Appendices

Appendix A. Permits

Appendix B. USDA AD-1006 Prime Farmland Form

Appendix C. NHPA Section 106 Consultation

Appendix D. Regulatory Agency Correspondence

Appendix E. Public Engagement

APPENDIX A

PERMITS

This appendix lists environmental permits, licenses, or other agreements that may need to be obtained to implement the Proposed Action. The Proposed Action would comply with all required federal, state, and local laws, regulations, and ordinances that are applicable and may be needed to construct and operate the project, whether they are explicitly listed in this appendix or elsewhere in this EA.

Agency	Permit/Requirement	Need/Basis
SC Department of Environmental Services	National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Construction Activities	Construction activities that disturb more than an acre of land are required to obtain coverage under the Construction General Stormwater Permit which aims to manage and store pollutants on construction sites.
U.S. Army Corps of Engineers	Clean Water Act Section 404 Permit	For activities that discharge dredged or fill material into the waters of the United States, including wetlands. Permanent impacts under 0.5 acres may be eligible for a Nationwide Permit 39: *Commercial and Institutional Developments*. Impacts over 0.5 acres may require a Section 404 Individual Permit.
SC Department of Environmental Services	Clean Water Act Section 401 Water Quality Certification	A Section 401 Water Quality Certification is likely required by SCDES; the WQC review would occur as part of the joint federal/state review of the USACE 404 permit.
City of Beaufort	Tree removal permit, City of Beaufort Community Development Department Code, Section 5.4 - Tree Removal	Permit required for the removal or relocation, of any tree 8-inch caliper or larger at chest height, or any tree designated as a specimen or landmark tree.
Town of Port Royal	Tree removal permit, Town of Port Royal Code of Ordinances, Chapter 20	Permit required for the removal of grand trees with a diameter of 6 inches or greater at chest height.
South Carolina Department of Transportation, Town of Port Royal, and City of Beaufort	Encroachment permit	Required for any work within the right-of-way, including the construction of new entrances and driveways on state and municipal roadways.

APPENDIX B

USDA AD-1006 PRIME FARMLAND FORM

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I *(To be completed by Federal Agency)*	Date Of Land Evaluation Request 24 February 2025
Name of Project Beaufort VA Outpatient Clinic	Federal Agency Involved US Dept Veterans Affairs
Proposed Land Use Outpatient Clinic US Dept Veterans Af	County and State Beaufort County, South Carolina

PART II *(To be completed by NRCS)*	Date Request Received By NRCS	Person Completing Form:

Does the site contain Prime, Unique, Statewide or Local Important Farmland? *(If no, the FPPA does not apply - do not complete additional parts of this form)*	YES ☐	NO ☐	Acres Irrigated	Average Farm Size

Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %	Amount of Farmland As Defined in FPPA Acres: %
Name of Land Evaluation System Used	Name of State or Local Site Assessment System	Date Land Evaluation Returned by NRCS

PART III *(To be completed by Federal Agency)*	Alternative Site Rating			
	Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly	11.09	10.67	7.46	
B. Total Acres To Be Converted Indirectly	17.21	5.83	3.64	
C. Total Acres In Site	28.3	16.5	11.1	
PART IV *(To be completed by NRCS)* Land Evaluation Information				
A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide Important or Local Important Farmland				
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted				
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value				
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)				

PART VI *(To be completed by Federal Agency)* Site Assessment Criteria *(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)*	**Maximum Points**	Site A	Site B	Site C	Site D
1. Area In Non-urban Use	(15)	3	7	0	
2. Perimeter In Non-urban Use	(10)	4	4	0	
3. Percent Of Site Being Farmed	(20)	0	20	0	
4. Protection Provided By State and Local Government	(20)	0	0	0	
5. Distance From Urban Built-up Area	(15)	0	0	0	
6. Distance To Urban Support Services	(15)	0	0	0	
7. Size Of Present Farm Unit Compared To Average	(10)	1	0	0	
8. Creation Of Non-farmable Farmland	(10)	10	10	0	
9. Availability Of Farm Support Services	(5)	3	4	0	
10. On-Farm Investments	(20)	4	0	0	
11. Effects Of Conversion On Farm Support Services	(10)	0	0	0	
12. Compatibility With Existing Agricultural Use	(10)	0	0	0	
TOTAL SITE ASSESSMENT POINTS	160	25	45	0	0
PART VII ***(To be completed by Federal Agency)***					
Relative Value Of Farmland *(From Part V)*	100	0	0	0	0
Total Site Assessment *(From Part VI above or local site assessment)*	160	25	45	0	0
TOTAL POINTS ***(Total of above 2 lines)***	260	25	45	0	0

Site Selected:	Date Of Selection	Was A Local Site Assessment Used? YES ☐ NO ☑

Reason For Selection:

Name of Federal agency representative completing this form: Jason Sturm	Date: 24 Feb 2025

(See Instructions on reverse side) **Form AD-1006 (03-02)**

APPENDIX C

NHPA SECTION 106 CONSULTATION

1. **Section 106 Consultation Letter**
2. **Consulting Party Distribution List**
3. **Response/Concurrence from Consulting Parties**

U.S. Department of Veterans Affairs

March 28, 2025

W. Eric Emerson, Ph.D.
State Historic Preservation Officer
South Carolina Department of Archives & History
8301 Parklane Road
Columbia, SC 29223
eemerson@scdah.sc.gov

RE: Initiation of Section 106 Consultation for the Proposed Acquisition, Construction, and Operation of a Department of Veterans Affairs (VA) Outpatient Clinic in Beaufort County, South Carolina

Dear Mr. Emerson,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is initiating Section 106 consultation with the South Carolina Department of Archives & History as the State Historic Preservation Officer for the referenced project in Beaufort County, South Carolina.

The undertaking is the acquisition of a parcel, subsequent construction and operation of a new clinic, and the closing of the existing clinic in Beaufort, South Carolina. There are three separate parcels under review for potential development, only one of which will be selected. If VA selects the parcel at 1844 Ribaut Road, all extant buildings on the parcel will be demolished prior to clinic construction. VA currently operates an outpatient clinic in the Naval Hospital Beaufort at 1 Pinckney Boulevard, Beaufort, South Carolina, 29902. The proposed project will improve medical care to better serve Veterans in the area.

In October 2024, VA contracted for this Initial Cultural Resources Impact Prediction (ICRIP) Report and archaeological surveys for each of the potential parcels. All work was conducted in accordance with the most recent guidelines promulgated by the South Carolina Department of Archives & History.

Regardless of the site selected, the undertaking will have no adverse effects to historic properties, pursuant to 36 CFR 800.5(b). VA requests your concurrence with this finding. Should you have any questions or comments about this project, please feel free to contact Mr. Alec Bennett, Senior Historic Preservation Specialist at alec.bennett@va.gov or 202-855-0727.

Sincerely,

Ronnie Smith MHSA, MBA
Associate Director

Attachment 1: Initial Cultural Resources Impact Prediction Report
Attachment 2: Phase I Cultural Resources Assessment Survey, 708 Robert Smalls Pkwy
Attachment 3: Phase I Cultural Resources Assessment Survey, Robert Small at Goethe Hill
Attachment 4: Phase I Cultural Resources Assessment Survey, 1844 Ribaut Road

CC: Alec Bennett, VA Senior Historic Preservation Specialist
Jason Sturm, VA Environmental Engineer

VA | U.S. Department of Veterans Affairs

March 28, 2025

Brina Williams, THPO
Alabama-Quassarte Tribal Town
2122 Highway 27,
Wetumka, OK 74883
Brina.williams@alabama-quassarte.org

RE: Initiation of Section 106 Consultation for the Proposed Acquisition, Construction, and Operation of a Department of Veterans Affairs (VA) Outpatient Clinic in Beaufort County, South Carolina

Dear THPO Williams,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is initiating Section 106 consultation with your organization for the referenced project in Beaufort County, South Carolina.

The undertaking is the acquisition, construction, and operation of a new VA outpatient clinic in Beaufort County, South Carolina, and the closure of the existing VA clinic. The proposed project will improve medical care to better serve Veterans throughout southeastern South Carolina. There are three separate parcels under review for potential development, only one of which will be selected. If VA selects the parcel at 1844 Ribaut Road, all extant buildings on the parcel will be demolished prior to clinic construction. VA currently operates an outpatient clinic in the Naval Hospital Beaufort at 1 Pinckney Boulevard, Beaufort, South Carolina, 29902.

In October 2024, VA contracted for an Initial Cultural Resources Impact Prediction study and archaeological surveys for each of the potential parcels. All work was conducted in accordance with the most recent guidelines promulgated by the South Carolina Department of Archives & History.

Regardless of the site selected, the undertaking will have no adverse effects to historic properties, pursuant to 36 CFR 800.5(b). Should you have any questions or comments about this project, please feel free to contact Mr. Alec Bennett, Senior Historic Preservation Specialist at alec.bennett@va.gov or 202-855-0727.

Sincerely,

Ronnie Smith MHSA, MBA
Associate Director

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Attachment 3: Phase I Cultural Resources Assessment Survey, Robert Small at Goethe Hill
Attachment 4: Phase I Cultural Resources Assessment Survey, 1844 Ribaut Road

CC: Alec Bennett, VA Senior Historic Preservation Specialist
Jason Sturm, VA Environmental Engineer

U.S. Department of Veterans Affairs

March 28, 2025

Dr. Wenonah G. Haire, THPO
Catawba Indian Nation
1536 Tom Steven Road,
Rock Hill, SC 29730
Wenonah.haire@catawba.com

RE: Initiation of Section 106 Consultation for the Proposed Acquisition, Construction, and Operation of a Department of Veterans Affairs (VA) Outpatient Clinic in Beaufort County, South Carolina

Dear THPO Haire,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is initiating Section 106 consultation with your organization for the referenced project in Beaufort County, South Carolina.

The undertaking is the acquisition, construction, and operation of a new VA outpatient clinic in Beaufort County, South Carolina, and the closure of the existing VA clinic. The proposed project will improve medical care to better serve Veterans throughout southeastern South Carolina. There are three separate parcels under review for potential development, only one of which will be selected. If VA selects the parcel at 1844 Ribaut Road, all extant buildings on the parcel will be demolished prior to clinic construction. VA currently operates an outpatient clinic in the Naval Hospital Beaufort at 1 Pinckney Boulevard, Beaufort, South Carolina, 29902.

In October 2024, VA contracted for an Initial Cultural Resources Impact Prediction study and archaeological surveys for each of the potential parcels. All work was conducted in accordance with the most recent guidelines promulgated by the South Carolina Department of Archives & History.

Regardless of the site selected, the undertaking will have no adverse effects to historic properties, pursuant to 36 CFR 800.5(b). Should you have any questions or comments about this project, please feel free to contact Mr. Alec Bennett, Senior Historic Preservation Specialist at alec.bennett@va.gov or 202-855-0727.

Sincerely,

Ronnie Smith MHSA, MBA
Associate Director

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Attachment 4: Phase I Cultural Resources Assessment Survey, 1844 Ribaut Road

CC: Alec Bennett, VA Senior Historic Preservation Specialist
Jason Sturm, VA Environmental Engineer

U.S. Department of Veterans Affairs

March 28, 2025

Tom Jonathan, Chief
Tuscarora Nation
5226 Walmore Rd,
Lewistown, NY 14092
tuscnationhouse@gmail.com

RE: Initiation of Section 106 Consultation for the Proposed Acquisition, Construction, and Operation of a Department of Veterans Affairs (VA) Outpatient Clinic in Beaufort County, South Carolina

Dear Chief Jonathan,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is initiating Section 106 consultation with your organization for the referenced project in Beaufort County, South Carolina.

The undertaking is the acquisition, construction, and operation of a new VA outpatient clinic in Beaufort County, South Carolina, and the closure of the existing VA clinic. The proposed project will improve medical care to better serve Veterans throughout southeastern South Carolina. There are three separate parcels under review for potential development, only one of which will be selected. If VA selects the parcel at 1844 Ribaut Road, all extant buildings on the parcel will be demolished prior to clinic construction. VA currently operates an outpatient clinic in the Naval Hospital Beaufort at 1 Pinckney Boulevard, Beaufort, South Carolina, 29902.

In October 2024, VA contracted for an Initial Cultural Resources Impact Prediction study and archaeological surveys for each of the potential parcels. All work was conducted in accordance with the most recent guidelines promulgated by the South Carolina Department of Archives & History.

Regardless of the site selected, the undertaking will have no adverse effects to historic properties, pursuant to 36 CFR 800.5(b). Should you have any questions or comments about this project, please feel free to contact Mr. Alec Bennett, Senior Historic Preservation Specialist at alec.bennett@va.gov or 202-855-0727.

Sincerely,

Ronnie Smith MHSA, MBA
Associate Director

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CC: Alec Bennett, VA Senior Historic Preservation Specialist
Jason Sturm, VA Environmental Engineer

VA | U.S. Department of Veterans Affairs

March 28, 2025

Turner Hunt, THPO
Muscogee (Creek) Nation
P.O. Box 580,
Okmulgee, OK 74447
Section106@muscogeenation.com

RE: Initiation of Section 106 Consultation for the Proposed Acquisition, Construction, and Operation of a Department of Veterans Affairs (VA) Outpatient Clinic in Beaufort County, South Carolina

Dear THPO Hunt,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is initiating Section 106 consultation with your organization for the referenced project in Beaufort County, South Carolina.

The undertaking is the acquisition, construction, and operation of a new VA outpatient clinic in Beaufort County, South Carolina, and the closure of the existing VA clinic. The proposed project will improve medical care to better serve Veterans throughout southeastern South Carolina. There are three separate parcels under review for potential development, only one of which will be selected. If VA selects the parcel at 1844 Ribaut Road, all extant buildings on the parcel will be demolished prior to clinic construction. VA currently operates an outpatient clinic in the Naval Hospital Beaufort at 1 Pinckney Boulevard, Beaufort, South Carolina, 29902.

In October 2024, VA contracted for an Initial Cultural Resources Impact Prediction study and archaeological surveys for each of the potential parcels. All work was conducted in accordance with the most recent guidelines promulgated by the South Carolina Department of Archives & History.

Regardless of the site selected, the undertaking will have no adverse effects to historic properties, pursuant to 36 CFR 800.5(b). Should you have any questions or comments about this project, please feel free to contact Mr. Alec Bennett, Senior Historic Preservation Specialist at alec.bennett@va.gov or 202-855-0727.

Sincerely,

Ronnie Smith MHSA, MBA
Associate Director

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CC: Alec Bennett, VA Senior Historic Preservation Specialist
Jason Sturm, VA Environmental Engineer

VA | U.S. Department of Veterans Affairs

March 28, 2025

Lora Nuckolls, THPO
Eastern Shawnee Tribe of Oklahoma
70500 E. 128 Rd.,
Wyandotte, OK 74370
thpo@estoo.net

RE: Initiation of Section 106 Consultation for the Proposed Acquisition, Construction, and Operation of a Department of Veterans Affairs (VA) Outpatient Clinic in Beaufort County, South Carolina

Dear THPO Nuckolls,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is initiating Section 106 consultation with your organization for the referenced project in Beaufort County, South Carolina.

The undertaking is the acquisition, construction, and operation of a new VA outpatient clinic in Beaufort County, South Carolina, and the closure of the existing VA clinic. The proposed project will improve medical care to better serve Veterans throughout southeastern South Carolina. There are three separate parcels under review for potential development, only one of which will be selected. If VA selects the parcel at 1844 Ribaut Road, all extant buildings on the parcel will be demolished prior to clinic construction. VA currently operates an outpatient clinic in the Naval Hospital Beaufort at 1 Pinckney Boulevard, Beaufort, South Carolina, 29902.

In October 2024, VA contracted for an Initial Cultural Resources Impact Prediction study and archaeological surveys for each of the potential parcels. All work was conducted in accordance with the most recent guidelines promulgated by the South Carolina Department of Archives & History.

Regardless of the site selected, the undertaking will have no adverse effects to historic properties, pursuant to 36 CFR 800.5(b). Should you have any questions or comments about this project, please feel free to contact Mr. Alec Bennett, Senior Historic Preservation Specialist at alec.bennett@va.gov or 202-855-0727.

Sincerely,

Ronnie Smith

Ronnie Smith MHSA, MBA
Associate Director

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CC: Alec Bennett, VA Senior Historic Preservation Specialist
Jason Sturm, VA Environmental Engineer

VA | U.S. Department of Veterans Affairs

March 28, 2025

Mary Lou Brewton
Beaufort County Historical Society
P.O. Box 55,
Beaufort, SC 29901
maryloubrew@aol.com

RE: Initiation of Section 106 Consultation for the Proposed Acquisition, Construction, and Operation of a Department of Veterans Affairs (VA) Outpatient Clinic in Beaufort County, South Carolina

Dear Ms. Brewton,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is initiating Section 106 consultation with your organization for the referenced project in Beaufort County, South Carolina.

The undertaking is the acquisition, construction, and operation of a new VA outpatient clinic in Beaufort County, South Carolina, and the closure of the existing VA clinic. The proposed project will improve medical care to better serve Veterans throughout southeastern South Carolina. There are three separate parcels under review for potential development, only one of which will be selected. If VA selects the parcel at 1844 Ribaut Road, all extant buildings on the parcel will be demolished prior to clinic construction. VA currently operates an outpatient clinic in the Naval Hospital Beaufort at 1 Pinckney Boulevard, Beaufort, South Carolina, 29902.

In October 2024, VA contracted for an Initial Cultural Resources Impact Prediction study and archaeological surveys for each of the potential parcels. All work was conducted in accordance with the most recent guidelines promulgated by the South Carolina Department of Archives & History.

Regardless of the site selected, the undertaking will have no adverse effects to historic properties, pursuant to 36 CFR 800.5(b). Should you have any questions or comments about this project, please feel free to contact Mr. Alec Bennett, Senior Historic Preservation Specialist at alec.bennett@va.gov or 202-855-0727.

Sincerely,

Ronnie Smith MHSA, MBA
Associate Director

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CC: Alec Bennett, VA Senior Historic Preservation Specialist
Jason Sturm, VA Environmental Engineer

U.S. Department of Veterans Affairs

March 28, 2025

Christina DiJulio-Cook, Planning Dept.
Beaufort County Historic Preservation Review Board
100 Ribaut Road, Room 115,
Beaufort, SC 29902
Christina.cook@bcgov.net

RE: Initiation of Section 106 Consultation for the Proposed Acquisition, Construction, and Operation of a Department of Veterans Affairs (VA) Outpatient Clinic in Beaufort County, South Carolina

Dear Ms. DiJulio-Cook,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is initiating Section 106 consultation with your organization for the referenced project in Beaufort County, South Carolina.

The undertaking is the acquisition, construction, and operation of a new VA outpatient clinic in Beaufort County, South Carolina, and the closure of the existing VA clinic. The proposed project will improve medical care to better serve Veterans throughout southeastern South Carolina. There are three separate parcels under review for potential development, only one of which will be selected. If VA selects the parcel at 1844 Ribaut Road, all extant buildings on the parcel will be demolished prior to clinic construction. VA currently operates an outpatient clinic in the Naval Hospital Beaufort at 1 Pinckney Boulevard, Beaufort, South Carolina, 29902.

In October 2024, VA contracted for an Initial Cultural Resources Impact Prediction study and archaeological surveys for each of the potential parcels. All work was conducted in accordance with the most recent guidelines promulgated by the South Carolina Department of Archives & History.

Regardless of the site selected, the undertaking will have no adverse effects to historic properties, pursuant to 36 CFR 800.5(b). Should you have any questions or comments about this project, please feel free to contact Mr. Alec Bennett, Senior Historic Preservation Specialist at alec.bennett@va.gov or 202-855-0727.

Sincerely,

Ronnie Smith MHSA, MBA
Associate Director

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Attachment 4: Phase I Cultural Resources Assessment Survey, 1844 Ribaut Road

CC: Alec Bennett, VA Senior Historic Preservation Specialist
Jason Sturm, VA Environmental Engineer

Initial Cultural Resource Impact Prediction Study for the Proposed Acquisition, Construction, and Operation of a Department of Veteran's Affairs Outpatient Clinic in Beaufort County, South Carolina

Prepared for:
US Department of Veterans Affairs
Office of Construction and Facilities Management

Prepared by:
Row 10 Historic Preservation Solutions, LLC
8215 Sycamore Place
New Orleans, LA 70118

On behalf of:
Mabbett & Associates, Inc.
105 Central Street, Suite 4100
Stoneham, MA 02180-1260

February 23, 2025

1. Executive Summary

The U.S. Department of Veteran's Affairs (VA) Office of Real Property (ORP) supports VA's mission by acquiring land and leasing space for construction of medical and medically-related facilities. VA is in the process of acquiring a long-term lease to construct and operate an outpatient clinic (OPC) in the Beaufort, South Carolina area. This will be a "build-to-suit" lease, and it will replace the existing VA Beaufort primary care clinic. VA is contemplating three different parcels in the Beaufort area for this new OPC. VA intends to choose one of these parcels for development of the project.

In October 2024, VA, through a contract with Mabbett & Associates, Inc., tasked Row 10 Historic Preservation Solutions, LLC (Row 10) to determine potential effects to historic and cultural resources of the proposed OPC acquisition, construction, and operation. Row 10 reviewed three proposed parcels, as well as the site of the existing VA Beaufort primary care clinic. The parcels for Sites 1 and 2 are both wooded lots along Robert Smalls Parkway. The parcel for Site 1, located at 708 Robert Smalls Parkway, is in the municipality of Port Royal and sits along the northwest side of the road. The parcel for Site 2 is also on the northwest side of the road and is located just within the city limits of Beaufort, north of the intersection of Robert Smalls Parkway and Goethe Hill Road. The parcel for Site 3 is a developed site along the north side of Ribaut Road in Port Royal. Site 3 consists of the current addresses 1844 Ribaut Road (Beaufort Construction of SC, general contractors); 1830 Ribaut Road (Sea Island Apartments); and 1807 Rahn Lane (Scoggins All Terrain Clearing office building). Though the Sea Island Apartment complex was designed in 1950 by a notable Columbia, SC architecture firm, the complex is not eligible for listing in the National Register of Historic Places (NRHP) under Criteria A or C. The existing VA Beaufort primary care clinic is located in the Naval Hospital Beaufort at 1 Pinckney Boulevard. Although no evaluation of the hospital has been done, and such an evaluation is beyond the scope of this study, for the purposes of this survey VA is assuming that the building is eligible for the NRHP.

There are no previously listed NRHP properties within the three discontinuous prospective parcel Areas of Potential Effect, nor are there any known archaeological sites. For the purposes of the current study, VA assumes that the Naval Hospital Beaufort is eligible for the NRHP. Regardless of which parcel is selected for the new clinic, the undertaking will result in the existing clinic inside the Naval Hospital being closed. When the existing VA Beaufort primary care clinic in Naval Hospital Beaufort is closed, there will be no effect to the operational hospital. Therefore, regardless of which parcel is selected, the project will have no adverse effects to historic properties, pursuant to 36 CFR 800.5(b).

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ATTACHMENTS

Attachment A: Chronicle Heritage, "Phase I Cultural Resource Survey for a Potential VA Outpatient Clinic Facility at 708 Robert Smalls Parkway, Beaufort County, South Carolina", February 7, 2025.

Attachment B: Chronicle Heritage, "Phase I Cultural Resource Survey for a Potential VA Outpatient Clinic Facility at Robert Smalls Parkway and Goethe Hill Road, Beaufort County, South Carolina, February 7, 2025.

Attachment C: Chronicle Heritage, "Phase I Cultural Resource Survey for a Potential VA Outpatient Clinic Facility at 1844 Ribaut Road, Beaufort County, South Carolina", February 7, 2025.

1. Project Description

The U.S. Department of Veterans Affairs (VA) Office of Real Property (ORP) supports VA's mission by acquiring land and leasing space for construction of medical and medically related facilities. VA is in the process of acquiring a long-term lease to construct and operate a replacement outpatient clinic (OPC) in the Beaufort, South Carolina area. This will be a "build-to-suit" lease, and it will replace the existing VA Beaufort primary care clinic. VA is evaluating three different parcels in the Beaufort area for this new OPC, as well as evaluating the effects of closing the extant clinic. VA intends to choose one parcel for the project. Row 10 is supporting VA by developing this Initial Cultural Resources Impact Prediction (ICRIP) report for each parcel around Beaufort.

This ICRIP study is developed to assist VA in conducting its due diligence effort and to identify any significant cultural resource concerns related to the acquisition, construction, and operation of a replacement OPC. Although a final design has not been selected, the OPC will not exceed two stories in height and will encompass approximately 95,000 square feet (SF).

1.1 The National Historic Preservation Act and the National Environmental Policy Act

The National Historic Preservation Act of 1966, as amended, 54 U.S.C. 300101 et seq. (NHPA), requires federal agencies to consider the potential effects of undertakings on historic properties and provide the Advisory Council on Historic Preservation (ACHP) the opportunity to comment. A historic property is defined as any "district, site, building, structure, or object included in, or eligible for, the NRHP, and hence entitled to consideration under NHPA."[1] The proposed construction and operation of a new VA OPC in or near Beaufort, South Carolina qualifies as an undertaking under NHPA.

1.2 Methodology

Identification efforts for this ICRIP included pedestrian survey of the parcels and the existing clinic; windshield survey of areas within the Area of Potential Effect (APE); review of sources as the Beaufort County Public Library, secondary sources, collections of USGS topographic maps of the Beaufort area, and historic maps and aerial photographs; review of NRHP-listed and -evaluated properties from the database of the South Carolina State Historic Preservation Office (SC SHPO), a division of the South Carolina Department of Archives and History; and the NRHP database administered by the National Park Service. All surveys were undertaken by personnel meeting the *Professional Qualifications Standards* established for Architectural History. Similarly, all research was undertaken by personnel meeting the *Professional Qualifications Standards* established for History. The field survey was conducted on December 11 and 12, 2024.

2. Brief History of Properties and Study Area

Around 4,000 years ago sea levels rose to nearly modern levels, creating miles of saltwater marshes and tidal areas along South Carolina's coastline. These areas were rich with food and other resources important to prehistoric indigenous life. During the 17th century indigenous tribes began moving north, out of Florida and along the Carolina coast. European exploration of the area began in the 16th century.

[1] 36CFR800.16(l).

Spain attempted to establish sovereignty over the region multiple times, each time constructing forts and settlements which only lasted for a few years.

The land that became the state of South Carolina was eventually claimed by England, and the Lords Proprietors of Carolina ordered the establishment of Beaufort Town in 1710. To defend Beaufort Town, Fort Frederick was constructed on Parris Island in 1734. Fort Frederick was constructed with tabby (a lime, sand, and crushed oyster shell mixture), but was poorly made and deteriorated quickly. The fort was replaced further upriver by Fort Lyttelton at Spanish Point which was in use through the Revolutionary War. The ruins of Fort Frederick are still extant and are located on the Naval Hospital Beaufort base, where the existing VA primary care clinic is located.[2] Beaufort and Port Royal Island were occupied by the British for three years during the Revolutionary War.[3]

Economic growth after the Revolutionary War was slow until the introduction of long staple Sea Island cotton, and the invention of the cotton gin dramatically increased the population of enslaved laborers; the enslaved population in the Beaufort area by 1800 exceeded 80 per cent of all residents.[4]

South Carolina seceded from the Union in 1860 and quickly attempted to defend Port Royal sound as a natural anchorage for large vessels. Union forces attacked November 7, 1861, and quickly took command of Hilton Head and Port Royal Islands, the port, and two Confederate forts. Beaufort County was occupied for the remainder of the Civil War, which spared Beaufort County the worst physical destruction. However, the war and the sea change from enslaved to freed labor left the region socially and economically shattered.[5]

Beaufort County's revitalization after the Civil War and Reconstruction gave thanks in large part to the division of former cotton plantations into small truck farms supplying produce to larger urban centers. Throughout the 20th century Beaufort County saw the development of a strong lumber industry and tourism once bridge construction began in the 1920s, connecting neighboring islands and marshland via automobile. Military installations post-World War II brought a large population surge of both military and civilians to staff multiple bases.[6]

3. Definition of the Undertaking

The proposed project is the acquisition of a single parcel for the construction and operation of a new VA OPC. Specific plans for the OPC are not yet available; however, for the purposes of this ICRIP, certain parameters are known. The project will be done as a "build-to-suit" lease agreement with a private developer. The clinic will not exceed two stories, and the facility will measure approximately 95,000 SF. The undertaking also includes the creation of approximately 500 parking spaces and associated utility work. VA currently operates a primary care clinic at 1 Pinckney Boulevard, Beaufort, South Carolina, which is within the Naval Hospital Beaufort. Upon completion of the new OPC, VA anticipates ceasing operations at the existing clinic and moving operations to the new OPC. The undertaking is the acquisition of a parcel

[2] Ibid, Page 2-5.
[3] Ibid, Page 2-6.
[4] Ibid, Page 2-7.
[5] Ibid, Pages 2-8 & 2-9.
[6] Ibid, Pages 2-14 & 2-15.

and subsequent construction and operation of the new OPC, as well as the closure of the existing primary care clinic.

VA presently is considering three parcels for development:

- Site 1- 708 Robert Smalls Parkway, Beaufort County[7]
- Site 2- Robert Smalls Parkway at Goethe Hill Road, City of Beaufort
- Site 3- 1844 Ribaut Road, City of Port Royal

Descriptions of the parcels and their respective historic properties and cultural resources follow. The parcels under consideration are located in densely developed areas slated for continued development. See maps of project areas and Areas of Potential Effects below.

Figure 1. Map of area between Beaufort and Port Royal, South Carolina. Three proposed development site parcels and existing clinic location marked.

4. Delineation of the Area of Potential Effects

Because the undertaking currently includes three potential parcels and the closure of the existing clinic, the APE consists of four discontiguous areas. The APE maps are included below. As noted above, the proposed OPC can be either one- or two-stories in height, regardless of which parcel is selected. All three parcels are zoned for commercial development. All proposed OPC conceptual development plans are set back from surrounding parcels at their front facades. The proposed OPC will not present significant physical visual, auditory, olfactory, or atmospheric effects to the surrounding area. Taking these factors

[7] The address for Site 1 in county Assessor's Office records is "708 Robert Smalls Parkway" and located within the Port Royal municipality. Online address searches place the location in Beaufort.

into account the recommended APE areas are each project parcel plus a buffer of 250 feet in all directions, and the limits of the existing VA primary care clinic within the Naval Hospital complex. The area of ground disturbance that could potentially disrupt archaeological resources is limited to the project footprint.

Figure 2. Site 1: 708 Robert Smalls Parkway. Project parcel indicated in red. APE with 250-foot buffer indicated in blue.

Figure 3. Site 2: Robert Smalls Parkway at Goethe Hill Road. Project parcel indicated in red. APE with 250-foot buffer indicated in blue.

Figure 4. Site 3: 1844 Ribaut Road. Project parcel indicated in red. APE with 250-foot buffer indicated in blue.

