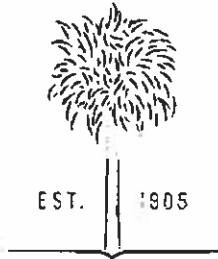


HEI-25366
RECEIVED AUG 30 2017



August 28, 2017

SOUTH CAROLINA DEPARTMENT OF
ARCHIVES & HISTORY

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 I 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.

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.
- 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 $\frac{3}{4}$ 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.