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May 22, 2018

Ms. Keely Lewis
South Carolina Department of Archives and History
State Historic Preservation Office
8301 Parklane Road
Columbia, South Carolina 29223

Reference: **SCSHPO Review – SHPO Project No. 18-KL0004**
Project Homeland – Lot 11 – Updated Request Letter
SC Highway 101 & Reidville Road
Greer, Spartanburg County, South Carolina
ECS Project No: 49: 5232-C

Ms. Lewis,

ECS Southeast, LLP (ECS) is pleased to provide an updated request letter for the South Carolina Department of Archives and History – State Historic Preservation Office's (SHPO) review of projects subject to applicable federal and/or state cultural resources protection laws. The proposed project is for due diligence purposes for future site development and is an updated request letter based on the SHPO response letter received on May 11, 2018.

Project Information

The site is located off of Reidville Road in Greer, Spartanburg County, South Carolina. The site consists of an approximate 47 acre portion of two parent parcels totaling approximately 75 acres. According to the Spartanburg County Online GIS Database website, the Parcel Identification Numbers (PINs) are: 5-36-00-049.01 (68.34 acres) and 5-36-00-047.02 (6.75 acres). The site consists of a single-family residence, wooded land, and agricultural structures and fields. Surrounding properties consist of wooded land, agricultural fields, and single-family residences. Based on the United States Geological Survey (USGS) Topographic Map, surface waters are not depicted on site.

Background

ECS composed a letter request addressed to the SC SHPO, dated December 29, 2017, in reference to the entire Project Homeland project which consists of approximately 475 acres. The request was made to determine if the entire site was located in the immediate vicinity of registered sightings or habitats for endangered species, and historic, cultural, or archaeological resources. This request is only in reference to an approximate 47 acre portion of the 475 acre project area.

ECS received a response from Ms. Keely Lewis, Archaeologist, with the SHPO on January 24, 2018, SHPO Project No. 18-KL0004. The letter states that the SHPO knows of no documented historic properties that are eligible for listing or listed in the National Register of Historic Places (NRHP) in the proposed project area. A portion of the project area along Reidville Road was previously surveyed for cultural resources/historic properties during the Cultural Resource Assessment Survey of the SC 101 Widening Project, from SC HWY 417 (M. Bland et al. 1999).

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The remainder of the project area has not been previously surveyed for cultural resources and/or historic properties. The letter also states that if the Project Homeland were to require state permits or federal permits, licenses, funds, loans, grants, or assistance for development, SHPO would recommend to the federal or state agency or agencies that a phased investigation of the project area's potential to contain historic properties, beginning with archival research on the history of the project area and a reconnaissance-level survey be conducted. The SHPO would recommend the phased investigations because of the project area's proximity to adjacent structures and because the area contains moderate to high probability areas in which there is reasonable likelihood for the occurrence of prehistoric and/or historic cultural resources. If these investigations indicate a high probability for historic properties to exist within the project area, SHPO would recommend proceeding to an intensive survey. A copy of this correspondence is attached.

ECS composed an updated letter request addressed to the SC SHPO, dated April 9, 2018, in reference to the above referenced Project Homeland – Lot 11, which consists of approximately 47 acres. The request was made to determine if the entire site was located in the immediate vicinity of registered sightings for historic, cultural, or archaeological resources for the 47 acre portion. The request also included a Cultural Resource Assessment (CRA) performed by Apalachee Research Archeological Consultants (ARAC), Inc. and the previously received SHPO response letter.

On May 11, 2018, ECS received a response from Ms. Keely Lewis, Archaeologist, with the SHPO, SHPO Project No. 18-KL0004. The letter states that the cultural resource assessment consisted of a walk-over of the project and a vehicular reconnaissance of the viewshed of the project area. No previously or newly recorded cultural resources were identified within the project area. One previously recorded historic structure (SHPO Site No. 293-0161) and one unrecorded historic structure were identified in the viewshed of the project area. Ms. Lewis states that if Project Homeland were to require state permits or federal permits, licenses, funds,, loans, grants, or assistance for development, SHPO would recommend to the federal or state agency that:

- Additional intensive survey of the 4.5 acres classified as high probability for prehistoric archaeological sites is needed.
- The unrecorded residence at 145 Hammett Road be assigned a SHPO Site Number and recorded on a Statewide Survey Form.

A copy of this correspondence is attached.

Cultural Resources Assessment

ECS contracted ARAC, Inc. to complete a CRA for the site. The investigation was completed to provide basic information needed to determine whether the proposed development is likely to affect historic properties.

On March 30, 2018, ARAC, Inc. provided ECS with a CRA report for the 47 acre site. The report states that in summary, ARAC concludes that is highly unlikely that construction within this tract would affect cultural resources that could be eligible for listing in the NRHP; therefore, ARC does not believe additional cultural resource investigations are necessary. A copy of the report is included as an attachment.

On May 17, 2018, ARAC, Inc. provided ECS with an updated report concerning the CRA

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previously issued March 30, 2018. The investigation was completed to provide basic information needed to determine whether the proposed development is likely to affect historic properties. The report states that other goals of the investigation are to:

- 1) Provide advance notice as to what can be expected in regard to future cultural resource requirements,
- 2) Eliminate areas from consideration that are unlikely to contain historic properties, and;
- 3) Identify areas that are likely to contain historic properties.

The report also states that there are no previously recorded cultural resources within the survey tract and none were found as a result of the fieldwork. ARAC concurs with the original recommendations (Johnston 1999) that the previously recorded structure at 351 Hammett Road (293-0161) is not eligible for the NRHP. The residence at 145 Hammett Road also lacks historical associations and architectural distinction and also does not appear to meet NRHP eligibility criteria. ARAC also mentions in their report that roughly one third of the survey tract was identified as within a high probability zone for historic period archeological sites solely based on proximity to roads depicted on early twentieth century maps. Based on the fieldwork and cartographic sources, ARAC does not believe any portion of the project area should be regarded as a high probability zone for historic sites. The report also states that there is a small (roughly four acre) high probability zone for prehistoric sites was identified base on proximity to a dry drainage gulley, but field inspection of this area revealed disturbances from agricultural terracing and erosion. ARAC states that due to these disturbances, it is unlikely that an intensive survey would result in the discovery of prehistoric sites that would offer significant research potential. In summary, ARAC concludes that it is highly unlikely that construction within the tract would affect cultural resources that could be eligible for listing in the NRHP; therefore, ARAC does not believe additional cultural resource investigations are necessary. A copy of the updated report is attached.