Figure 5. Existing VA Primary Care Clinic located at 1 Pinckney Boulevard, on the Naval Base and inside the Naval Hospital. The Naval Base parcel is indicated in red.

5. Identification of Historic Properties

On December 11 and 12, 2024, an architectural historian who meets the *Professional Qualification Standards* for History and Architectural History established by the Secretary of Interior conducted a reconnaissance survey and historic research to identify properties within the APE that are more than fifty years of age and that retain sufficient integrity to warrant listing in the NRHP.

Identification efforts for this ICRIP included a walking survey of the identified acquisition parcel and pedestrian and windshield survey of the APE and surrounding areas.

5.1 Site 1: 780 Robert Smalls Parkway, Beaufort, South Carolina

Site Description

The Site 1 project parcel is located on the north side of Robert Smalls Parkway (aka SC 170 Hwy) and consists of two parcels of vacant, wooded land. Site 1 is comprised of two real property lots: The primary lot with an assigned address is a triangular lot whose southern border is the highway, running diagonally southwest to northeast. The second lot sits behind (north of) the primary lot and is not as wide as the front lot. The two lots total approximately 28.3 acres of land. North of the project parcel is the Shadow Moss subdivision, which has posted Private Property signs at all subdivision entrances. Another wooded vacant lot sits between the project parcel and the subdivision at the northeast corner where it meets the highway. The project parcel adjoins vacant wooded land along the majority of the southwestern boundary with a small portion of cleared vacant land fronting to the highway. The entire project parcel appears to

be wooded with no large areas cleared of trees and shrubs nor paved or gravel driving surfaces. There is a small area cleared of large trees near the southwest entry point.

The parcel has one gravel entry point from the highway at the southwest corner, across the highway from the FWDG furniture store at 745 Robert Smalls Parkway. The highway is comprised of two lanes of traffic in each direction with a center turning lane and has a high volume of traffic. The properties across the highway from the project parcel consist of commercial retail fronting the highway and apartment complexes set back from the highway.

The project parcel is essentially flat and level to the highway surface; however, a wide ditch separates the highway from adjacent parcels.

Figure 6 depicts the proposed OPC conceptual development plan for the parcel at Site 1.

Figure 6. Site 1 Proposed OPC Concept Development Plan.

Figure 7. View north to Site 1 frontage onto highway from across Robert Smalls Parkway.

Figure 8. View of Site 1 looking northeast from inside southwest entry point where there is a small clearing of trees.

Figure 9. View south into Site 1 parcel from end of street Seneca Way in the Shadow Moss subdivision north of parcel. Sign posted prohibiting dumping of trash.

5.1.1 Historic Districts

There are no listed or eligible historic districts within this portion of the APE.

5.1.2 Buildings

There are 11 buildings within this portion of the APE. Ten of the buildings are residences in the Shadow Moss subdivision which were built in 2007 (Winyah and Waccamaw Way) and 2022 (Seneca Way). There is one building inside the APE that is 50 years old or older; the building is at 667 Robert Smalls Parkway and was constructed in 1948.

Figure 10. Location of residence at 667 Robert Smalls Parkway (inside red box), across highway from northeast corner of project parcel (shaded in blue). Green dashed line indicates the access road to 667 is privately owned and maintained. Image courtesy Beaufort County, South Carolina's Public Mapping Site GIS web portal: https://gis.beaufortcountysc.gov/publicmapping/

667 Robert Smalls Parkway, Beaufort, SC 29066 (Figure 11)

This one-story home was constructed in 1948 and, per the county assessor's records, is 1,449 SF. The "L"-shaped home sits on a stone foundation and has lap siding and an asphalt shingle gabled roof. The small, 2 over 2 windows may be original. The building does not appear to possess the qualities of significance for individual eligibility in the NRHP pursuant to 36 CFR part 63.

Figure 11- View northeast of 667 Robert Smalls Parkway from northeast corner of project parcel.

5.1.3 Cemeteries

There are no cemeteries in the Site 1 portion of the APE.

5.1.4 Archaeological Resources

Archaeological Sites Previously Identified

In 2024, Chronicle Heritage (Chronicle) archaeologists conducted a desktop study of this site.[8] This study consulted the SCERA, the South Carolina ArchSite online GIS database of archaeological and above-ground historic and architectural properties. They determined that there have been fourteen previous surveys located within 2 miles of the project parcel, two of which intersected portions of the parcel. There are also 55 known archaeological sites within 2 miles of the parcel as well as 26 previously recorded historical resources. None of the previously identified resources are located within the project parcel. As part of the current project, Chronicle conducted a Phase I Archaeological Survey.

Phase I Archaeological Survey

The Phase I work for Site 1, as part of the current project, was completed in December 2024. Chronicle conducted subsurface testing within the project parcel in 30-meter intervels, excavating a total of 128 shovel tests, none of which contained either prehistoric or historic artifacts. Chronicle determined that the undertaking would have no adverse effects to sites eligible for listing in the NRHP and recommends no additional archaeologic investigation is required at this time.

5.1.5 Historic Landscapes

No historic landscapes have been recorded in the Site 1 APE, nor did field survey identify any historic landscapes.

[8] Chronicle Heritage, "Phase I Cultural Resources Survey for a Potential VA Outpatient Clinic Facility at 708 Robert Smalls Parkway, Beaufort County, South Carolina", February 7, 2025. Attached as Appendix A.

5.1.6 Traditional Cultural Properties (TCP)

The SC SHPO does not identify any traditional cultural properties within the APE, nor did field survey identify any TCPs. However, the current studies did not include a TCP study.

5.2 Site 2: Robert Smalls Parkway at Goethe Hill Road, Beaufort, South Carolina

Site Description

The Site 2 project parcel is addressed 301 Robert Smalls Parkway and consists of approximately 16 acres configured roughly in a triangle. It is fully wooded, and largely surrounded by dense trees; there also is a small drainage ditch that runs along the edges of the parcel. The southern point of the parcel, near where Robert Smalls Parkway intersects Goethe Hill Road is adjacent to a small grouping of residences. The western boundary of the project parcel runs due north and is adjacent to a vacant wooded lot. The eastern boundary of the parcel runs southeast to the highway, which also bounds the parcel.

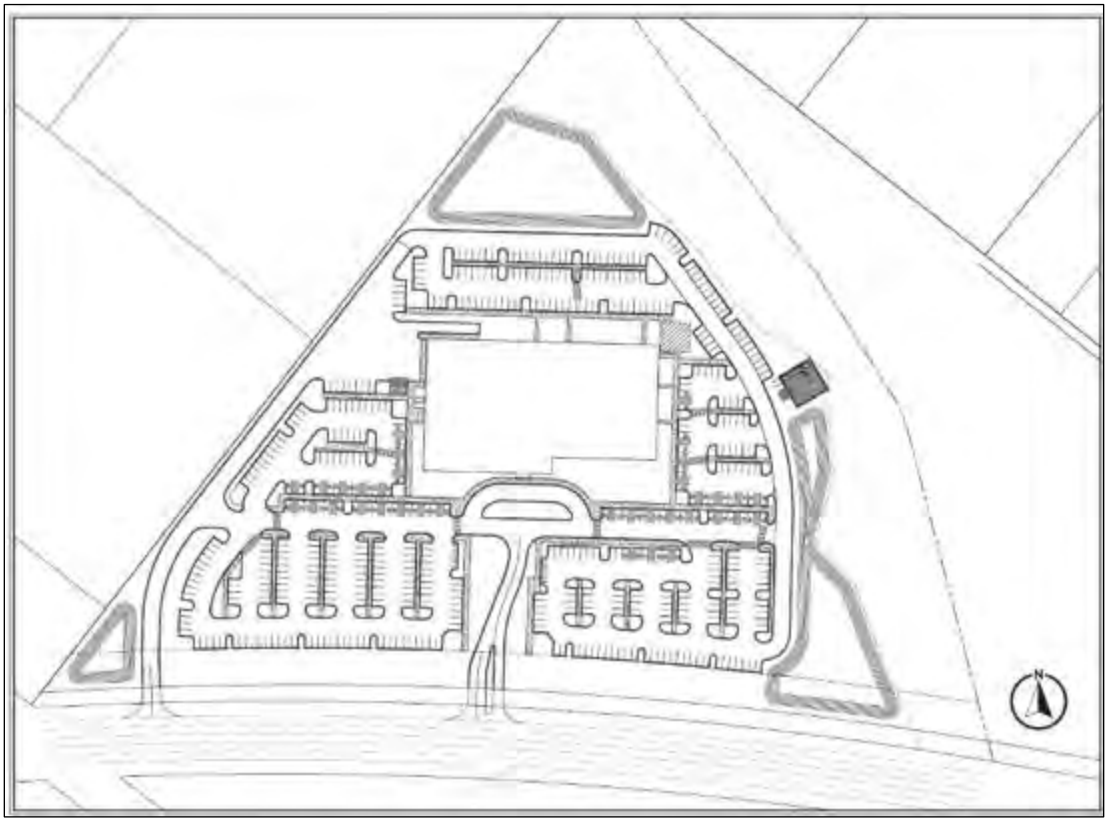

Figure 12. Site 2 Proposed OPC Concept Development Plan.

Figure 13. View north into Site 2 project parcel from Robert Smalls Parkway.

Figure 14. View south-southwest down Robert Smalls Parkway, the southern boundary.

Figure 15. View northwest from Robert Smalls Parkway into Site 2. Taken directly across road from intersection with Goethe Hill Road.

5.2.1 Historic Districts

There are no listed or eligible historic districts within this portion of the APE.

5.2.2 Buildings

Site 2 is wooded and vacant. There are, however, five buildings within the 250-foot APE buffer. Three manufactured homes at the intersection of Goethe Hill Road and Robert Smalls Parkway date to the early 21st century. An older development, Walker Circle, is a residential cul-de-sac just northwest of the northernmost point of the project parcel. This development, all trailers and manufactured homes, has a mix of mid-20th century and early 21st century construction. Of these built resources, only one building is at least 50 years old, 5612 Walker Circle.

Figure 16. 5612 Walker Circle location indicated by red box. Northwestern point of Site 2 project parcel shaded blue.

5612 Walker Circle, Beaufort, SC 29906 (Figure 17)

The one-story residence at 5612 Walker Circle is a manufactured home placed, according to county assessor records, in 1968. It is oriented south with a permanent covered front porch and ramp entrance. The gable end roof has asphalt shingles, and the home has skirting around the base, vinyl siding, and vinyl windows. The building does not appear to possess the qualities of significance for individual eligibility, pursuant to 36 CFR part 63.

Figure 17. 5612 Walker Circle, looking east.

5.2.3 Cemeteries

There are no cemeteries in the Site 2 portion of the APE.

5.2.4 Archaeological Resources

Archaeological Sites Previously Identified

In 2024, Chronicle Heritage (Chronicle) archaeologists conducted a desktop study of this site.[9] This study consulted SCERA and determined that there have been nineteen previous surveys located within 2 miles of the project parcel, two of which intersected portions of the parcel. There are also 64 known archaeological sites within 2 miles of the parcel as well as 46 previously recorded historical resources. None of the previously identified resources are located within the project parcel although a Middle Woodland-period archaeological site, 38BU1729, is located directly south of the parcel. As part of the current project, Chronicle conducted a Phase I Archaeological Survey.

Phase I Archaeological Survey

The Phase I work for Site 1, as part of the current project, was completed in December 2024. Chronicle conducted subsurface testing within the project parcel in 30-meter intervels, excavating a total of 85 shovel tests, none of identified a site or isolated find. Chronicle determined that the undertaking would have no adverse effects to sites eligible for listing in the NRHP and recommends no additional archaeological investigation is required at this time.

[9] Chronicle Heritage, "Phase I Cultural Resources Survey for a Potential VA Outpatient Clinic Facility at Robert Smalls Parkway and Goethe Hill Road, Beaufort County, South Carolina", February 7, 2025. Attached as Appendix B.

5.2.5 Historic Landscapes

No historic landscapes have been recorded in the Site 2 APE, nor did field survey identify any historic landscapes.

5.2.6 Traditional Cultural Properties (TCP)

The SC SHPO does not identify any traditional cultural properties within the APE, nor did field survey identify any TCPs. However, the current studies did not include a TCP study.

5.3 Site 3: 1844 Ribaut Road, Port Royal, South Carolina

Site Description

Site 3 is an irregularly-shaped area, comprised of three developed lots on Ribaut Road in Port Royal, South Carolina, and measuring 10.56 acres. The parcel has several buildings on it, and it is bounded by Ribaut Road to the south, Smilax Avenue to the north, and Vaigneur Road to the east. Ribaut Road is primarily a commercial corridor with some residential development. The parcel is flanked by residential neighborhoods to the west, north, and east. A commercial landscaping business adjoins the parcel to the west, fronting Ribaut Road, and a cabinetry shop, fronting Smilax Avenue, is adjacent to the the northwest corner property. The adjacent property facing Ribaut Road to the east (across Vaigneur Road) is a laundromat. South, across Ribaut Road from the project parcel, from west to east, is a realty company office, a pottery painting store, AMVETS Post #70, and a self-storage facility. A small residential neighborhood lies behind the businesses and organization fronting Ribaut Road.

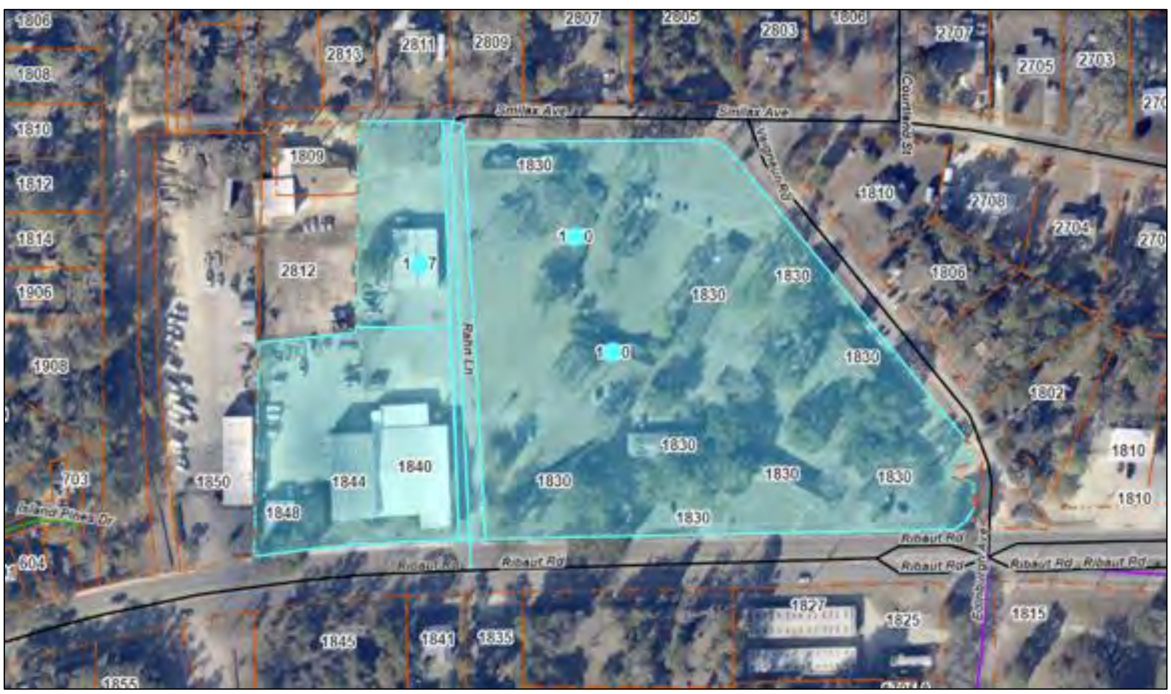

Figure 18. View of the three lots that comprise the Site 3 project parcel (shaded blue) and the surrounding parcels in Port Royal, South Carolina, as viewed on the Beaufort County "Public Mapping Site" GIS portal. [*https://gis.beaufortcountysc.gov/publicmapping/*](https://gis.beaufortcountysc.gov/publicmapping/)

Figure 19. Site 3 Proposed OPC Concept Development Plan.

5.3.1 Historic Districts

There are no listed historic districts within this portion of the APE, and the buildings in the APE are not a historic district.

5.3.2 Buildings

There are 14 buildings on the project parcel. Outside the parcel but in the APE are 22 buildings. All but one of the buildings on the project parcel are at least 50 years old; 10 buildings outside the project parcel, but in the APE, are 50 years or older. These buildings are described below.

Buildings on Site 3

1840-1844-1848 Ribaut Road, Port Royal, SC 29935 (Figures 20 & 21)

The southwest portion of the project parcel is 1840-1844-1848 Ribaut Road. The parcel consists of approximately 1.84 acres of land with a fenced storage yard and large commercial buildings. It is currently the offices of Beaufort Construction of SC, LLC. At the southeast corner of the yard is 1840 Ribaut Road, a one-story brick building. There are three buildings on site, all identified as warehouse storage in county records; one building dates to 1963. The brick building appears to be the 1963 construction, encompassing almost 5,000 SF. This building has been altered from its original construction, including a raised roof on the front façade, and non-original seamed metal paneling supporting the altered end-gable roof. The seamed metal paneling shows two former openings into the building along the eastern façade, facing Rahn Lane. The rear of the building has a shed roof addition, also constructed of seamed metal paneling. Assessor records also list a 22,020 SF warehouse dating to 1965 and a 1,392 SF warehouse built in 1995,

which would be the two metal buildings on site.[10] Abutting the building at the corner of Ribaut Road and Rahn Lane is a taller metal paneled warehouse with a standing seam metal roof that runs along the west side of the corner building. This building has openings on the west side of the building into the secure yard. In the southwest corner of the parcel is a long but thin metal warehouse with a rolling door that faces Ribaut Road. The buildings on this parcel do not appear to posses the qualities of significance for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 20. 1840 Ribaut Road, Beaufort Construction, LLC office at intersection of Ribaut Road and Rahn Lane. View west northwest; note the raised roof.

[10] Beaufort County Assessor Office Property Records, 1844 Ribaut Road, Property ID: R110 008 000 0118 0000, accessible through the Beaufort County Property Search website, https://sc-beaufort.publicaccessnow.com/Searches/Real/Detail.aspx?p=R110%20008%20000%200118%200000&a=

Figure 21. Rear entrance of 1840 Ribaut Road. View west into parking lot. A small moveable metal shed sits at the right. The blue metal warehouse in the distance is part of the landscaping company property to the west.

1807 Rahn Lane, Port Royal, SC 29935 (Figures 22 & 23)

The second lot that is part of the project parcel is 1807 Rahn Lane, which is situated just north of 844 Ribaut Road and fronts Rahn Lane. This lot is 0.78 acres, and contains a 4,800 SF one-story metal building constructed in 1968. The front façade is brick and has two entrances. There are coiling metal doors at both the north and south ends of the building. Currently, the property is home to the business Scoggins All Terrain Clearing but this building and property was once part of the Palmetto Bottling Company's property and part of the Coca-Cola Bottling plant. This building does not appear to posses the qualities of significance for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 22. View northwest to 1807 Rahn Lane, offices of Scoggins All Terrain Clearing.

Figure 23. View southwest to north end of 1807 Rahn Lane and parking lot north of building.

1830 Ribaut Road, Port Royal, SC 29935 (Figures 24 – 31)

The third lot of the Site 3 project parcel is located across Rahn Lane from the two other lots, and is the location of the Sea Island Apartment buildings at 1830 Ribaut Road. The lot is bounded by Ribaut Road to the south, Rahn Lane to the west, Smilax Avenue to the north and Vaigneur Road to the east. The complex, now vacant, has nine one-story, brick, multi-unit apartment buildings, and one small free-standing brick garage. The lot has many mature trees and parking areas accessed from all four roads. The apartment buildings are scattered across the lot and primarily face Ribaut Road, Vaigneur Road, and Smilax Avenue. The assessor's office dates the apartment buildings to 1948, and the garage to 1940; however, these dates

do not match with public records that demonstrate the complex was constructed in 1950. All the apartment buildings have asphalt tab shingle gabled roofs, wood doors, and wood windows with some noticeable replacement doors and windows. The buildings are long, rectangular buildings; each unit fronts the main façade. Front façade windows are framed by faux shutters. The larger windows are 6 over 6 and the smaller windows 2 over 2. Each unit has a front and back door. The rear of the buildings have concrete stoops and asphalt pads at the rear entrances.

The nine apartment buildings are labeled 1 through 5 and 7 through 10. It does not appear that a "Building 6" was constructed. All buildings have parking areas in front of the buildings. There is additional access to the rear of the properties from Rahn Lane which also provides access to the one-car garage, situated behind Building 2. Five buildings (Buildings 1, 3, 5, 7, and 9) have 6 units each and four buildings (Buildings 2, 4, 8, and 10) have 4 units each (Figures 24 – 31, below) for a total of 50 units. The only notable characteristics of the structures are the windows and doors that denote each separate unit. Many of the doors and windows appear to be replacements.

In February 1950 the local newspaper, *The Beaufort Gazette*, announced that two housing developments were planned for the Beaufort area to accommodate the influx of new residents who would be working at the nearby military facilities of the Naval Hospital Beaufort, the Marine Corps Recruiting Depot on Parris Island south of Port Royal, and the Naval Air Station (now Marine Corps Air Station Beaufort). The developments would be open to both military and civilians. One development, Robert Smalls Gardens, had 40 units, was constructed behind the Beaufort National Cemetery, and was for the exclusive use of African Americans. The second development was the Sea Island Apartments in Port Royal with 50 units and was not designated as segregated, although it was identified in local newspapers as 'whites only.' The developer for both apartment complexes was the same, although with different corporations for each. The developer of the Port Royal apartments was Sea Island Apartments, Inc., which consisted of Claud C. Smith, president and treasurer, and J.A. Gresham, secretary.[11]

In October 1950, the newspaper reported that construction on Sea Island Apartments, "being erected to meet the demands locally of civilian and military personnel alike," had begun following the design of Columbia, SC architectural firm of Lyles, Bissett, Carlisle and Wolff. The mortgage was loaned by the Manufacturers Trust Company, and the loan was secured by the Federal Housing Administration (FHA). The FHA valuation of the project was $282,265, and was the largest apartment project in the Beaufort area. Each unit was a two-bedroom apartment, to rent for $55 per month. The complex had a recreational area, playground, and parking. The design called for either wood or asbestos shingle siding and the landscaping.[12] The project was an FHA "Section 608" development, a program to support multi-family residential construction aimed for housing both civilian and military personnel near military facilities. Section 608 was a 1942 amendment to the National Housing Act aimed at creating housing, initially for civilian war workers, then, after the war, for military veterans and their families. After multiple amendments regarding mortgage and loan parameters, the 608 program was terminated after widespread fraud by developers was uncovered, largely by claiming construction costs far above the

[11] *The Beaufort Gazette*, Beaufort, SC, February 9, 1950, Page 1, "Two Large Housing Projects To Start In Beaufort Area", and May 11, 1950, Page 8, "Notice", www.Newspapers.com
[12] *The Beaufort Gazette*, October 12, 1950, Page 1, "Work Begins This Week On 50 Apartment Development Near Port Royal, P.I.", www.Newspapers.com

actual costs.[13] The program funded an enormous wave of residential construction across the United States:

> From 1947 to 1951, the proportion of FHA-financed rental construction to total rental construction was much higher than the proportion of owner-occupied housing built with both FHA and VA loans to total building for owner-occupancy. During these five years, about 80 per cent of the annual production of rental housing was financed by FHA loans.[14]

By April 1951, Sea Island's first 20 apartments were ready for occupancy, followed by the remaining 30 apartments the next month. Col. Smith reported that he had received over 300 applications for the rentals.[15] Col. Smith and his wife lived in the complex for the next few years as he managed the apartments from his downtown realty office.[16] Col. Smith died in a car wreck in February 1955.[17]

In 1963 the property faced foreclosure and in September 1964 the FHA published requests for sealed bids for the property with a minimum price of $120,000.[18] The complex remained open under new management until 2024, with activity visible in satellite imagery through April 2024, though it was vacant during the December 2024 site visit.[19]

The architecture firm that designed Sea Island Apartments, Lyles, Bissett, Carlisle and Wolff, eventually became an important and noted firm in Columbia, SC in the mid-20th century, specializing in Modernism with a "Total Design" philosophy. Their focus was on the relationship between space, function and construction materials, and melding that with their clients' budgets. They opened their firm in 1949 and had 58 employees by 1950. Early in their career, the firm designed multiple FHA housing projects across the South.[20]

These early apartment projects do not exhibit any of the Modern design elements that characterize Lyles, Bissett, Carlisle, and Wolff's most notable work. The firm is remembered for advocating Modernism for a southern audience. This complex is not representative of that design philosophy. The materials and façade of the buildings are classic residential materials and forms. The setting is prosaic and blends well with the suburban residential neighborhood that grew around it. There is nothing distinctive or unique about the complex that would make it eligible for NRHP listing under Criteria C for architecture. Additionally, although the complex is an example of Section 608-financed, multi-family military support housing, there were thousands of apartment complexes funded through this program. The Sea Island Apartments do not have materials integrity, and are not a notable example of this housing program, which was widespread throughout South Carolina, as well as the country. It is therefore not eligible under Criteria A as a significant example of post-World War II housing. Therefore, if VA elects to develop Site 3, the buildings on the project parcels do not appear to posses the qualities of significance for inclusion in the NRHP.

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[13] CQ Almanac, "Housing Probe", 1954, https://library.cqpress.com/cqalmanac/document.php?id=cqal54-1358024# =

[14] Leo Grebler, editor, "The Role of Federal Credit Aids in Residential Construction, National Bureau of Economin Research, 1953, Page 27, http://www.nber.org/chapters/c9295

[15] *The Beaufort Gazette*, April 19, 1951, Page 1, "First 20 Apartments In New Project Ready In 2 Weeks", www.Newspapers.com

[16] *The Beaufort Gazette*, September 2, 1954, Page 6, "Claud Smith Realty Company President Has Extensive Background In Real Estate, Land Appraisal, Financing And General Business", www.Newspapers.com

[17] *The Beaufort Gazette*, February 9, 1955, Page 15 and March 24, 1955, Page 8, www.Newspapers.com

[18] *The State*, Columbia, SC, September 20, 1964, Page 61, "Sealed Bids", www.Newspapers.com

[19] Google Earth Historical Imagery, 1830 Ribaut Rd, Port Royal, SC, USA, https://shorturl.at/FP7Xe

[20] *The Index-Journal*, Greenwood, SC, February 18, 1950, Page 1, "Begin Work On Apartment In March",

Figure 24. View north to Building 2, a four unit building from parking lot in front of Buildings 1, 2, and 3. The four-unit buildings have their front entrances paired at each end of the building.

Figure 25. View northeast to front facade of Building 3, a six-unit building. Six-unit buildings have two additional entrances at the center of the building, in addition to paired entrances at each end. The right center front door on Building 3 is a white replacement door.

Figure 26. View northwest of front facade of Building 5 from Vaigneur Road.

Figure 27. View southeast at front facade of Building 7, with replacement doors and windows.

Figure 28. View east at rear of Building 8.

Figure 29. View east of single car garage located behind (north of) Building 2.

Figure 30. View southeast at front facade of Building 10; windows are not original.

Figure 31. View south of frontages of Building 7 (left) and 8 (right).

Buildings in the buffer portion of the APE

There is also one address in the county records, 2805 Smilax Avenue, that cannot be viewed from the right-of-way and is not obviously extant from satellite imagery, so its current condition/existence is unknown; the building is listed in the county records as a mobile home.

Table 1. Site 3: Buildings within the APE that are 50 years old or older

Address	Name	Date of Construction	Listed or Eligible
1830 Ribaut Road	Sea Island Apartments	1951	No
1840-1844-1848 Ribaut Road	Beaufort Construction, Inc.	1963, 1965, 1995	No
1807 Rahn Lane	Scoggins All Terrain Clearing	1968	No
1809 Rahn Lane	Vieira Cabinetry	1950	No
2811 Smilax Ave	Residence	1925	No
2809 Smilax Ave	Residence	1970	No
2807 Smilax Ave	Residence	1960	No
2805 Smilax Ave?	*Residence*	*1958*	*No*
2803 Smilax Ave	Residence	1964	No
2708 Smilax Ave	Residence	1957	No
1810 Vaigneur Road	Residence	1953	No
1705 Edinburgh Ave	Residence	1957	No
1835 Ribaut Road	Paints 'N Paradise pottery store	1953	No
1841 Ribaut Road	Carolina Realty of the Lowcountry	1955	No

1809 Rahn Lane, Port Royal, SC 29935 (Figure 32)

This building is currently occupied by Vieira Cabinetry. The assessor's office gives a date of 1950 for the construction which may be the painted concrete block structure with gabled asphalt shingle roof and modern window units. This building is extended to the west by the wood board and batten panel over brick addition with gabled asphalt shingle roof, which is further extended west with a low-slope roof addition with coiling metal door along the north (frontage) side of the building. The assessor lists this commercial building as 2,231 SF. Though the original, concrete block building may date to the mid-20th century, the altered building does not appear to possess the qualities of significance or integrity of materials for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 32. View southwest from Smilax Avenue of 1809 Rahn Lane.

2811 Smilax Avenue, Port Royal, SC 29935 (Figure 33)

The county assessor records this 1,350 SF residence as constructed in 1925. Historic aerial photography shows that the farmland directly north of the Sea Island Apartment complex did have buildings present in 1951; however, the structure appears to be a replacement.[21] The home features a partially enclosed screened porch with metal hipped roof in front of the main body of the house with an end gabled metal roof, wood siding, and vinyl windows. A rear extension to the home and a metal shed are visible from the right-of-way. If this building does date from ca. 1925, it does not appear to have sufficient integrity of design, workmanship, or materials, to possess the qualities of significance for individual eligibility to the NRHP pursuant to 36 CFR part 63.

[21] HistoricAerials.com, "1830 Ribaut Road, Port Royal, SC 29935", https://www.historicaerials.com/viewer

Figure 33. View northeast to 2811 Smilax Avenue.

2809 Smilax Avenue, Port Royal, SC 29935 (Figure 34)

The residence at 2809 Smilax Avenue has a construction date of 1970 per the county assessor's office. The one-story brick home is approximately 1,627 SF with an integrated carport. The home features modern replacement windows with faux shutters and an asphalt shingle, cross-gabled roof. The building does not appear to possess the qualities of significance for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 34. View north of 2809 Smilax Avenue.

2807 Smilax Avenue, Port Royal, SC 29935 (Figure 35)

The one-story brick residence at 2807 Smilax Avenue dates to 1960 with the detached garage built in 1971, according to the assessor's records. The ranch, listed as a single-family home, has two separate entry doors with separate brick stoops on the front façade, resembling a duplex. The asphalt shingled roof is a low-pitched hip roof. The windows may be vinyl. This house does not appear to possess the qualities of significance in style or originality for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 35. View north of 2807 Smilax Avenue.

