### FINDING OF NO HISTORIC PROPERTIES AFFECTED

# Pedestrian Bridge over State Route 21/Augusta Road

# GDOT P.I. 0013549, CHATHAM COUNTY

GP - 160208-001

# **Description of the Undertaking**

GDOT Project No. 0013549 is state funded. This document fulfills the Department's obligations under the Georgia Environmental Policy Act (GEPA).

The proposed project would consist of the design and construction of a pedestrian bridge over State Route (SR) 21/Augusta Road in Port Wentworth and a sidewalk to the nearest intersection of Rice Mill Road and SR 21/Augusta Road; approximately 300 feet north of the pedestrian bridge (see attached Project Location Map). The pedestrian crossing would serve the population of a growing Rice Mill Subdivision and the newly constructed Rice Creek School. Residents would be able to use the crossing to safely cross SR 21/Augusta Road to take their children to school, and access goods and services provided by a new development, with Publix Grocery as an anchor, on the northeast portion of the SR 21/Augusta Road and Rice Mill Road intersection. The project would be constructed using a Design-Build process. Minor additional required right-of-way is anticipated.

The area of potential effects (APE), as defined in 36 CFR 800.16(d), is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties if any such properties exist. Because of the nature and scope of the undertaking, the area of potential effects (APE) is limited to the project view shed and the proposed right-of-way. No potential for indirect effects outside of the APE is anticipated as a result of implementation of the proposed project.

# **Identification of Historic Properties**

Existing information on previously identified historic properties was checked to determine if any are located within the APE of this undertaking. This review included National Register listed properties, pending National Register nominations, National Historic Landmarks, and the updated Georgia Historic Bridge Survey (GHBS). No properties listed in or nominated for listing in the National Register, National Historic Landmarks or bridges determined eligible for inclusion in the National Register were identified within the proposed project's APE. The Department of Natural Resources (DNR) Chatham County survey dated 1993 and the Georgia Natural, Archaeological, Historic Resources GIS (GNAHRGIS) was also consulted and one resource was identified; GNAHRGIS # 249983 (Houston Baptist Church and Cemetery) within the proposed project's APE.

The potential consulting parties invited to comment on the undertaking in accordance with Section 12-16-4(b) of GEPA were the Coastal Regional Commission, Chatham County

Commission, Chatham County/Savannah Metropolitan Planning Commission, Port Wentworth City Council, and the Houston Museum. The consulting parties were informed of our efforts to identify historic properties by consulting existing information and the results of those efforts and asked to provide information on any unidentified National Register listed or eligible properties within the project's APE by a Notification dated December 22, 2015 (see Notification in Appendix). A response was received from the Georgia SHPO by memo on February 8, 2016.

One property 50 years old or older was identified within the proposed project's APE in the 1993 DNR Chatham County survey and on GNAHRGIS as site number 249983 (Houston Baptist Church and Cemetery). No additional historic properties were identified as a result of the field survey. The property was originally surveyed in 2000 and again in 2004. The 2004 *Cultural Resources Survey of the Rice Hope Plantation Tract, Chatham County, Georgia* completed by Brockington and Associates, Inc. identified the church as architectural resource CH-RH-001 and cemetery as archaeological site 9CH1053. Both the church and cemetery were recommended not eligible for the NRHP. The SHPO concurred with the finding in a letter on file at the Archives and History Department in Morrow, Georgia – Box RCB 63027. The property was reevaluated due to the age of the original survey.

The National Register Criteria of Eligibility were applied and that property was determined not eligible for listing in the National Register, maintaining the original findings of the Department of Natural Resources, Historic Preservation Division (HPD).

However, because the property contains a cemetery, the boundary of the property will be marked on plans and will be avoided.

## **Determination**

Based on the results of our historic property identification efforts, no properties listed in or considered eligible for listing in the National Register were located within the APE of this undertaking. Therefore, there is a finding of No Historic Properties Affected for this undertaking in accordance with Section 12-16-4(a) of GEPA.

# APPENDIX A

# **NOTIFICATION**

# AND

# EARLY CONSULTATION CORRESPONDENCE



## **GEORGIA DEPARTMENT OF TRANSPORTATION**

One Georgia Center, 600 West Peachtree Street, NW Atlanta, Georgia 30308 Telephone: (404) 631-1000

# **NOTIFICATION**

# Initiation of GEPA Process for GDOT Project 0013549, Chatham County

# SR 21 Pedestrian Bridge

**December 22, 2015** 

The Georgia Department of Transportation (Department) is in the beginning stages of project development for this proposed transportation project. In compliance with the Georgia Environmental Policy Act (GEPA) the Department has determined that because of the nature and the scope of this undertaking, the proposed project has the potential to cause effects to historic properties if any such properties exist in the project area. The Department is attempting to identify historic properties already listed in the National Register of Historic Places (NRHP) and any properties not already listed that would be considered eligible for listing that are located within the geographic area of potential effects (APE) of the proposed project.

