



August 20, 2025

Kimberly Nagle, MS, RPA
Principal Archaeologist
S&ME, Inc.
134 Suber Road
Columbia, SC 29210
knagle@smeinc.com

Re: Highway 321 Site, Cultural Resources Identification Survey, Draft
Gaston, Lexington County, South Carolina
SHPO Project No. 25-RL0256

Dear Kimberly Nagle:

Our office has received the documentation dated August 5th, 2025 that you submitted under the Department of Commerce Site Certification program for the tract referenced above. We have received a copy of the draft report *Cultural Resources Identification Survey, Highway 321 Site, Gaston, Lexington County, South Carolina* as supporting documentation for this undertaking. This letter is for informational purposes only and constitutes our office's coordination under the 2020 Memorandum of Understanding (MOU) with the South Carolina Department of Commerce. This letter is not a result of consultation under Section 106 of the National Historic Preservation Act or under any pertinent state law.

The cultural resources identification survey provided meets the requirements of the MOU and is compliant with the archaeological survey guidelines, as stipulated within the 2024 *South Carolina Standards and Guidelines for Archaeological Investigations*. Archaeological survey of the 73 acre project tract, through the systematic excavation of 29 shovel tests, resulted in the identification of no subsurface artifact assemblages or subsurface cultural features, as such no new archaeological sites were identified. As the project tract contains no evidence of pre-contact or historic cultural resources, our office concurs that the project tract has a very low probability to contain significant archaeological sites. While the survey noted intact stratigraphical horizons within the excavated shovel tests, our office concurs that any archaeological resources within the project tract have been presumably destroyed by silvicultural clearing sequences which occurred on the aforementioned project throughout the late 20th-21st centuries. No demonstrable evidence of historic above ground structures were identified either. Our office concurs with the report recommendations that the project, as currently depicted, would have no effect on historic properties.

If the Highway 321 Site 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 further cultural resources management is not currently necessary. The agency will determine if a reasonable and

good faith effort has been made to identify historic properties or whether additional identification efforts are needed.

Additional consultation with our office is needed if the proposed alignment changes.

Project Review Forms and additional guidance regarding our office's role in the federal and state compliance process and historic preservation can be found on our website at <https://scdah.sc.gov/historic-preservation/programs/review-compliance>.

Our office has no additional comments or concerns and accepts the report as final. In accordance with the MOU, please provide two bound copies of the final report to the DOC and one bound, one unbound, and one digital (PDF) copy of the final report to SHPO.

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. For additional information, please see our [GIS Data Submission Requirements](#).

Please provide final electronic copies of the survey forms and photographs for the above-ground resources following the [Electronic Submission Requirements for Planning Surveys and Review & Compliance Surveys](#).

Please ensure that all Final survey deliverables (reports, survey forms and photographs, and GIS shapefiles) are sent to the SHPO at the same time using the same medium (e.g., DVD-RW, thumb drive, or FTP/file sharing site) to assist in project tracking. Files should be sent to rc@scdah.sc.gov. This new email address is only to be used for submitting survey deliverables. Contact your assigned reviewer directly for any questions or concerns.

Please refer to SHPO Project Number 25-RL0256 in any future correspondence regarding this project. If you have any questions, please contact me at 803-896-6181 or at RLarsen@scdah.sc.gov.

Sincerely,



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

CC.
Jennifer Druce - SCDOC