2805 Smilax Avenue, Port Royal, SC 29935 (Figure 36)

Though the county assessor's office records lists two buildings on the property at 2805 Smilax Avenue, the entrance to the property is not maintained in front of locked gates marked "Private Property." The assessor lists a 1958 manfactured (mobile) home, 636 SF in size, and a 1935 built utility room of 1,120 SF. Again, no buildings are visible from Smilax Avenue or in satellite imagery.

Figure 36. View north at former entrance to 2805 Smilax Avenue.

2803 Smilax Avenue, Port Royal, SC 29935 (Figure 37)

The one-story brick residence at 2803 Smilax Avenue was constructed in 1964. The 1,292 SF home has vinyl siding at the west end of the building. The windows appear to be fixed, large pane units. The hipped roof has asphalt shingles. This building does not appear to possess the qualities of significance for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 37. View north to 2803 Smilax Avenue.

2708 Smilax Avenue, Port Royal, SC 29935 (Figure 38)

This one-story home was constructed in 1957, according to county records. The 1,126 SF residence has lap siding above brick façade. The windows appear to be aluminum and the gabled roof is metal. There is a deep front porch and a covered pathway attaching the home to a detached garage to the west. This building does not appear to possess the qualities of significance or material integrity for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 38. View southwest to 2708 Smilax Avenue.

1810 Vaigneur Road, Port Royal, SC 29935 (Figure 39)

The small, one-story residence at 1810 Vaigneur Road sits on an odd-shaped lot at the intersection of Vaigneur Road and Smilex Avenue. The assessor's office records indicate it was constructed in 1953, and that it is 1,070 SF. The home has a small extension on the northwest end of the home. The majority of the home appears to have asbestos shingles while the extension has wood paneling. The windows may be aluminum and the gabled roof has asphalt shingles. This building does not appear to possess the qualities that possess the significance for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 39. View northeast to front facade of 1810 Vaigneur Road.

1705 Edinburgh Avenue, Port Royal, SC 29935 (Figure 40)

The one-story home at 1705 Edinburgh Avenue was constructed in 1957, according to the assessor office records. The 828 SF home is constructed of concrete block with an asphalt shingled, end-gable roof. The windows appear to be modern replacements. The building does not appear to possess the qualities of significance or characteristics necessary for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 40. View west of 1705 Edinburgh Avenue.

1835 Ribaut Road, Port Royal, SC 29935 (Figure 41)

This commercial building facing Ribaut Road is the premises for Paints 'N Paradise pottery painting studio. County records list the construction date as 1953. The "L" shaped building has vinyl siding and an asphalt shingled, cross-gabled roof. The front entrance is through an enclosed porch at the center of the front façade. The entrance porch has wood lap siding and large fixed pane windows. To the left of the entrance are paired doors that may be a former entrance that is now sealed and covered with signage. The front of the property is paved parking with access directly from Ribaut Road. This building does not appear to posses the qualities of significance necessary for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 41. View southwest across Ribaut Road to 1835 Ribaut Road.

1841 Ribaut Road, Port Royal, SC 29935 (Figure 42)

The two-story commercial building at 1841 Ribaut Road is listed in the county assessor records as having a construction date of 1955. The 2,264 SF building has what appears to be a stucco ground floor and wood board and batten at the second floor. The windows and front door appear to be modern replacements. The parcel is almost entirely paved for parking. This building does not appear to posses the qualities of significance for individual eligibility to the NRHP pursuant to 36 CFR part 63.

Figure 42. View southwest across Ribaut Road to 1841 Ribaut Road.

5.3.3 Cemeteries

There are no cemeteries in the Site 3 portion of the APE.

5.3.4 Archaeological Resources

Archaeological Sites Previously Identified

In 2024, Chronicle Heritage (Chronicle) archaeologists conducted a desktop study of this site.[22] This study consulted SCERA and determined that there have been 24 previous surveys located within 2 miles of the project parcel, none of which intersected the project parcel. There are also 62 known archaeological sites within 2 miles of the parcel as well as 242 previously recorded historical resources. None of the previously identified resources are located within the project parcel. As part of the current project, Chronicle conducted a Phase I Archaeological Survey.

Phase I Archaeological Survey

The Phase I work for Site 1, as part of the current project, was completed in December 2024. Chronicle conducted subsurface testing within the project parcel in 30-meter intervels, excavating a total of 15 shovel tests, none of which contained cultural material. Sixteen planned shovel tests were not excavated due to the presence of existing structures or paved surfaces. Chronicle determined that the undertaking would have no adverse effects to sites eligible for listing in the NRHP and recommends no additional archaeologic investigation is required at this time.

5.3.5 Historic Landscapes

The SC SHPO records do not identify any historic landscapes in the Site 3 APE, nor did field survey identify any potentially eligible landscapes in the APE.

5.3.6 Traditional Cultural Properties (TCP)

The records of the SC SHPO do not indicate any traditional cultural properties are known within the recommended APE. It should be noted, however, that the current studies did not include a TCP study.

5.4 Existing VA Clinic - 1 Pinckney Boulevard, Beaufort, SC 22902 (Figure 43)

The existing VA Primary Care Clinic is within the Naval Hospital Beaufort, at 1 Pinckney Boulevard, which is a secure military base. The Naval Hospital was constructed in 1949 on 127 acres of land which is also the location of the ruins of the 1734 British-built Fort Frederick and the 1862 Civil War garrison Camp Saxton, both listed in the National Register. It is also where the First South Carolina Volunteers, the earliest federally authorized unit of African American soldiers camped.[23] The Naval Hospital building does not contribute to either NRHP listing.

Today the Naval Hospital supports the Marine Corp Recruit Depot on Parris Island and the Marine Corps Air Station as well as all retired military personnel and dependents residing in the Beaufort area. The hospital is not designated as historic in any of the identified sources reviewed for this study. The evaluation of the entirety of the Naval Hospital is outside the scope of the current work. However, based upon a desktop review, the hospital may be eligible for inclusion in the NRHP. Therefore, for the purposes of this study, VA is assuming this property is eligible for the NRHP.

[22] Chronicle Heritage, "Phase I Cultural Resources Survey for a Potential VA Outpatient Clinic Facility at 1844 Ribaut Road, Beaufort County, South Carolina", February 7, 2025. Attached as Appendix C.
[23] Naval Hospital Beaufort "About Us", https://beaufort.tricare.mil/About-Us

Figure 43. View north of the bay-facing facade of Naval Hospital Beaufort, 1 Pinckney Boulevard.

6. Assessment of Effects on Historic Properties

The parts of the APE associated with Site 1 (780 Robert Smalls Parkway), Site 2 (Robert Smalls Parkway at Goethe Hill Road), and Site 3 (1844 Ribaut Road) do not have historic properties. For the pusposes of the current study, VA assumes that the Naval Hospital Beaufort is eligible for the NRHP. Regardless of which parcel is selected for the new clinic, VA will close the existing primary care clinic inside the Naval Hospital. This will result in adverse no effect to the operational hospital. Therefore, regardless of which parcel is selected, the project will have no adverse effects to historic properties, pursuant to 36 CFR 800.5(b).

7. Consultation Efforts

In addition to consulting with the SC SHPO, VA is submitting this information to the list of consulting parties on Table 2 below and requesting input from those parties.

Table 2. Consulting Parties

Organization Name	Contact Name	Title	Address	Phone	Email
SC Department of Archives & History	W. Eric Emerson, Ph.D.	SHPO	8301 Parklane Rd, Columbia, SC 29223	803-896-6185	eemerson@scdah.sc.gov
Alabama-Quassarte Tribal Town	Brina Williams	THPO	2122 Highway 27, Wetumka, OK 74883	405-452-3881	Brina.williams@alabama-quassarte.org
Catawba Indian Nation (aka Catawba Indian Tribe of South Carolina)	Dr. Wenonah G. Haire	THPO	1536 Tom Steven Road, Rock Hill, SC 29730	803-328-2427, xt.224	Wenonah.haire@catawba.com
Eastern Shawnee Tribe of Oklahoma	Lora Nuckolls	THPO	70500 E. 128 Rd., Wyandotte, OK 74370	918-238-5151, xt.1840	thpo@estoo.net
Muscogee (Creek) Nation	Turner Hunt	THPO	P.O. Box 580, Okmulgee, OK 74447	918-732-7759	Section106@muscogeenation.com
Tuscarora Nation	Tom Jonathan	Chief	5226 Walmore Rd, Lewistown, NY 14092	716-264-6007,xt.110	tuscnationhouse@gmail.com
Beaufort County Historic Preservation Review Board (CLG)	Christina DiJulio-Cook	Planning Dept. Contact	100 Ribaut Road, Room 115, Beaufort, SC 29902	843-255-2140	Christina.cook@bcgov.net
Beaufort County Historical Society	MaryLou Brewton	Contact	P.O. Box 55, Beaufort, SC 29901		maryloubrew@aol.com

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Phase I Cultural Resource Survey for a Potential VA Outpatient Clinic Facility at 708 Robert Smalls Parkway,

Beaufort County, South Carolina

Douglas Sain, Ph.D., RPA
Laura Hensel, M.S., RPA
Holly Baker, M.A.
March 11, 2025

Phase I Cultural Resource Survey for a Potential VA Outpatient Clinic Facility at 708 Robert Smalls Parkway, Beaufort County, South Carolina

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Office of Construction and Facilities Management
425 I Street NW, Washington, DC 20001

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Contract Number: 36C10F24F50021, GS10F0120T

Technical Report No.: 24-581

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March 11, 2025

Executive Summary

On behalf of the Department of Veterans Affairs (VA) and under subcontract to Mabbett & Associates, Inc. (Mabbett), PaleoWest, LLC dba Chronicle Heritage (Chronicle Heritage) completed a cultural resource survey (CRS) for the potential siting of an Outpatient Clinic (OPC) at 708 Robert Smalls Parkway (Project) on a 28.33-acre Project area in Beaufort County, South Carolina. The Project area comprises the footprint of the proposed development and staging areas within Parcel ID Nos. R112 031 000 017 0000 and R112 031 000 017C 0000 on the U.S. Geological Survey 2024 Laurel Bay, South Carolina, 7.5-minute topographic quadrangle.

The archaeological survey was completed in accordance with federal and state regulations, and it was undertaken to comply with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716), Professional Qualification Standards (36 Code of Federal Regulations [CFR] Part 61), and the *South Carolina Standards and Guidelines for Archaeological Investigations* (Council of South Carolina Professional Archaeologists [COSPA] 2013). Additionally, the requirements of Article 8, Section 8.500, of the Beaufort County Zoning Ordinance as well as Section 3.12 of the City of Beaufort development review ordinance were followed for projects within the jurisdiction.

Fieldwork was carried out over two days, from December 16 to 17, 2024. Shovel test pits (STPs) were pre-plotted at 30-meter (m) intervals. Chronicle Heritage plotted a total of 132 STPs and excavated 128, none of which were positive for cultural material. Four STPs were precluded from excavation due to the presence of a drainage canal and an existing structure.

Chronicle Heritage's CRS concluded that **no historic properties will be affected** by this Project in accordance with 36 CFR § 800.4 (d)(1). Chronicle Heritage recommends **no additional archaeological investigation** within the Project area at this time.

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1 Project Location and Purpose

On behalf of the Department of Veterans Affairs (VA) and under subcontract to Mabbett & Associates, Inc. (Mabbett), PaleoWest, LLC dba Chronicle Heritage (Chronicle Heritage) completed a cultural resource survey (CRS) for the potential siting of an Outpatient Clinic (OPC) at 708 Robert Smalls Parkway (Project) on a 28.33-acre (ac) Project area in Beaufort County, South Carolina. The Project area comprises the footprint of the proposed development and staging areas within Parcel ID Nos. R112 031 000 017 0000 and R112 031 000 017C 0000 on the U.S. Geological Survey (USGS) 2024 Laurel Bay, South Carolina, 7.5-minute topographic quadrangle (Figure 1-1).

This CRS was prepared accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (36 Code of Federal Regulations [CFR] Part 800), and the *South Carolina Standards and Guidelines for Archaeological Investigations* (Council of South Carolina Professional Archaeologists [COSPA] 2013). Additionally, the requirements of Article 8, Section 8.500, of the Beaufort County Zoning Ordinance as well as Section 3.12 of the City of Beaufort development review ordinance were followed for projects within the jurisdiction.

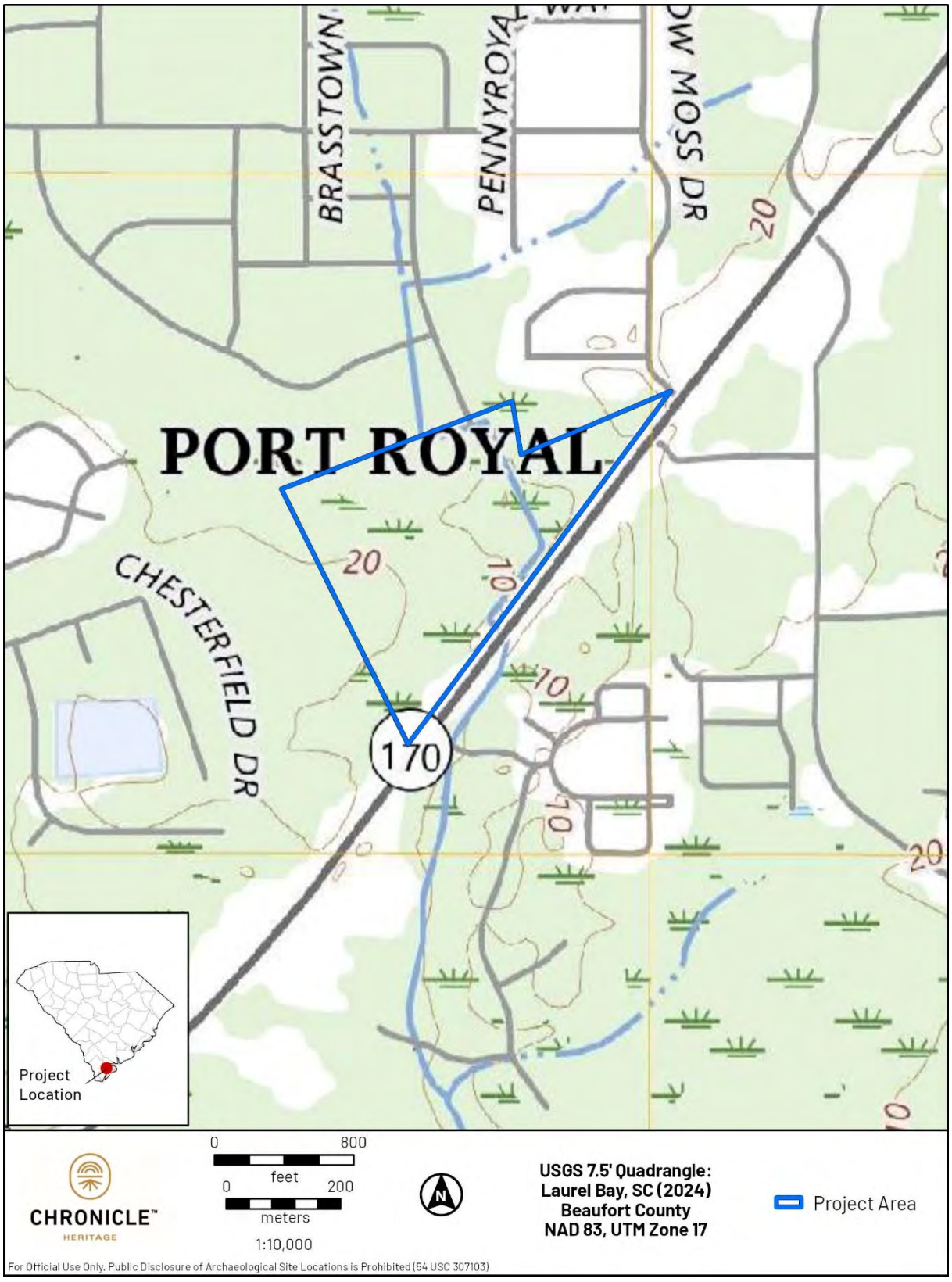

Figure 1-1. Project location map.

2 Environmental Setting

The Project area is in the Sea Islands section of the Atlantic Coastal Plain province, an area of low elevation with relatively unconsolidated beds of terrestrially and marine-deposited sand, gravel, and clay sediments (Fenneman 1938; Thornbury 1965). This is the flattest province in the state and gently slopes eastward through a sequence of terraces (National Park Service [NPS] 2024a). The province consists of clastic sediments, and the landscape contains rivers that flow eastward and southeastward and carry sand, silt, and clay toward the ocean, sometimes depositing these soils within estuaries and marshes. The Sea Islands section is an area of coastal plain with a submerged coastal border (Fenneman 1938).

The Environmental Protection Agency defines the ecoregion encompassing the Project area as the Sea Islands/Coastal Marsh within the Southern Coastal Plain. The Southern Coastal Plain is a variable region containing "barrier islands, coastal lagoons, marshes, and swampy lowlands" (Griffith et al. 2001). This ecoregion was originally vegetated by a variety of species, including "longleaf pine, slash pine, pond pine, beech, sweetgum, southern magnolia, white oak, and laurel oak" (Griffith et al. 2001). Currently, the region contains a significant amount of urban development, with other portions of the region cleared for pasture or citrus agriculture. Forests primarily consist of slash and loblolly pines. The landscape within the Sea Islands/Coastal Marsh region is affected by fluvial, aeolian, and oceanic forces, resulting in a highly dynamic and changing environment. The barrier islands consist largely of sandy soils, while the marshes largely consist of clayey and organic soils (Griffith et al. 2001).

2.1 Soils and Hydrology

Soils in the Project area are composed of sandy and loamy soils formed in marine and fluviomarine sediments. The U.S. Department of Agriculture (USDA) classifies five types of soil within the Project area (Figure 2-1; Table 2-1). The most prominent soil type is mapped as Deloss fine sandy loam (47.36% of the Project area) (Soil Survey Staff 2025). Deloss fine sandy loam is a very poorly drained soil that formed in loamy fluviomarine deposits in the northern portion of the tract. The second most abundant soil is Bladen fine sandy loam (4.05% of the Project area), which is confined to the southern portion of the Project area. Bladen fine sandy loam is described as a poorly drained soil formed from clayey marine deposits. Approximately 96.84 percent of the soils in the Project area are defined as having somewhat poorly drained to very poorly drained soils.

Topography in the Project area is relatively level across most of the tract, ranging from about 3 to 6 meters (m) above mean sea level (amsl). The tract slopes slightly from west to east, with higher elevations in the west (approximately 6 m amsl) and lower elevations found in the east-central portion of the tract in the vicinity of a channelized segment of an unnamed tributary of the Broad River. Broad River is the closest major source of water to the parcel, approximately 1.9 kilometers (km) west of the Project area. The Broad River is a tidal channel that flows between the mainland to the south and west, and Port Royal and Parris islands on the east. The Coosawhatchie River flows into the Broad River approximately 17.7 km north-northwest of the tract. It joins Coosaw River channel northeast and continues southeast to the Atlantic Ocean as Port Royal Sound. The Project area is situated within the Coosawhatchie River portion of the Port Royal Sound watershed.

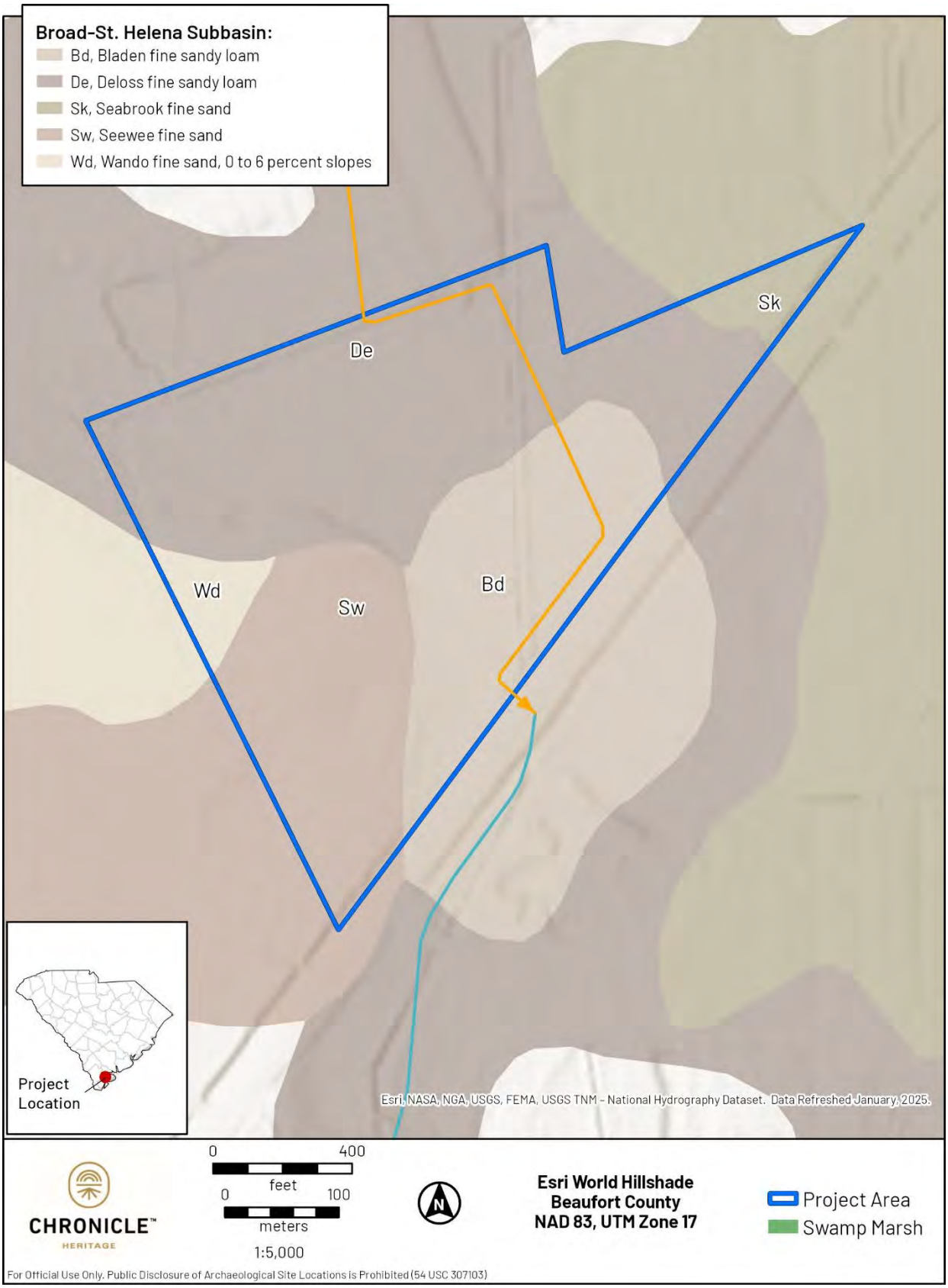

Figure 2-1. Project area in relation to mapped soils and local hydrologic features.

Table 2-1. Soils Mapped within the Project area

Soil Name	Map Code	Drainage	Landform	Slope (%)	Percentage of Project area
Deloss fine sandy loam	De	Very poorly drained	Depressions; marine terraces	0–2	47.36
Bladen fine sandy loam	Bd	Poorly drained	Depressions; marine terraces	0–2	24.05
Seewee fine sand	Sw	Somewhat poorly drained	Marine terraces	0–2	22.13
Seabrook fine sand	Sk	Somewhat poorly drained	Marine terraces	0–2	3.30
Wando fine sand	Wd	Excessively drained	Marine terraces	0–6	3.16

Source: Soil Survey Staff (2025)

2.2 Historical Map and Aerial Photograph Review

Chronicle Heritage conducted a review of historical maps and aerial photographs to infer past land use in the Project area. Sources consulted included USGS aerial photographs and topographic maps. The USGS 1920 Okatie, South Carolina, 1:62,500-scale topographic map shows the tract in a rural setting in Beaufort County, South Carolina (Figure 2-2). Four unpaved roads are depicted within the Project area. Two roads cross the northern portion of the tract from roughly west to east, merging with a third road that runs south to north in the eastern portion of the project tract. The fourth unpaved road traverses the extreme southwest portion of the Project area. One structure is indicated as being within the south-central portion of the Project area at this time.

The USGS 1942 Okatie, South Carolina, 15-minute topographic map shows development to the east and northwest of the Project area (Figure 2-3). A channelized segment of an unnamed tributary of the Broad River traverses the tract from north to south. The structure that was depicted on the USGS 1920 Okatie, South Carolina map is no longer present by 1942, and no other signs of development are visible within the project area at this time.

A USGS 1961 aerial photograph of Beaufort County shows the Project area as bordered to the south by Robert Smalls Parkway (Figure 2-4). The western and extreme eastern portions of the Project tract appear to have been cleared, possibly serving as agricultural fields. The central portion of the tract is forested. No structures are visible within the Project area at this time.

The USGS 1962 Laurel Bay, South Carolina, 7.5-minute topographic map shows the Project area in a similar setting as seen in the 1961 aerial photograph (Figure 2-5). The channelized segment of the unnamed tributary is still present in the central portion of the tract. The absence of this tributary on the USGS 1920 Okatie, South Carolina topographic map indicates that this feature was likely constructed sometime between 1920 and 1942. No other signs of development or structures are evident within the Project area.

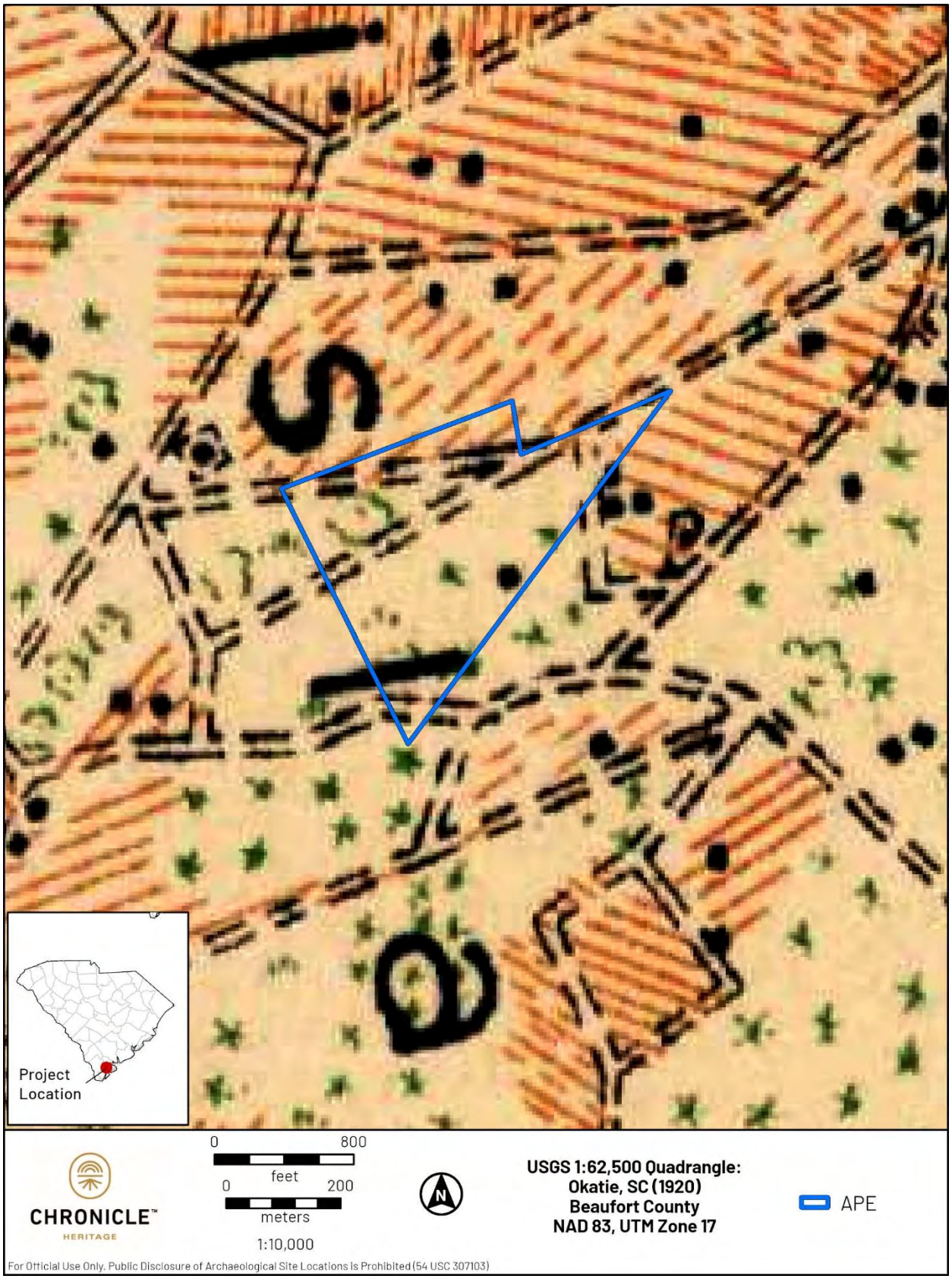

Figure 2-2. USGS 1920 Okatie, South Carolina, 15-minute topographic map of the Project area.