Conclusions

ECS contracted ARAC, Inc. to complete a CRA survey for the site and concurs with the conclusions provided in the reports issued on March 30th and May 17th, 2018. Based on the correspondence with the SCSHPO and the CRA reports prepared by ARAC, ECS believes that no historic properties would be affected by the proposed construction and development on Lot 11, and that additional cultural resource investigations are not necessary for this specific tract.

Also included in the updated request letter is information for the he unrecorded residence at 145 Hammett Road be assigned a SHPO Site Number and recorded on a Statewide Survey Form. A copy of the Statewide Survey of Historic Properties form and a picture of the residence at 145 Hammett Road are attached.

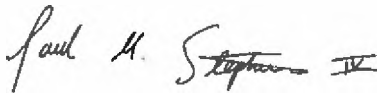
Project Homeland – Lot 11
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Closure

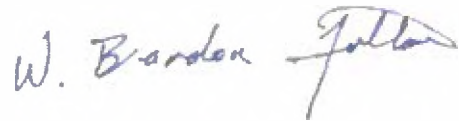
ECS appreciates your assistance. Please contact Paul Stephens at (843) 284-7823, or via email at pstephens@ecslimited.com if you have any questions concerning the site or this request.

Respectfully submitted,

ECS Southeast, LLP



Paul M. Stephens IV, E.I.
Environmental Project Manager
pstephens@ecslimited.com
843-284-7823



W. Brandon Fulton, LSS, PSC, PWS
Environmental Principal
bfulton@ecslimited.com
704-409-7744

Attachments:

CRIS Report by ARAC, Inc., dated May 17, 2018
CRIS Report by ARAC, Inc., dated March 30, 2018
SCSHPO 106 Form
SCSHPO Response Letter, dated May 11, 2018
SCSHPO Response Letter, dated January 24, 2018
Statewide Survey of Historic Properties Form
Picture of residence at 145 Hammett Road
Figures
Photolog

Apalachee Research Archaeological Consultants Inc.

P.O. Box 161 Athens, Ga 30601

May 17, 2018

Subject: Cultural Resource Assessment for a 47-Acre Tract (Lot 11), on Reidville Road, Spartanburg County, South Carolina. ARAC Project 2018-06

Apalachee Research Archaeological Consultants, Inc. completed a Cultural Resource Assessment (CRA) on behalf of ECS limited. This investigation was conducted in order to provide basic information needed to determine whether the proposed development is likely to affect historic properties. Historic properties are defined as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in the National Register of Historic Places (NRHP). Other goals of this investigation are to:

- 1) Provide advance notice as to what can be expected in regard to future cultural resource requirements
- 2) Eliminate areas from consideration that are unlikely to contain historic properties
- 3) Identify areas that are likely to contain historic properties

This investigation was initiated on March 26, 2018 with literature review and records search followed by fieldwork, which was completed on March 29, 2018. All stages of this project were performed by George Price in accordance with the guidelines for Cultural Resource Assessments established by the South Carolina State Historic Preservation Office and the *South Carolina Standards and Guidelines for Archaeological Investigations* (COSCPA 2013:15).

The project area is a 47-acre tract of farmland located approximately 1.1 miles west of the Reidville community in western Spartanburg County (Figure 1). The archaeological Area of Potential Effects (APE) includes the entire 47-acre tract where the proposed construction will take place. The APE for historic structures and above-ground resources extends to also include potential viewshed impacts to the surrounding area.

Literature Review Methods and Results

The project was initiated with a literature and records search for indications of known archaeological sites, historic structures, historic roads, and cultural features in the project area and vicinity in order to gain insight into patterns of prior land use and to provide guidance for field methods. This included a subscriber level review of the ArchSite records, which is an online Geographic Information System (GIS) that includes records of prior cultural resource surveys, as well as cultural resources and historic properties that have been previously documented.

National Register of Historic Places: There are no NHRP-listed properties within or near the project area. The nearest is the ca 1905 Reidville Academy Faculty House located approximately 1.2 miles east in the Reidville Community.

ArchSite Database: There are no previously recorded cultural resources within the survey tract. The ArchSite Map (Figure 2) depicts all previously recorded cultural resources and previously surveyed areas

within a 0.25-mile radius of the survey tract. There are three previously recorded cultural resources within a 0.25-mile radius of the project area. Figure 2 depicts the locations and Table 1 provides summary data. ArchSite indicates all three were recorded during a series of three road widening surveys along Route 101 and Reidville Road between 1999 and 2000 that resulted in the discovery of 18 sites.

The archaeological site (38SP309) is small historic artifact scatter located on the south side of Reidville Road, which forms the southern boundary of the survey tract, which was determined not eligible for the NRHP on July 9, 1999.

One of the structures (293-061) is a small single-story frame cabin located approximately 200 feet from the northeastern corner of the survey tract. The address of the structure at this location is 351 Hammett Road. It is within the potential viewshed. It was recommended not eligible for the NRHP. We agree with the previous recommendation (Johnston 1999). The other structure (293-060) is located approximately 0.24 miles east and is not within the viewshed, which is blocked by stand of mature pines and hardwoods. The structure at this location is a two-story wood frame house with modern aluminum siding and is much altered from its original condition. We also concur with the previous recommendation (Johnston 1999) that this structure is not eligible for the NRHP.

Table 1. Summary of Previously Recorded Cultural Resources with a 0.25 Mile Radius

Designation	Description	NRHP Status	Reference
38SP309	Historic (20 th century) artifact scatter	Determined not eligible	Johnston 1999
293-060	Ca 1890 David and Donald Rogers House	Recommended not eligible	
293-061	James Harrison House Ca 1920	Recommended not eligible	

Other pertinent sources examined as part of the background research include county tax assessor records, historic maps and aerial photographs. One of the earliest maps depicting this area is the Henry Mouzon 1775 map of North and South Carolina. This map indicates the project area was in Cherokee territory at the time though no paths or settlements are depicted near the project area. The 1825 Mills Atlas of the Spartanburg District provides more detail and reflects increased European settlement as shown by additional roads and several landowners in the region though the only feature depicted in the project area vicinity is the Buncombe Road, which roughly corresponds to the current route of SC 101 roughly one-half mile west of the project area.