The proposed project would consist of the design and construction of a pedestrian bridge over State Route (SR) 21 in Port Wentworth to also include sidewalk up to the nearest intersection of Rice Mill Road/SR 21 (see attached location map). The pedestrian crossing would serve the population of a growing residential neighborhood and a new school. Residents would be able to use the crossing to safely cross SR 21 to take their children to school, and access goods and services provided by Rice Hope and Rice Creek developments. The project would be constructed using a Design-Build process. Minor additional required right-of-way is anticipated.

Because of the nature and scope of the undertaking, the APE is limited to the proposed ROW and viewshed of the proposed project, within which all construction and ground disturbing activity would be confined. No potential for indirect effects outside of the corridor is anticipated as a result of implementation of the proposed project.

In accordance with GEPA, existing information on previously identified historic properties has been checked to determine if any are located within the APE of this undertaking. This review of existing information revealed that no properties listed in or nominated for listing in the NRHP, no National Historic Landmarks and no bridges determined eligible for inclusion in the NRHP in the updated Georgia Historic Bridge Survey (GHBS) are located within the proposed project's APE. One property 50 years old or older was identified within the proposed project's APE in the 1993 Department of Natural Resources (DNR) Chatham County Survey and on GNAHRGIS as site number 249983 (Houston Baptist Church and Cemetery).

Field surveys for both historic properties and archaeological sites will be conducted and the Criteria of Eligibility will be applied to determine if any of these sites are eligible for inclusion in the NRHP.

Please advise us of any historic or archaeological resources of which you are aware that may be located within the area of potential effect for Project 0013549, Chatham County. With your assistance, we can give these issues due consideration and integrate them into the development of the project's alignment and design.

By copy of this letter, we also are requesting information concerning historic and archaeological resources along the project corridor from the Georgia SHPO, Chatham County Commission, Chatham County/Savannah Metropolitan Planning Commission, Coastal Regional Commission, Port Wentworth City Council, and the Houston Museum. Responses regarding historic and archaeological resources would be appreciated within thirty (30) days of receipt of this letter. If you are aware of additional organizations or individuals interested in cultural resources in your area, please forward their names to the Department.

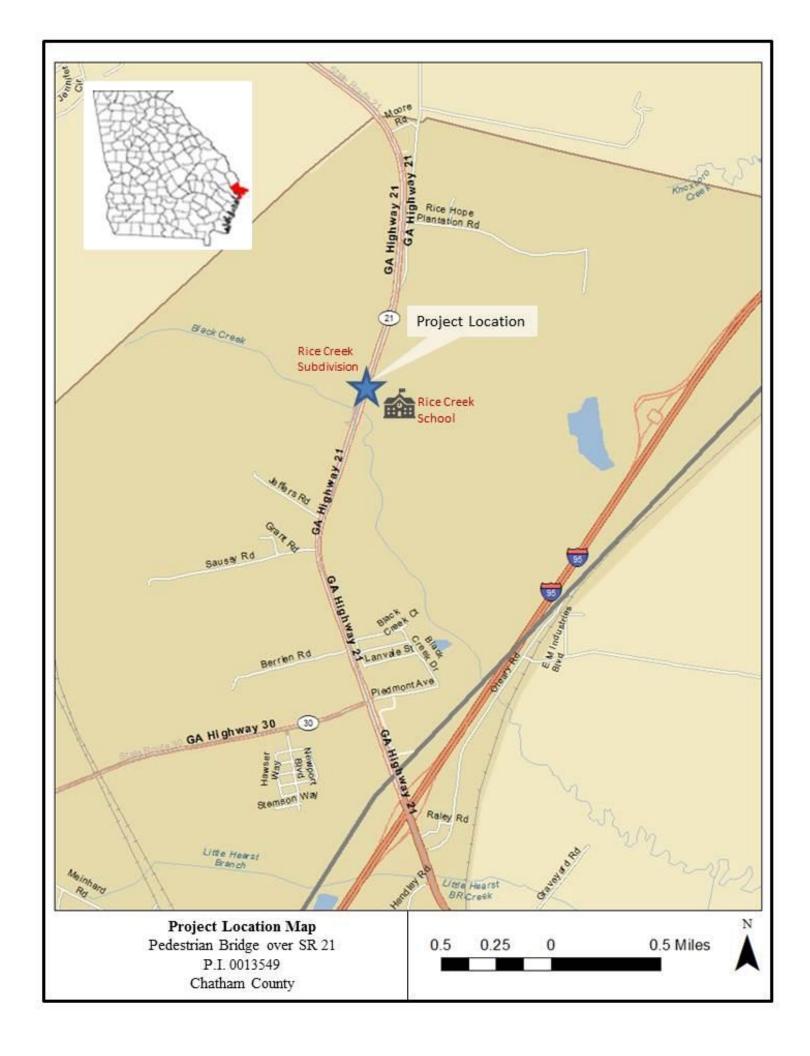
A written response to become a consulting party for this project should be directed to:

Charlotte Weber
Historian
HNTB Corporation
3715 Northside Parkway
200 Northcreek, Suite 800
Atlanta, GA 30327

Also, the following tribal governments are invited to participate in the GEPA cultural resource identification process for this project: Absentee-Shawnee Tribe, Shawnee Tribe, Eastern Shawnee Tribe, Muscogee (Creek) Nation, Muscogee (Creek) National Council, Poarch Band of Creek Indians, and the Thlopthlocco Tribal Town. Responses to this Notification regarding tribal concerns should be addressed to the attention of Mr. Jim Pomfret, the Department's American Indian liaison at GDOT – Office of Environmental Services, One Georgia Center, 600 West Peachtree Street, NW, 16<sup>th</sup> Floor, Atlanta, GA 30308.

In accordance with GEPA, the Department will assess project effects to any identified historic properties as preliminary project plans become available, endeavor to minimize harm to all identified historic properties and produce an Assessment of Effects report. This document will be provided to all consulting parties for comment when completed.

If you have additional questions or concerns regarding cultural resources in the project area please direct them to the following individuals: historic resource concerns can be can be addressed to Charlotte Weber (404-946-5712 or <a href="mailto:chweber@hntb.com">chweber@hntb.com</a>); archaeological resource concerns, including cemetery and other human burials, can be addressed to Jim Pomfret (404-631-1256 or jpomfret@dot.ga.gov) of this office. Questions concerning general design or location issues may be addressed to Andrew Hoenig (<a href="mailto:ahoenig@dot.ga.gov">ahoenig@dot.ga.gov</a>, (404) 631-1757) of the Department's Innovative Delivery Office in Atlanta, Georgia.





MARK WILLIAMS COMMISSIONER Dr. David Crass Division Director

# **MEMORANDUM**

TO: Charlotte Weber, Historian

HNTB Corporation 3715 Northside Parkway 200 Northcreek, Suite 800 Atlanta, Georgia 30327

FROM: Barbara L. Fisher

Environmental Review Historian Historic Preservation Division

RE: Receipt of Early Coordination Information

Project Title: PI 0013549: Construct Pedestrian Bridge over

SR 21, Port Wentworth

**Project Number: GP-160208-001** 

County: Chatham

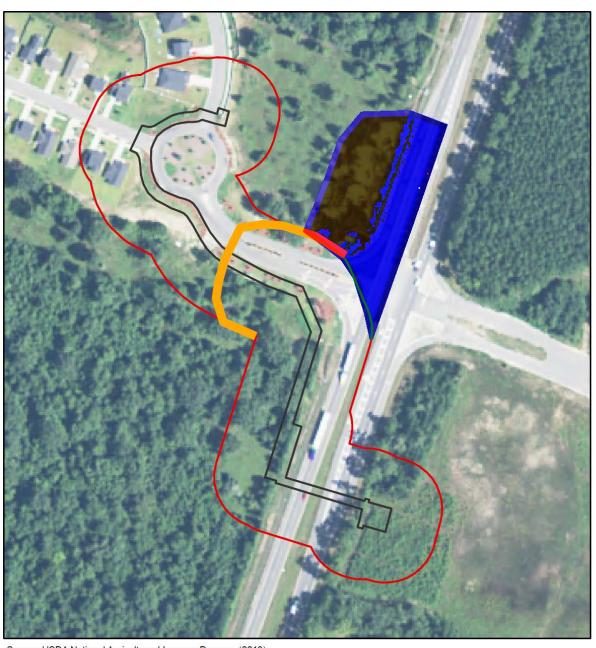
DATE: February 8, 2016

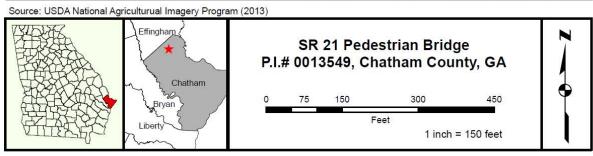
The Historic Preservation Division has received the early coordination information required by the Georgia Environmental Policy Act. Thank you for submitting this information. We look forward to working with you in the future as this project progresses.