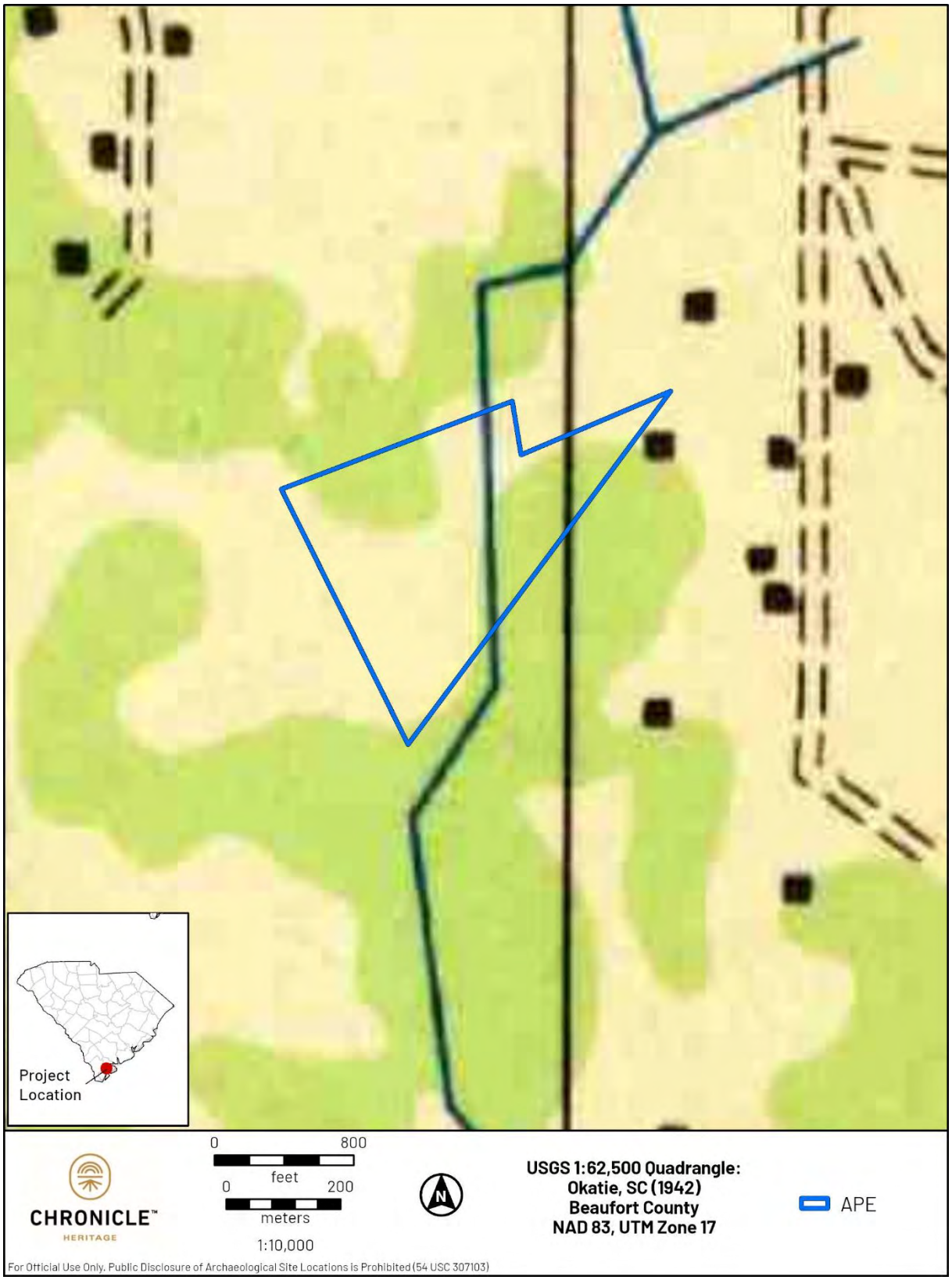

Figure 2-3. USGS 1942 Okatie, South Carolina, 15-minute topographic map of the Project area.

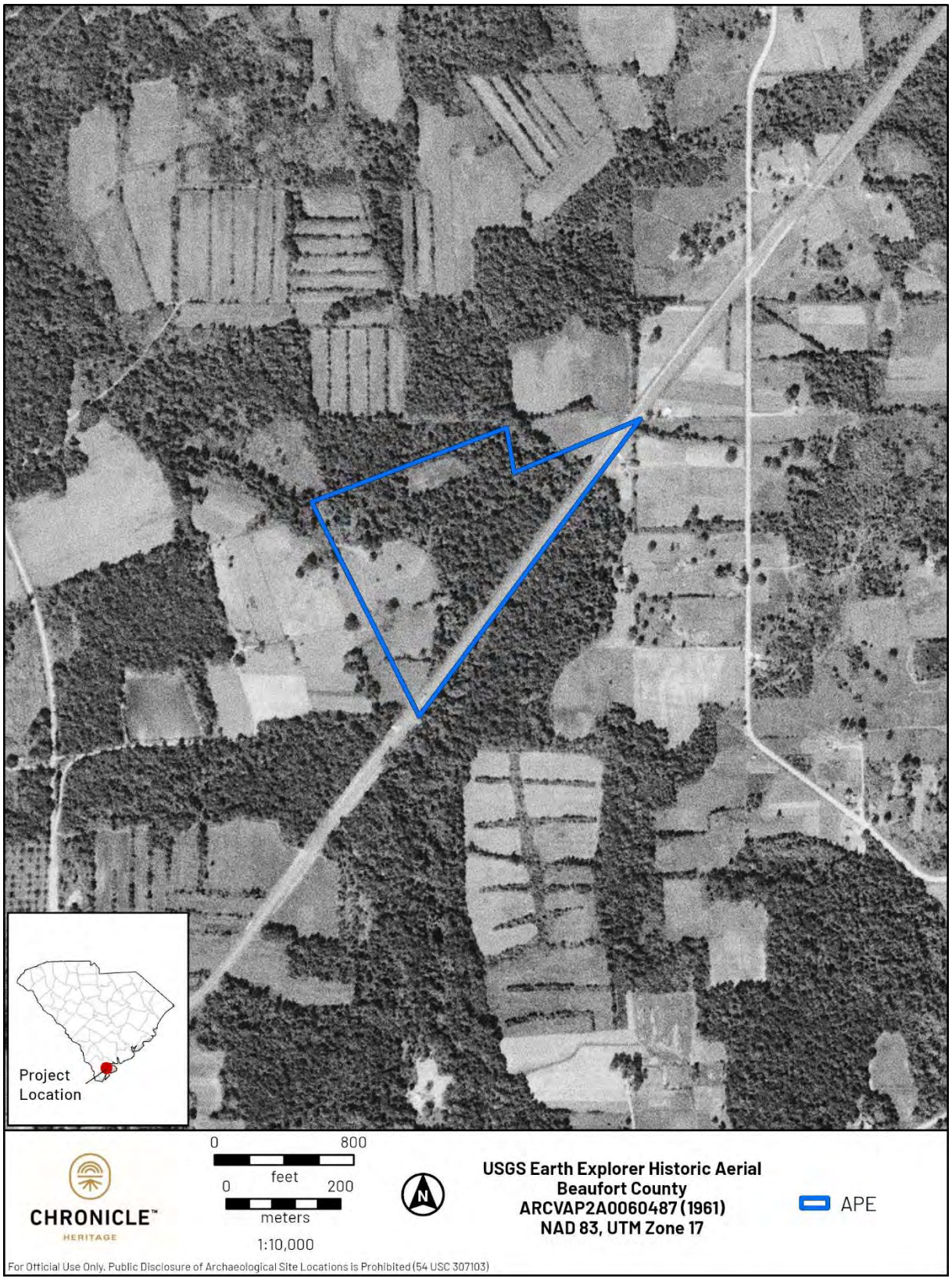

Figure 2-4. USGS 1961 aerial photograph of Beaufort County with Project area boundaries overlain.

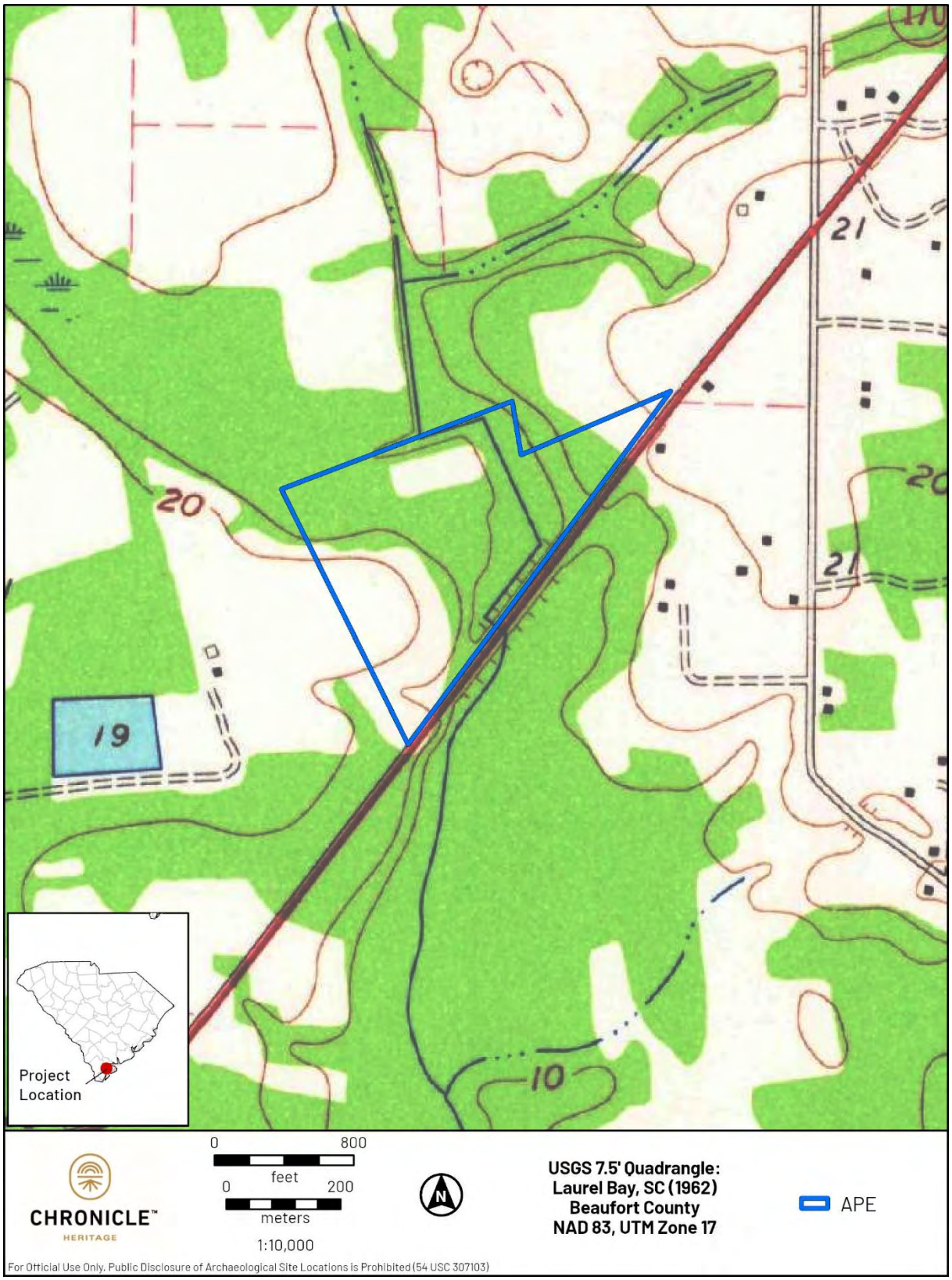

Figure 2-5. USGS 1962 Laurel Bay, South Carolina, 7.5-minute quadrangle showing the Project area.

2.3 Current Conditions

Vegetation in the Project area consists of mixed hardwoods throughout with stands of saw palmetto in the central portion of the tract (Figure 2-6 and Figure 2-7). Wetland vegetation is present in the northwestern portion of the Project area and in the central section associated with a drainage canal (Figure 2-8 and Figure 2-9). The Beaufort County Assessor's Office (BCAO) classifies the current land use as "agriculture vacant forest" (BCAO 2025).

Figure 2-6. Mixed hardwood vegetation in the eastern portion of the Project area, facing north.

Figure 2-7. Vegetation in the central portion of the Project area, facing north.

Figure 2-8. Wetland area in the northwestern portion of the Project area, facing north.

Figure 2-9. Drainage canal in the central portion of the Project area, facing northeast.

3 Historic Contexts

A review of historic contexts is a prerequisite to archaeological survey, providing perspectives for fieldwork, analysis, and interpretation. Humans have lived in South Carolina since at least 12,000 years ago, a legacy that is reflected in thousands of archaeological sites. Five broad chronological periods are used to characterize the Native American history of South Carolina: Paleoindian, Archaic, Woodland, Mississippian, and Historic. Each of these are based on distinct cultural and technological developments that can be recognized in the archaeological record. These five periods are reviewed below in addition to a discussion of the history of the Beaufort and Port Royal area.

3.1 Paleoindian

Human occupation of the Americas began during the Paleoindian Period. At present, it is uncertain when the first humans permanently settled the western hemisphere, although most scholars believe it was sometime between 20,000 and 13,000 years ago in the last stages of the Pleistocene glaciation. Recent research has provided evidence of the Paleoindian occupation of what is now known as the American Southeast as early as approximately 14,550 years B.P. (Halligan et al. 2016). This is based on 71 radiocarbon dates derived from intact peat deposits that contained a partial biface and lithic debitage at the Page-Ladson site (8JE00591) in the Aucilla River in northern Florida. The Pleistocene–Holocene transition marks the end of the Paleoindian Period, which is given an arbitrary terminal date of 8,000 B.C. in most areas of the southeastern United States.

The Paleoindian Period also corresponds, however tentatively, with the accepted temporal boundaries of the Clovis tradition, which is identified through the presence of characteristic fluted projectile points such as the Clovis and Cumberland types (Anderson and Faught 1998).

One of the most well-known archaeological sites connected to the Paleoindian Period in South Carolina is the Topper Site, 38AL23, located on the Savannah River in Allendale County. The site is on an alluvial terrace and was used as a quarry and production location for a variety of stone tools (Goodyear et al. 2007; Miller 2007, 2010). The site has proven to be important for studying the Paleoindian Period in the Southeast and has also facilitated important discussions regarding pre-Clovis occupations in the Americas. Debate regarding evidence at this site for potential pre-Clovis occupation of the Americas continues in the archaeological community.

3.2 Archaic

During the Archaic Period, the environment was characterized by a warmer climate and rising sea levels. Regionally specific adaptations to these changes resulted in changes to subsistence strategies and the formation of regionally distinct material assemblages. Archaeological evidence suggests that during this period, humans focused on the procurement of smaller game, fish, and wild plants, as the megafauna of the Pleistocene had become extinct. The Archaic Period is typically subdivided into Early, Middle, and Late periods based on distinct stone tool and other material typologies.

3.2.1 Early Archaic

The Early Archaic Period (roughly 8,000–5,000 B.C.) was a time of climate change. The southeastern United States saw a general increase in temperature and surface water. The thawing or melting of continental glaciers created higher sea levels and increased precipitation. This led to

the development of oak-dominated forest vegetation throughout the Southeast (Delcourt and Delcourt 1987). Human adaptations to a changing environment are visible in the archaeological record; these include regionally specific material culture and specialized lifeways (Anderson and Hanson 1988). The repeated use of rock shelters and inter-riverine terraces and ridge tops suggests a different lifestyle that may be a direct result of post-Pleistocene warming (Claggett and Cable 1982).

According to Anderson and Hanson (1988), Early Archaic groups in South Carolina lived in small, band-level groups and practiced seasonal settlement along major river drainages. Coastal Plain locales were used as spring foraging and logistical camps, while groups of people traversing a river drainage would aggregate at the Fall Line during the winter months (Anderson and Hanson 1988). Material culture specific to the Early Archaic Period in South Carolina includes characteristic side notched and corner notched projectile point/knives such as the Hardaway Side-notched, Palmer Corner-notched, and Kirk Corner-notched. Toward the end of the Early Archaic Period, the corner- and side-notched types give way to a bifurcate tradition such as the Hardaway-Palmer point (Chapman 1975).

3.2.2 Middle Archaic

The Middle Archaic Period (5,000–3,000 B.C.) saw increased regional adaptation and a shift toward a foraging lifestyle, as climate trends allowed for a more homogenous environment. Sassaman (1983) proposed a settlement model based on adaptive flexibility in which Middle Archaic societies could practice a fairly high level of social mobility to take advantage of dispersed but similar resource patches. The material signatures of such societies show a lack of specialized tools for varied resources. While these groups practiced social mobility, their seasonal territories continued to be regionally specific. This can be seen in a shift from the use of cryptocrystalline rock to coarser, locally available lithic material found in the Coastal Plain (Milner 2004). These assemblages are typically recognized by characteristic stemmed projectile points such as the Kirk Serrated and Kirk Stemmed points, and later Stanly Stemmed points.

3.2.3 Late Archaic

During the Late Archaic Period (3,000–1,000 B.C.), the regionally specific adaptation trends continued to develop, and an emphasis on sedentism developed throughout the Southeast. Evidence of long-term habitation can be seen in the form of large middens of oyster shell, which have accumulated along the South Carolina coastline (Smith 1986). The Late Archaic Period also saw the emergence of fired clay pottery in Coastal Plain locations throughout the Southeast. This early pottery type was known as Stallings pottery and is recognized by its distinctive fiber-tempered paste (Simpkins and Scoville 1986). Stallings vessel forms included shallow bowls, wide-mouthed bowls, and jars that were constructed by hand molding as opposed to the coiling method employed in later ceramic types (Sassaman 1993; Trinkley 1986). Surface treatments for Stallings pottery included punctation, finger pinching, and elaborate incising. Other examples of Late Archaic material culture include characteristic stemmed projectile points such as the Savannah River stemmed and the Otarre projectile points (Griffin 1943; Stoltman 1974).

3.3 Woodland Period

As a general theme, many of the cultural phenomena seen in the Late Archaic become more prevalent during the Woodland Period. Pottery, a somewhat isolated phenomenon in the Late Archaic, became common throughout the eastern United States, and variations in style and

decoration quickly became regionally specific (Milner 2004). As archaeological evidence suggests, ever larger groups of people practiced year-round settlement at certain locations and took advantage of local and regional resources. The size, frequency, and complexity of archaeological sites all increased during the Woodland Period. Archaeologists have subdivided the Woodland Period to simplify interpretation of the archaeological record. Early (1,000–300 B.C.), Middle (300 B.C.–A.D. 800), and Late (A.D. 800–1000) divisions frame the discussion and are loosely based on a seriation of diagnostic artifacts.

3.3.1 Early Woodland

The start of the Early Woodland Period is not clearly demarcated. When considering a starting point through a lens of pottery traditions, such as Thom's Creek, it is made even more confusing (Trinkley 1980). Although it was long considered an early Woodland type, Thom's Creek ceramics appear very similar to Stallings wares, exhibiting a similar form and surface treatment. A difference is seen through the type of tempering agent that makers of the traditions used, with some preferring sand instead of fiber (Griffin 1943). Originally seen as an evolution on Stallings type, radiocarbon dates obtained from the Spanish Mount site (38CH62) in Charleston County show that both traditions have been found at contemporaneous contexts (Trinkley 1980). Other dates place these two pottery types within the Early Woodland. Refuge pottery represents another Early Woodland pottery tradition and is often described as very similar to Thom's Creek. Significant changes in settlement patterns are evident where high frequencies of Refuge-type ceramics have been recovered (Brooks et al. 1989; Colquhoun et al. 1980).

3.3.2 Middle Woodland

The Middle Woodland is marked by the appearance of quartz- and grit-tempered pottery types such as the Pigeon and Cartersville series ceramics. Pigeon type ceramics are typically decorated with check-stamped, simple-stamped, or brushed surface treatments applied to quartz-tempered paste. Cartersville pottery is usually recognized by a grit- or sand-tempered paste with cord marking and sometimes simple or check-stamped surface decoration. The Cartersville type is thought to be related to the widespread Deptford series of ceramics, typically seen throughout the Coastal Plain in the American Southeast (Anderson and Schuldenrein 1985). Later in the Middle Woodland, Connestee pottery becomes common in this region. This pottery type is characterized by a thin-walled design comprised of sand-tempered paste and is typically decorated with brushed, simple stamped, or cord marked designs (Keel 1976).

3.3.3 Late Woodland

The Late Woodland Period, in many ways, represents a continuation of the Middle Woodland Period, with the continued preponderance of grit- and sand-tempered wares. Both Cartersville and Deptford ceramics continue into the Late Woodland Period; however, they begin to noticeably decline in frequency (Anderson and Schuldenrein 1985). Sassaman and colleagues (1990) note that Late Woodland assemblages in this region are often difficult to distinguish from the preceding Middle Woodland and subsequent Mississippian occupations. As such, the Late Woodland is often interpreted as a transitional period between the Woodland and Mississippian lifeways. This includes the intensification of sedentism, horticulture, and social inequality—all characteristic signatures of the Mississippian Period that followed.

Increased population density, sedentary habitation, and increasingly stratified social structure eventually led to the rise of the politically centralized Southeastern Mississippian chiefdoms. This

period is typically thought to begin around A.D. 1000 and continued until European contact. The hallmarks of the Mississippian Period in the Southeast include intensive maize agriculture, sedentary villages and towns, ceremonial architecture such as earthen platform mounds, and political stratification among individuals and settlements.

3.4 Mississippian Period

The Mississippian Period saw the rise of chiefdoms, which were made up of hierarchically ranked villages. Ferguson (1971) established a model of Mississippian settlement patterns composed of political centers surrounded by smaller villages and farmsteads. These political centers tended to be approximately 160 km apart often with buffers of unoccupied territory between them (Hally 1993). Mississippian centers have been found along most major river systems in the southeast. Examples of these centers include the Belmont and Mulberry sites along the Wateree River, the Santee/Fort Watson/Scotts Lake site on the Santee River, the Irene site on the Savannah River, the Hollywood, Lawton, Red Lake, and Mason's Plantation sites in the central Savannah Valley, and Town Creek along the Pee Dee River in North Carolina (Anderson 1994).

Mississippian Period diagnostic artifacts typically include small triangular projectile points, ground stone tools, and polished stone objects. Exotic items crafted from stone, bone, shell, mica, and copper are also associated with Mississippian assemblages and are often interpreted as symbols of status and authority. Increased regionalization during the Mississippian Period is also indicated by the diversity of regional ceramic variants found from sites dating to this period.

3.5 Contact and Historic Period

European contact with native populations in what is now South Carolina occurred during the early 1500s. Expeditions to North America by Juan Ponce de León and Pedro de Salazar inspired Lucas Vásquez de Ayllón, Judge of the Royal Audencia of Santo Domingo, to finance his own mission to the new continent. This led to the first known visit to the South Carolina coast by slavers Francisco Gordillo and Pedro de Quejo, who sailed from the Bahamas to the Santee River-Winyah Bay area in 1521. Ayllón was so encouraged by this successful endeavor that he set out to settle the area with an expedition he led personally. Ayllón and as many as 600 settlers first landed at the Santee River in 1526 but then moved to another unknown location within Native American territory to establish the settlement of San Miguel de Gualdape (Swanton 1922; Thomas 1993).

Within two months of its creation, Ayllón was dead, and the colony had failed. While the settlement was short lived, its effects were far reaching for the Native inhabitants. Spanish goods were apparently introduced to the Native American groups of the area and were traded far inland where they were later encountered during the de Soto *entrada* of 1540 (Thomas 1993). The Ayllón expedition also introduced European diseases, which devastated some of the interior settlements described in the chronicles of the de Soto expedition (Clayton et al. 1993). These diseases induced changes and likely population movements in the proto-historic Native groups that were later described in detail by the more intensive Spanish occupation to come. In the vicinity of the Project area, tribes were part of the Cusabo family, which included the Ashepoo, Combahee, Coosa, Edisto, Escamacu, Etiwan, Kiawah, Stono, Wando, and Wimbee tribes (South Carolina Information Highway [SCIWAY] 2023; South 1972)

The next wave of European settlement came with the French, in 1562, to the land they called Carolana, in honor of Charles IX, King of France. This expedition of French Protestants, known as Huguenots, was led by Jean Ribault, who established the short-lived Charlesfort settlement on Parris Island. Ribault's lieutenant, René de Laudonnière, detailed the names of powerful local

chieftains in the area around the fort, including "Audusta (Orista)," "Macou (Escumacu)," and "Oade (Guale)" whose names became European monikers for coastal Native American groups as a whole (Laudonnière 1975).

In June of 1562, shortly after establishing Charlesfort, Ribault returned to France for supplies and left 27 volunteers behind to maintain the fort (McGrath 2022; Thomas 1993). Ribault was unable to rescue the men he left behind due to religious upheaval in France. The men who had been left at Charlesfort struggled to feed themselves because they had not planted any crops and a fire had destroyed much of their provisions (Saraceni 1996). With the help of Native Americans from the nearby Orista chiefdom, Charlesfort survivors built a small ship to return to France in 1563 (Saraceni 1996). By the time they were rescued at sea by an English ship, the remaining Charlesfort survivors had resorted to cannibalism (Laudonnière 1975).

The Spanish saw the failed Charlesfort colony as a direct challenge to lands they believed were rightfully theirs. When Ribault did return to North America to establish the Fort Caroline colony, Spain's champion, Pedro Menendez de Aviles, was not far behind. Menendez eventually defeated the French at Fort Caroline and established St. Augustine and a series of outposts along the Georgia Coast. For the capital of his Florida colony, Menendez returned to Parris Island and founded Santa Elena on top of the original Charlesfort colony in 1566. Santa Elena served as Spain's colonial capital in North America until 1587, when it was abandoned due to conflicts with the aboriginal population and its colonial rivals, France and England (Thomas 1993).

Conflicts in Europe led to a virtual stalemate for the colonial occupation of Carolina, and the region remained as a northern frontier of the Spanish La Florida colony for almost a century. Sir Robert Heath, attorney general for King Charles I of England, was granted the "Province of Carolina" in 1629 (Edgar 1998). This broadly defined territory included the modern states of North Carolina, South Carolina, Georgia, Alabama, Tennessee, and Mississippi. The settlement of this land was never realized, however, due largely to broader conflicts such as the English Civil War. The charter was eventually declared invalid, and a new one was established in 1663 granting Carolina to eight "Lords Proprietors" in return for the financial and political backing of the restored English monarchy (Edgar 1998). Of this group, Lord Shaftesbury seemed to take the most active interest in the Carolina Colony. He and his secretary, the philosopher John Locke, drafted the Constitutions of Carolina, which established a government for the colony that was heavily based on the work of English political scientist James Harrington. This government was to consist of a Governor coupled with a strong council heavily influenced by the Lords Proprietors themselves (Edgar 1998) . While Charles Towne was the principal seat of government in the Carolina colony, the northern settlements often operated independently due to their remote location. As a result, they maintained a separate assembly and deputy governor for the northern half of the colony. This laid the groundwork for the eventual separation of the colony in 1729, when half of the Lords Proprietors sold their interests to the Crown and two Royal Colonies were established: North Carolina and South Carolina (Edgar 1998).

3.6 Local History

Before European settlers arrived, the region now known as Beaufort County in South Carolina was inhabited by indigenous peoples, including the Yamasee tribe. These communities thrived in the area's fertile lands and waterways, cultivating crops, fishing, and trading extensively. Their knowledge of the environment shaped the region's development, even as European colonization displaced them.

Located in the heart of South Carolina's Lowcountry, the city of Beaufort was established in 1711 by British planters. Beaufort, founded as part of the proprietary colony of Carolina, was designed around a fort and blockhouse that were built in 1706 to guard against the Spanish. It is the second-oldest city in the state after Charleston. Named for Henry Somerset, the second Duke of Beaufort and a proprietor of Carolina between 1700 and 1714, Beaufort serves as the county seat of Beaufort County.

Early interactions between indigenous peoples and Europeans in the area ranged from trade to conflict, culminating in the Yamasee War of 1715 to 1717, which significantly impacted the local population. In 1715, the Yamassee tribe destroyed Beaufort, but the city recovered. In 1740, an act was passed, titled "An Act to Encourage the Better Settling and improvement of Beaufort Town," and the town quickly became a center of commerce, benefiting from its strategic location along Port Royal Sound. The introduction of rice and indigo as cash crops turned Beaufort into a prosperous community, with plantation agriculture becoming the cornerstone of its economy (Lawrence S. Rowland 2022). In 1769, Beaufort County was established, originally including present-day Jasper and Hampton counties.

The Battle of Beaufort, also known as the Battle of Port Royal Island, took place on February 3, 1779, during the American Revolutionary War. This engagement occurred near Beaufort as British forces sought to secure control over the southern colonies following their capture of Savannah, Georgia. American forces, commanded by Brigadier General William Moultrie, confronted the British in a skirmish near Port Royal Island. Despite being outnumbered and less experienced, the American militia and Continental soldiers effectively repelled the British attack, forcing them to retreat. The battle showcased the resilience of American forces and helped bolster local support for the Patriot cause. It also served to delay British efforts to consolidate their position in the Southern Theater of the war, setting the stage for further resistance in South Carolina (Harry Schenawolf 2024).

The Antebellum period was a time of growth and prosperity for Beaufort, but it was also defined by the exploitation of enslaved African Americans. Large plantations dominated the economy, producing rice, indigo, and later, cotton. Enslaved laborers played an essential role in Beaufort's economy, and their unique cultural traditions evolved into what is now known as Gullah culture. This culture remains a vital part of Beaufort's identity. By the mid-nineteenth century, Beaufort had become one of the wealthiest towns in the South, with elegant homes and a thriving social scene (Beaufort County Government 2010).

The American Civil War brought dramatic changes to Beaufort (Figure 3-1). In November 1861, Union forces captured Port Royal Sound, making Beaufort one of the first Southern towns to fall to the Union. The occupation transformed the town into a hub for the Union war effort and a refuge for formerly enslaved people. The Port Royal Experiment, an early effort to educate and empower freed African Americans, took place in the region. Following the Union's capture of the Sea Islands off the coast of South Carolina, including the town of Port Royal, approximately 10,000 formerly enslaved individuals were left behind as plantation owners fled (Figure 3-2).

Figure 3-1. Plot of Beaufort, South Carolina, 1860 (Schelten 1860).

Figure 3-2. Newly freed African American Women and Children, Port Royal circa 1865 (Lowcountry Digital History Initiative 2024).

Abolitionist groups, missionaries, and educators from the North collaborated with the U.S. government to implement programs focused on agricultural reorganization, wage-based labor, and education. Schools were established to provide literacy and vocational training, fostering a sense of empowerment and self-sufficiency among freed people. Schools like the Penn School, now known as the Penn Center on St. Helena Island, became beacons of progress during Reconstruction. The experiment demonstrated that freed African Americans could live and work independently, manage their own affairs, and contribute to the broader economy as wage laborers. This era saw significant land redistribution, as many former plantations were purchased by freedmen (Lowcountry Digital History Initiative 2024).

One of those freedmen was Robert Smalls, born into slavery in 1839 on the Henry McKee plantation at 511 Prince Street in Beaufort (Figure 3-3). In 1862, Smalls commandeered the Confederate ship Planter, navigating it past heavily fortified Confederate checkpoints to deliver it to Union forces, securing his freedom and that of his family and crew. Smalls delivered valuable intelligence and resources to the Union cause but also garnered widespread attention, elevating him as a prominent advocate for abolition. After the war, Smalls purchased the house in Beaufort in which he had been enslaved and pursued a career in public service. Serving five terms in the United States Congress, he advocated the expansion of educational opportunities, protecting civil rights, and promoting economic equality during the Reconstruction era. When Smalls died in 1915, the home in Beaufort in which he was born into slavery, the McKee House, was inherited by his family. In 1974, it was designated as a National Historic Landmark (NPS 2024b).

Figure 3-3. Robert Smalls, (Library of Congress 1880)

From the 1870 to the mid-1890s, cotton, timber, rice, shipping, and phosphate mining transformed Beaufort into an agricultural, commercial, and industrial center. In the 1890s, Beaufort's economy began to decline. The Sea Island Hurricane of 1893 destroyed the once prosperous town. Soon after, the phosphate industry relocated to Florida. In 1907, a fire damaged most of the central business district. Once a primary rice growing region, the last commercial rice crop was produced in Beaufort in 1914 (Figure 3-4). Cotton prices plummeted due to the arrival of the boll weevil in 1919, bringing an end to the cotton industry in Beaufort.