The 1921 Spartanburg County Soil Map is the earliest to depict individual structures and secondary roads. This map depicts a few structures widely dispersed along Reidville Road and Hammond Road, which form the respective southern and northern boundaries of the survey tract. However, this map, and later topographic quadrangles (USGS Greer 1957, 1938, 1935; Pelham 1983) depict no structures, cemeteries, or cultural features of any kind within the survey tract.

Site Location Model

The prevailing model for predicting site locations in the Carolina Piedmont (Benson 2006) classifies areas into zones of high, moderate, and low probability based upon the topographic setting, soil types, and distance to water, historic roads or raw material sources. For non-floodplain settings high probability zones include level areas with well drained soils within 150-m of a water source or within 50-m of a historic road or raw material source. Locations of former buildings and previously recorded cultural resources identified through archival research are also high probability zones. Moderate probability zones include the remaining areas with less than ten percent slope and low probability zones include areas with greater than ten percent

slope and areas disturbed by erosion, logging, construction, etc. to the extent that archaeological materials, if present would be displaced from their original context.

The survey tract has frontage on three roads, all of which are depicted on the 1921 soil map. Therefore, roughly 20 acres would be classifiable as a high probability zone for historic sites by these criteria. Roughly 4.5 acres of level terrain west of the seasonal drainage is classified as high probability for prehistoric sites (Figure 3). The remainder of the project areas is classified as moderate to low probability.

Fieldwork Methods and Results

Fieldwork included a walk-over of the project area in order to evaluate the project area vis a vis the site location model, document field conditions, and determine if surface artifacts were present as well as other above-ground cultural features (e.g. structures, cemeteries, earthworks). Fieldwork also included a vehicular reconnaissance of the viewshed to determine whether there were unrecorded standing buildings or structures over 50 years old that could be eligible for the NRHP.

There are no structures within the survey tract. Most of the survey tract was covered in pasture with the exception a small, approximately 3.7 acres of mature hardwoods and pine at the eastern end of the tract. Surface exposure approaching 25 percent was available along most of the periphery of the pasture as result of vehicle traffic. Surface exposure in the interior was limited to areas of active erosion in the pasture and a few fallen tree roots in the wooded portion. Pedestrian survey of the tract was along ten transects with judgmental inspection of all ridgecrests and knolls. The entire course of the seasonal stream was also inspected for remnants for former road crossings, dams or moonshine stills.

Areas defined as high probability zones were thoroughly inspected during walk-over. Coverage of the areas defined as high probability for historic sites were examined along four transects. Two were along both sides of the relict dirt road in the southwest corner of the tract. The other two paralleled South Hammond Road and Reidville Road (Figure 3). Surface exposure was around 25 percent and was fairly consistent along the course of these four transects, largely as a result of vehicle traffic along the edges of the field. There were no foundation elements or vegetative indications of a former house site (i.e. jonquils, walnut trees, chinaberry trees). The portion of tract north of previously recorded archaeological site (39SP309) was subjected to more intense inspection. No artifacts were recovered despite fair surface exposure. This is consistent with cartographic sources and aerial images, which depict no structures or cultural features, other than roads, in the survey tract. We conclude that it is unlikely that an intensive survey would result in the discovery historic sites.

Coverage of the area defined as high probability for prehistoric sites was along two transects spaced at 20-meter intervals along the ridge crest west of the drainage. There was very little surface exposure in this area and no artifacts were observed. The terrain along the ridge was broken by erosion gullies and pronounced terracing along the ridge crest and slopes (Figure 5). Due to these disturbances we conclude that it is unlikely that an intensive survey would result in the discovery of prehistoric sites that would offer significant research potential and meet NRHP eligibility requirements.

The field investigation of the viewshed documented one previously recorded structure (293-061) and one undocumented structure. One other previously recorded structure (293-060) is located approximately 0.24 miles east and is not within the viewshed (Figure 2), which is blocked by stand of mature pines and hardwoods.

The previously recorded structure within the viewshed (293-061) is described as a small single story vertical board and batten frame cabin. Figure 6 depicts the structure mapped at this location. The address is 351

Hammett Road. It is within 200 feet of the northeastern corner of the survey tract. It is within the potential viewshed however, the view is currently obscured by a stand of mature forest northeast of the survey tract. It lacks significant historical associations and architectural distinction. It is not a significant example of its type, period or method of construction, therefore, we agree with the previous recommendation (Johnston 1999) that this structure does not meet NRHP eligibility requirements.

Figure 7 depicts a previously unrecorded residence at 145 Hammett Road that is within 450 feet of the northwestern corner of the survey tract with an unobstructed view. We have completed Statewide Survey of Historic Properties Form for this property. As a result, it was assigned Spartanburg County Site Number 1342 by Brad Sauls on May 16, 2018. The Spartanburg County Tax Assessor records list the construction date as 1936 with 2006 revisions. The construction date is consistent with early cartographic sources depicting a residence at this location. It has modern vinyl siding, replaced windows and doors, and one or more large, non-historic additions, which compromise historic integrity. It lacks historical associations and architectural distinction and therefore does not appear to meet NRHP eligibility criteria.

Summary and Recommendations

There are no previously recorded cultural resources within the survey tract and none were found as a result of the fieldwork. There are two historic structures within the potential viewshed. These include a previously recorded ca 1920s residence (293-0161) at 351 Hammett Road and a previously unrecorded ca 1936 residence at 145 Hammett Road, which is now recorded as 393-1342. We agree with the original recommendation (Johnston 1999) that the previously recorded structure is not eligible for the NRHP. The residence at 145 Hammett Road also lacks historical associations and architectural distinction and also does not appear to meet NRHP eligibility criteria.

Roughly one third of the survey tract was identified as within a high probability zone for historic period archaeological sites solely based on proximity to roads depicted on early twentieth century maps. Cartographic sources depict structures along these roads in 1921, 1935, 1938, 1957, and 1983 however, none are within the survey tract. Close inspection of these areas during the site walk-over produced no evidence of former homesites or structures. Based on the fieldwork and cartographic sources we do not believe any portion of the project area should be regarded as a high probability zone for historic sites. A small (roughly four-acre) high probability zone for prehistoric sites was identified based on proximity to a dry drainage gully. Field inspection of this area revealed disturbances from agricultural terracing and erosion. Due to these disturbances it is unlikely that an intensive survey would result in the discovery of prehistoric sites that would offer significant research potential.

