



February 23, 2018

William Green, M.A., RPA
Terracon Consultants, Inc.
521 Clemson Road
Columbia, SC 29229

Re: Summerton Solar Project, Cultural Resources Reconnaissance Survey
Clarendon County, South Carolina
SHPO Project No. 18-KL0020

Dear William Green:

Our Office received documentation on January 17, 2018 that you submitted as due diligence for the project referenced above, including the draft report, *Cultural Resources Reconnaissance Survey of Approximately 1,086 Acres at the Proposed Summerton Solar Project*. 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 reconnaissance survey of the approximately 1,086-acre project area identified two newly recorded archaeological sites (38CR1042, 38CR1043), one previously recorded architectural resource (SHPO Site No. 0280), and six newly recorded architectural resources (SHPO Site Nos. 0298-0304). Sites 38CR1042 and 38CR1043 are recommended as not eligible for listing in the National Register of Historic Places (NRHP). SHPO Site No. 0280 was previously determined to be eligible for listing in the NRHP in 2015. SHPO Site Nos. 0298-0303 are recommended as not eligible for listing in the NRHP. SHPO Site No. 0304 is recommended to need additional research to evaluate its eligibility for listing in the NRHP. Our office concurs with these recommendations.

If the Summerton Solar Project 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 in the areas identified as having moderate to high probability for prehistoric and/or historic resources.
- An opaque vegetative buffer be constructed between the proposed solar facility and Andrews Chapel. For additional information, please see our *Guidance for Assessing Visual and Indirect Effects to Historic Landscapes*, available at: <http://shpo.sc.gov/programs/revcomp/Pages/landscapesguidance.aspx>. Our office additionally recommends submitting a vegetative buffer plan for review.

- The owners of Andrews Chapel be invited to participate in the section 106 process, if applicable, under 36 CFR 800.3(f).

Our office accepts the draft report and survey cards as final. To complete the reporting process, please provide at least two (2) hard copies of a final report: 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 letter is included in the Appendices and Attachments of the final report.

Please provide GIS shapefiles for the surveyed area (and architectural sites as applicable). Shapefiles for identified archaeological sites should be coordinated with SCIAA. 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.

The federal or state agency or agencies will take our recommendation(s) into consideration when evaluating the project and will determine if additional work or consultation 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-KL0020 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,



Keely Lewis
Archaeologist
State Historic Preservation Office

cc: Keith Derting, SCIAA

Technical Comments

- Pg. 3-We recommend including a map indicating high and low probability areas as determined by the predictive model research.
- Pg. 4- Were low probability areas inspected with pedestrian survey?
- Pg. 5, Figure 12- 38CR1042 cannot be considered fully delineated as it was not tested beyond the project boundary.
- Pg. 10- If high probability areas are determined to be low probability due to disturbance, we recommend providing documentation of the disturbance.