Figure 3-4. Hoeing Rice in South Carolina (Library of Congress 1904).

The decline of plantation agriculture in the late nineteenth century and early twentieth century led to economic hardship in Beaufort County. However, the establishment of military bases, including Marine Corps Recruit Depot in Parris Island in 1915 and the Marine Corps Air Station (then known as the Naval Air Station Beaufort) in 1943, provided economic stability the area. These military installations remain vital to the local economy today.

Economic growth was slow in the early twentieth century due to geographic isolation, but with the construction of bridges, Beaufort had greater access to the mainland. In the 1920s, Port Royal Island and the mainland were connected by a bridge. In the 1930s, Lady's Islands and Port Royal were also bridged. In the 1950s, the northern and southern sections of Beaufort County were joined for the first time with bridges crossing the Broad and Chechessee rivers. The construction of roads and bridges during this time led to commercial development and population growth in the area (Beaufort County Government 2010).

During the mid-twentieth century, efforts to preserve Beaufort's historic character gained momentum. In 1973, Beaufort's downtown was designated a National Historic Landmark District, recognizing its antebellum architecture and historical significance. Today, Beaufort balances its growth with preservation. Its population reflects a blend of long-time residents, military families, and newcomers drawn by the area's beauty and history. Cultural festivals such as the Beaufort Water Festival and the Gullah Festival celebrate the town's heritage, while environmental conservation efforts protect its fragile ecosystems. The Gullah culture, rooted in the traditions of enslaved Africans, continues to influence the region's cuisine, music, and storytelling (City of Beaufort 2024).

Named after the "Gullah statesman," Robert Smalls Parkway is a section of S.C. Highway 170 that runs through Beaufort. In 1991, it was established by the Beaufort County Council after a petition from the Robert Smalls High School Alumni Association (Andrew Billingsley 2023). Robert Smalls Parkway is situated just east of the Broad River and the Edward Burton Rodgers Bridge. Also known as the Broad River Bridge, which opened in 1958 when S.C. 170 was rerouted to US 21 in Beaufort, it connects the northern and southern sections of Beaufort County (Dennis Adams 2007).

4 Research Design and Methods

4.1 Research Design

The purpose of the Phase I survey was to locate, record, and assess cultural resources within the Project area, and survey methods were designed to meet this goal. Chronicle Heritage completed the Phase I survey using Secretary of the Interior (SOI) and other qualified staff. All work was consistent with standard professional practices and Section 106 of the NHPA, as amended (54 U.S.C. § 300101 et seq.). Chronicle Heritage surveyed the Project area according to guidelines outlined in the *South Carolina Standards and Guidelines for Archaeological Investigations* (COSPA 2013).

Chronicle Heritage contacted Ms. Heather Spade at the City of Beaufort Certified Local Government (CLG), and Mr. Curt Freese, the Director of Community Development at the City of Beaufort, for additional information about the Project area on January 23, 2025. As of the submittal of this report, no responses have been received. Chronicle Heritage also contacted Kristen Forbus, the Long Range Planner for Beaufort County, on January 23, 2025, who had no additional information to provide about the Project area.

The Project area also overlaps traditional homelands of five federally-recognized Native American Nations: the Alabama-Quassarte Tribal Town, the Catawba Indian Nation (aka Catawba Indian Tribe of South Carolina), the Eastern Shawnee Tribe of Oklahoma, the Muscogee (Creek) Nation, and the Tuscarora Nation. Pursuant to 54 U.S. Code § 302706 (b), continual cooperation and consultation with these nations through their Tribal Historic Preservation Offices (THPOs) will be performed.

4.2 Field Methods

Systematic subsurface sampling was conducted using shovel test pits (STPs). During the Phase I survey, the 28.33-ac tract was surveyed by excavating shovel tests at 30-m intervals along transects spaced 30 m apart. STPs were excavated to a maximum depth of 80 centimeters (cm) below surface (bs) or until the water table, subsoil, or an impenetrable obstacle was reached. STPs were approximately 30 cm wide. In instances where 80 cm was not reached, the maximum depth reached was noted. Field data were collected using a digital STP form designed to capture stratigraphy with soil descriptions, environmental variables, and presence or absence of artifacts.

Each STP location was plotted with a Global Positioning System (GPS) unit and numbered sequentially (Appendix A). Chronicle Heritage preloaded a GPS unit capable of sub-meter accuracy with STP locations at predefined intervals. During fieldwork, all locations were plotted with a newly recorded point to ensure the GPS points are as accurate as possible. Therefore, maps reflect actual test locations and may show slight deviations from target intervals based on pacing, environmental conditions, and GPS accuracy. STP forms were completed within the GPS, eliminating the possibility for transcription error after fieldwork. All soil was screened through 0.25-inch wire mesh. Chronicle Heritage will submit all Geographic Information System (GIS) data,

state archaeological site forms, and other digital project records to South Carolina Electronic Records Archive (SCERA) and South Carolina Institute of Archaeology and Anthropology (SCIAA) at the completion of the fieldwork.

4.3 Site Criteria and National Register Criteria

All cultural resources that are encountered are assessed as to their significance based on NRHP criteria. Four criteria are applied during the evaluation of an archaeological site's eligibility for inclusion in the NRHP. Normally, a property must be at least 50 years of age and meet at least one of the following four criteria to be considered eligible for listing in the NRHP:

- Be associated with events that have made a significant contribution to the broad patterns of our history (Criterion A); or
- Be associated with the lives of persons significant in our past (Criterion B); or
- Embody the distinct characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction (Criterion C); or
- Yield, or be likely to yield, information important in prehistory or history (Criterion D).

Chronicle Heritage archaeologists used these criteria, in conjunction with evaluations of site integrity, to provide recommendations concerning the NRHP-eligibility status of all archaeological sites located in the Project area. Determinations of ineligibility are not possible when the limits of a site are unknown and only a portion has been sampled, but it may be possible to assess a site as potentially significant or eligible based on an incomplete sample.

5 Archaeological Investigations

5.1 Previous Research

Chronicle Heritage consulted the SCERA and the South Carolina ArchSite (the online GIS database that contains archaeological site information from the SCIAA) to determine the location of previously recorded cultural resources and previously conducted surveys within 3.2 km of the Project area (Figure 5-1).

According to SCERA records, 14 professional surveys have been conducted within 3.2 km of the Project area, two of which overlap the northern portions of the tract (Table 5-1; Figure 5-1). Of the identified surveys, one is an intensive survey (2006), and the remaining survey is an intensive-archaeological survey (2007).

In 2006, Brockington completed a CRS of the Centex Port Roal Tract (Table 5-1; Figure 5-1). The field method employed during this survey included pedestrian survey of transects within the tract. One post-contact archaeological site (38BU2174) located outside of the current Project area was identified (Ellerbee and Fletcher 2006).

In 2007, Brockington completed a CRS of the Beazer Trask Tract (Table 5-1; Figure 5-1). This survey encompassed 95.5 ac and excavated STPs at 30-m intervals throughout the tract. The survey identified and documented two archaeological sites (38BU2246 and 38BU2247) and two isolated finds. The surveyors recommended both archaeological sites potentially eligible for listing in the

NRHP, but they are not located in the vicinity of the current Project area. The isolated finds, also recorded outside the Project area, were recommended ineligible (Philips Jr. et al. 2007).

There are 55 known archaeological sites within 3.2 km of the tract, none of which intersect the Project area (Table 5-2; Figure 5-2). Two of the archaeological sites within 3.2 km of the Project area are listed in the NRHP. Five of the archaeological sites have been evaluated by the SHPO as eligible for listing in the NRHP, 20 sites do not have eligibility statuses determined, and the remaining sites are not eligible for listing in the NRHP.

Additionally, there are 26 previously recorded historical resources within 3.2 km of the tract, none of which are located within the Project area itself (Table 5-3; Figure 5-2). Four of these structures have been determined eligible for listing in the NRHP, and the remaining structures are not eligible for the NRHP.

Table 5-1. Previously Conducted Surveys within 3.2 km of the Project area

Project Title	Year	Consultant	Type
Proposed Telecommunications Tower Site Section 106 Field Assessment Beaufort Mall Tower	2002	FCC	Intensive-Architectural
Historic Structures Report, Burton Wells County Park	2002	Brooker Architectural	Intensive Architectural
CR Survey of the Proposed Port Royal Reclamation Facility Transmission	2003	Brockington	Intensive
Phase I CR Survey of the Pinckney Retreat Development Site	2004	R.S. Webb	Intensive
Phase I Archeological Survey and Phase II Site Evaluation of the Habersham Tract	2004	New South	Intensive
CR Survey of the Centex Port Royal Tract	2006	Brockington	Intensive
CR Survey of the William Trask Tract	2006	Brockington	Intensive
CRS of the Gagne Property	2007	Brockington	Intensive-Archaeological
Cultural Resources Survey of SC Route 802 Widening Project	2007	New South	Intensive
Cultural Resources Survey of the Beazer Trask Tract	2007	Brockington	Intensive-Archaeological
Cultural Resources Survey of the Carsons Tract	2007	Brockington	Intensive
Cultural Resources Survey of the Military Utilities Consolidation Corridor	2009	Brockington	
Phase I Cultural Resources Survey of the 39-Acre Shadow Moss Expansion Tract	2017	RS Webb	Intensive
Phase I Intensive Archaeological Resources Survey of the Shearwater Bluff Tract	2022	Brockington	Intensive

Note: Shaded projects indicate they intersect the current Project area.

Table 5-2. Previously Recorded Archaeological Sites within 3.2 km of the Project area

Site Number	Site Name	Temporal/Cultural Affiliation	NRHP Status
38BU0029	No Name	Late Archaic; Prehistoric	NRHP Listed
38BU0029	[Revisit 2] Chester Field	Late Archaic; Prehistoric	NRHP Listed
38BU0251	No Name	Prehistoric	Not Determined
38BU0252	No Name	Early–Late Woodland; Historic	Not Determined
38BU0253	Dog Skull Shell Midden [38BU0253/38BU1280]	Prehistoric	Not Eligible
38BU0253	Island	Prehistoric	Not Eligible
38BU0254	No Name	Early Woodland	Not Determined
38BU1104	PR-3	Middle Woodland; Sixteenth and Nineteenth Century Historic; Historic	Eligible
38BU1104	Jean de la Gaye House	Eighteenth Century Historic	Not Determined
38BU1282	No Name	Prehistoric; Eighteenth and Nineteenth Century Historic	Not Determined
38BU1283	No Name	Prehistoric; Nineteenth and Twentieth Century Historic	Not Eligible
38BU1284	No Name	Prehistoric	Not Eligible
38BU1285	No Name	Prehistoric	Not Eligible
38BU1286	No Name	Prehistoric	Not Eligible
38BU1287	No Name	Prehistoric	Not Eligible
38BU1288	Island	Prehistoric	Not Eligible
38BU1644	No Name	Late Archaic; Early–Late Woodland; Eighteenth–Twentieth Century Historic	Eligible
38BU1683	No Name	Eighteenth–Twentieth Century Historic	Not Determined
38BU1685	No Name	Late Archaic; Early Woodland; Eighteenth and Nineteenth Century Historic	Not Determined
38BU1725	No Name	Twentieth Century Historic	Not Eligible
38BU1726	No Name	Late Woodland; Twentieth Century Historic	Not Eligible
38BU1727	No Name	Late Archaic; Middle–Late Woodland; Eighteenth–Twentieth Century	Not Eligible
38BU1728	No Name	Late Woodland	Not Eligible
38BU1729	No Name	Middle Woodland	Not Determined
38BU1826	Trask Site 1	Unknown	Not Determined

Site Number	Site Name	Temporal/Cultural Affiliation	NRHP Status
38BU1827	Trask Site 2	Prehistoric; Historic	Not Determined
38BU2091	No Name	Early and Middle Woodland	Not Eligible
38BU2091	No Name	Late Woodland; Mississippian; Twentieth Century	Not Eligible
38BU2093	No Name	Middle Woodland; Twentieth Century	Not Eligible
38BU2094	PR-2	Late Archaic; Middle and Late Woodland; Mississippian; Eighteenth Century	Eligible
38BU2094	[Revisit 1]	Late Archaic; Early and Middle Woodland; Eighteenth–Twentieth Century	Eligible
38BU2095	No Name	Late Archaic; Early and Middle Woodland	Not Eligible
38BU2096	No Name	Early–Late Woodland	Not Eligible
38BU2097	No Name	Early–Late Woodland	Not Eligible
38BU2098	No Name	Early–Late Woodland; Mississippian	Not Eligible
38BU2099	No Name	Late Archaic; Early–Late Woodland; Mississippian; Nineteenth and Twentieth Century Historic	Not Eligible
38BU2119	No Name	Nineteenth Century Historic	Not Eligible
38BU2120	No Name	Prehistoric; Nineteenth Century Historic	Eligible
38BU2121	No Name	Prehistoric; Nineteenth Century Historic	Not Eligible
38BU2122	No Name	Prehistoric	Not Eligible
38BU2123	No Name	Prehistoric	Not Eligible
38BU2174	Site A	Nineteenth and Twentieth Century Historic	Not Eligible
38BU2177	No Name	Unknown	Not Determined
38BU2246	Site 1	Prehistoric; Historic	Not Eligible
38BU2247	Site 2	Prehistoric; Historic	Not Eligible
38BU2258	No Name	Late Woodland	Not Determined
38BU2266	No Name	Late Woodland	Not Determined
38BU2267	No Name	Late Woodland	Not Determined
38BU2268	N-1	Prehistoric	Not Determined
38BU2313	Site 1	Unknown	Not Eligible
38BU2368	FS 1	Prehistoric; Historic	Not Determined

Site Number	Site Name	Temporal/Cultural Affiliation	NRHP Status
38BU2369	FS 2	Prehistoric; Historic	Not Determined
38BU2370	FS 3	Prehistoric	Not Determined
38BU2371	FS 4	Historic	Not Determined
38BU2372	FS 2	Eighteenth Century Historic	Not Determined

Table 5-3. Previously Recorded Historical Resources within 3.2 km of the Project area

Resource ID	Name/Address	Year Built	SHPO Evaluation
025-250	Sea Gull Villa Lane	ca. 1920	Not Eligible
025-252	Ricket Place	ca. 1930	Not Eligible
025-254	Parris Island Gateway	ca. 1900	Not Eligible
025-322	Broad River Road	ca. 1925	Not Eligible
025-324	Goethe Hill Road	ca. 1930	Not Eligible
025-342	Ramsay Road	ca. 1940	Not Eligible
025-348	Regina Jenkins Washington Simmons House	ca. 1930	Not Eligible
025-350	Providence Road	ca. 1920	Not Eligible
025-352	Providence Road	ca. 1930	Not Eligible
025-354	Rick Larsen House	1900	Not Eligible
025-620	Oak View Drive	ca. 1940	Not Eligible
025-621	130 Pinckney Retreat Rd.	ca. 1760	Eligible
025-622	First Jericho Baptist Church	1875	Eligible
025-623	116 Old Jericho Rd.	ca. 1935	Eligible
290-187	No Name	Unknown	Not Eligible
290-223	46 Joe Frazier Rd.	ca. 1930	Not Eligible
290-265	153 Gruber Hill Rd.	ca. 1945	Not Eligible
290-267	145 Gruber Hill Rd.	ca. 1935	Not Eligible
290-269	1 Ricket Pl.	ca. 1945	Not Eligible
290-271	853 Broad River Blvd.	ca. 1935	Not Eligible
290-273	858 Robert Smalls Pkwy.	ca. 1940	Not Eligible
290-421	Cavu Lane	1881	Eligible
5014	308 Savannah Highway	1900; 1965	Not Eligible
5015	11 Shea Lane	ca. 1945; ca. 1985	Not Eligible
5017	507 Parris Island Gateway	ca. 1900	Not Eligible
5018	517 Parris Island Gateway	ca. 1957	Not Eligible

Figure 5-1. Map of surveys within 3.2 km of the Project area.

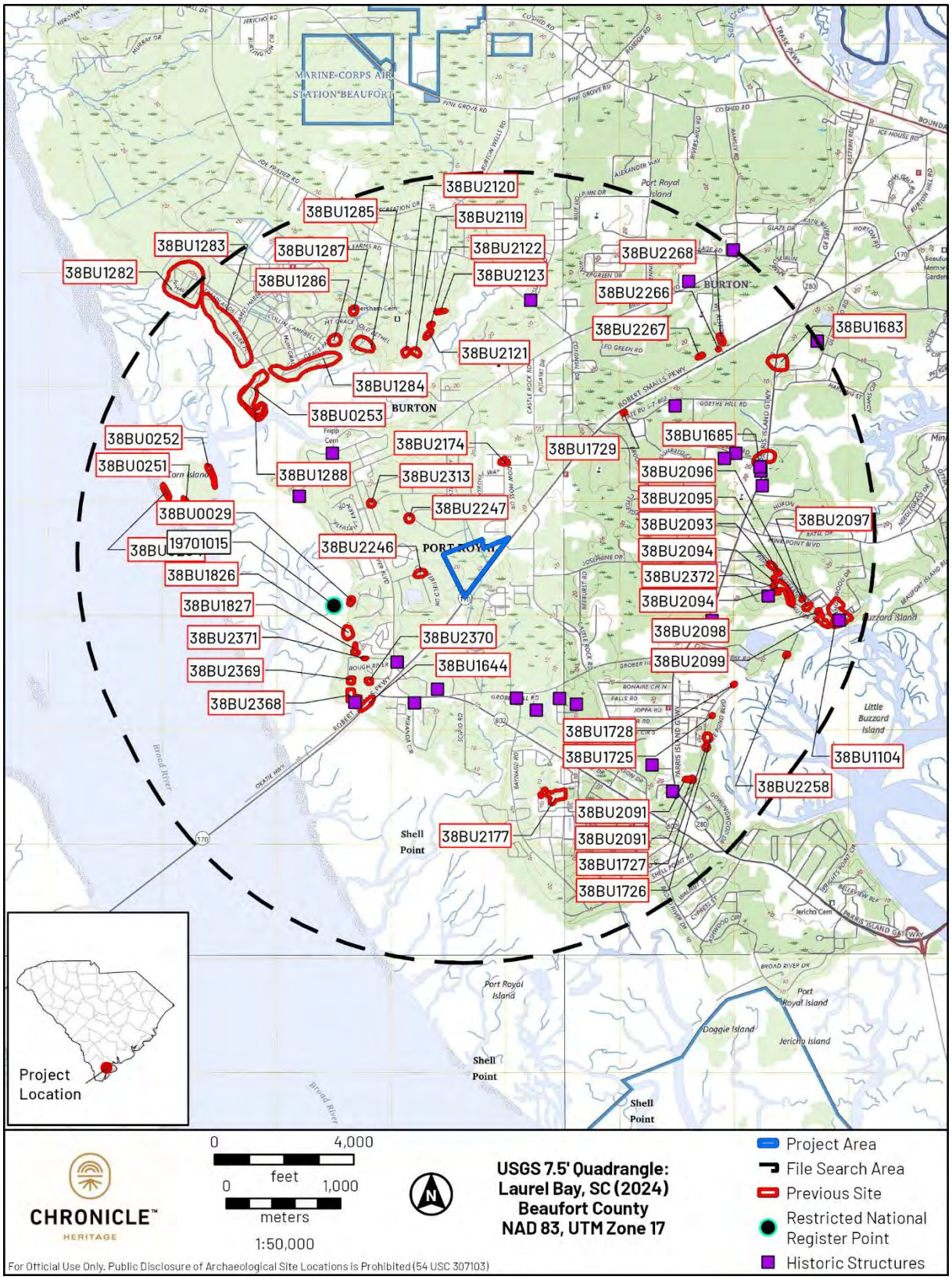

Figure 5-2. Map of recorded cultural resources within 3.2 km of the Project area.

5.2 Results of Survey

Chronicle Heritage conducted subsurface testing within the Project area at 30-m intervals, excavating a total of 128 STPs, none of which contained artifacts (Figure 5-3). No sites or isolated finds were identified as a result of the survey. A total of 67 STPs were excavated to a depth of at least 80 cmbs. Of the STPs where excavation was terminated early, excavation of 47 STPs was stopped after clay subsoil was encountered prior to reaching 80 cmbs and ten STPs terminated early after encountering water between 10 and 70 cmbs (Figure 5-4). Four STPs were not excavated due to disturbance related to development, utilities, or a drainage canal.

A representative soil profile (STP 112) in the southwestern portion of the tract consisted of approximately 20 cm of yellowish brown (10YR 5/4) loamy sand underlain by at least 60 cm of light gray (10YR 7/1) sand that exceeded 80 cmbs (Figure 5-5). A typical soil profile (STP 8) in the western portion of the Project area consisted of approximately 30 cm of very dark grayish brown (10YR 3/2) loamy sand underlain by at least 50 cm of brown (10YR 5/3) sand that exceeded 80 cmbs (Figure 5-6).

Figure 5-3. Results map of the Project area.

Figure 5-4. STP 9 showing a shovel test in the western portion of the Project area where excavation was terminated early due to water.

Figure 5-5. STP 112 showing a representative soil profile in the southwestern portion of the Project area.

Figure 5-6. STP 8 showing a representative soil profile in the western portion of the Project area.

6 Conclusions and Recommendations

On behalf of the Department of Veterans Affairs and under subcontract to Mabbett, Chronicle Heritage completed a CRS for the potential siting of an OPC at 708 Robert Smalls Parkway on a 28.33-ac Project area in Beaufort County, South Carolina. The Project area comprises the footprint of the proposed development and staging areas of the VA OPC within Parcel ID Nos. R112 031 000 017 0000 and R112 031 000 017C 0000 on the USGS 2024 Laurel Bay, South Carolina, 7.5-minute topographic quadrangle.

The archaeological survey was completed in accordance with federal and state regulations, and it was undertaken to comply with the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716), Professional Qualification Standards (36 CFR Part 61), and *the South Carolina Standards and Guidelines for Archaeological Investigations* (COSPA 2013). Additionally, the requirements of Article 8, Section 8.500, of the Beaufort County Zoning Ordinance as well as Section 3.12 of the City of Beaufort development review ordinance was followed for projects within the jurisdiction.

Fieldwork was carried out over two days, from December 16 to 17, 2024. STPs were pre-plotted at 30-m intervals. Chronicle Heritage plotted a total of 132 STPs and excavated 128, none of which were positive for cultural material. Four STPs were precluded from excavation due to the presence of a drainage canal and an existing structure.

Chronicle Heritage's CRS concluded that **no historic properties will be affected** by this Project in accordance with 36 CFR § 800.4 (d)(1). Chronicle Heritage recommends **no additional archaeological investigation** within the Project area at this time.

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Appendix A.
Shovel Test Pit Locations

Table A-1. UTM NAD 83 Zone 17

STP	Results	Easting	Northing
1	Negative	522481.2439	3585524.425
2	Negative	522508.2447	3585534.056
3	Negative	522534.8467	3585547.377
4	Negative	522561.4529	3585559.978
5	Negative	522588.7513	3585573.727
6	Negative	522616.0689	3585586.956
7	Negative	522642.6559	3585600.076
8	Negative	522494.1167	3585494.076
9	Negative	522518.2505	3585505.693
10	Negative	522548.0213	3585520.425
11	Negative	522574.7409	3585534.426
12	Negative	522601.9259	3585546.774
13	Negative	522628.6315	3585560.128
14	Negative	522655.8307	3585573.123
16	Negative	522709.7353	3585599.473
17	Negative	522736.6833	3585612.646
18	Negative	522763.6401	3585625.822
19	Negative	522790.5923	3585638.997
20	Negative	522776.8147	3585598.87
21	Negative	522749.8707	3585585.698
22	Negative	522722.9099	3585572.52
23	Negative	522695.9831	3585559.362
23	Negative	522682.7375	3585586.323
24	Negative	522669.0053	3585546.171
25	Negative	522641.7929	3585532.76
26	Negative	522615.1007	3585519.822
27	Negative	522587.6301	3585506.276
28	Negative	522561.1959	3585493.472
29	Negative	522534.4501	3585480.071
30	Negative	522507.2915	3585467.123
31	Negative	522520.4659	3585440.171
32	Negative	522547.1005	3585451.054

STP	Results	Easting	Northing
33	Negative	522574.3705	3585466.52
34	Negative	522601.1327	3585478.761
35	Negative	522628.2753	3585492.869
36	Negative	522655.5707	3585505.737
37	Negative	522682.1799	3585519.219
38	Negative	522709.1379	3585532.395
39	Negative	522736.0849	3585545.568
40	Negative	522763.0851	3585558.776
41	Negative	522789.9893	3585571.917
42	Negative	522816.9417	3585585.092
43	Negative	522533.6407	3585413.219
44	Negative	522557.6811	3585426.371
45	Negative	522587.5453	3585439.568
46	Negative	522613.7663	3585453.982
47	Negative	522641.4499	3585465.917
48	Negative	522668.0791	3585478.368
49	Negative	522695.3547	3585492.266
50	Negative	522722.2961	3585505.448
51	Negative	522749.2593	3585518.616
52	Negative	522777.9959	3585532.34
53	Negative	522803.1639	3585544.965
54	Negative	522830.1163	3585558.14
55	Negative	522857.0617	3585571.252
56	Negative	522884.0209	3585584.489
57	Negative	522910.9733	3585597.664
58	Negative	522937.9257	3585610.838
59	Not Excavated	522964.8779	3585624.013
60	Not Excavated	522991.8303	3585637.188
61	Negative	522950.6275	3585584.437
62	Not Excavated	522910.3703	3585530.584
63	Negative	522924.1479	3585570.711
64	Negative	522897.1957	3585557.537
65	Negative	522870.3073	3585544.331

STP	Results	Easting	Northing
66	Negative	522883.4925	3585517.503
67	Negative	522843.2909	3585531.187
68	Negative	522856.4659	3585504.235
69	Negative	522842.6879	3585464.108
70	Negative	522829.5133	3585491.06
71	Negative	522816.3387	3585518.013
72	Negative	522789.3289	3585504.882
73	Not Excavated	522762.4339	3585491.664
74	Negative	522735.4447	3585478.519
75	Negative	522708.5293	3585465.314
76	Negative	522681.4269	3585452.062
77	Negative	522654.6247	3585438.965
78	Negative	522627.1905	3585426.749
79	Negative	522600.7199	3585412.615
80	Negative	522573.6099	3585396.076
81	Negative	522546.8153	3585386.266
82	Negative	522559.9899	3585359.314
83	Negative	522584.8539	3585371.251
84	Negative	522613.8945	3585385.663
85	Negative	522640.6127	3585398.624
86	Negative	522667.7993	3585412.012
87	Negative	522694.6583	3585425.167
88	Negative	522721.7039	3585438.362
89	Negative	522748.6583	3585451.523
90	Negative	522775.6087	3585464.711
91	Negative	522802.5473	3585477.888
92	Negative	522815.6877	3585450.984
93	Negative	522788.7835	3585437.759
94	Negative	522761.6809	3585424.344
95	Negative	522734.8785	3585411.409
96	Negative	522707.6761	3585398.253
97	Negative	522680.9739	3585385.06
98	Negative	522655.0817	3585371.804

STP	Results	Easting	Northing
99	Negative	522627.0693	3585358.711
100	Negative	522599.2499	3585345.248
101	Negative	522573.1647	3585332.362
102	Negative	522869.6405	3585477.283
103	Negative	522828.8521	3585424.029
104	Negative	522801.9579	3585410.806
105	Negative	522778.6829	3585399.687
106	Negative	522748.0533	3585384.457
107	Negative	522720.9359	3585371.357
108	Negative	522694.1487	3585358.108
109	Negative	522665.5261	3585345.306
110	Negative	522640.2439	3585331.758
111	Negative	522614.0487	3585318.495
112	Negative	522586.3393	3585305.409
113	Negative	522599.5141	3585278.457
114	Negative	522626.5421	3585290.863
115	Negative	522653.4185	3585304.806
116	Negative	522680.7549	3585318.013
117	Negative	522707.3233	3585331.155
118	Negative	522734.6745	3585344.329
119	Negative	522761.2279	3585357.505
120	Negative	522788.1579	3585370.242
121	Negative	522747.1487	3585317.654
122	Negative	522720.4979	3585304.203
123	Negative	522693.7367	3585290.915
124	Negative	522666.5933	3585277.854
125	Negative	522639.3537	3585264.853
126	Negative	522612.6885	3585251.505
127	Negative	522625.8633	3585224.552
128	Negative	522652.5709	3585237.64
129	Negative	522679.7679	3585250.901
130	Negative	522705.1881	3585265.381
131	Negative	522665.8951	3585211.009

STP	Results	Easting	Northing
132	Negative	522639.0381	3585197.6

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Phase I Cultural Resource Survey for a Potential VA Outpatient Clinic Facility at Robert Smalls Parkway and Goethe Hill Road,
Beaufort County, South Carolina

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Holly Baker, M.A.
March 11, 2025

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Technical Report No.: 24-582

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March 11, 2025

Executive Summary

On behalf of the Department of Veterans Affairs (VA) and under subcontract to Mabbett & Associates, Inc. (Mabbett), PaleoWest, LLC dba Chronicle Heritage (Chronicle Heritage) completed a cultural resource survey (CRS) for the potential siting of an Outpatient Clinic (OPC) at Robert Smalls Parkway and Goethe Hill Road (Project) on an approximately 19.5-acre parcel in Beaufort County, South Carolina. The Project area comprises the footprint of the proposed development and staging areas within Parcel ID No. R120 028 000 0138 0000 on the U.S. Geological Survey 2024 Beaufort, South Carolina, 7.5-minute topographic quadrangle.

The archaeological survey was completed in accordance with federal and state regulations, and it was undertaken to comply with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716), Professional Qualification Standards (36 Code of Federal Regulations [CFR] Part 61), and the *South Carolina Standards and Guidelines for Archaeological Investigations* (Council of South Carolina Professional Archaeologists [COSPA] 2013). Additionally, the requirements of Article 8, Section 8.500, of the Beaufort County Zoning Ordinance as well as Section 3.12 of the City of Beaufort development review ordinance will be followed for projects within the jurisdiction.

Fieldwork was carried out over two days, from December 18 to 19, 2024. Shovel test pits (STPs) were pre-plotted at 30-meter (m) intervals. Chronicle Heritage plotted 94 total STPs and excavated 85, none of which contained cultural material. Nine STPs were precluded from excavation due to a drainage along the northern and eastern portions of the property and along a ditch adjacent to Robert Smalls Road.

Chronicle Heritage's CRS concluded that **no historic properties will be affected** by this Project in accordance with 36 CFR § 800.4 (d)(1). Chronicle Heritage recommends **no additional archaeological investigation** within the Project area at this time.