In summary we conclude that it is highly unlikely that construction within this tract would affect cultural resources that could be eligible for listing in the NRHP. Therefore, we do not believe additional cultural resource investigations are necessary.

References Cited:

Benson, Robert

2006 *Sumter National Forest Cultural Resources Overview*. Francis Marion and Sumter National Forests CRM Report 2006-07

Johnston, Sidney

1999 *Cultural Resource Assessment Survey of SC 101 Widening from SC 417 to Rogers Bridge Road, Spartanburg, County, South Carolina*. Environmental Services Inc.

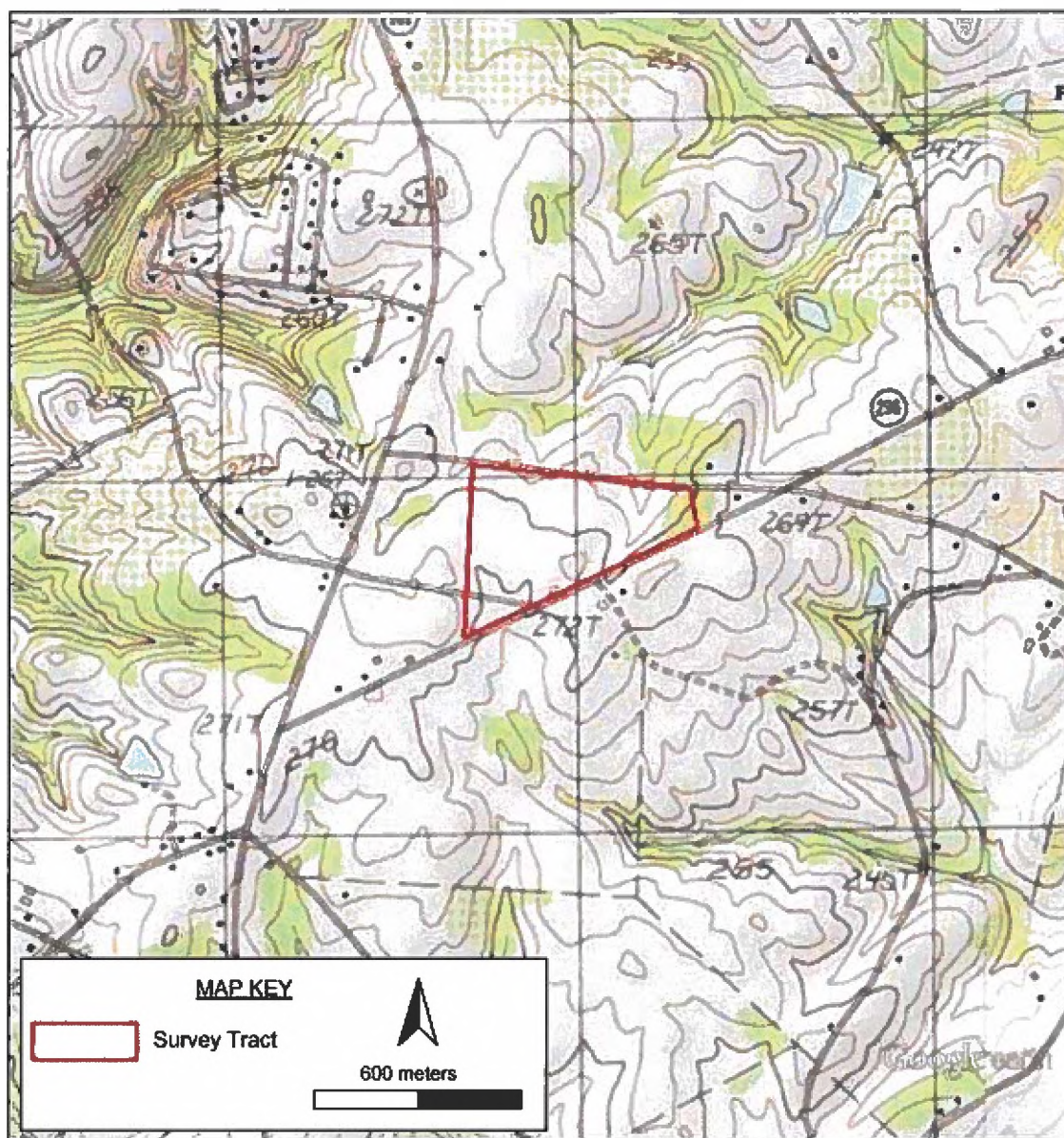
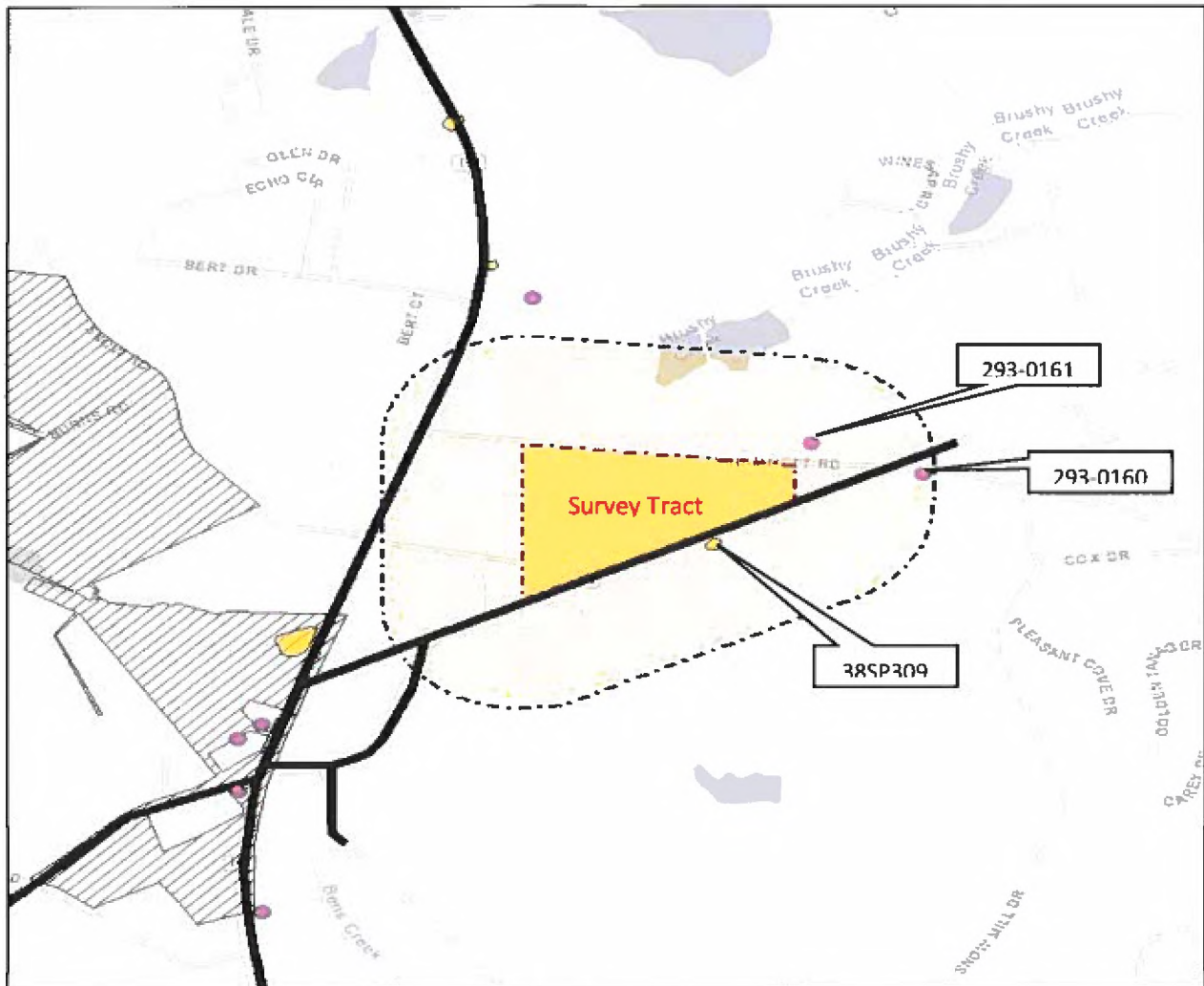


