments and reporting requirements for submittal with the revised report.

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 15-ED0130/17-JS0239 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](mailto:KLewis@scdah.sc.gov); for architectural resource survey questions please contact John Sylvest at (803) 896-6129 or at [JSylvest@scdah.sc.gov](mailto:JSylvest@scdah.sc.gov).

Sincerely,

*Keely Lewis*

Keely Lewis  
Archaeologist  
State Historic Preservation Office

### **Technical Comments**

p. 9, TYPO- “approximately 168-acre Project area.” Please clarify project area, cited as 39 acres throughout the remainder of the report.

p. 11- Stated here that “an approximately 39-acre section of the parcel has been developed into a utility scale solar farm” which would indicate construction within the entire project tract. The construction of solar arrays on approximately 29 acres is cited on pg. 1. Please clarify.

Figures 10, 13, 14, and 15- Provide the address, or if recorded on a survey form, provide the SHPO site number.

#### ***Architectural Survey:***

You may need to enlist the services of an architectural historian in order to better meet our Survey Manual’s guidelines.

We recommend combining the Apple Street resources/district into the Cherry/Berry/Bomway Streets Neighborhood resources/district, and re-numbering the report and survey forms accordingly. We can take back survey number 0504.

The architectural survey utilized the “representative survey” approach as provided for in our new Survey Manual. As such, it should follow the representative survey guidelines as closely as possible. We recommend including the following in the final submittal (survey report and survey forms):

Determine the typology of buildings (typically residences), structures, objects, or sites in the area/neighborhood/subdivision, and record the number of each type. The two potential districts need to be better documented in writing and in photodocumentation.

Note the total number of properties in the potential district, and a description of existing conditions. While an approximate number was included on the survey forms this information is missing from the report.

Record the potential district on a survey form following applicable Site Numbering guidance and Instructions for Completing the Survey Form for “District.” See Survey Forms below for examples.

Photograph and record on a survey form one or two examples of each type of property in the potential district. The draft CRS only discussed and recorded the potential districts. One or two examples of each type of property in the districts should be recorded as a sub-number on a survey form and discussed in the report.

Photograph and include in the survey report or project review documentation additional representative views of property types and community resources, streetscapes, landscape features, and vacant land, if applicable.

Provide a map of the potential district’s boundaries as part of the survey report. Survey maps should include street names, show lot lines, and compass orientation. Each resource in the district should be outlined on the map or a dot can indicate their locations. The proposed name of the district should also be indicated. For this CRS, a dot can indicate the resources recorded as sub-numbers and the name of the neighborhood (if there is one, otherwise Apple, Cherry, Berry, Bromway Streets Neighborhood should be fine) can be used as the district name.

### ***Survey Forms:***

Site Number 0502- Add “Neighborhood” at the end of the Historic Name.

Under Address/Location the Manual states that “For districts, give either the inclusive street address numbers for all primary buildings and structures, for example: 1-151 Main Street, or a rough description of the boundaries (for example: bounded by Carolina Creek, South St, Lowcountry Ave, and Hwy 61).” Try to enter the address range on the forms or in the report, and/or better specify a boundary for the Neighborhood.

Enter “Not Eligible” under the SHPO National Register Determination of Eligibility”.

Under Construction Date, for districts and individual properties constructed over a period of years, enter the beginning and ending dates of the period of construction. If the exact date is not known, a circa date may be entered.

Under Description, delete “non-contributing”. There are no non-contributing resources in a not eligible resource. The company housing angle is worth investigating more.

Site Number 0503 (new number): The Historic Name should be “House”.

The Address/Location should be better described/more concise. Is this a private dirt road? Streetview infers that there is an address mailbox here, for one or more residences.

The Category should be “Building”.

Enter “Not Eligible” under the SHPO National Register Determination of Eligibility”.

If the exact date of construction is not known, a circa date may be entered.

Closer view photographs of the resource through the holes in the fencing, or from the access road, are recommended.

All Forms: Please complete the Digital Photo IDs and Program Management fields. Streetscape photographs should be utilized for the district survey form’s photographs; the district sub-number resources should list the photographs utilized for those individual resources.

Tax Parcel data is available at <http://www.qpublic.net/sc/barnwell/>

### **REPORTING REQUIREMENTS**

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