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1 Project Location and Purpose

On behalf of the Department of Veterans Affairs (VA) and under subcontract to Mabbett & Associates, Inc. (Mabbett), PaleoWest, LLC dba Chronicle Heritage (Chronicle Heritage) completed a cultural resource survey (CRS) for the potential siting of an Outpatient Clinic (OPC) at Robert Smalls Parkway and Goethe Hill Road (Project) on an approximately 19.5-acre (ac) parcel in Beaufort County, South Carolina. The Project area comprises the footprint of the proposed development and staging areas within Parcel ID No. R120 028 000 0138 0000 on the U.S. Geological Survey (USGS) 2024 Beaufort, South Carolina, 7.5-minute topographic quadrangle (Figure 1-1).

This Phase I CRS was prepared accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (36 Code of Federal Regulations [CFR] Part 800), and the *South Carolina Standards and Guidelines for Archaeological Investigations* (Council of South Carolina Professional Archaeologists [COSPA] 2013). Additionally, the requirements of Article 8, Section 8.500, of the Beaufort County Zoning Ordinance as well as Section 3.12 of the City of Beaufort development review ordinance will be followed for projects within the jurisdiction.

Figure 1-1. Project location map.

2 Environmental Setting

The Project area is in the Sea Islands section of the Atlantic Coastal Plain province. The Atlantic Coastal Plain province can be generally described as an area of low elevation with relatively unconsolidated beds of terrestrially and marine-deposited sand, gravel, and clay sediments (Fenneman 1938; Thornbury 1965). This is the flattest province that gently slopes eastward through a sequence of terraces (National Park Service [NPS] 2024a). The province consists of clastic sediments and the landscape contains rivers that flow eastward and southeastward and carry sand, silt, and clay toward the ocean, sometimes depositing these soils within estuaries and marshes. The Sea Islands section is an area of coastal plain with a submerged coastal border (Fenneman 1938).

The Environmental Protection Agency defines the ecoregion encompassing the Project area as the Sea Islands/Coastal Marsh within the Southern Coastal Plain. The Southern Coastal Plain is a variable region containing "barrier islands, coastal lagoons, marshes, and swampy lowlands" (Griffith et al. 2001). This ecoregion was originally vegetated by a variety of species, including "longleaf pine, slash pine, pond pine, beech, sweetgum, southern magnolia, white oak, and laurel oak" (Griffith et al. 2001). Currently, the region contains a significant amount of urban development with other portions of the region cleared for pasture or citrus agriculture. Forests primarily consist of slash and loblolly pines. The landscape within the Sea Islands/Coastal Marsh region is affected by fluvial, aeolian, and oceanic forces, resulting in a highly dynamic and changing environment. The barrier islands consist largely of sandy soils, while the marshes largely consist of clayey and organic soils. These barrier islands are vegetated by "live oak, red cedar, slash pine, and cabbage palmetto" in addition to "cordgrass, saltgrass, and rushes" (Griffith et al. 2001).

2.1 Soils and Hydrology

The U.S. Department of Agriculture (USDA) has mapped two soils within the Project area, the most abundant of which is Seewee fine sand, making up 52.4 percent of the tract and extending throughout the southern portion of the Project area (Figure 2-1) (Soil Survey Staff 2025). The remaining soil type is mapped as Yonges loamy fine sand (47.6% of the Project area) in the northern portion of the tract. Slopes given for the mapped soil types within the Project area do not exceed 2 percent, and topography within the tract is relatively level—between 4 and 6 meters (m) above mean sea level. The landform within the tract peaks slightly through the eastern portion of the tract, running roughly northeast–southwest, and slopes down roughly to the north and south. The soils mapped within the tract exhibit poor to somewhat poor drainage characteristics. All of the mapped soil types are found on marine terraces and have a depth to restrictive feature that exceeds 200 centimeters (cm).

The Project area is situated in within the Coosawhatchie River portion of the Port Royal Sound watershed. The closest water source to the tract is a small tributary of Battery Creek, approximately 1 kilometer (km) east of the tract. This tributary flows into Battery Creek approximately 2 km east of the tract. Habersham Creek, a tributary of the Broad River (approximately 1.4 km west of the Project area), flows into the Broad River approximately 3.6 km south-southwest of the Project area. The Broad River is a tidal channel fed by the Coosawhatchie River that flows between the mainland to the south and west, and Port Royal and Parris islands on the east. The Coosawhatchie River, the nearest source of fresh water to the Project area, flows into the Broad River approximately 19 km north-northwest of the tract. It joins Coosaw River

channel northeast and continues southeast to the confluence with Battery Creek 16 km southeast of the Project area, and ultimately to the Atlantic Ocean as Port Royal Sound.

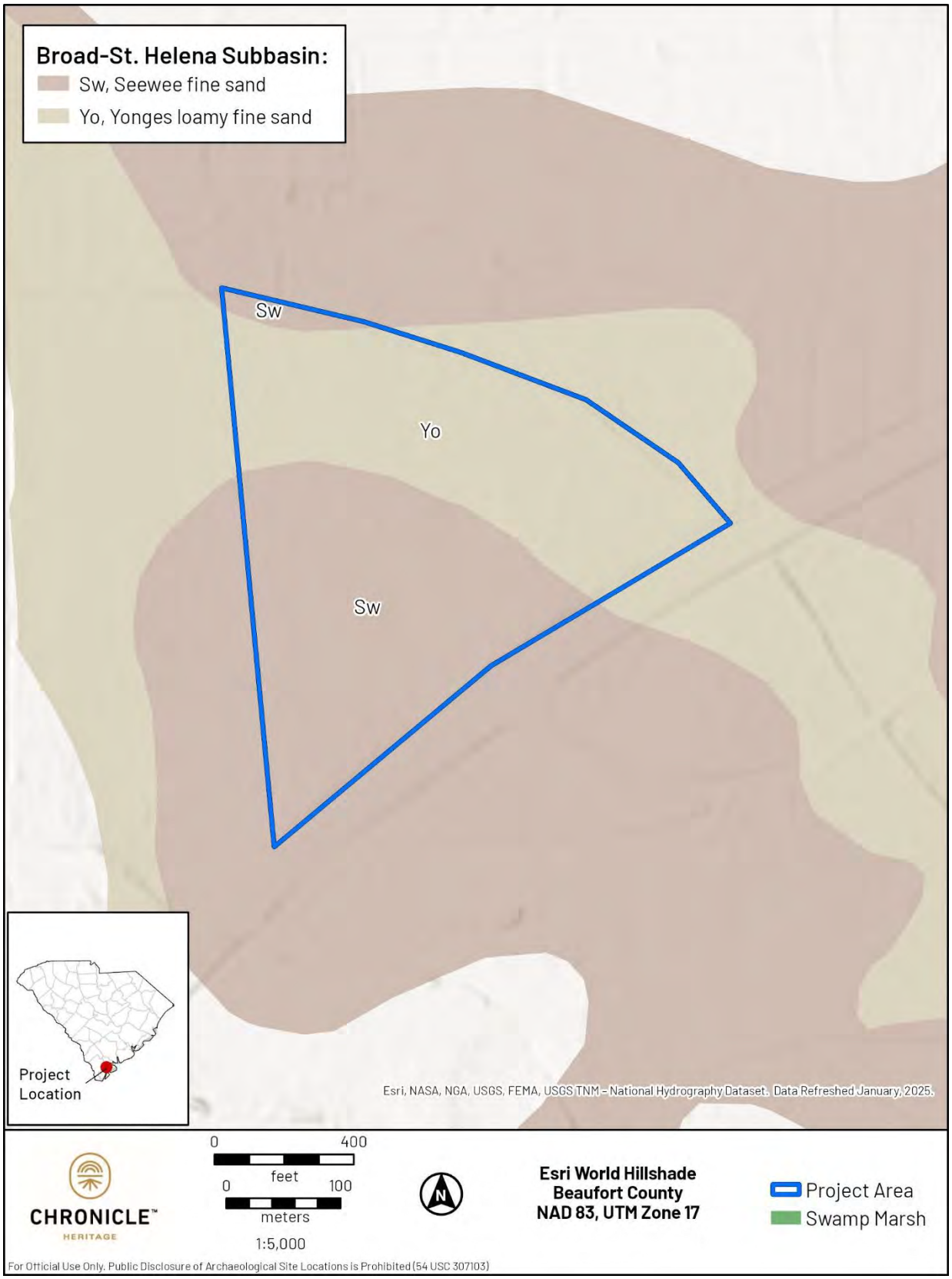

Figure 2-1. Project area in relation to mapped soils.

2.2 Current Conditions

Vegetation in the Project area consists of mixed hardwoods (Figure 2-2). Wetland vegetation is present in the northern portion of the Project area and associated with a drainage (Figure 2-3). The Beaufort County Assessor's Office (BCAO) classifies the current land use as "agriculture forest" (BCAO 2025).

Figure 2-2. Mixed hardwood vegetation in the eastern portion of the Project area, facing north.

Figure 2-3. Wetland vegetation associated with drainage in the northern portion of the Project area, facing northeast.

2.3 Historical Map and Aerial Photograph Review

Chronicle Heritage conducted a review of historical maps and aerial photographs to infer past land use in the Project area. Sources consulted included USGS aerial photographs and topographic maps. The USGS 1944 Fort Fremont, South Carolina topographic map shows the tract in a sparsely populated area bracketed to the north and east by a small tributary and to the south by an unnamed road. (Figure 2-4). The road is depicted as an unimproved road and crosses the extreme southern corner of the tract. It appears to follow the alignment of Goethe Hille Road. There are three structures plotted along this road, although none are within the Project area. Two additional structures are depicted in the vicinity of the Project area along an unimproved road to the north. There are no structures indicated as being within the tract at this time. Most of the Project area consists of moderately dense vegetation with the exception of the eastern, southern, and northwest corners, which appear to have been cleared.

A USGS 1968 aerial photograph of Beaufort County shows the Project area bounded by Robert Smalls Road to the southeast and Goethe Hill Road to the south (Figure 2-5). No structures or roads are visible within the tract, although one structure does appear to be located just south of the tract across Goethe Hill Road. The entirety of the Project area appears to have been covered in dense woodland vegetation at this time.

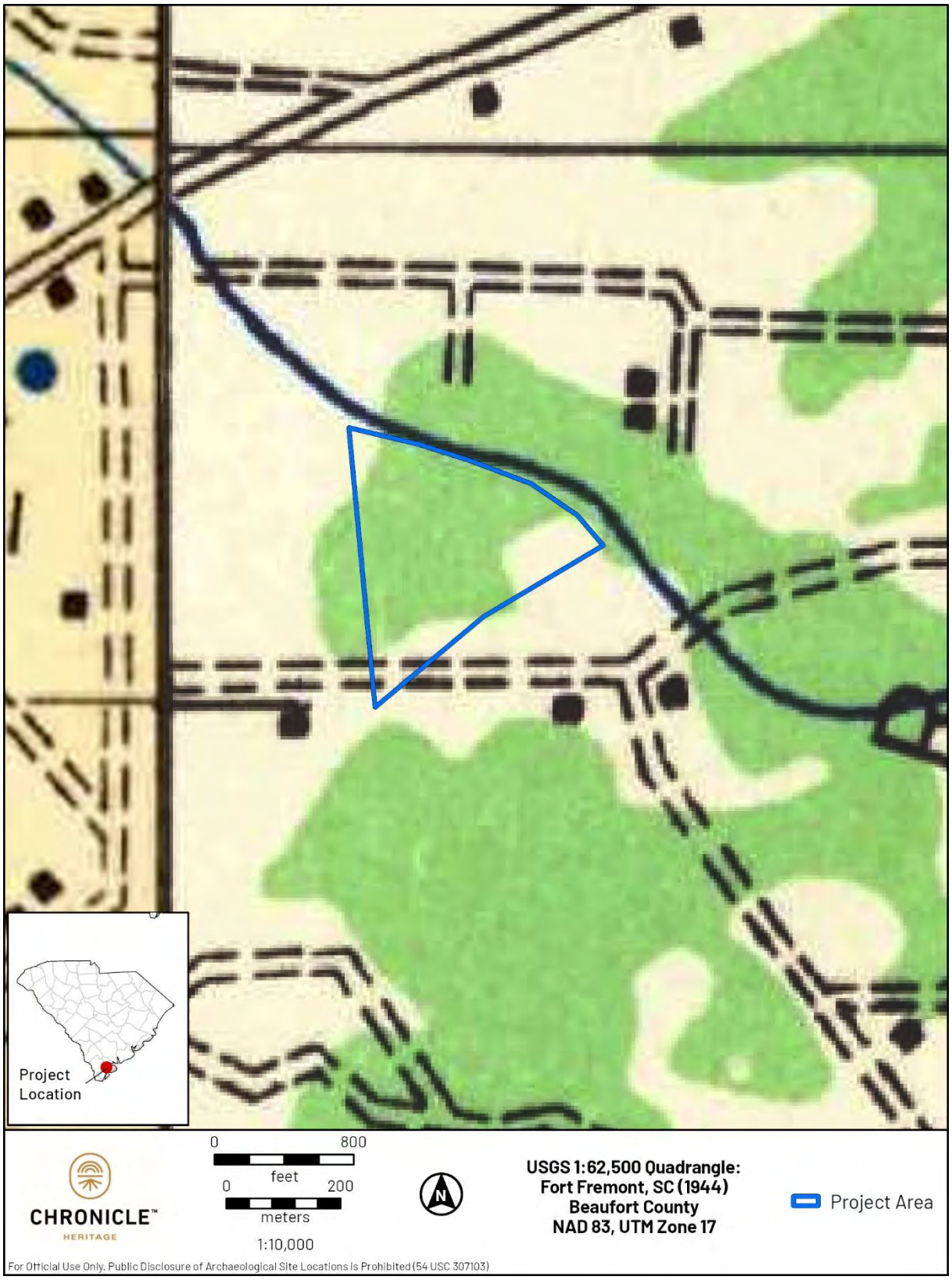

Figure 2-4. USGS 1944 Fort Fremont, South Carolina, topographic map showing the Project area.

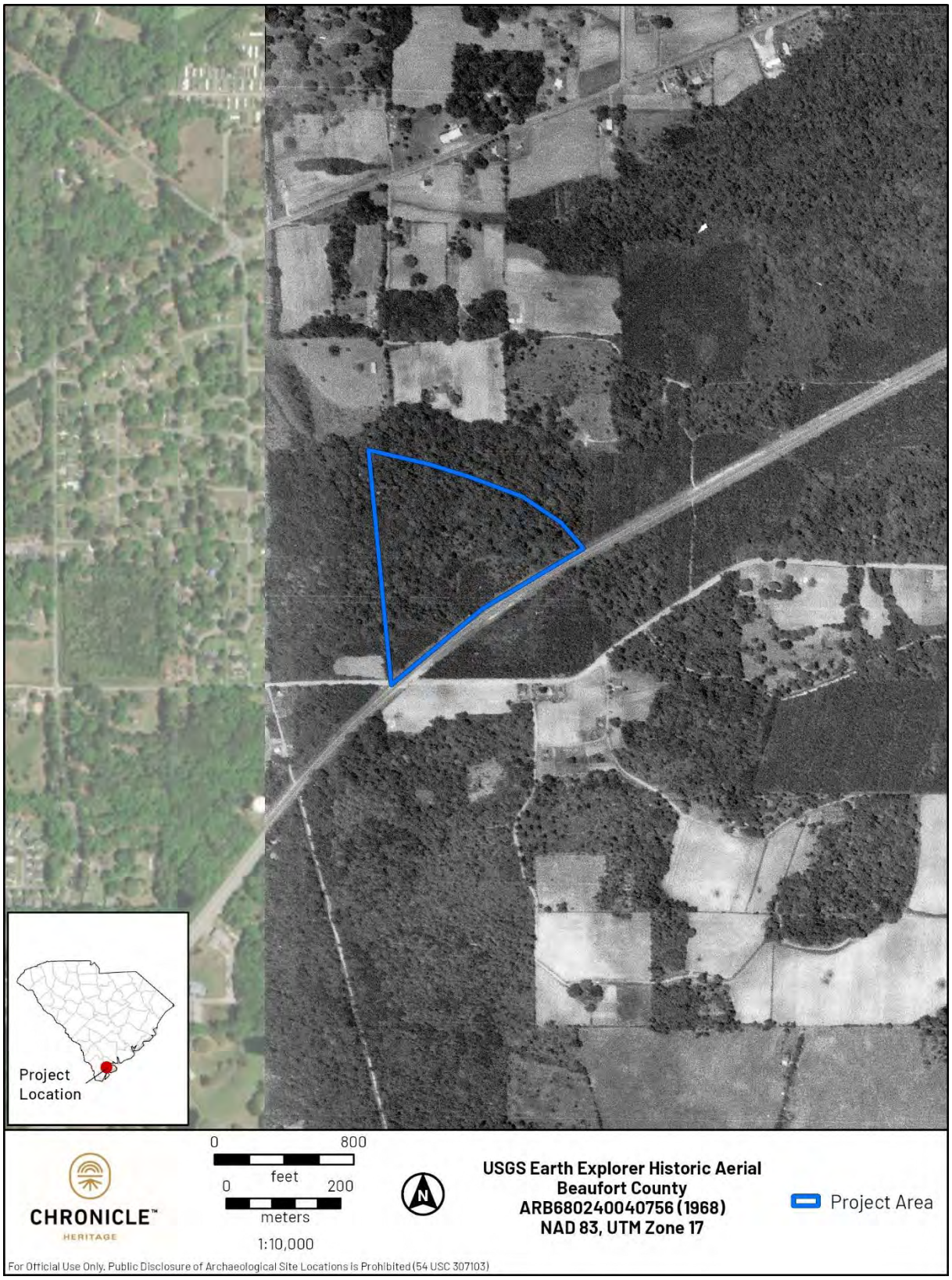

Figure 2-5. USGS 1968 historical aerial photograph of Beaufort County showing the Project area.

3 Historic Contexts

A review of historic contexts is a prerequisite to archaeological survey, providing perspectives for fieldwork, analysis, and interpretation. Humans have lived in South Carolina since at least 12,000 years ago, a legacy that is reflected in thousands of archaeological sites. Five broad chronological periods are used to characterize the Native American history of South Carolina: Paleoindian, Archaic, Woodland, Mississippian, and Historic. Each of these are based on distinct cultural and technological developments that can be recognized in the archaeological record. These five periods are reviewed below in addition to a discussion of the history of the Beaufort and Port Royal area.

3.1 Paleoindian

Human occupation of the Americas began during the Paleoindian Period. At present, it is uncertain when the first humans permanently settled the western hemisphere, although most scholars believe it was sometime between 20,000 and 13,000 years ago in the last stages of the Pleistocene glaciation. Recent research has provided evidence of the Paleoindian occupation of what is now known as the American Southeast as early as approximately 14,550 years B.P. (Halligan et al. 2016). This is based on 71 radiocarbon dates derived from intact peat deposits that contained a partial biface and lithic debitage at the Page-Ladson site (8JE00591) in the Aucilla River in northern Florida. The Pleistocene–Holocene transition marks the end of the Paleoindian Period, which is given an arbitrary terminal date of 8,000 B.C. in most areas of the southeastern United States.

The Paleoindian Period also corresponds, however tentatively, with the accepted temporal boundaries of the Clovis tradition, which is identified through the presence of characteristic fluted projectile points such as the Clovis and Cumberland types (Anderson and Faught 1998).

One of the most well-known archaeological sites connected to the Paleoindian Period in South Carolina is the Topper Site, 38AL23, located on the Savannah River in Allendale County. The site is on an alluvial terrace and was used as a quarry and production location for a variety of stone tools (Goodyear et al. 2007; Miller 2007, 2010). The site has proven to be important for studying the Paleoindian Period in the Southeast and has also facilitated important discussions regarding pre-Clovis occupations in the Americas. Debate regarding evidence at this site for potential pre-Clovis occupation of the Americas continues in the archaeological community.

3.2 Archaic

During the Archaic Period, the environment was characterized by a warmer climate and rising sea levels. Regionally specific adaptations to these changes resulted in changes to subsistence strategies and the formation of regionally distinct material assemblages. Archaeological evidence suggests that during this period, humans focused on the procurement of smaller game, fish, and wild plants, as the megafauna of the Pleistocene had become extinct. The Archaic Period is typically subdivided into Early, Middle, and Late periods based on distinct stone tool and other material typologies.

3.2.1 Early Archaic

The Early Archaic Period (roughly 8,000–5,000 B.C.) was a time of climate change. The southeastern United States saw a general increase in temperature and surface water. The thawing or melting of continental glaciers created higher sea levels and increased precipitation. This led to

the development of oak-dominated forest vegetation throughout the Southeast (Delcourt and Delcourt 1987). Human adaptations to a changing environment are visible in the archaeological record; these include regionally specific material culture and specialized lifeways (Anderson and Hanson 1988). The repeated use of rock shelters and inter-riverine terraces and ridge tops suggests a different lifestyle that may be a direct result of post-Pleistocene warming (Claggett and Cable 1982).

According to Anderson and Hanson (1988), Early Archaic groups in South Carolina lived in small, band-level groups and practiced seasonal settlement along major river drainages. Coastal Plain locales were used as spring foraging and logistical camps, while groups of people traversing a river drainage would aggregate at the Fall Line during the winter months (Anderson and Hanson 1988). Material culture specific to the Early Archaic Period in South Carolina includes characteristic side notched and corner notched projectile point/knives such as the Hardaway Side-notched, Palmer Corner-notched, and Kirk Corner-notched. Toward the end of the Early Archaic Period, the corner- and side-notched types give way to a bifurcate tradition such as the Hardaway-Palmer point (Chapman 1975).

3.2.2 Middle Archaic

The Middle Archaic Period (5,000–3,000 B.C.) saw increased regional adaptation and a shift toward a foraging lifestyle, as climate trends allowed for a more homogenous environment. Sassaman (1983) proposed a settlement model based on adaptive flexibility in which Middle Archaic societies could practice a fairly high level of social mobility to take advantage of dispersed but similar resource patches. The material signatures of such societies show a lack of specialized tools for varied resources. While these groups practiced social mobility, their seasonal territories continued to be regionally specific. This can be seen in a shift from the use of cryptocrystalline rock to coarser, locally available lithic material found in the Coastal Plain (Milner 2004). These assemblages are typically recognized by characteristic stemmed projectile points such as the Kirk Serrated and Kirk Stemmed points, and later Stanly Stemmed points.

3.2.3 Late Archaic

During the Late Archaic Period (3,000–1,000 B.C.), the regionally specific adaptation trends continued to develop, and an emphasis on sedentism developed throughout the Southeast. Evidence of long-term habitation can be seen in the form of large middens of oyster shell, which have accumulated along the South Carolina coastline (Smith 1986). The Late Archaic Period also saw the emergence of fired clay pottery in Coastal Plain locations throughout the Southeast. This early pottery type was known as Stallings pottery and is recognized by its distinctive fiber-tempered paste (Simpkins and Scoville 1986). Stallings vessel forms included shallow bowls, wide-mouthed bowls, and jars that were constructed by hand molding as opposed to the coiling method employed in later ceramic types (Sassaman 1993; Trinkley 1986). Surface treatments for Stallings pottery included punctation, finger pinching, and elaborate incising. Other examples of Late Archaic material culture include characteristic stemmed projectile points such as the Savannah River stemmed and the Otarre projectile points (Griffin 1943; Stoltman 1974).

3.3 Woodland Period

As a general theme, many of the cultural phenomena seen in the Late Archaic become more prevalent during the Woodland Period. Pottery, a somewhat isolated phenomenon in the Late Archaic, became common throughout the eastern United States, and variations in style and

decoration quickly became regionally specific (Milner 2004). As archaeological evidence suggests, ever larger groups of people practiced year-round settlement at certain locations and took advantage of local and regional resources. The size, frequency, and complexity of archaeological sites all increased during the Woodland Period. Archaeologists have subdivided the Woodland Period to simplify interpretation of the archaeological record. Early (1,000–300 B.C.), Middle (300 B.C.–A.D. 800), and Late (A.D. 800–1000) divisions frame the discussion and are loosely based on a seriation of diagnostic artifacts.

3.3.1 Early Woodland

The start of the Early Woodland Period is not clearly demarcated. When considering a starting point through a lens of pottery traditions, such as Thom's Creek, it is made even more confusing (Trinkley 1980). Although it was long considered an early Woodland type, Thom's Creek ceramics appear very similar to Stallings wares, exhibiting a similar form and surface treatment. A difference is seen through the type of tempering agent that makers of the traditions used, with some preferring sand instead of fiber (Griffin 1943). Originally seen as an evolution on Stallings type, radiocarbon dates obtained from the Spanish Mount site (38CH62) in Charleston County show that both traditions have been found at contemporaneous contexts (Trinkley 1980). Other dates place these two pottery types within the Early Woodland. Refuge pottery represents another Early Woodland pottery tradition and is often described as very similar to Thom's Creek. Significant changes in settlement patterns are evident where high frequencies of Refuge-type ceramics have been recovered (Brooks et al. 1989; Colquhoun et al. 1980).

3.3.2 Middle Woodland

The Middle Woodland is marked by the appearance of quartz- and grit-tempered pottery types such as the Pigeon and Cartersville series ceramics. Pigeon type ceramics are typically decorated with check-stamped, simple-stamped, or brushed surface treatments applied to quartz-tempered paste. Cartersville pottery is usually recognized by a grit- or sand-tempered paste with cord marking and sometimes simple or check-stamped surface decoration. The Cartersville type is thought to be related to the widespread Deptford series of ceramics, typically seen throughout the Coastal Plain in the American Southeast (Anderson and Schuldenrein 1985). Later in the Middle Woodland, Connestee pottery becomes common in this region. This pottery type is characterized by a thin-walled design comprised of sand-tempered paste and is typically decorated with brushed, simple stamped, or cord marked designs (Keel 1976).

3.3.3 Late Woodland

The Late Woodland Period, in many ways, represents a continuation of the Middle Woodland Period, with the continued preponderance of grit- and sand-tempered wares. Both Cartersville and Deptford ceramics continue into the Late Woodland Period; however, they begin to noticeably decline in frequency (Anderson and Schuldenrein 1985). Sassaman and colleagues (1990) note that Late Woodland assemblages in this region are often difficult to distinguish from the preceding Middle Woodland and subsequent Mississippian occupations. As such, the Late Woodland is often interpreted as a transitional period between the Woodland and Mississippian lifeways. This includes the intensification of sedentism, horticulture, and social inequality—all characteristic signatures of the Mississippian Period that followed.

Increased population density, sedentary habitation, and increasingly stratified social structure eventually led to the rise of the politically centralized Southeastern Mississippian chiefdoms. This

period is typically thought to begin around A.D. 1000 and continued until European contact. The hallmarks of the Mississippian Period in the Southeast include intensive maize agriculture, sedentary villages and towns, ceremonial architecture such as earthen platform mounds, and political stratification among individuals and settlements.

3.4 Mississippian Period

The Mississippian Period saw the rise of chiefdoms, which were made up of hierarchically ranked villages. Ferguson (1971) established a model of Mississippian settlement patterns composed of political centers surrounded by smaller villages and farmsteads. These political centers tended to be approximately 160 km apart often with buffers of unoccupied territory between them (Hally 1993). Mississippian centers have been found along most major river systems in the southeast. Examples of these centers include the Belmont and Mulberry sites along the Wateree River, the Santee/Fort Watson/Scotts Lake site on the Santee River, the Irene site on the Savannah River, the Hollywood, Lawton, Red Lake, and Mason's Plantation sites in the central Savannah Valley, and Town Creek along the Pee Dee River in North Carolina (Anderson 1994).

Mississippian Period diagnostic artifacts typically include small triangular projectile points, ground stone tools, and polished stone objects. Exotic items crafted from stone, bone, shell, mica, and copper are also associated with Mississippian assemblages and are often interpreted as symbols of status and authority. Increased regionalization during the Mississippian Period is also indicated by the diversity of regional ceramic variants found from sites dating to this period.

3.5 Contact and Historic Period

European contact with native populations in what is now South Carolina occurred during the early 1500s. Expeditions to North America by Juan Ponce de León and Pedro de Salazar inspired Lucas Vásquez de Ayllón, Judge of the Royal Audencia of Santo Domingo, to finance his own mission to the new continent. This led to the first known visit to the South Carolina coast by slavers Francisco Gordillo and Pedro de Quejo, who sailed from the Bahamas to the Santee River-Winyah Bay area in 1521. Ayllón was so encouraged by this successful endeavor that he set out to settle the area with an expedition he led personally. Ayllón and as many as 600 settlers first landed at the Santee River in 1526 but then moved to another unknown location within Native American territory to establish the settlement of San Miguel de Gualdape (Swanton 1922; Thomas 1993).

Within two months of its creation, Ayllón was dead, and the colony had failed. While the settlement was short lived, its effects were far reaching for the Native inhabitants. Spanish goods were apparently introduced to the Native American groups of the area and were traded far inland where they were later encountered during the de Soto *entrada* of 1540 (Thomas 1993). The Ayllón expedition also introduced European diseases, which devastated some of the interior settlements described in the chronicles of the de Soto expedition (Clayton et al. 1993). These diseases induced changes and likely population movements in the proto-historic Native groups that were later described in detail by the more intensive Spanish occupation to come. In the vicinity of the Project area, tribes were part of the Cusabo family, which included the Ashepoo, Combahee, Coosa, Edisto, Escamacu, Etiwan, Kiawah, Stono, Wando, and Wimbee tribes (South Carolina Information Highway [SCIWAY] 2023; South 1972)

The next wave of European settlement came with the French, in 1562, to the land they called Carolana, in honor of Charles IX, King of France. This expedition of French Protestants, known as Huguenots, was led by Jean Ribault, who established the short-lived Charlesfort settlement on Parris Island. Ribault's lieutenant, René de Laudonnière, detailed the names of powerful local

chieftains in the area around the fort, including "Audusta (Orista)," "Macou (Escumacu)," and "Oade (Guale)" whose names became European monikers for coastal Native American groups as a whole (Laudonnière 1975).

In June of 1562, shortly after establishing Charlesfort, Ribault returned to France for supplies and left 27 volunteers behind to maintain the fort (McGrath 2022; Thomas 1993). Ribault was unable to rescue the men he left behind due to religious upheaval in France. The men who had been left at Charlesfort struggled to feed themselves because they had not planted any crops and a fire had destroyed much of their provisions (Saraceni 1996). With the help of Native Americans from the nearby Orista chiefdom, Charlesfort survivors built a small ship to return to France in 1563 (Saraceni 1996). By the time they were rescued at sea by an English ship, the remaining Charlesfort survivors had resorted to cannibalism (Laudonnière 1975).

The Spanish saw the failed Charlesfort colony as a direct challenge to lands they believed were rightfully theirs. When Ribault did return to North America to establish the Fort Caroline colony, Spain's champion, Pedro Menendez de Aviles, was not far behind. Menendez eventually defeated the French at Fort Caroline and established St. Augustine and a series of outposts along the Georgia Coast. For the capital of his Florida colony, Menendez returned to Parris Island and founded Santa Elena on top of the original Charlesfort colony in 1566. Santa Elena served as Spain's colonial capital in North America until 1587, when it was abandoned due to conflicts with the aboriginal population and its colonial rivals, France and England (Thomas 1993).