cc: Dennis Cheek, GDOT
Terri Lotti, GDOT
Jim Pomfret, GDOT
Lupita McClenning, Coastal Regional Commission of Georgia

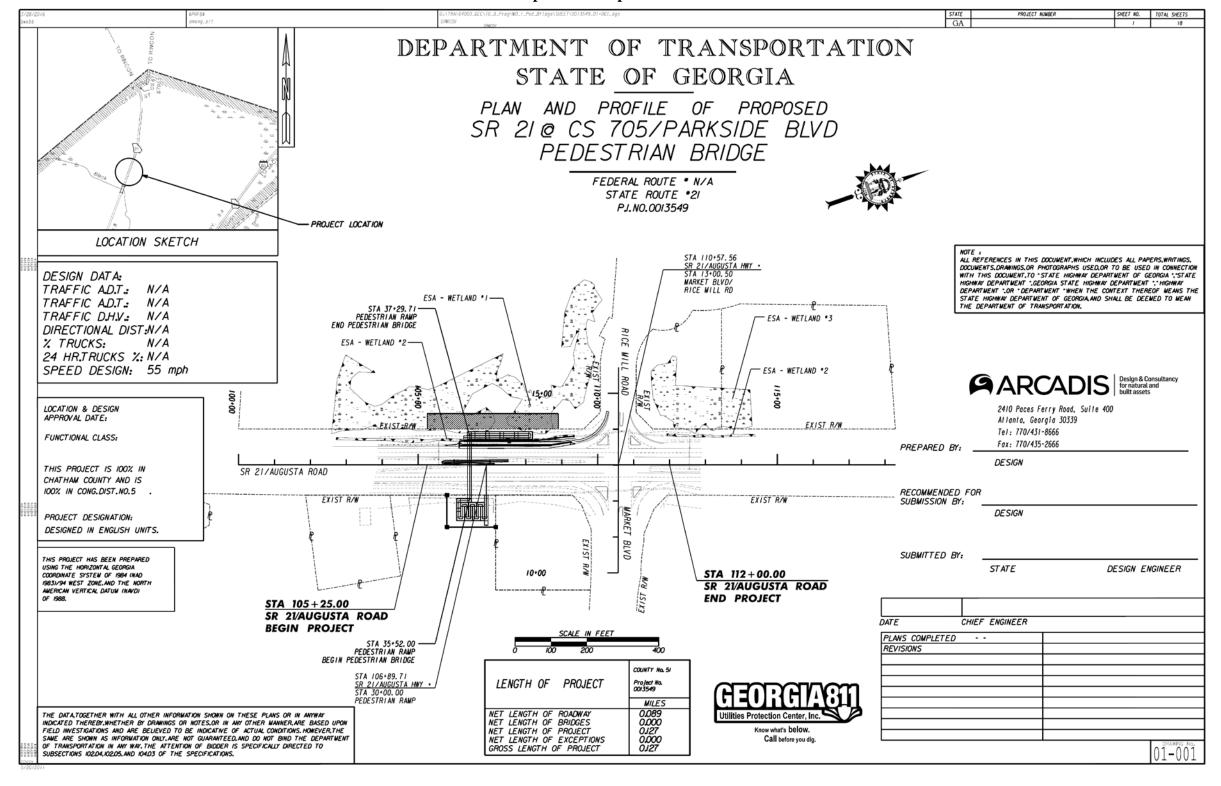
# APPENDIX B PROPOSED PLANS

# Survey Area Map (provided 1/13/16)





# Proposed Plans provided 3/30/16



# APPENDIX C CORRESPONDENCE

Lonice C. Barrett, Commissioner

# Historic Preservation Division

W. Ray Luce, Division Director and Deputy State Historic Preservation Officer 47 Trinity Avenue, S.W., Suite 414-H, Atlanta, Georgia 30334 Telephone (404) 656-2840 Fax (404) 657-1040 http://www.gashpo.org

June 14, 2004

U.S. Army Corps of Engineers Savannah District Attn: Regulatory Branch (Richard Morgan) P.O. Box 889 Savannah, Georgia 31402-0889

RE:

JPN 200307880: Rice Hope Plantation Development Tract, Port Wentworth

Chatham County, Georgia HP-040102-001

Dear Mr. Morgan:

The Historic Preservation Division (HPD) has reviewed the Cultural Resources Survey of the Rice Hope Plantation Tract, Chatham County, Georgia Final Report by Brockington and Associates dated April 2004. Our comments are offered to assist the Corps of Engineers (COE) in complying with the provisions of Section 106 of the National Historic Preservation Act.