Figure 1. Project Area Location (USGS Pelham 7.5 minute quadrangle)

ArchSite Map 3/28/2018



March 28, 2018

Archaeological Site

ArchSite_Prod_7423

Historic Structure (not eligible or requires evaluation)

Previously Surveyed Corridor

Previously Surveyed Area

1:18,068
0 0.15 0.3 0.6 mi
0 0.175 0.35 0.7 km

East HERE, Gm to, © OpenStreetMap contributors, and the GIS user community

ArchSite
ArchSite 2015

Figure 2. Previously recorded cultural resources and surveyed areas with a 0.25-mile radius of the survey tract

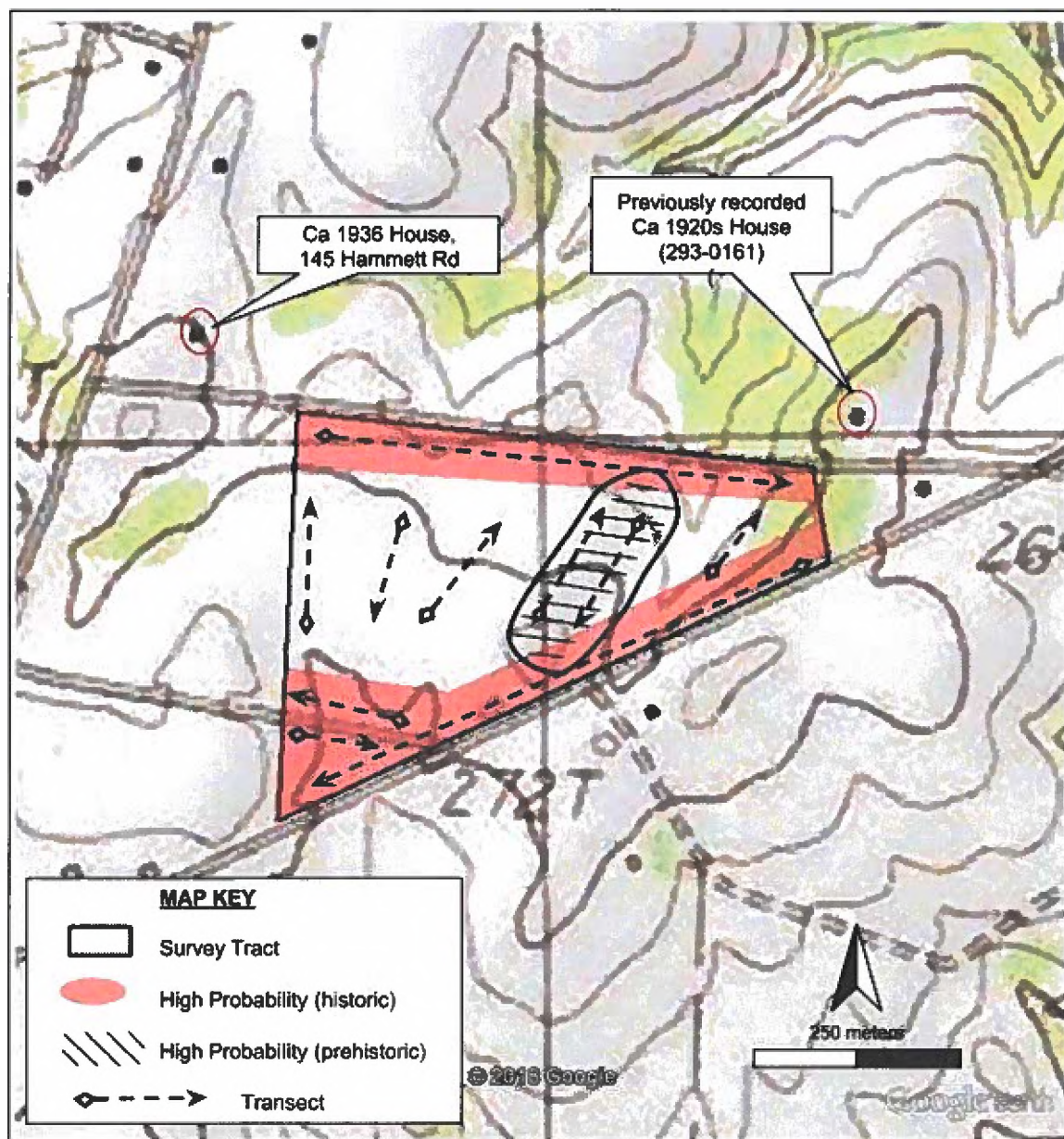


Figure 3. High probability zones, transect locations and pertinent cultural resources



