



STATE OF NORTH CAROLINA  
DEPARTMENT OF ADMINISTRATION

ROY COOPER  
GOVERNOR

MACHELLE SANDERS  
SECRETARY

December 9, 2020

Kimberley Campbell  
North Carolina Department of Commerce  
Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4325

**Re: SCH File # 20-E-4600-0210; Application of American Beech Solar, LLC for Certificate to construct a 110 MW Solar Facility in Halifax Co. Docket #EMP-108, Sub 0.**

Dear Ms. Campbell:

The above referenced environmental information has been reviewed through the State Clearinghouse under the provisions of the North Carolina Environmental Policy Act.

Attached to this letter are additional comments made in the review of this document. The Department of Cultural Resources has requested additional information prior to their concurrence with the above referenced document.

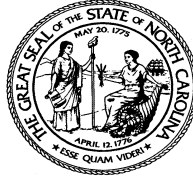
Therefore, pursuant to 1 NCAC 25 .0506(c), this office requests that a supplemental document providing the additional information requested by the Department of Cultural Resources be submitted to the Clearinghouse for further review and comment.

Sincerely,

A handwritten signature in cursive script that reads "Crystal Best".

Crystal Best  
State Environmental Review Clearinghouse

Attachments



**North Carolina Department of Natural and Cultural Resources  
State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary Susi H. Hamilton

Office of Archives and History  
Deputy Secretary Kevin Cherry

December 8, 2020

Susan E. Bamann  
Commonwealth Heritage Group  
201 West Wilson Street  
P.O. Box 1198  
Tarboro, NC 27886

[susanbamann@chg-inc.com](mailto:susanbamann@chg-inc.com)

Re: Archaeological Addendum Survey, Proposed American Beech 1 and 2 Solar Farm, Halifax County,  
ER 19-2192

Dear Ms. Bamann:

Thank you for your November 13, 2020, letter transmitting the archaeological report and site forms for the project noted above. We have reviewed this report and offer the following comments.

The survey identified forty-seven newly recorded sites (31HX632 – 31HX678). In addition, nine previously recorded sites that extend into the addendum survey area were revisited (31HX590, 31HX591, 31HX602, 31HX608, 31HX609, 31HX614, 31HX621, 31HX623, and 31HX624).

We previously found that sites 31HX602 and 31HX621 are not eligible for listing in the National Register of Historic Places, and the information in the addendum survey report is consistent with this determination. Given their poor integrity and limited research potential, the remaining seven previously recorded sites (31HX590, 31HX591, 31HX608, 31HX609, 31HX614, 31HX623, and 31HX624) are not considered eligible for listing in the National Register. Based on the information provided in the report, we concur with these recommendations.

Two of the newly identified sites are cemeteries (31HX637 and 31HX644). We concur that given their lack of significant historical associations, distinctive markers, or research potential, these cemeteries are not eligible for listing in the National Register. However, cemeteries are protected under North Carolina General Statutes (NCGS) Chapter 14-148 and 149 and are afforded consideration under NCGS Chapters 65 and 70. Given the potential for unmarked graves to be associated with these cemeteries, we recommend they either be archaeologically delineated, or a 100-ft buffer be maintained between above-ground cemetery features and any ground disturbing activities associated with the proposed project.

Sites 31HX654, 31HX659, 31HX665, 31HX669, 31HX670, and 31HX671 yielded artifacts produced during the Middle Archaic through the Middle Woodland Periods and may be able to provide important information about American Indian settlement in the project area. Site 31HX664 is the remains of an early-twentieth century homesite and schoolhouse, which may be able to provide important information about rural life and education. We concur with these assessments. We recommend the specified sites be avoided

by ground disturbing activities associated with the proposed project, or that additional work be undertaken to determine if they are eligible for listing in the National Register.

We request project designs showing that the cemeteries will be avoided, along with a description of measures that will be taken to ensure these areas will not be subject to ground disturbance during construction and how access will be maintained. The unassessed sites should be included in the avoidance plan if your client chooses to preserve them.

In addition, we request that the report be revised before resubmittal so that it addresses the following discrepancy: the same photograph of artifacts, but with different annotation, appears in Figure 3.3-13 (top) and Figure 3.3-93.

Finally, we concur with your plan to consult with the Office of State Archaeology regarding documentation for collections that will be returned to landowners at their request.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or [environmental.review@ncdcr.gov](mailto:environmental.review@ncdcr.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



*for* Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Whitney Rubin, BayWa R.E.  
Crystal Best, State Clearinghouse

[Whitney.rubin@baywa-re.com](mailto:Whitney.rubin@baywa-re.com)  
[crystal.best@doa.nc.gov](mailto:crystal.best@doa.nc.gov)