

#EO-2948

**Wood, Diana**

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**From:** Wood, Diana  
**Sent:** Thursday, September 28, 2017 12:15 PM  
**To:** 'ejohnson@scdah.sc.gov'  
**Cc:** 'Stevens, Courtney M CIV USARMY CESAC (US)'  
**Subject:** Camp Hall Rail Project, Cultural Resources Survey - SHPO Project No. 16EJ0087, SAC-2016-01395  
**Attachments:** EI-25366 SC SHPO.pdf

Dear Ms. Johnson:

The Surface Transportation Board's (STB) Office of Environmental Analysis (OEA) recently sent you an agency preliminary consultation letter, dated September 8, 2017, regarding the above referenced proposed rail line project entitled "STB Finance Docket No. 36095, Palmetto Railways—Construction and Operation Exemption—In Berkeley County, South Carolina." As the letter states, STB and the Corps of Engineers (Corps) are acting as joint-lead agencies in the NEPA review, and are seeking early agency input into the process. After sending the agency consultation letter, however, T Ravenel of Palmetto Railways sent the attached letter from your office, dated August 28, 2017, regarding the cultural resources survey. As we received your letter after the preliminary consultation letter was sent out, this email acknowledges your comments and concerns, and informs you that they will be considered as we move forward.

Specifically, you note that Palmetto Railway's proposed rail crossing of the Lakes Marion and Moultrie Diversion Canal and the Bulltown Ditch could have adverse effects on these National Register-eligible properties and District. To that end, we understand the importance of early project planning to avoid where possible, and/or minimize/mitigate potential harms the project could have on these resources. We are currently in the process of assessing Palmetto's various alternatives from the Tier studies discussed in the environmental report prepared by HDR (referenced in the September 8<sup>th</sup> letter and available to viewing on the project web site at [www.camphallnepa.com](http://www.camphallnepa.com)) and have just sent Palmetto an information request to clarify certain aspects of the report's findings and conclusions. Palmetto's response to the information request, as well other responses from agencies and a site visit to the project area, possibly in the end of October, will help determine what alternatives, both proposed by Palmetto and possibly new ones created by STB and the Corps, will move forward in the NEPA and Section 106 process.

We look forward to working with you on this project.

Sincerely,

Diana Wood

Diana F Wood  
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US Surface Transportation Board  
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HEI-25366

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SOUTH CAROLINA DEPARTMENT OF  
ARCHIVES • HISTORY

August 28, 2017

T. Ravenel  
Director of Special Projects  
Palmetto Railways  
540 East Bay Street  
Charleston, SC 29403

Re: Camp Hall Rail Project Cultural Resource Survey  
Berkeley County, South Carolina  
SHPO Project No. 16EJ0087  
SAC-2016-01395

Dear Mr. Ravenel:

Thank you for your letter of July 28, 2017, which we received on July 28, 2017, regarding the Camp Hall Rail Project. We also received the draft report, *Phase 1 Cultural Resource Survey Camp Hall Rail Project Berkeley County, South Carolina*, as supporting documentation for this undertaking. The State Historic Preservation Office (SHPO) is providing comments to U.S. Army Corps of Engineers and the Surface Transportation Board 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.

An archaeological and historic architecture survey investigated the proposed rail corridor, which was delineated as 200 feet wide and spanning approximately 23 miles. As a result of the archaeological survey, no previously or newly recorded archaeological sites or isolated finds were recorded within the proposed railway corridor. No further archaeological investigation was recommended for this railway alignment as it is currently proposed. Our office concurs with this recommendation.