Figure 4. View facing south along the western boundary of the survey tract

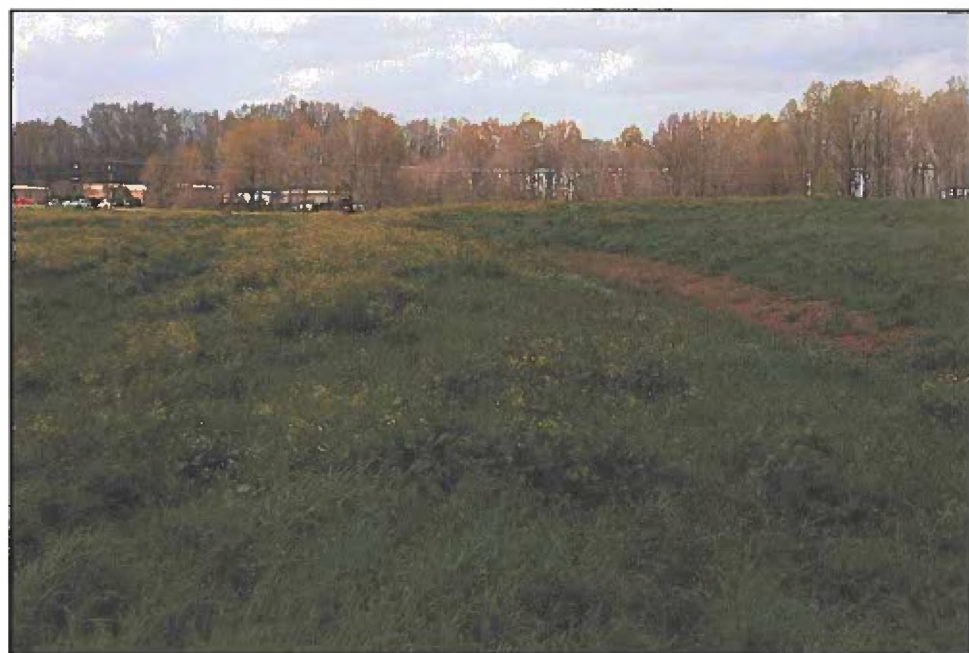


Figure 5. View facing northwest depicting pronounced terracing in the prehistoric high probability zone



Figure 6. Previously recorded structure (93-0161) at 351 Hammet Road,
View facing north



Figure 7. ca 1935 house at 145 Hammet Road, view facing northeast, recorded as
Spartanburg County Site Number 1342

Apalachee Research Archaeological Consultants Inc.

P.O. Box 161 Athens, Ga 30601

March 30, 2018

Subject: Cultural Resource Assessment for a 47-Acre Tract (Lot 11), on Reidville Road, Spartanburg County, South Carolina. ARAC Project 2018-06

Apalachee Research Archaeological Consultants, Inc. completed a Cultural Resource Assessment (CRA) on behalf of ECS limited. This investigation was conducted in order to provide basic information needed to determine whether the proposed development is likely to affect historic properties. Historic properties are defined as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in the National Register of Historic Places (NRHP). Other goals of this investigation are to:

- 1) Provide advance notice as to what can be expected in regard to future cultural resource requirements
- 2) Eliminate areas from consideration that are unlikely to contain historic properties
- 3) Identify areas that are likely to contain historic properties

This investigation was initiated on March 26, 2018 with literature review and records search followed by fieldwork, which was completed on March 29, 2018. All stages of this project were performed by George Price in accordance with the guidelines for Cultural Resource Assessments established by the South Carolina State Historic Preservation Office and the *South Carolina Standards and Guidelines for Archaeological Investigations* (COSCPA 2013:15).

The project area is a 47-acre tract of farmland located approximately 1.1 miles west of the Reidville community in western Spartanburg County (Figure 1). The archaeological Area of Potential Effects (APE) includes the entire 47-acre tract where the proposed construction will take place. The APE for historic structures and above-ground resources extends to also include potential viewshed impacts to the surrounding area.

Literature Review Methods and Results

The project was initiated with a literature and records search for indications of known archaeological sites, historic structures, historic roads, and cultural features in the project area and vicinity in order to gain insight into patterns of prior land use and to provide guidance for field methods. This included a subscriber level review of the ArchSite records, which is an online Geographic Information System (GIS) that includes records of prior cultural resource surveys, as well as cultural resources and historic properties that have been previously documented.

National Register of Historic Places: There are no NHRP-listed properties within or near the project area. The nearest is the ca 1905 Reidville Academy Faculty House located approximately 1.2 miles east in the Reidville Community.

ArchSite Database: There are no previously recorded cultural resources within the survey tract. The ArchSite Map (Figure 2) depicts all previously recorded cultural resources and previously surveyed areas

within a 0.25-mile radius of the survey tract. There are three previously recorded cultural resources within a 0.25-mile radius of the project area. Figure 2 depicts the locations and Table 1 provides summary data. ArchSite indicates all three were recorded during a series of three road widening surveys along Route 101 and Reidville Road between 1999 and 2000 that resulted in the discovery of 18 sites.

The archaeological site (38SP309) is small historic artifact scatter located on the south side of Reidville Road, which forms the southern boundary of the survey tract, which was determined not eligible for the NRHP on July 9, 1999.

One of the structures (293-061) is a small single-story frame cabin located approximately 200 feet from the northeastern corner of the survey tract. The address of the structure at this location is 351 Hammett Road. It is within the potential viewshed. It was recommended not eligible for the NRHP. We agree with the previous recommendation (Johnston 1999). The other structure (293-060) is located approximately 0.24 miles east and is not within the viewshed, which is blocked by stand of mature pines and hardwoods. The structure at this location is a two-story wood frame house with modern aluminum siding and is much altered from its original condition. We also concur with the previous recommendation (Johnston 1999) that this structure is not eligible for the NRHP.

