



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

Ramona M. Bartos, Administrator

Governor Roy Cooper
Secretary D. Reid Wilson

Office of Archives and History
Deputy Secretary, Darin J. Waters, Ph.D.

September 27, 2022

Kimberly Nagle
S&ME, Inc.

knagle@smeinc.com

Re: Archaeological survey report for 80 MW Filo Solar Site, 1679 NC Highway 24-27 East, Biscoe, Montgomery County, ER 21-1329

Ms. Nagle:

Thank you for your submittal of July 28, 2022, transmitting the drafts of the above-referenced report. We have reviewed the information provided and offer the following comments.

According to the Phase I archaeological survey report submitted by S&ME, approximately 1194-acres were investigated with 319.4 acres intensively surveyed and the remaining 744.7 acres investigated through pedestrian survey and judgmental shovel testing. These investigations resulted in the identification of eleven newly recorded archaeological sites (31MG2255-31MG2265) and two previously recorded sites (31MG64 and 31MG65) were revisited.

S&ME relocated the two previously recorded archaeological sites and based on their findings, recommends the sites be combined as 31MG64/65. S&ME recommends that the previously recorded sites (31MG64/65) and eight of the 11 newly recorded sites (31MG2255-31MG2262) are not eligible for inclusion in the National Register of Historic Places (NRHP).

The three remaining archaeological sites are cemeteries (31MG2263-31MG2265) and are also recommended as not eligible for the NRHP but recommends that they should be preserved by avoidance and a 10 meter buffer be placed around the cemeteries.

Except for avoiding the cemeteries, S&ME recommends that no additional archaeological work is necessary.

We concur with S&ME's findings and recommendations and accept the report as final. We ask that the boundaries of each cemetery be mapped by a licensed surveyor, recorded on deeds or plats, and filed with the county.

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. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



for Ramona Bartos, Deputy
State Historic Preservation Officer

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Oct 05 2022