Thank you for the copies. For your information, two copies of this report shall be kept for our files, the other sent to the Georgia Archaeological Site Files at the University of Georgia-Athens for permanent retention.

Please refer to project number HP-040102-001 in future correspondence regarding this undertaking. If we may be of further assistance, please contact Serena Bellew, Environmental Review Coordinator, at (404) 651-6624.

Sincerely

Richard Cloues

Deputy State Historic Preservation Officer

RC:mcv

cc:

Iris Scheff, Coastal Georgia RDC

Dave Crampton, COE

Lonice C. Barrett, Commissioner

# Historic Preservation Division

OFFICE OF HISTORIC PRESERVATION DIVISION W. Ray Luce, Division Director and Deputy State Historic Preservation Officer 47 Trinity Avenue, S.W., Suite 414-H, Atlanta, Georgia 30334-9006 Telephone (404) 656-2840 Fax (404) 657-1040 http://www.gashpo.org

# MEMORANDUM

TO:

U. S. Army Corps of Engineers

Savannah District

Attn: Regulatory Branch (Richard Morgan)

P. O. Box 889

Savannah, Georgia 31402-0889

FROM:

Denise P. Messick 200

Environmental Review Historian Historic Preservation Division

RE:

Finding of "No Historic Properties Affected"

PROJECT:

200307880: Rice Hope Plantation Development Tract, Port Wentworth

HP-040102-001

COUNTY:

Chatham County, Georgia

DATE:

April 6, 2004

The Historic Preservation Division has reviewed the information received concerning the abovementioned project. Our comments are offered to assist federal agencies and project applicants in complying with the provisions of Section 106 of the National Historic Preservation Act.

Based on the information submitted, HPD believes that no historic properties or archaeological resources that are listed in or eligible for listing in the National Register of Historic Places (NRHP) will be affected by this undertaking. Please note that historic and/or archaeological resources may be located within the project's area of potential effect (APE), however, at this time it has been determined that they will not be impacted by the above-referenced project. Furthermore, any changes to this project as proposed will require further review by our office for compliance with the Section 106 process.

If we may be of further assistance contact me at (404) 651-6777 or Serena Bellew, Environmental Review Coordinator at (404) 651-6624. Please refer to the project number assigned above in any future correspondence regarding this project.

-DPM

CC:

David Crampton, Savannah District, COE Joshua Fletcher, Brockington and Associates Stuart F. Sligh, Sligh Environmental, 49 Park of Commerce Way, Savannah, GA 31405 Dave Edwards, Sivica Communities, 675 Mansell Road, Suite 130, Roswell, GA 30076 Iris Scheff, Coastal Georgia RDC

IMPORTANT: Please note HPD's new address above.



200307880

Regulatory Branch

DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS

ANNAH DISTRICT, CORPS OF ENGINEERS P.O. BOX 889 SAVANNAH, GEORGIA 31402-0889

APR 0 6 2004

HP 040102-001 Chatham

RECEIVED

APR 8 2004

OFFICE OF HISTORIC PRESERVATION DIVISION

Historic Preservation Division Georgia Department of Natural Resources Attention: Dr. Ray Luce, Director and Deputy SHPO 47 Trinity Avenue, SW Suite 414-H Atlanta, Georgia 30334-9006

Dear Dr. Luce:

I refer to Department of the Army Permit Application No. 200307880, concerning the Rice Hope Plantation Development, Chatham County, Georgia. I also refer to the draft cultural resources survey report dated September 2003, prepared by Brockington and Associates, and to correspondence to and from your office dated December 30, 2003 and January 28, 2004, respectively.