Table 1. Summary of Previously Recorded Cultural Resources with a 0.25 Mile Radius

Designation	Description	NRHP Status	Reference
38SP309	Historic (20 th century) artifact scatter	Determined not eligible	Johnston 1999
293-060	Ca 1890 David and Donald Rogers House	Recommended not eligible	
293-061	James Harrison House Ca 1920	Recommended not eligible	

Other pertinent sources examined as part of the background research include county tax assessor records, historic maps and aerial photographs. One of the earliest maps depicting this area is the Henry Mouzon 1775 map of North and South Carolina. This map indicates the project area was in Cherokee territory at the time though no paths or settlements are depicted near the project area. The 1825 Mills Atlas of the Spartanburg District provides more detail and reflects increased European settlement as shown by additional roads and several landowners in the region though the only feature depicted in the project area vicinity is the Buncombe Road, which roughly corresponds to the current route of SC 101 roughly one-half mile west of the project area.

The 1921 Spartanburg County Soil Map is the earliest to depict individual structures and secondary roads. This map depicts a few structures widely dispersed along Reidville Road and Hammond Road, which form the respective southern and northern boundaries of the survey tract. However, this map, and later topographic quadrangles (USGS Greer 1957, 1938, 1935; Pelham 1983) depict no structures, cemeteries, or cultural features of any kind within the survey tract.

Site Location Model

The prevailing model for predicting site locations in the Carolina Piedmont (Benson 2006) classifies areas into zones of high, moderate, and low probability based upon the topographic setting, soil types, and distance to water, historic roads or raw material sources. For non-floodplain settings high probability zones include level areas with well drained soils within 150-m of a water source or within 50-m of a historic road or raw material source. Locations of former buildings and previously recorded cultural resources identified through archival research are also high probability zones. Moderate probability zones include the remaining areas with less than ten percent slope and low probability zones include areas with greater than ten percent

slope and areas disturbed by erosion, logging, construction, etc. to the extent that archaeological materials, if present would be displaced from their original context.

The survey tract has frontage on three roads, all of which are depicted on the 1921 soil map. Therefore, roughly 20 acres would be classifiable as a high probability zone for historic sites by these criteria. Roughly 4.5 acres of level terrain west of the seasonal drainage is classified as high probability for prehistoric sites (Figure 3). The remainder of the project areas is classified as moderate to low probability.

Fieldwork Methods and Results

Fieldwork included a walk-over of the project area in order to evaluate the project area vis a vis the site location model, document field conditions, and determine if surface artifacts were present as well as other above-ground cultural features (e.g. structures, cemeteries, earthworks). Fieldwork also included a vehicular reconnaissance of the viewshed to determine whether there were unrecorded standing buildings or structures over 50 years old that could be eligible for the NRHP.

There are no structures within the survey tract. Most of the survey tract was covered in pasture with the exception a small, approximately 3.7 acres of mature hardwoods and pine at the eastern end of the tract. Surface exposure approaching 25 percent was available along most of the periphery of the pasture as result of vehicle traffic. Surface exposure in the interior was limited to areas of active erosion in the pasture and a few fallen tree roots in the wooded portion. Pedestrian survey of the tract was along ten transects with judgmental inspection of all ridgecrests and knolls. The entire course of the seasonal stream was also inspected for remnants for former road crossings, dams or moonshine stills.

Areas defined as high probability zones were thoroughly inspected during walk-over. Coverage of the areas defined as high probability for historic sites were examined along four transects. Two were along both sides of the relict dirt road in the southwest corner of the tract. The other two paralleled South Hammond Road and Reidville Road (Figure 3). Surface exposure was around 25 percent and was fairly consistent along the course of these four transects, largely as a result of vehicle traffic along the edges of the field. There were no foundation elements or vegetative indications of a former house site (i.e. jonquils, walnut trees, chinaberry trees). The portion of tract north of previously recorded archaeological site (39SP309) was subjected to more intense inspection. No artifacts were recovered despite fair surface exposure. This is consistent with cartographic sources and aerial images, which depict no structures or cultural features, other than roads, in the survey tract. We conclude that it is unlikely that an intensive survey would result in the discovery historic sites.

Coverage of the area defined as high probability for prehistoric sites was along two transects spaced at 20-meter intervals along the ridge crest west of the drainage. There was very little surface exposure in this area and no artifacts were observed. The terrain along the ridge was broken by erosion gullies and pronounced terracing along the ridge crest and slopes (Figure 5). Due to these disturbances we conclude that it is unlikely that an intensive survey would result in the discovery of prehistoric sites that would offer significant research potential and meet NRHP eligibility requirements.

The field investigation of the viewshed documented one previously recorded structure (293-061) and one undocumented structure. One other previously recorded structure (293-060) is located approximately 0.24 miles east and is not within the viewshed (Figure 2), which is blocked by stand of mature pines and hardwoods.

The previously recorded structure within the viewshed (293-061) is described as a small single story vertical board and batten frame cabin. Figure 6 depicts the structure mapped at this location. The address is 351

Hammett Road. It is within 200 feet of the northeastern corner of the survey tract. It is within the potential viewshed however, the view is currently obscured by a stand of mature forest northeast of the survey tract. It lacks significant historical associations and architectural distinction. It is not a significant example of its type, period or method of construction, therefore, we agree with the previous recommendation (Johnston 1999) that this structure does not meet NRHP eligibility requirements.

Figure 7 depicts an unrecorded residence at 145 Hammett Road that is within 450 feet of the northwestern corner of the survey tract with an unobstructed view. The Spartanburg County Tax Assessor records list the construction date as 1936 with 2006 revisions. The construction date is consistent with early cartographic sources depicting a residence at this location. It has modern vinyl siding, replaced windows and doors, and one or more large, non-historic additions, which compromise historic integrity. It lacks historical associations and architectural distinction and therefore does not appear to meet NRHP eligibility criteria.

Summary and Recommendations

There are no previously recorded cultural resources within the survey tract and none were found as a result of the fieldwork. There are two historic structures within the potential viewshed. These include a previously recorded ca 1920s residence (293-0161) at 351 Hammett Road and an unrecorded ca 1936 residence at 145 Hammett Road. We agree with the original recommendation (Johnston 1999) that the previously recorded structure is not eligible for the NRHP. The unrecorded structure also lacks historical associations and architectural distinction and also does not appear to meet NRHP eligibility criteria.

Roughly one third of the survey tract was identified as within a high probability zone for historic period archaeological sites solely based on proximity to roads depicted on early twentieth century maps. Cartographic sources depict structures along these roads in 1921, 1935, 1938, 1957, and 1983 however, none are within the survey tract. Close inspection of these areas during the site walk-over produced no evidence of former homesites or structures. Based on the fieldwork and cartographic sources we do not believe any portion of the project area should be regarded as a high probability zone for historic sites. A small (roughly four-acre) high probability zone for prehistoric sites was identified based on proximity to a dry drainage gully. Field inspection of this area revealed disturbances from agricultural terracing and erosion. Due to these disturbances it is unlikely that an intensive survey would result in the discovery of prehistoric sites that would offer significant research potential.