Conflicts in Europe led to a virtual stalemate for the colonial occupation of Carolina, and the region remained as a northern frontier of the Spanish La Florida colony for almost a century. Sir Robert Heath, attorney general for King Charles I of England, was granted the "Province of Carolina" in 1629 (Edgar 1998). This broadly defined territory included the modern states of North Carolina, South Carolina, Georgia, Alabama, Tennessee, and Mississippi. The settlement of this land was never realized, however, due largely to broader conflicts such as the English Civil War. The charter was eventually declared invalid, and a new one was established in 1663 granting Carolina to eight "Lords Proprietors" in return for the financial and political backing of the restored English monarchy (Edgar 1998). Of this group, Lord Shaftesbury seemed to take the most active interest in the Carolina Colony. He and his secretary, the philosopher John Locke, drafted the Constitutions of Carolina, which established a government for the colony that was heavily based on the work of English political scientist James Harrington. This government was to consist of a Governor coupled with a strong council heavily influenced by the Lords Proprietors themselves (Edgar 1998) . While Charles Towne was the principal seat of government in the Carolina colony, the northern settlements often operated independently due to their remote location. As a result, they maintained a separate assembly and deputy governor for the northern half of the colony. This laid the groundwork for the eventual separation of the colony in 1729, when half of the Lords Proprietors sold their interests to the Crown and two Royal Colonies were established: North Carolina and South Carolina (Edgar 1998).

3.6 Local History

Before European settlers arrived, the region now known as Beaufort County in South Carolina was inhabited by indigenous peoples, including the Yamasee tribe. These communities thrived in the area's fertile lands and waterways, cultivating crops, fishing, and trading extensively. Their knowledge of the environment shaped the region's development, even as European colonization displaced them.

Located in the heart of South Carolina's Lowcountry, the city of Beaufort was established in 1711 by British planters. Beaufort, founded as part of the proprietary colony of Carolina, was designed around a fort and blockhouse that were built in 1706 to guard against the Spanish. It is the second-oldest city in the state after Charleston. Named for Henry Somerset, the second Duke of Beaufort and a proprietor of Carolina between 1700 and 1714, Beaufort serves as the county seat of Beaufort County.

Early interactions between indigenous peoples and Europeans in the area ranged from trade to conflict, culminating in the Yamasee War of 1715 to 1717, which significantly impacted the local population. In 1715, the Yamassee tribe destroyed Beaufort, but the city recovered. In 1740, an act was passed titled "An Act to Encourage the Better Settling and improvement of Beaufort Town," and the town quickly became a center of commerce, benefiting from its strategic location along Port Royal Sound. The introduction of rice and indigo as cash crops turned Beaufort into a prosperous community, with plantation agriculture becoming the cornerstone of its economy (Rowland 2022). In 1769, Beaufort County was established, originally including present day Jasper and Hampton Counties.

The Battle of Beaufort, also known as the Battle of Port Royal Island, took place on February 3, 1779, during the American Revolutionary War. This engagement occurred near Beaufort as British forces sought to secure control over the southern colonies following their capture of Savannah, Georgia. American forces, commanded by Brigadier General William Moultrie, confronted the British in a skirmish near Port Royal Island. Despite being outnumbered and less experienced, the American militia and Continental soldiers effectively repelled the British attack, forcing them to retreat. The battle showcased the resilience of American forces and helped bolster local support for the Patriot cause. It also served to delay British efforts to consolidate their position in the Southern Theater of the war, setting the stage for further resistance in South Carolina (Schenawolf 2023).

The Antebellum period was a time of growth and prosperity for Beaufort, but it was also defined by the exploitation of enslaved African Americans. Large plantations dominated the economy, producing rice, indigo, and later, cotton. Enslaved laborers played an essential role in Beaufort's economy, and their unique cultural traditions evolved into what is now known as Gullah culture. This culture remains a vital part of Beaufort's identity. By the mid-nineteenth century, Beaufort had become one of the wealthiest towns in the South, with elegant homes and a thriving social scene (Beaufort County Government 2010).

The American Civil War brought dramatic changes to Beaufort (Figure 3-1). In November 1861, Union forces captured Port Royal Sound, making Beaufort one of the first Southern towns to fall to the Union. The occupation transformed the town into a hub for the Union war effort and a refuge for formerly enslaved people. The Port Royal Experiment, an early effort to educate and empower freed African Americans, took place in the region. Following the Union's capture of the Sea Islands off the coast of South Carolina, including the town of Port Royal, approximately 10,000 formerly enslaved individuals were left behind as plantation owners fled (Figure 3-2).

Figure 3-1. Plot of Beaufort, South Carolina (Schelten 1860).

Figure 3-2. Newly freed African American Women and Children, Port Royal circa 1865 (Lowcountry Digital History Initiative 2024)

Abolitionist groups, missionaries, and educators from the North collaborated with the U.S. government to implement programs focused on agricultural reorganization, wage-based labor, and education. Schools were established to provide literacy and vocational training, fostering a sense of empowerment and self-sufficiency among freed people. Schools like the Penn School, now known as the Penn Center on St. Helena Island, became beacons of progress during Reconstruction. The experiment demonstrated that freed African Americans could live and work independently, manage their own affairs, and contribute to the broader economy as wage laborers. This era saw significant land redistribution, as many former plantations were purchased by freedmen (Lowcountry Digital History Initiative 2024).

One of those freedmen was Robert Smalls, born into slavery in 1839 on the Henry McKee plantation at 511 Prince Street in Beaufort. In 1862, Smalls commandeered the Confederate ship Planter, navigating it past heavily fortified Confederate checkpoints to deliver it to Union forces, securing his freedom and that of his family and crew. Smalls delivered valuable intelligence and resources to the Union cause but also garnered widespread attention, elevating him as a prominent advocate for abolition. After the war, Smalls purchased the house in Beaufort in which he had been enslaved and pursued a career in public service. Serving five terms in the United States Congress, he advocated the expansion of educational opportunities, protecting civil rights, and promoting economic equality during the Reconstruction era. When Smalls died in 1915, the home in Beaufort in which he was born into slavery, the McKee House, was inherited by his family. In 1974, it was designated as a National Historic Landmark (NPS 2024b).

Figure 3-3. Robert Smalls (Library of Congress 1880).

From the 1870 to the mid-1890s, cotton, timber, rice, shipping, and phosphate mining transformed Beaufort into an agricultural, commercial, and industrial center. In the 1890s, Beaufort's economy began to decline. The Sea Island Hurricane of 1893 destroyed the once prosperous town. Soon after, the phosphate industry relocated to Florida. In 1907, a fire damaged most of the central business district. Once a primary rice growing region, the last commercial rice crop was produced in Beaufort in 1914 (Figure 3-4). Cotton prices plummeted due to the arrival of the boll weevil in 1919, bringing an end to the cotton industry in Beaufort.

Figure 3-4. Hoeing Rice in South Carolina (Library of Congress 1904).

The decline of plantation agriculture in the late nineteenth century and early twentieth century led to economic hardship in Beaufort County. However, the establishment of military bases, including Marine Corps Recruit Depot in Parris Island in 1915 and the Marine Corps Air Station (then known as the Naval Air Station Beaufort) in 1943, provided economic stability the area. These military installations remain vital to the local economy today.

Economic growth was slow in the early twentieth century due to geographic isolation, but with the construction of bridges, Beaufort had greater access to the mainland. In the 1920s, Port Royal Island and the mainland were connected by a bridge. In the 1930s, Lady's Islands and Port Royal were also bridged. In the 1950s, the northern and southern sections of Beaufort County were joined for the first time with bridges crossing the Broad and Chechessee rivers. The construction of roads and bridges during this time led to commercial development and population growth in the area (Beaufort County Government 2010).

During the mid-twentieth century, efforts to preserve Beaufort's historic character gained momentum. In 1973, Beaufort's downtown was designated a National Historic Landmark District, recognizing its antebellum architecture and historical significance. Today, Beaufort balances its growth with preservation. Its population reflects a blend of long-time residents, military families, and newcomers drawn by the area's beauty and history. Cultural festivals such as the Beaufort Water Festival and the Gullah Festival celebrate the town's heritage, while environmental conservation efforts protect its fragile ecosystems. The Gullah culture, rooted in the traditions of enslaved Africans, continues to influence the region's cuisine, music, and storytelling (City of Beaufort 2024).

Named after the "Gullah statesman," Robert Smalls Parkway is a section of S.C. Highway 170 that runs through Beaufort. In 1991, it was established by the Beaufort County Council after a petition from the Robert Smalls High School Alumni Association (Billingsley 2023). Robert Smalls Parkway is situated just east of the Broad River and the Edward Burton Rodgers Bridge. Also known as the Broad River Bridge, which opened in 1958 when S.C. 170 was rerouted to US 21 in Beaufort, it connects the northern and southern sections of Beaufort County (Adams and Cordial 2018).

4 Research Design and Methods

4.1 Research Design

The purpose of the Phase I survey was to locate, record, and assess cultural resources within the Project area, and survey methods were designed to meet this goal. Chronicle Heritage completed the Phase I survey using Secretary of the Interior and other qualified staff and all work was consistent with standard professional practices and Section 106 of the NHPA, as amended (54 U.S.C. § 300101 et seq.). Chronicle Heritage surveyed the Project area according to guidelines outlined in the *South Carolina Standards and Guidelines for Archaeological Investigations* (COSPA 2013).

Chronicle Heritage contacted Ms. Heather Spade at the City of Beaufort Certified Local Government (CLG), and Mr. Curt Freese, the Director of Community Development at the City of Beaufort, for additional information about the Project area on January 23, 2025. As of the submittal of this report, no responses have been received. Chronicle Heritage also contacted Kristen Forbus, the Long Range Planner for Beaufort County, on January 23, 2025, who had no additional information to provide about the Project area.

The Project area also overlaps traditional homelands of five federally-recognized Native American Nations: the Alabama-Quassarte Tribal Town, the Catawba Indian Nation (aka Catawba Indian Tribe of South Carolina), the Eastern Shawnee Tribe of Oklahoma, the Muscogee (Creek) Nation, and the Tuscarora Nation. Pursuant to 54 U.S. Code § 302706 (b), continual cooperation and consultation with these nations through their Tribal Historic Preservation Offices (THPOs) will be performed.

4.2 Field Methods

Systematic subsurface sampling was conducted using shovel test pits (STPs). During the Phase I survey, the 19.5-ac tract was surveyed by excavating shovel tests at 30-m intervals along transects spaced 30 m apart. STPs were excavated to a maximum depth of 80 cm below surface (cmbs) or until the water table, subsoil, or an impenetrable obstacle was reached. STPs were approximately 30 cm wide. In instances where 80 cm was not reached, the maximum depth reached was noted. Field data were collected using a digital STP form designed to capture stratigraphy with soil descriptions, environmental variables, and presence or absence of artifacts.

Each STP location was plotted with a Global Positioning System (GPS) unit and numbered sequentially (Appendix A). Chronicle Heritage preloaded a GPS unit capable of sub-meter accuracy with STP locations at predefined intervals. During fieldwork, all locations were plotted with a newly recorded point to ensure the GPS points are as accurate as possible. Therefore, maps reflect actual test locations and may show slight deviations from target intervals based on pacing, environmental conditions, and GPS accuracy. STP forms were completed within the GPS, eliminating the possibility for transcription error after fieldwork. All soil was screened through 0.25-inch wire mesh. Chronicle Heritage will submit all Geographic Information System (GIS) data,

state archaeological site forms, and other digital project records to South Carolina Electronic Records Archive (SCERA) and South Carolina Institute of Archaeology and Anthropology (SCIAA) at the completion of the fieldwork.

4.3 Site Criteria and National Register Criteria

All cultural resources that are encountered are assessed as to their significance based on NRHP criteria. Four criteria are applied during the evaluation of an archaeological site's eligibility for inclusion in the NRHP. Normally, a property must be at least 50 years of age and meet at least one of the following four criteria to be considered eligible for listing in the NRHP:

- Be associated with events that have made a significant contribution to the broad patterns of our history (Criterion A); or
- Be associated with the lives of persons significant in our past (Criterion B); or
- Embody the distinct characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction (Criterion C); or
- Yield, or be likely to yield, information important in prehistory or history (Criterion D).

Chronicle Heritage archaeologists used these criteria, in conjunction with evaluations of site integrity, to provide recommendations concerning the NRHP-eligibility status of all archaeological sites located in the Project area. Determinations of ineligibility are not possible when the limits of a site are unknown and only a portion has been sampled, but it may be possible to assess a site as potentially significant or eligible based on an incomplete sample.

5 Archaeological Investigations

5.1 Previous Research

Chronicle Heritage consulted the SCERA, the South Carolina ArchSite (the online GIS database that contains archaeological site information from the SCIAA), and above-ground historic and architectural properties information maintained by the SCDAH, to determine the location of previously recorded cultural resources and previously conducted surveys within 3.2 km of the Project area.

According to SCERA records, 19 professional surveys have been conducted within 3.2 km of the Project area, two of which overlap portions of the tract (Table 5-1; Figure 5-1). Of the 19 investigations identified, 6 are linear surveys, and 13 are reconnaissance-level surveys. Although two surveys overlap portions of the tract, the entirety of the tract has not been professionally surveyed.

There are 64 known archaeological sites within 3.2 km of the Project area, none of which intersect the tract (Figure 5-2; Table 5-2). Two of the archaeological sites within 3.2 km of the Project area are NRHP-listed, six have been evaluated by the SHPO as eligible for listing in the NRHP, 18 have not been evaluated by the SHPO, and 36 have been evaluated as not eligible for listing in the NRHP. The nearest archaeological site to the Project area is site 38BU1729, a Middle Woodland-period site located directly south of the tract. Additionally, there are 46 previously recorded historical structures within 3.2 km of the tract, none of which intersect the tract (Table 5-3). Four of these

structures have been evaluated as eligible for listing in the NRHP, and the remaining structures have been evaluated as not eligible.

Table 5-1. Previously Conducted Surveys within 3.2 km of the Project area

Project Title	Year	Consultant	Type
Archaeological survey of US 21 & bridge over Albergotti Creek widening	1980	DOT	Intensive Archaeological
Archaeological survey of SC 170	1991	DOT	Intensive Archaeological
Proposed Telecommunications Tower Site Section 106 Field Assessment Beaufort Mall Tower	2002	FCC	Intensive-Architectural
Historic Structures Report, Burton Wells County Park	2002	Brooker Architectural	Intensive Architectural
CR Survey of the Proposed Port Royal Reclamation Facility Transmission	2003	Brockington	Intensive
Phase I CR Survey of the Pinckney Retreat Development Site	2004	R.S. Webb	Intensive
Phase I Archaeological Survey and Phase II Site Evaluation of the Habersham Tract	2004	New South	Intensive
CR Survey of the Centex Port Royal Tract	2006	Brockington	Intensive
CR Survey of the William Trask Tract	2006	Brockington	Intensive
Cultural Resources Survey of SC Route 802 Widening Project	2007	New South	Intensive
CRS of the Gagne Property	2007	Brockington	Intensive-Archaeological
Cultural Resources Survey of the Beazer Trask Tract	2007	Brockington	Intensive-Archaeological
Cultural Resources Survey of the Carsons Tract	2007	Brockington	Intensive
Cultural Resources Survey of the Military Utilities Consolidation Corridor	2009	Brockington	Intensive-Archaeological
Cultural Resources Survey of the Proposed Bridge Replacement on US 21 over Albergotti Creek	2009	New South	Intensive
Phase I Cultural Resources Survey of the 39-Acre Shadow Moss Expansion Tract	2017	RS Webb	Intensive
Phase I Archaeological Survey Beaufort Zinc Ribbon Installation Project Hampton and Beaufort Counties, South Carolina	2020	S&ME, Inc.	Reconnaissance-Archaeological
Phase I CR Survey of the Burton-Frogmore 115kV Transmission Line	2022	Terracon Consultants, Inc.	Intensive
Phase I Intensive Archaeological Resources Survey of the Shearwater Bluff Tract	2022	Brockington	Intensive

Note: Shaded projects indicate they intersect the current Project area.

Table 5-2. Previously Recorded Archaeological Sites within 3.2 km of the Project area

Site Number	Site Name	Temporal/Cultural Affiliation	NRHP Status
38BU0017	No Name	Prehistoric	Not Determined
38BU0028	No Name	Late Archaic; Early–Late Woodland; Mississippian	Not Determined
38BU0029	No Name	Late Archaic; Prehistoric	NRHP Listed
38BU0029	[Revisit 2] Chester Field	Late Archaic; Prehistoric	NRHP Listed
38BU0253	Dog Skull Shell Midden [38BU0253/38BU1280]	Prehistoric	Not Eligible
38BU0253	Island	Prehistoric	Not Eligible
38BU0332	No Name	Early Archaic; Historic	Not Determined
38BU1104	PR-3	Middle Woodland; Sixteenth and 19th Century Historic; Historic	Eligible
38BU1104	Jean de la Gaye House	Eighteenth Century Historic	Not Determined
38BU1283	No Name	Prehistoric; Nineteenth and Twentieth Century Historic	Not Eligible
38BU1284	No Name	Prehistoric	Not Eligible
38BU1285	No Name	Prehistoric	Not Eligible
38BU1286	No Name	Prehistoric	Not Eligible
38BU1287	No Name	Prehistoric	Not Eligible
38BU1288	Island	Prehistoric	Not Eligible
38BU1440	No Name	Early–Late Woodland; Historic	Not Eligible
38BU1441	No Name	Prehistoric; Historic	Not Eligible
38BU1580	No Name	Early and Middle Woodland; Mississippian; Seventeenth and Eighteenth Century	Eligible
38BU1581	No Name	Early and Middle Woodland	Not Eligible
38BU1582	No Name	Early and Middle Woodland	Not Eligible
38BU1586	No Name	Early and Middle Woodland; Mississippian	Eligible
38BU1587	No Name	Middle Woodland	Not Eligible
38BU1644	No Name	Late Archaic; Early–Late Woodland; Eighteenth–Twentieth Century Historic	Eligible
38BU1681	No Name	Late Archaic; Early–Late Woodland; Eighteenth and Nineteenth Century Historic	Not Eligible
38BU1682	No Name	Middle Woodland; Prehistoric; Twentieth Century Historic	Not Eligible
38BU1683	No Name	Eighteenth–Twentieth Century Historic	Not Determined

Site Number	Site Name	Temporal/Cultural Affiliation	NRHP Status
38BU1684	No Name	Late Archaic; Early–Late Woodland; Mississippian	Not Eligible
38BU1685	No Name	Late Archaic; Early Woodland; Eighteenth and Nineteenth Century Historic	Not Determined
38BU1725	No Name	Twentieth Century Historic	Not Eligible
38BU1726	No Name	Late Woodland; 20th Century Historic	Not Eligible
38BU1727	No Name	Late Archaic; Middle–Late Woodland; Eighteenth–Twentieth Century	Not Eligible
38BU1728	No Name	Late Woodland	Not Eligible
38BU1729	No Name	Middle Woodland	Not Determined
38BU1826	Trask Site 1	Unknown	Not Determined
38BU1827	Trask Site 2	Prehistoric; Historic	Not Determined
38BU2091	No Name	Early and Middle Woodland	Not Eligible
38BU2091	No Name	Late Woodland; Mississippian; Twentieth Century	Not Eligible
38BU2093	No Name	Middle Woodland; Twentieth Century	Not Eligible
38BU2094	PR-2	Late Archaic; Middle and Late Woodland; Mississippian; Eighteenth Century	Eligible
38BU2094	[Revisit 1]	Late Archaic; Early and Middle Woodland; Eighteenth–Twentieth Century	Eligible
38BU2095	No Name	Late Archaic; Early and Middle Woodland	Not Eligible
38BU2096	No Name	Early–Late Woodland	Not Eligible
38BU2097	No Name	Early–Late Woodland	Not Eligible
38BU2098	No Name	Early–Late Woodland; Mississippian	Not Eligible
38BU2099	No Name	Late Archaic; Early–Late Woodland; Mississippian; Nineteenth and Twentieth Century Historic	Not Eligible
38BU2119	No Name	19th Century Historic	Not Eligible
38BU2120	No Name	Prehistoric; Nineteenth Century Historic	Eligible
38BU2121	No Name	Prehistoric; Nineteenth Century Historic	Not Eligible
38BU2122	No Name	Prehistoric	Not Eligible
38BU2123	No Name	Prehistoric	Not Eligible
38BU2174	Site A	Nineteenth and Twentieth Century Historic	Not Eligible
38BU2246	Site 1	Prehistoric; Historic	Not Eligible
38BU2247	Site 2	Prehistoric; Historic	Not Eligible
38BU2258	No Name	Late Woodland	Not Determined

Site Number	Site Name	Temporal/Cultural Affiliation	NRHP Status
38BU2266	No Name	Late Woodland	Not Determined
38BU2267	No Name	Late Woodland	Not Determined
38BU2268	N-1	Prehistoric	Not Determined
38BU2313	Site 1	Unknown	Not Eligible
38BU2368	FS 1	Prehistoric; Historic	Not Determined
38BU2369	FS 2	Prehistoric; Historic	Not Determined
38BU2370	FS 3	Prehistoric	Not Determined
38BU2371	FS 4	Historic	Not Determined
38BU2372	FS 2	Eighteenth Century Historic	Not Determined

Table 5-3. Previously Recorded Historical Resources within 3.2 km of the Project area

Resource ID	Name/Address	Year Built	SHPO Evaluation
025-252	Ricket Place	ca. 1930	Not Eligible
025-254	Parris Island Gateway	ca. 1900	Not Eligible
025-318	County Shed Road	ca. 1920	Not Eligible
025-320	Mamie Frazier Lane	ca. 1930	Not Eligible
025-322	Broad River Road	ca. 1925	Not Eligible
025-324	Goethe Hill Road	ca. 1930	Not Eligible
025-326	Broad River Road	ca. 1930	Not Eligible
025-328	Broad River Road	ca. 1920	Not Eligible
025-330	N/A	N/A	Not Eligible
025-332	Broad River Road	ca. 1925	Not Eligible
025-334	Broad River Road	ca. 1925	Not Eligible
025-336	Broad River Road	ca. 1925	Not Eligible
025-338	Broad River Road	ca. 1930	Not Eligible
025-340	Broad River Road	ca. 1940	Not Eligible
025-342	Ramsay Road	ca. 1940	Not Eligible
025-344add	Unknown	Unknown	Not Eligible
025-346	County Shed Road	ca. 1940	Not Eligible
025-348	Regina Jenkins Washington Simmons House	ca. 1930	Not Eligible
025-350	Providence Road	ca. 1920	Not Eligible
025-352	Providence Road	ca. 1930	Not Eligible
025-354	Rick Larsen House	1900	Not Eligible
025-620	Oak View Drive	ca. 1940	Not Eligible

Resource ID	Name/Address	Year Built	SHPO Evaluation
025-621	130 Pinckney Retreat Rd.	ca. 1760	Eligible
025-622	First Jericho Baptist Church	1875	Eligible
025-623	116 Old Jericho Rd.	ca. 1935	Eligible
025-624	33 Old Salem Rd.	ca. 1910	Not Eligible
025-628	28 Old Jericho Rd.	ca. 1935	Not Eligible
025-629	55 Horton Dr.	ca. 1935	Not Eligible
025-630	45 Horton Dr.	ca. 1935	Not Eligible
025-631	12 Coinbow Loop	ca. 1910	Not Eligible
025-632	65 Broad River Blvd.	ca. 1950	Not Eligible
290-187	Unknown	Unknown	Not Eligible
290-223	46 Joe Frazier Rd.	ca. 1930	Not Eligible
290-265	153 Gruber Hill Rd.	ca. 1945	Not Eligible
290-267	145 Gruber Hill Rd.	ca. 1935	Not Eligible
290-269	1 Ricket Pl.	ca. 1945	Not Eligible
290-271	853 Broad River Blvd.	ca. 1935	Not Eligible
290-421	Cavu Lane	1881	Eligible
5014	308 Savannah Highway	1900; 1965	Not Eligible
5015	11 Shea Lane	ca. 1945; ca. 1985	Not Eligible
5017	507 Parris Island Gateway	ca. 1900	Not Eligible
5018	517 Parris Island Gateway	ca. 1957	Not Eligible
5470	67 Parris Island Gateway	ca. 1930s	Not Eligible
5471	73 Parris Island Gateway	ca. 1940s	Not Eligible
5472	63 Broad River Boulevard	ca. 1940s	Not Eligible
5473	48 Broad River Boulevard	1972	Not Eligible

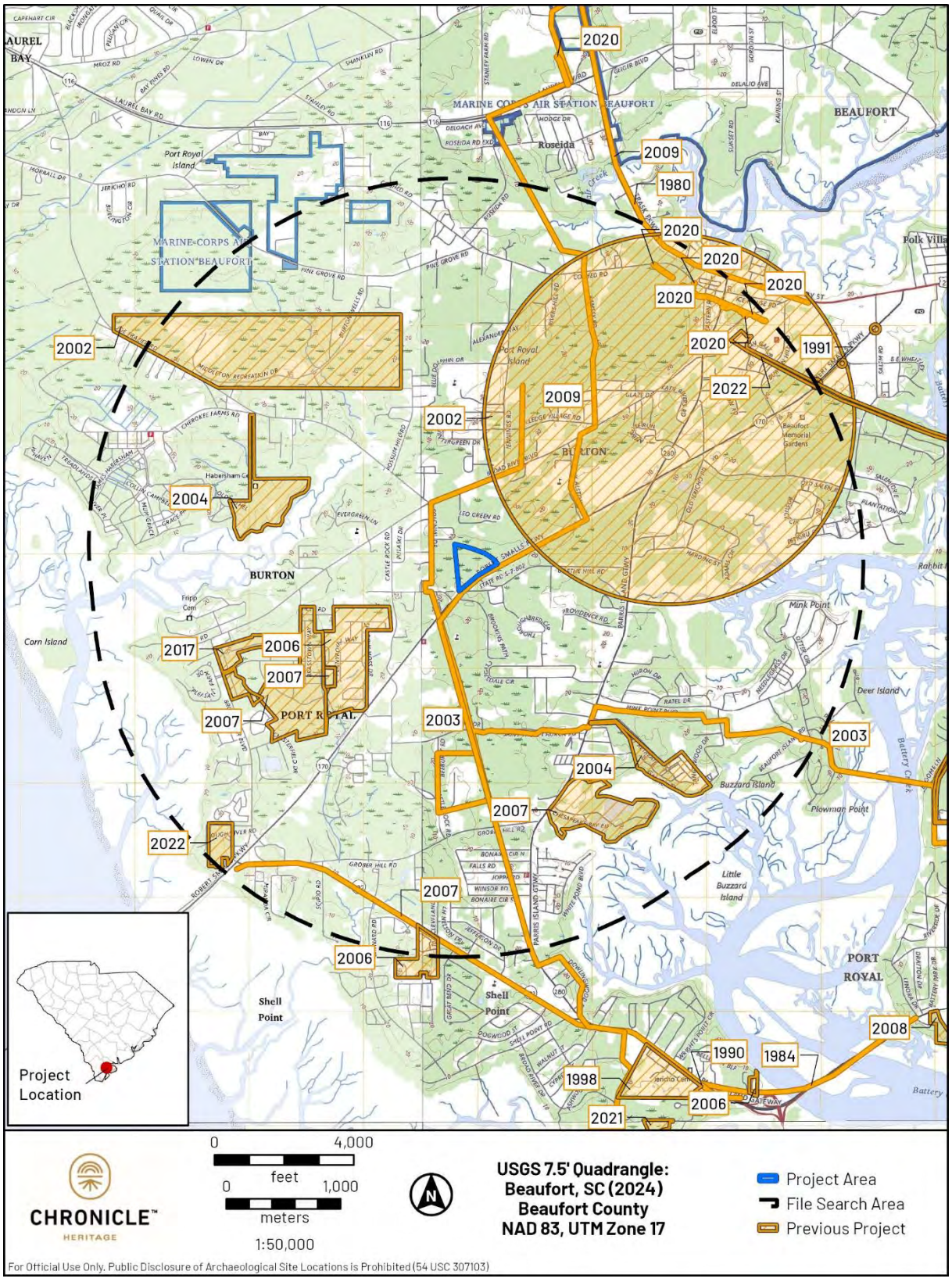

Figure 5-1. Map of surveys within 3.2 km of the Project area.

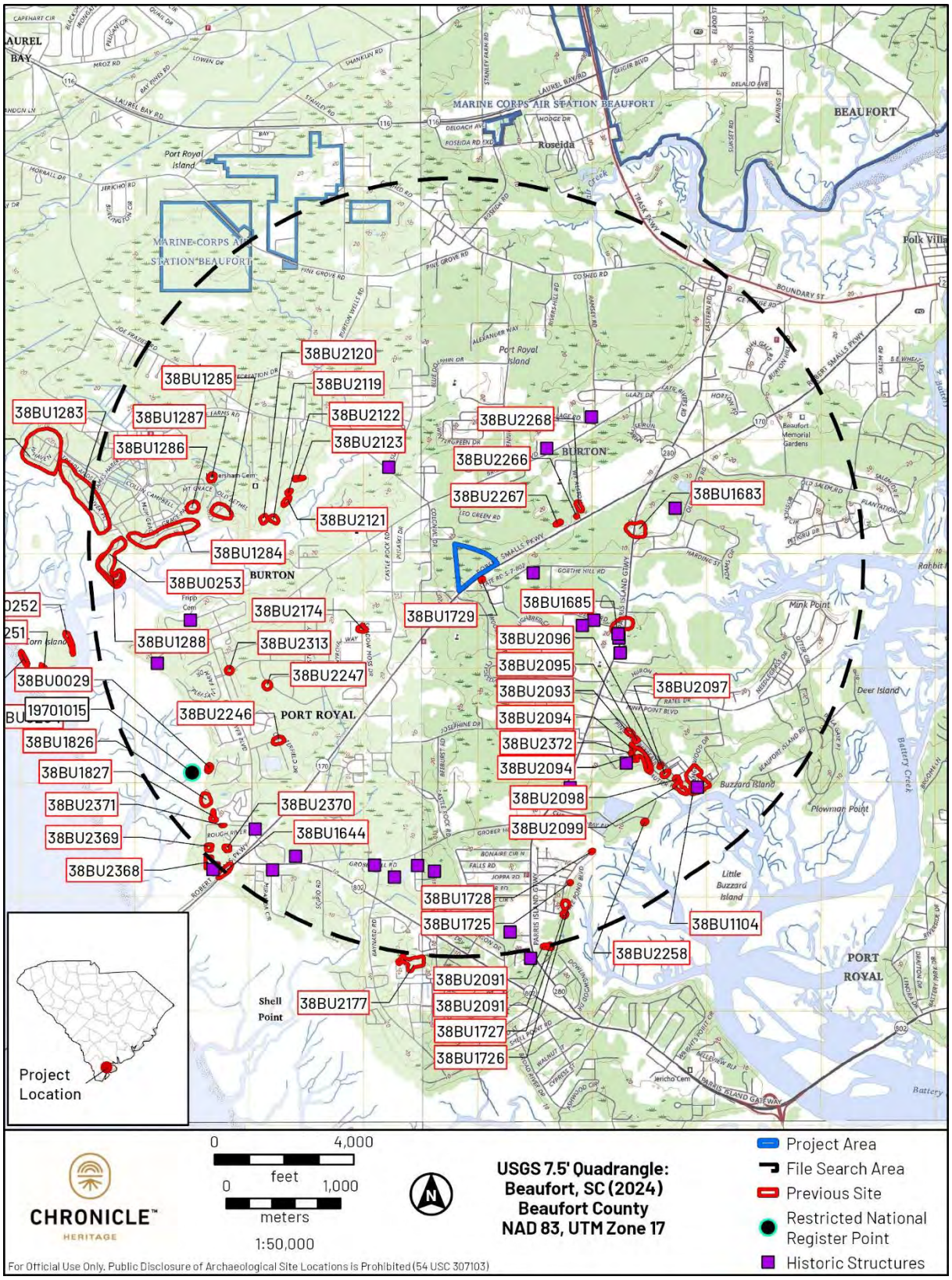

Figure 5-2. Map of recorded resources within 3.2 km of the Project area.