The applicant has submitted a revised cultural resources survey report, dated February 2004, with an accompanying transmittal letter, dated February 26, 2004, responding to the agencies' review comments and request for limited additional fieldwork; copies of the revised report and transmittal letter were forwarded for your review. We have reviewed the revised report and find that between it and the comments contained in the transmittal letter, our review comments have been adequately addressed. In particular, we have reviewed the results of the additional limited controlled subsurface testing, and concur with the report's recommendations that archaeological site 9CH1052, should be considered ineligible for inclusion in the National Register of Historic Places.

We request your comment with regard to our National Register of Historic Places eligibility recommendation, pursuant to 36 CFR 800.4. Should you concur that Site 9CH1052 is ineligible for inclusion in the National Register, the proposed permit action, or undertaking, will have no effect on historic properties (No Historic Properties Affected).

Sincerely,

Regulatory Specialist, Southern Section

Lonice C. Barrett, Commissioner

# Historic Preservation Division

W. Ray Luce, Division Director and Deputy State Historic Preservation Officer 47 Trinity Avenue, S.W., Suite 414-H, Atlanta, Georgia 30334-9006 Telephone (404) 656-2840 Fax (404) 657-1040 http://www.gashpo.org

# MEMORANDUM

TO:

U. S. Army Corps of Engineers

Savannah District

Attn: Regulatory Branch (Richard Morgan)

P. O. Box 889

Savannah, Georgia 31402-0889

FROM:

Denise P. Messick

Don

Environmental Review Historian Historic Preservation Division

RE:

Finding of "No Historic Properties Affected"

PROJECT:

200307880: Rice Hope Plantation Development Tract, Port Wentworth

HP-040102-001

COUNTY:

Chatham County, Georgia

DATE:

April 6, 2004

The Historic Preservation Division has reviewed the information received concerning the abovementioned project. Our comments are offered to assist federal agencies and project applicants in complying with the provisions of Section 106 of the National Historic Preservation Act.

Based on the information submitted, HPD believes that no historic properties or archaeological resources that are listed in or eligible for listing in the National Register of Historic Places (NRHP) will be affected by this undertaking. Please note that historic and/or archaeological resources may be located within the project's area of potential effect (APE), however, at this time it has been determined that they will not be impacted by the above-referenced project. Furthermore, any changes to this project as proposed will require further review by our office for compliance with the Section 106 process.

If we may be of further assistance contact me at (404) 651-6777 or Serena Bellew, Environmental Review Coordinator at (404) 651-6624. Please refer to the project number assigned above in any future correspondence regarding this project.

-DPM

cc:

David Crampton, Savannah District, COE
Joshua Fletcher, Brockington and Associates
Stuart F. Sligh, Sligh Environmental, 49 Park of Commerce Way, Savannah, GA 31405
Dave Edwards, Sivica Communities, 675 Mansell Road, Suite 130, Roswell, GA 30076
Iris Scheff, Coastal Georgia RDC

IMPORTANT: Please note HPD's new address above.

# Serena Bellew - Chatham County, Rice Hope Plantation, #200307880, Revised Cultural Resources

From: "Crampton, David B SAS" < David.B.Crampton@sas02.usace.army.mil> "serena\_bellew@mail.dnr.state.ga.us" <serena\_bellew@mail.dnr.state.ga.us> To: Date:

3/9/04 3:36 PM Subject:

Chatham County, Rice Hope Plantation, #200307880, Revised Cultural Resources Survey CC: "Crosby, David E SAS" < David.E. Crosby@sas02.usace.army.mil>, "Beckwith, Loretta A

SAS" <Loretta.A.Beckwith@sas02.usace.army.mil>, "Morgan, Richard W SAS"

<Richard.W.Morgan@sas02.usace.army.mil>

# Serena:

The revised cultural resources survey report prepared by Brockington and Associates, dated February 2004 and authored by Josh Fletcher, et al. sufficiently well addresses my main review comments concerning the original draft report. I agree that the Houston chrch and cemetery should be considered ineligible for inclusion in the National Register, as our offices have agreed on one previous occasion (Port Wentworth New Town Center cultural resources survey), a couple of years ago. The cemetery is subject to the statutes of the state of Georgia.

I further agree that the potential historic archaeological property identified as the Chisholm Caretakers house should be considered ineligible for inclusion in the National Register. It would have been good had they been able to locate a photograph of the razed structure for several reasons, such as helping to determine if it had been built from salvaged brick, its architectural style, whether the attribution of its having been built c. 1930s was correct, etc., but such data are often fortuitous, and one cannot expect such luck on a regular basis, or expend a great deal of time and effort trying to locate such data within normal time, budget and manpower constraints.