In summary we conclude that it is highly unlikely that construction within this tract would affect cultural resources that could be eligible for listing in the NRHP. Therefore, we do not believe additional cultural resource investigations are necessary.

References Cited:

Benson, Robert

2006 *Sumter National Forest Cultural Resources Overview*. Francis Marion and Sumter National Forests CRM Report 2006-07

Johnston, Sidney

1999 *Cultural Resource Assessment Survey of SC 101 Widening from SC 417 to Rogers Bridge Road, Spartanburg, County, South Carolina*. Environmental Services Inc.



June 18, 2018

Paul M. Stephens
Environmental Project Manager
ECS Southeast, LLP

Re: Project Homeland – Lot 11
Spartanburg County, South Carolina
SHPO Project No. 18-KL0004

Dear Paul Stephens:

Our Office has received the documentation dated May 22, 2018 that you submitted as due diligence for the project referenced above, including the revised *Cultural Resource Assessment for a 47-Acre Lot (Lot 11) on Reidville Road, Spartanburg 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.

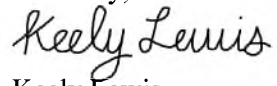
Thank you for addressing our technical comments. One previously recorded structure (SHPO Site No. 293-0161) and one newly recorded structure (SHPO Site No. 1342) were identified in the viewshed of the project area. Both structures are recommended as not eligible for listing in the National Register of Historic Places. Our office concurs with these recommendations. Our office accepts the revised cultural resource assessment as final.

Please provide GIS shapefiles for the surveyed area (and architectural sites as applicable). 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 that are available in the left side bar on the following webpage <http://shpo.sc.gov/research/Pages/ArchSite.aspx>. 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 additionally provide a digital pdf copy of the SHPO Survey Form.

Please refer to SHPO Project Number 18-KL0004 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.

Sincerely,

A handwritten signature in black ink that reads "Keely Lewis". The script is cursive and fluid, with the first letters of each name being capitalized and prominent.

Keely Lewis
Archaeologist
State Historic Preservation Office



May 11, 2018

Paul M. Stephens
Environmental Project Manager
ECS Southeast, LLP

Re: Project Homeland
Spartanburg County, South Carolina
SHPO Project No. 18-KL0004

Dear Paul Stephens:

Our Office has received the documentation dated April 9, 2018 that you submitted as due diligence for the project referenced above, including the draft *Cultural Resource Assessment for a 47-Acre Lot (Lot 11) on Reidville Road, Spartanburg 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 cultural resource assessment consisted of a walk-over of the project area and a vehicular reconnaissance of the viewshed of the project area. No previously or newly recorded cultural resources were identified within the project area. One previously recorded historic structure (SHPO Site No. 293-0161) and one unrecorded historic structure were identified in the viewshed of the project area.

If Project Homeland 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 survey of the 4.5 acres classified as high probability for prehistoric archaeological sites is needed.
- The unrecorded residence at 145 Hammett Road be assigned a SHPO Site Number and recorded on a Statewide Survey Form (see attached *Technical Comments* for additional information).

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

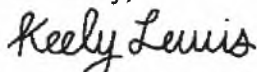
Please address the attached technical comments in a revised final report to be submitted to this office.

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: <http://shpo.sc.gov/programs/revcomp>.

Please refer to SHPO Project Number 18-KL0004 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.

Sincerely,

A handwritten signature in black ink that reads "Keely Lewis". The signature is written in a cursive, flowing style.

Keely Lewis
Archaeologist
State Historic Preservation Office

Technical Comments

Your letter states that the investigations were completed in accordance with the guidelines for Reconnaissance Surveys while the assessment states that it was completed in accordance with the guidelines for Cultural Resource Assessments. As stated in the South Carolina Standards and Guidelines for Archaeological Investigations (SCSGAI), reconnaissance surveys include limited shovel testing. Cultural Resource Assessments will be removed from the SCSGAI in the next revised version scheduled to be completed in fall 2018. Our office will no longer accept cultural resource assessments following this update to the SCSGAI.

Pg. 3- We accept our Reconnaissance Survey Form as the minimal level of documentation when a National Register of Historic Places (NRHP) eligibility recommendation is made for a historic structure. We recommend that the unrecorded residence be assigned a SHPO Site Number and recorded on a Reconnaissance Survey Form. Please consult the *Statewide Survey of Historic Properties Survey Manual* for further guidance. Please include the SHPO Site Number to reference to the structure in the revised report.



January 2, 2018

Paul M. Stephens
Environmental Project Manager
ECS Southeast, LLP

Re: Project Homeland
Spartanburg County, South Carolina
SHPO Project No. 18-KL0004

Dear Paul Stephens:

Our Office has received the documentation dated December 28, 2017 that you submitted as due diligence for the project referenced above, including the project information, project review form, maps and site photographs. 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.

Our office knows of no documented historic properties that are eligible for listing or listed in the National Register of Historic Places in the proposed project area. A portion of the project area along Reidville Road was previously surveyed for cultural resources/historic properties during the *Cultural Resource Assessment Survey of the SC 101 Widening Project, from SC HWY 417* (M. Bland et al. 1999).

If Project Homeland 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 a phased investigation of the project area's potential to contain historic properties, beginning with archival research on the history of the project area and a reconnaissance-level cultural resource/historic property identification survey be conducted. We recommend the phased investigations because the project area contains structures and is in direct proximity to adjacent structures and archaeological sites. The project area also contains high probability areas in which there is reasonable likelihood for the occurrence of prehistoric and historic cultural resources. If these investigations indicate a high probability for historic properties to exist within the project area, we recommend proceeding to an intensive survey. Please consult the South Carolina Standards and Guidelines for Archaeological Investigations and the Statewide Survey of Historic Properties Survey Manual for further guidance.

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

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: <http://shpo.sc.gov/programs/revcomp>.

Please refer to SHPO Project Number 18-KL0004 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.

Sincerely,

A handwritten signature in black ink that reads "Keely Lewis". The script is cursive and fluid.

Keely Lewis
Archaeologist
State Historic Preservation Office

cc: W. Brandon Fulton, ECS Southeast, LLP