



August 12, 2024

Jeremy Eddy
Manager – Mining and Reclamation Section
Division of Mining & Solid Waste Management
Bureau of Land & Waste Management
2600 Bull Street
Columbia, SC 29201
Jeremy.Eddy@des.sc.gov

Re: Pelham Stone Mine, Mine Permit Application I-000431
Greer, Spartanburg County, South Carolina
SHPO Project No. 24-RL0219

Dear Jeremy Eddy:

The State Historic Preservation Office (SHPO) has reviewed the permit application referenced above for possible adverse effects to significant cultural and historic sites pursuant to the South Carolina Mining Act (SC Code Title 48, Chapter 20, Sections 10-310) and its implementing regulations found at Chapter 89-120(C)(4) of the SC Code of Regulations. The SHPO recommends that a Phase I archaeological survey of the proposed affected mining areas (as depicted on the Existing Conditions Map within the mine permit application package), including all sections of the Overburden Area (as depicted on the Mine Plan Map within the mine permit application package) in the southeastern section of project tract, be conducted at intervals of no less than 30 meters. Please inform our office of when the Phase I archaeological survey will begin and upon completion of the fieldwork, please provide a draft archaeological survey report to our office for review.

Our Office recommends a Phase I archaeological survey because the southeastern portions of the project tract border a permanent water source in Vines Creek. Our office would recommend the focus of the Phase I archaeological survey be upon undisturbed upland landforms bordering Vines Creek, which would contain the potential for intact pre-contact archaeological resources to be present. A review of USDA soil profile maps also indicates this southeastern portion of the project tract is dominated by well drained soils (Cecil Sand Loam (2-6 percent slopes), Cecil Sandy Loam (6-10 percent slopes) and Cecil-Bethlehem Complex (10-15 percent slopes), which are only moderately eroded and sloped, further indicating the potential for pre-contact archaeological resources to be present.

The purpose of the recommended survey is to identify cultural and historic sites, particularly archaeological sites, and evaluate their eligibility for listing in the National Register of Historic Places (see

<http://shpo.sc.gov/pubs/Documents/htln1210.pdf>). The results of this survey will be used by South Carolina Department of Health and Environmental Control to assess whether significant cultural or historic sites will be adversely affected by the proposed mining.

All fieldwork, analyses, and report writing shall be performed by, or under the supervision of, individuals who meet the Secretary of Interior's Professional Qualifications Standards. Please consult the *South Carolina Standards and Guidelines for Archaeological Investigations* for further guidance on archaeological survey methodologies --

[https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20\(SHPO\)/Publications/Standards_Guidelines2005-13.pdf](https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20(SHPO)/Publications/Standards_Guidelines2005-13.pdf).

Please consult the *South Carolina Statewide Survey of Historic Properties Survey Manual* for further guidance on architectural survey methodologies --

[https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20\(SHPO\)/Survey/Survey_Manual_Dec2018_revised2.pdf](https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20(SHPO)/Survey/Survey_Manual_Dec2018_revised2.pdf).

Information about Section 106 Review, Project Review Guidance, South Carolina and Federal standards and guidelines, and a list of qualified consultants can be found on our website from:

SHPO Review & Compliance -- <https://scdah.sc.gov/historic-preservation/programs/review-compliance>

Project Professionals Lists -- <https://scdah.sc.gov/historic-preservation/technical-assistance/publications/project-professionals-lists>

Thank you for giving our office the opportunity to comment on this permit application. Please refer to SHPO Project Number 24-RL0219 in any future correspondence regarding this project. If you or the applicant has any questions or comments, please contact me at (803) 896-6181 or RLarsen@scdah.sc.gov.

Sincerely,

Robert P. Larsen III

Robert P. Larsen III, MSc., RPA
Archaeologist
State Historic Preservation Office