The report should have been a little more detailed (descriptive) in the types of modern refuse observed in various parts of the site. In the case of one borrow pit dump, the "modern" refuse would appear to include portions of a late 1920s early 1930s vehicle, if I make the photograph out properly.

Figure 2 indicates the areas that were surveyed and the wetlands that were not. If these were only seasonal wetlands, and are not permanently inundated, they should be surveyed, if accessible, especially as the hydorlogy of the area and the water table has fluctuated a good deal over the centuries, such that earlier prehistoric materials might in fact be present. However, I did verbally tell Josh Fletcher that I would not insist that they do so in this instance, since we have been arguing this point for several years now. It is still my view that all areas not inundated and for which it is physically possible to survey should be surveyed, and at the same level of intensity. Had it been I doing the survey, I would have inspected the vertical profiles of the borrow pits by shaving them vertically in several selected locations, either in addition to, or in lieu of some areas of shovel testing.

The revised report does not, however, address the questions I had with regard to several canals mentioned within the project area, and nearby, and whether or not these were related to the rice agriculture efforts for which the plantation is named. My anticipation is that the actual rice fields were located further riverward (east) than th tract under consideration. Still, there is mention, at least in the original report of some canals in the project tract, but no real description of these, their origin or purpose.

I will draft a letter to your office informing you that our determination is that there will be "no historic properties affected by the proposed undertaking, or the issuance of our corps' permit.

Please relay this information to the appropriate people. Thanks ---- dave crampton

Lonice C. Barrett, Commissioner

# Historic Preservation Division

W. Ray Luce, Division Director and Deputy State Historic Preservation Officer 156 Trinity Avenue, S.W., Suite 101, Atlanta, Georgia 30303-3600 Telephone (404) 656-2840 Fax (404) 657-1040 http://www.gashpo.org

January 28, 2004

Commander, U. S. Army Corps of Engineers Savannah District Attn: Regulatory Branch (Richard Morgan) P.O. Box 889 Savannah, Georgia 31402-0889

RE:

200307880: Rice Hope Plantation Development Tract, Port Wentworth Chatham County, Georgia HP-040102-001

Dear Mr. Morgan:

The Historic Preservation Division (HPD) has reviewed the Cultural Resources Survey of the Rice Hope Plantation Tract, Chatham County, Georgia Draft Report by Brockington and Associates dated September 2003, as well as comments by the Department of the Army, Savannah District Corps of Engineers (USACE) dated December 30, 2003. Our comments are offered to assist the USACE and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act.

Based on the information provided, HPD concurs with the comments made by the UASCE. Additional comments (numbered 1 through 9) related to the archaeological investigations are provided in the enclosure. (For questions specific to archaeology, please call Joey Charles, Review Archaeologist at 404-651-6433.) As to architectural resources (buildings or structures), we will need a definition of the Area of Potential Effect (APE) for visual or non-physical effects, along with a better description of the proposed undertaking, in order to know whether resources on adjacent parcels should be evaluated. It appears the there may be some small communities on nearby tracts that should to be surveyed and evaluated as to their eligibility for inclusion in the National Register of Historic Places. If they are in the APE for visual or other effects, an assessment of effects should be prepared.

Please refer to project number HP-040102-001 in any future correspondence regarding this matter. If we may be of further assistance, please contact me at (404) 651-6777 or Serena Bellew, Environmental Review Coordinator, at (404) 651-6624.

Sincerely,

Denise P. Messick

Environmental Review Historian

**Enclosure: Review Comments** 

cc: David Crampton, USACE, Savannah District
Joshua N. Fletcher, Brockington and Associates
David Odum, Sivica Communities, 675 Mansell Road, Suite 130, Roswell, GA 30076
Joel Price, Sligh Environmental 49 Park of Commerce Way, Savannah, GA 31405

Iris Scheff, Coastal Georgia RDC





REPLY TO ATTENTION OF:

# DEPARTMENT OF THE ARMY SAVANNAH DISTRICT, CORPS OF ENGINEERS

P.O. BOX 889 SAVANNAH, GEORGIA 31402-0889

3 0 DEC 2003

# RECEIVED

JAN 2 2004

OFFICE OF
HISTORIC PRESERVATION DIVISION

200307880

Regulatory Branch

Historic Preservation Division Georgia Department of Natural Resources Attention: Dr. Ray Luce, Director and Deputy SHPO 156 Trinity Avenue, SW. Suite 101 Atlanta, Georgia 30303-3600

Dear Dr. Luce:

I refer to Department of the Army Permit Application No. 200307880, by Civica Properties, Inc., concerning the Rice Hope Plantation Development Tract, city of Port Wentworth, Chatham County, Georgia. I also refer a survey conducted for the identification of historic properties that may potentially be affected by the proposed development. The survey was conducted to assist our office in the consideration of historic properties in the processing and issuance of US Army Corps of Engineers' (USACE) permits, and compliance with Section 106 of the National Historic Preservation Act. The results of the survey are contained in the report entitled "Cultural Resources Survey of the Rice Hope Plantation Tract, Chatham County, Georgia."