As a result of the historic architecture survey, eight previously recorded above ground resources were revisited and 53 previously unrecorded structures were documented. Of the previously recorded architectural resources, the current survey:

- Recommends resource 0786, the Lakes Marion and Moultrie Diversion Canal, which was determined eligible as contributing to a National Register of Historic Places (NRHP) district in 2002, remains eligible. Our office concurs with this recommendation.
- Recommends that the seven other resources (115-006, Peagler House; 0808, ca. 1930 house; 115-0011, Winningham Cemetery; 497-002, Blackmon-Shuler Cemetery; 155-0004, J.L. Williams House; 0806, ca. 1925 house; and 0807, R. L. Singletary Grocery) remain ineligible for the NRHP. Our office concurs with these recommendations, with the exception of Resource 0807, R.L. Singletary Grocery. This resource should be evaluated within the context of South Carolina's Country Stores, 1850-1950, available at <http://shpo.sc.gov/research/Pages/conreps.aspx>. The revised report should contain this evaluation.

Of the 53 newly recorded architectural resources, two were recommended eligible for the NRHP (1263, Garrett Cemetery; and 1270, Bulltown Ditch) and the remaining resources were recommended ineligible. Our office concurs with these recommendations.

In addition to making eligibility recommendations for the NRHP, the report also discusses potential effects of the undertaking to the three NRHP eligible properties (0786, the Lakes Marion and Moultrie Diversion Canal; 1263, Garrett Cemetery; and 1270, Bulltown Ditch. The report states two of the eligible properties (0786, 1270) could be adversely effected by the proposed undertaking. Additional consultation with the federal agencies to apply the criteria of adverse effects (36 CFR 800.5) to the proposed project is needed. If adverse effects are present and cannot be avoided, they will need to be minimized and/or mitigated through the development of a Memorandum of Agreement (36 CFR 800.6).

The report also recommends that the one eligible cemetery (1263, Garrett Cemetery) and one ineligible cemetery (497-0002, Blackmon-Shuler Cemetery) be protected from disturbance and desecration in adherence to SC state law by establishing a 50 foot buffer around the cemetery perimeters. We concur with this recommendation.

Our office has additional technical comments on the report (see enclosed.) Please provide one copy of a revised final report addressing these comments for our review. Also, in the revised final report please include the "Architectural Statewide Survey of Historic Resources Cards" in Appendix B for our review, prior to final submission of hard copies in accordance with the standards of our Survey Manual.

Thank you for your patience as we reviewed this report, and for the opportunity to provide comments. We look forward to additional consultation on this project. If you have any questions, please contact me at (803) 896-6168, [ejohnson@scdah.sc.gov](mailto:ejohnson@scdah.sc.gov).

Sincerely,



Elizabeth M. Johnson  
Director, Historical Services  
State Historic Preservation Office

Cc: M. Zulauf, Corps  
R. Sipe, AMEC Foster Wheeler

## **Technical Comments**

### *Phase I Cultural Resource Survey Camp Hall Rail Project Berkeley County, South Carolina, July 2017*

- No page numbers are included in the digital or paper copy of the report, please include in revised final report.
- Table I and 4.2-For architectural resources recorded as "Gone" please update this terminology to read "Not Extant".
- 1.0-TYPO "corridr"
- 3.1-The Paleoindian period in the southeast is more widely accepted as beginning in 12,000 B.C. For reference, [shpo.sc.gov/res/native/Pages/naperiods.aspx](http://shpo.sc.gov/res/native/Pages/naperiods.aspx).
- 3.4-TYPO "Caorlina"
- 4.1.3 - Were shovel tests circular with a diameter of 30 cm? If so, this would not adhere to the Standard and Guidelines minimum requirement of 30 x 30 cm shovel tests and would have only covered ¾ of the total area of a 30 x 30 cm square shovel test.
- 4.2.3 In the Assessing NRHP Eligibility section, be more specific about how the resources not recorded exhibited poor integrity.
- Throughout the report, 54 newly recorded architectural resources are referenced but only 53 are included in results and the *Historic Architectural Resources within the APE* Table. Please include the missing resource or clarify this discrepancy in the total count.
- Please evaluate resource 0807, R.L. Singletary Grocery within the context of South Carolina's Country Stores, 1850-1950, available at <http://shpo.sc.gov/research/Pages/conreps.aspx>.
- Please include the architectural survey cards in Appendix B, and ensure the architectural survey forms state "revisit" for the applicable properties.