



July 29, 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 June 27, 2019 that you submitted as due diligence for the project referenced above, including the draft letter report, *Cultural Resources Reconnaissance Survey of Approximately 372 Acres at the Proposed Croxtan Solar Farm*. We also received the associated survey forms and photographs in an email dated May 28, 2019. 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 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), and one newly recorded historic architectural resource (SHPO Site No. 2413). Site 38LU0764 and SHPO Site No. 2413 are recommended as not eligible for listing in the National Register of Historic Places (NRHP). Martin Cemetery (Site 38LU0765/SHPO Site No. 2414) is recommended to require additional research and/or testing to determine its eligibility for listing in the NRHP. Our office concurs with the recommendation for site 38LU0764 and requires additional information to determine the eligibility of SHPO Site No. 2413 and Martin Cemetery (Site 38LU0765/SHPO Site No. 2414) (Please see *Technical Comments*).

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 109 acres 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 is needed (Please see *Technical Comments* regarding revisits to previously recorded resources).
- Additional information on the potential effect of the project on Martin House (SHPO Site No. 0178) and Martin Cemetery (Site 38LU0765/SHPO Site No. 2414) be provided.

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.

Please address the attached technical comments in a revised final report to be submitted to this office.

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

- p. 2, Section 3.1: SHPO Site Numbers 0177 and 0178 should be revisited due to the passage of time, to be recorded on a SHPO Survey Form. See the Revisits section of our Survey Manual at <https://scdah.sc.gov/historic-preservation/programs/statewide-survey-historic-properties>. SHPO Site Number 0178 (Martin House) was determined eligible by the Western Laurens County Survey, as noted on ArchSite and in the survey report. Please see the inventory attached to the report, *Properties Determined Eligible for Listing in the National Register of Historic Places*, for additional information regarding this determination. Please update this determination in the report and conduct a re-evaluation as part of the revisit. Please also add description and photographs of these resources to the report.
- p. 3, pp. 2- “Martin Cemetery is recorded as archaeological site 38LU765/Resource No. 2414, while the house southeast of the cemetery is recorded as Resource 2414.” Please correct above ground site numbers for consistency throughout the report and figures.
- p. 5, Section 4.1.3- Martin Cemetery discussed as Resource No. 2413 here, labeled as No. 2414 in Figure 1 and recorded as No. 2414 on the survey form. Please correct for consistency throughout the report and figures.
- p. 5, Section 4.1.3- The cultural or ethnic group that this cemetery is associated with should be specified if this information is known.
- p. 6, Section 4.1.3- Please include a discussion of the funerary art relevant to the evaluation of this resource under Criterion C.
- p. 6, Section 4.1.3- Information potential of this resource under Criterion D should include additional considerations other than just the “preservation condition of the remains.” As noted in the [National Register Bulletin for Evaluating Cemeteries and Burial Places](#), information potential can also include “location and grouping of graves; use and quantity of commercial markers, fieldstone, impermanent markers, or no markers; funerary art; and inscriptions indicating identity, cultural affiliation, birth and death dates, and cause of death.” Please clarify in the discussion here.
- We recommend moving the Martin Cemetery to Section 4.2, as it was recorded primarily as an architectural resource with no associated shovel testing. At minimum, Section 4.2 should contain discussion of the 2 architectural resources recorded. It currently only cites 2414, which actually is a typo, for the following Structure 2413.
- Please include an address for architectural resources recorded in Terracon’s reports
- p. 8, Section 4.2- Resource 2414 is referenced here but section 4.2.1 discusses Structure 2413. Please correct site number here for consistency throughout.
- p. 8, and Survey Form for 2413: The historic outbuildings (“well, two implement sheds, and one unknown historic structure”, as well as apparently another barn/shed shown in the photographs provided) should be recorded as sub-numbers on SHPO Survey Forms. See the Site Numbering section of our Survey Manual. The photographs for these secondary resources should then be listed under the Digital Photo IDs section on the survey forms for each of those resources. Please resubmit 2413 with the Digital Photo IDs renumbered. In general, the illustration and description of survey photographs should start with a view of the front façade and/or oblique and proceed around the resource (for example, start with 02413002, then 005, 003, and 001), followed by the capturing of the overall site and/or historic or non-historic outbuildings (for example, 004 and 017 for this resource).
- p. 9, Section 5.0, pp. 1: “Structure 2414” should read 2413.
- p. 9, Section 5.0- Additional investigations under Criteria A and C are listed here for Site 38LU765/SHPO Site No. 2414. The evaluation on p. 6 recommends additional investigations under Criteria A and D. Please correct for consistency.
- p. 9, Section 5.0- “Significant disturbance and deflation due to agricultural and silvicultural

activities” is cited here but no disturbance is noted in the discussion of Areas A and B.

Survey Forms

- Survey Form for 2414: Is the Address/Location field correct (403-179 Bramlett Church Rd)? The Construction Date field should include a date range for graves.
- The Digital Photo IDs section is limited to 10 photographs. 12 photographs were provided. Please select 10 photographs, renumber as necessary, and resubmit the Form and photographs.