We are enclosing a copy of the referenced report, prepared by Brockington and Associates, Inc., and dated September 2003, for your review and comment. We request comments especially with regard to the adequacy of the survey, and the National Register Eligibility status of the sites/potential historic properties identified in the report.

We have reviewed the report also, and our review comments are enclosed for your information and/or use. The report identified one historic/prehistoric archaeological site (9CH1052, the Chisholm Caretaker's House) and one historic architectural property, Houston Church with an associated cemetery, designated 9CH1053. The Brockington and Associates report recommends all three properties ineligible for inclusion in the National Register of Historic Places.

We have previously consulted with your office concerning the Houston church, but not the cemetery, in Section 106 consultations concerning the Port Wentworth New Town Center. The property was identified in a December 2000 cultural resources (historic properties) report prepared for the City of Port Wentworth by Environmental Services, Inc. Our offices concurred at that time that the existing church structure, which is abandoned and in advanced stages of deterioration, should be considered ineligible for inclusion in the National Register of Historic Places. We continue to consider and recommend that the remains of the Houston parish church structure should be considered ineligible for inclusion in the National Register of Historic Places.

On the basis of the information presented in the present survey report dated September 2003, and for the reasons stated therein, we concur with the recommendation that the associated Houston Church cemetery should be considered ineligible for inclusion in the National Register of Historic Places.

We disagree with the report's recommendation that the Chisholm Caretaker's Residence should be considered ineligible for inclusion in the National Register for several reasons, stated below, and in the attached review comments. We believe limited additional subsurface controlled testing and evaluation of the site should be conducted before making a determination of eligibility for this property. The additional testing and evaluation should include additional archival and background research on the Rice Hope Plantation, the (Chisholm?) estate to which the Caretaker's house site is related, and historic documents relating to the former residence itself (i.e., photographs, verbal descriptions, etc.).

We base our recommendation that additional testing be conducted on this site for the following reasons: 1) the site (structure) is reported to be early 20<sup>th</sup> century in date, although several lines of evidence indicate that it may well be a good deal older; 2) there is no context provided against which the site can be evaluated (i.e., no description of the Chisholm property/estate to which it relates, nor the historical significance of that property; 3) there is evidence that the site has a moderate depth to it, and it is not strictly a surface and near-surface site; and, 4) there is inadequate presentation, analysis and comparison of the recovered artifacts by collection level. For these reasons we feel some additional evaluation is justified prior to making a determination of eligibility.

The scope of the survey would appear to be more in keeping with that of a reconnaissance level survey, rather than an intensive one conducted for Section 106 purposes. We are therefore requesting your comments concerning the adequacy of the scope of the survey.

The survey does not appear to have taken into account any areas adjacent to the periphery of the subject development tract, for the purposes of visual or other non-physical direct effects. There was some discussion of this issue during the Section 106 consultation regarding the Port Wentworth New Town Center Section 404 permit application regarding the small, unincorporated community located immediately to the south-southwest of the present project tract. Therefore we also are requesting your comments with regard to the appropriate area and scale to be included within the permit application's "area of potential effect."

If you have any questions considering this matter, please contact me at 912-652-5503, or Mr. Richard Morgan, Regulatory Branch Southern Section Project Manager, at 912-652-5139.

Sincerely,

Carol Bernstein

Chief, Southern Section

Enclosures

Copies Furnished:

Historic Preservation Division Georgia Department of Natural Resources Attention: Dr. David Crass, State Archaeologist 156 Trinity Avenue, SW. Suite 101 Atlanta, Georgia 30303-3600

Sivica Communities, Inc. Attention: Mr. Dave Odum Roswell, Georgia 30076

Sligh Environmental Consultants, Inc. Attention: Mr Joel Price 49 Park of Commerce Way Savannah, Georgia 31405

Brockington and Associates, Inc. Attention: Mr. Paul Brockington 6611 Bay Circle, Suite 220 Norcross, Georgia 30071