5.2 Results of Survey

From December 18 to 19, 2024, Chronicle Heritage conducted subsurface testing within the Project area at 30-m intervals, excavating a total of 85 STPs, none of which contained artifacts (Figure 5-3). No sites or isolated finds were identified as a result of the survey. A total of 73 STPs were excavated to a depth of at least 80 cmbs. Of the STPs where excavation was terminated early, excavation of 10 STPs was terminated after clay subsoil was encountered prior to reaching 80 cmbs (between 10–70 cmbs), and excavation of two STPs was terminated early as the result of a root impasse. Nine STPs were not excavated due to disturbance related to development, utilities, and a drainage along the northern and eastern portions of the property and along a ditch adjacent to Robert Smalls Road.

A representative soil profile (STP 15) in the southwestern portion of the tract consisted of approximately 20 cm of very dark brown (10YR 2/2) loamy sand, underlain by at least 60 cm of yellowish brown (10YR 5/4) sand that exceeded 80 cmbs (Figure 5-4). Soil profiles were fairly uniform throughout the rest of the Project area.

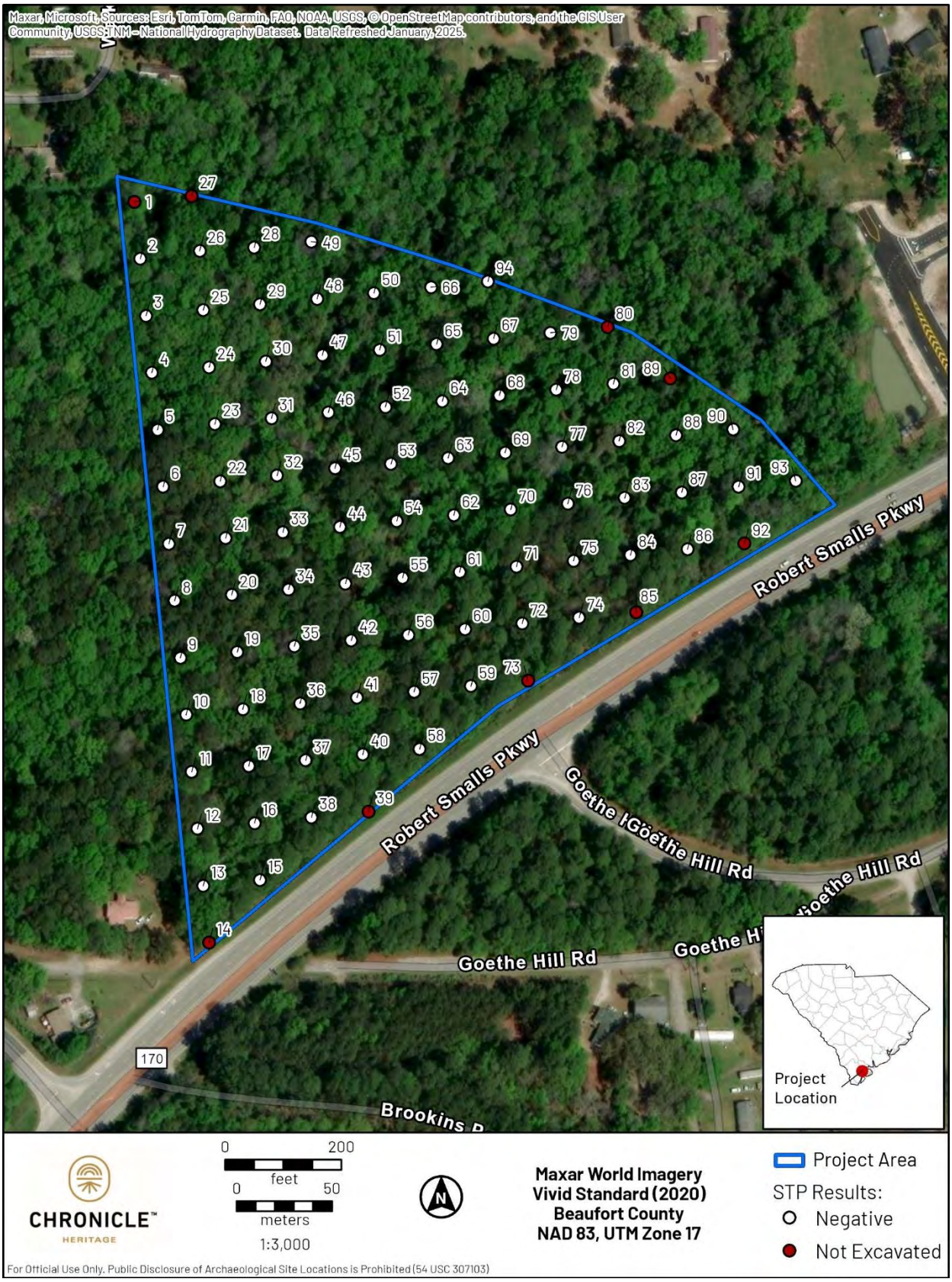

Figure 5-3. Results map of the Project area.

Figure 5-4. STP 15 showing a representative soil profile in the southwestern portion of the Project area.

6 Conclusions and Recommendations

On behalf of the Department of Veterans Affairs and under subcontract to Mabbett, Chronicle Heritage completed a CRS for the potential siting of an OPC at Robert Smalls Parkway and Goethe Hill Road on an approximately 19.5-ac parcel in Beaufort County, South Carolina. The Project area comprises the footprint of the proposed development and staging areas within Parcel ID No. R120 028 000 0138 0000 on the USGS 2024 Beaufort, South Carolina, 7.5-minute topographic quadrangle.

The archaeological survey was completed in accordance with federal and state regulations, and it was undertaken to comply with the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716), Professional Qualification Standards (36 CFR Part 61), and the *South Carolina Standards and Guidelines for Archaeological Investigations* (COSPA 2013). Additionally, the requirements of Article 8, Section 8.500, of the Beaufort County Zoning Ordinance as well as Section 3.12 of the City of Beaufort development review ordinance will be followed for projects within the jurisdiction.

Fieldwork was carried out over two days, from December 18 to 19, 2024. STPs were pre-plotted at 30-m intervals. Chronicle Heritage plotted a total of 94 STPs and excavated 85, none of which were positive for cultural material. Nine STPs were precluded from excavation due to the presence of disturbance related to development, utilities, and a drainage along the northern and eastern boundary of the Project area.

Chronicle Heritage's CRS concluded that **no historic properties will be affected** by this Project in accordance with 36 CFR § 800.4 (d)(1). Chronicle Heritage recommends **no additional archaeological investigation** within the Project area at this time.

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Appendix A.
Shovel Test Pit Locations

Table A-1. UTM NAD 83 Zone 17

STP	Results	Easting	Northing
1	Not Excavated	523804.7431	3587073.891
2	Negative	523807.7383	3587044.041
3	Negative	523810.7337	3587014.191
4	Negative	523813.7289	3586984.341
5	Negative	523816.7239	3586954.49
6	Negative	523819.7193	3586924.641
7	Negative	523822.7145	3586894.79
8	Negative	523825.7095	3586864.94
9	Negative	523828.7049	3586835.09
10	Negative	523831.7001	3586805.24
11	Negative	523834.6955	3586775.39
12	Negative	523837.6907	3586745.54
13	Negative	523840.6859	3586715.69
14	Not Excavated	523843.6811	3586685.839
15	Negative	523870.4679	3586718.794
16	Negative	523867.5799	3586748.541
17	Negative	523864.5307	3586778.422
18	Negative	523861.4029	3586808.179
19	Negative	523858.5519	3586838.085
20	Negative	523855.5807	3586867.983
21	Negative	523852.4837	3586897.874
22	Negative	523849.5957	3586927.632
23	Negative	523846.7499	3586957.417
24	Negative	523843.7947	3586987.269
25	Negative	523840.7159	3587017.143
26	Negative	523838.8007	3587048.189
27	Not Excavated	523834.5931	3587076.886
28	Negative	523867.4387	3587050.031
29	Negative	523870.4339	3587020.181
30	Negative	523873.4291	3586990.331
31	Negative	523876.4243	3586960.481
32	Negative	523879.4193	3586930.631

STP	Results	Easting	Northing
33	Negative	523882.4147	3586900.781
34	Negative	523885.4099	3586870.93
35	Negative	523888.4051	3586841.081
36	Negative	523891.4003	3586811.23
37	Negative	523894.3957	3586781.38
38	Negative	523897.3909	3586751.53
39	Not Excavated	523927.2411	3586754.542
40	Negative	523924.2491	3586784.388
41	Negative	523921.2509	3586814.228
42	Negative	523918.2617	3586844.105
43	Negative	523915.2465	3586874.002
44	Negative	523912.2561	3586903.609
45	Negative	523909.6971	3586934.387
46	Negative	523906.2363	3586963.499
47	Negative	523903.0909	3586993.502
48	Negative	523900.3465	3587023.048
49	Negative	523897.2887	3587053.026
50	Negative	523930.1341	3587026.172
51	Negative	523933.1293	3586996.321
52	Negative	523936.1245	3586966.471
53	Negative	523939.1197	3586936.621
54	Negative	523942.1149	3586906.771
55	Negative	523945.1103	3586876.921
56	Negative	523948.1053	3586847.071
57	Negative	523951.1007	3586817.221
58	Negative	523954.0959	3586787.371
59	Negative	523980.9507	3586820.216
60	Negative	523977.9555	3586850.066
61	Negative	523974.9603	3586879.916
62	Negative	523971.9585	3586909.764
63	Negative	523968.9847	3586939.628
64	Negative	523965.9769	3586969.47
65	Negative	523962.9789	3586999.303

STP	Results	Easting	Northing
66	Negative	523959.9705	3587029.17
67	Negative	523992.8295	3587002.312
68	Negative	523995.8247	3586972.462
69	Negative	523998.8199	3586942.612
70	Negative	524001.8151	3586912.762
71	Negative	524004.8105	3586882.911
72	Negative	524007.8055	3586853.062
73	Not Excavated	524010.8009	3586823.211
74	Negative	524037.6557	3586856.057
75	Negative	524034.6605	3586885.907
76	Negative	524031.6653	3586915.757
77	Negative	524028.6701	3586945.607
78	Negative	524025.6537	3586975.448
79	Negative	524022.6669	3587005.318
80	Not Excavated	524052.5297	3587008.302
81	Negative	524055.5249	3586978.452
82	Negative	524058.5201	3586948.602
83	Negative	524061.5153	3586918.752
84	Negative	524064.5105	3586888.902
85	Not Excavated	524067.5059	3586859.052
86	Negative	524094.3607	3586891.897
87	Negative	524091.3655	3586921.747
88	Negative	524088.3703	3586951.597
89	Not Excavated	524085.3751	3586981.448
90	Negative	524118.2203	3586954.593
91	Negative	524121.2155	3586924.742
92	Not Excavated	524124.2107	3586894.893
93	Negative	524151.0657	3586927.738
94	Negative	523989.8343	3587032.162

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Phase I Cultural Resource Survey for a Potential VA Outpatient Clinic Facility at 1844 Ribaut Road, Beaufort County, South Carolina

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February 25, 2025

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February 25, 2025

Executive Summary

On behalf of the Department of Veterans Affairs (VA) and under subcontract to Mabbett & Associates, Inc. (Mabbett), PaleoWest, LLC dba Chronicle Heritage (Chronicle Heritage) completed a cultural resource survey (CRS) for the potential siting of an Outpatient Clinic (OPC) at 1844 Ribaut Road (Project) on an approximately 11-acre site in Beaufort County, South Carolina. The Project area comprises the footprint of the proposed development and staging areas within five parcels (Parcel ID Nos. R110 008 000 0114 0000, R110 008 000 0115 0000, R110 008 000 0116 0000, R110 008 000 116A 0000, and R110 008 000 0118 0000) on the U.S. Geological Survey 2024 Beaufort, South Carolina, 7.5-minute topographic quadrangle.

The Phase I CRS was completed in accordance with federal and state regulations, and it was undertaken to comply with the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (48 Code of Federal Regulations [CFR] 44716), Professional Qualification Standards (36 CFR Part 61), and the *South Carolina Standards and Guidelines for Archaeological Investigations* (Council of South Carolina Professional Archaeologists [COSPA] 2013). Additionally, the requirements of Article 8, Section 8.500, of the Beaufort County Zoning Ordinance were followed.

Fieldwork was carried out over two days, from December 19 to 20, 2024. Shovel test pits (STPs) were pre-plotted at 30-meter (m) intervals. Chronicle Heritage plotted 31 total STPs and excavated 15, none of which contained cultural material. Sixteen STPs were precluded from excavation due to the presence of existing structures and paved surfaces.

Chronicle Heritage's CRS concluded that **no historic properties will be affected** by this Project in accordance with 36 CFR § 800.4 (d)(1). Chronicle Heritage recommends **no additional archaeological investigation** within the Project area at this time.

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1 Project Location and Purpose

On behalf of the Department of Veterans Affairs (VA) and under subcontract to Mabbett & Associates, Inc. (Mabbett), PaleoWest, LLC dba Chronicle Heritage (Chronicle Heritage) completed a cultural resource survey (CRS) for the potential siting of an Outpatient Clinic (OPC) at 1844 Ribaut Road (Project) on an approximately 11-acre (ac) site in Beaufort County, South Carolina. The Project area comprises the footprint of the proposed development and staging areas within five parcels (Parcel ID Nos. R110 008 000 0114 0000, R110 008 000 0115 0000, R110 008 000 0116 0000, R110 008 000 116A 0000, and R110 008 000 0118 0000) on the U.S. Geological Survey (USGS) 2024 Beaufort, South Carolina, 7.5-minute topographic quadrangle (Figure 1-1).

This CRS was prepared accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (36 Code of Federal Regulations [CFR] Part 800), and the *South Carolina Standards and Guidelines for Archaeological Investigations* (Council of South Carolina Professional Archaeologists [COSPA] 2013). Additionally, the requirements of Article 8, Section 8.500, of the Beaufort County Zoning Ordinance were followed.

Figure 1-1. Project area location map.

2 Environmental Setting

The Project area is in the Sea Islands section of the Atlantic Coastal Plain province. The Atlantic Coastal Plain province can be generally described as an area of low elevation with relatively unconsolidated beds of terrestrially and marine-deposited sand, gravel, and clay sediments (Fenneman 1938; Thornbury 1965). This is the flattest province that gently slopes eastward through a sequence of terraces (National Park Service 2024). The province consists of clastic sediments, and the landscape contains rivers that flow eastward and southeastward and carry sand, silt, and clay toward the ocean, sometimes depositing these soils within estuaries and marshes. The Sea Islands section is an area of coastal plain with a submerged coastal border (Fenneman 1938).

The Environmental Protection Agency defines the ecoregion encompassing the Project area as the Sea Islands/Coastal Marsh within the Southern Coastal Plain. The Southern Coastal Plain is a variable region containing "barrier islands, coastal lagoons, marshes, and swampy lowlands" (Griffith et al. 2001). This ecoregion was originally vegetated by a variety of species, including "longleaf pine, slash pine, pond pine, beech, sweetgum, southern magnolia, white oak, and laurel oak" (Griffith et al. 2001). The landscape within the Sea Islands/Coastal Marsh region is affected by fluvial, aeolian, and oceanic forces, resulting in a highly dynamic and changing environment. The barrier islands consist largely of sandy soils, while the marshes largely consist of clayey and organic soils. These barrier islands are vegetated by "live oak, red cedar, slash pine, and cabbage palmetto" in addition to "cordgrass, saltgrass, and rushes" (Griffith et al. 2001). Forests primarily consist of slash and loblolly pines.

2.1 Soils and Hydrology

The U.S. Department of Agriculture (USDA) has mapped two soils within the Project area, the most abundant of which is Seabrook fine sand, making up 90.79 percent of the Project area (Figure 2-1) (Soil Survey Staff 2025). Seabrook soils are very deep and rapidly permeable that formed in sandy marine and fluvial sediments. The remaining soil type is mapped in the western boundary of the tract as Polawana loamy fine sand (9.21%). Polawana sands are deep, rapidly permeable, and formed in marine sediments. Slopes given for the soil types mapped within the tract do not exceed 2 percent. The soils mapped within the tract exhibit very to somewhat poor drainage characteristics. Topography in the tract is relatively level across most of the tract, ranging from about 6 to 8 meters (m) above mean sea level.

The Project area is situated within the Battery Creek portion of the Port Royal Sound watershed. The closest water source to the Project area is Battery Creek, approximately 350 m southwest of the tract. Battery Creek is a saltwater river, with no freshwater inputs other than stormwater runoff. Battery Creek drains to the Beaufort River approximately 2 kilometers (km) southeast of the Project area, which in turn drains to Port Royal Sound and the Atlantic Ocean. The closest source of fresh water to the tract is the Coosawhatchie River, approximately 25 km northwest of the Project area.

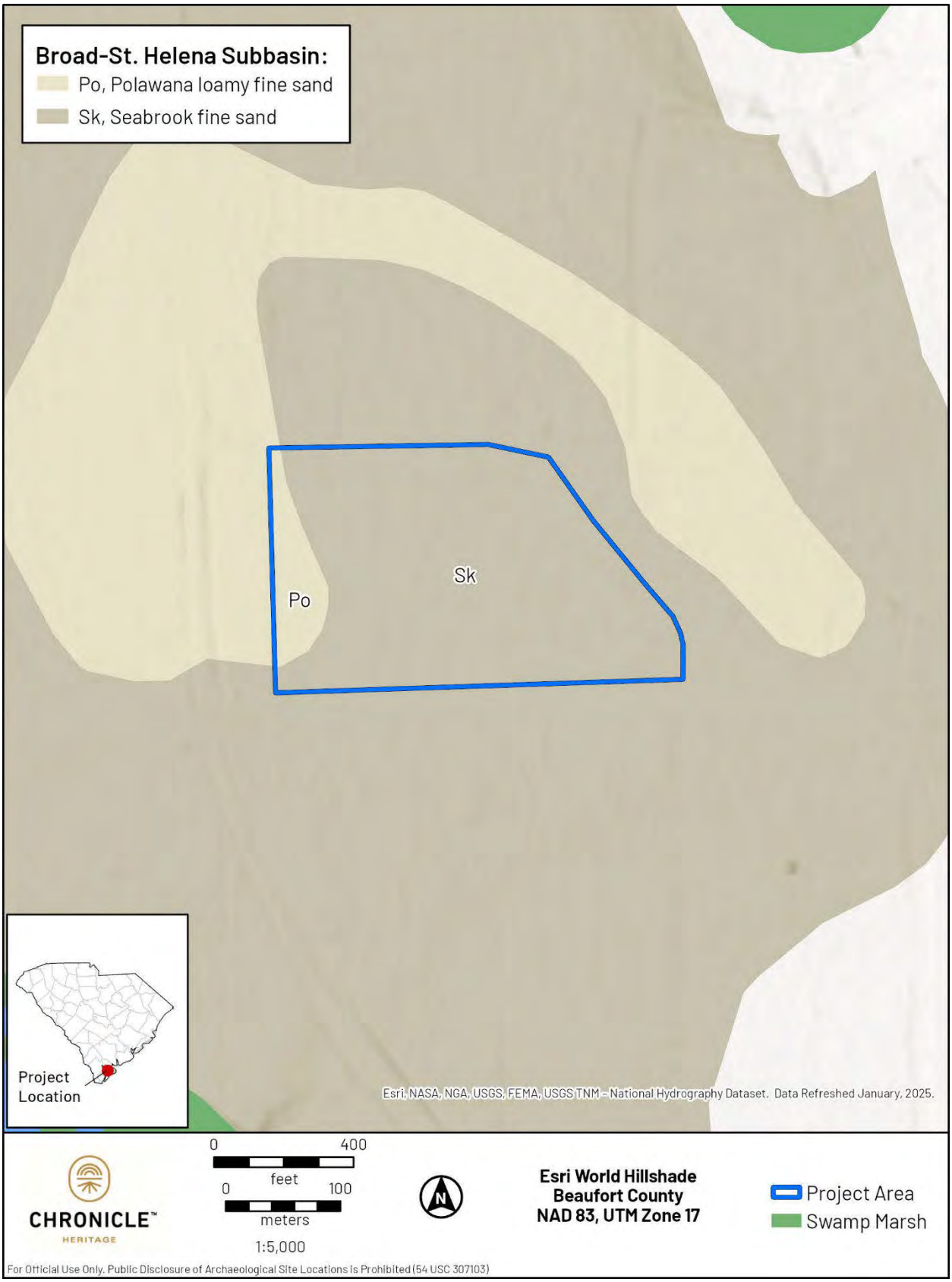

Figure 2-1. Project area in relation to mapped soils and local hydrologic features.

2.2 Historical Map and Aerial Photograph Review

Chronicle Heritage conducted a review of historical maps and aerial photographs to infer past land use in the Project area. Sources consulted included USGS aerial photographs and topographic maps.

The USGS 1944 Fort Fremont, South Carolina, topographic map shows the Project area bracketed to the and south by roads and to the west by a rail line and adjacent unimproved roadway consistent with present-day Rahn Lane (Figure 2-2). The road east of the tract is plotted as an unimproved road, while the road to the south appears to follow the current alignment of Ribaut Road. Three structures are plotted in the vicinity of the project area that have potential to lie within or intersect portions of the Project area.

A USGS 1951 aerial photograph of Beaufort County shows development in the eastern half of the Project area. At least five structures are visible in this area, all of which are currently extant (Figure 2-3). The western third of the tract consisted of a moderately dense woodland, while areas in the vicinity of the structures appear to have been cleared of vegetation. Ribaut Road is depicted south of the Project area with the rail line to the west.

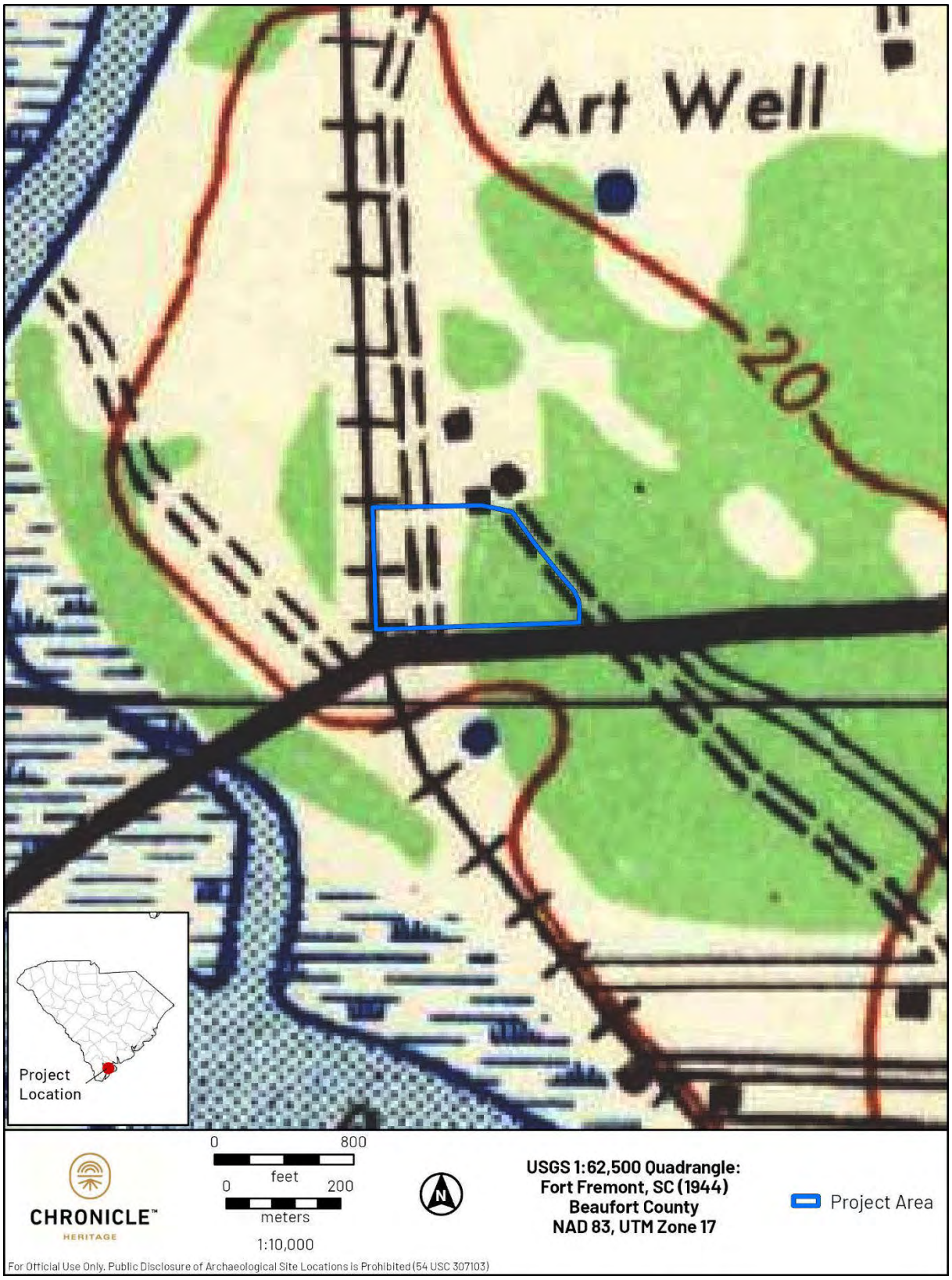

Figure 2-2. USGS 1944 Fort Fremont, South Carolina, topographic map showing the Project area.

Figure 2-3. USGS 1951 historical aerial photograph of Beaufort County showing the Project area.

2.3 Current Conditions

Currently, the region surrounding the Project area contains a significant amount of urban development, with other portions of the region cleared for pasture or citrus agriculture. The tract is in an urban setting, and vegetation consists of sparsely distributed individual hardwoods and manicured lawns (Figure 2-4, Figure 2-5, and Figure 2-6).

The eastern portion of the tract (Parcel ID No. R110 008 000 0114 0000) is currently utilized by the Sea Islands Apartments, consisting of nine apartment buildings that were constructed in 1948 (Beaufort County Assessor's Office [BCAO] 2025). Parcel ID No. R110 008 000 0118 0000, on the northwest corner of Rahn Lane and Ribaut Road, contains three structures. One structure is a vacant building constructed in 1963, to which an adjoining structure (built in 1965) is attached and currently occupied by "Beaufort Construction of SC" (BCAO 2025). The remaining structure is a shed constructed in 1995. The BCAO classifies the land use of this parcel as "trade wholesale" (BCAO 2025).

The parcel directly west (R110 008 000 0541 0000) contains one structure occupied by "Landscape Workshop", and the BCAO classifies the parcel use as "trade other" (BCAO 2025). North of this parcel are Parcel ID Nos. R110 008 000 0116 0000 and R110 008 000 116A 0000. These parcels contain one dwelling that was constructed in 1950, and the parcel use is classified as "trade other" (BCAO 2025). The remaining parcel (ID No. R110 008 000 0115 0000), at 1807 Rahn Lane, is the location of an "Old Coca Cola Bottling Plant" constructed in 1968 that is currently occupied by "Scoggins All Terrain Cleaning" (BCAO 2025).

Figure 2-4. Overview facing east from the north-central portion of the Project area showing paved surfaces and existing structures.

Figure 2-5. View west from the central portion of the Project area showing development and existing structures.

Figure 2-6. Overview from the central portion of the Project area facing south showing scattered vegetation and manicured lawns.

3 Historic Contexts

A review of historic contexts is a prerequisite to archaeological survey, providing perspectives for fieldwork, analysis, and interpretation. Humans have lived in South Carolina since at least 12,000 years ago, a legacy that is reflected in thousands of archaeological sites. Five broad chronological periods are used to characterize the Native American history of South Carolina: Paleoindian, Archaic, Woodland, Mississippian, and Historic. Each of these are based on distinct cultural and technological developments that can be recognized in the archaeological record. These five periods are reviewed below in addition to a discussion of the history of the Beaufort and Port Royal area.

3.1 Paleoindian

Human occupation of the Americas began during the Paleoindian Period. At present, it is uncertain when the first humans permanently settled the western hemisphere, although most scholars believe it was sometime between 20,000 and 13,000 years ago in the last stages of the Pleistocene glaciation. Recent research has provided evidence of the Paleoindian occupation of what is now known as the American Southeast as early as approximately 14,550 years B.P. (Halligan et al. 2016). This is based on 71 radiocarbon dates derived from intact peat deposits that contained a partial biface and lithic debitage at the Page-Ladson site (8JE00591) in the Aucilla River in northern Florida. The Pleistocene–Holocene transition marks the end of the Paleoindian Period, which is given an arbitrary terminal date of 8,000 B.C. in most areas of the southeastern United States.

The Paleoindian Period also corresponds, however tentatively, with the accepted temporal boundaries of the Clovis tradition, which is identified through the presence of characteristic fluted projectile points such as the Clovis and Cumberland types (Anderson and Faught 1998).

One of the most well-known archaeological sites connected to the Paleoindian Period in South Carolina is the Topper Site, 38AL23, located on the Savannah River in Allendale County. The site is on an alluvial terrace and was used as a quarry and production location for a variety of stone tools (Goodyear et al. 2007; Miller 2007, 2010). The site has proven to be important for studying the Paleoindian Period in the Southeast and has also facilitated important discussions regarding pre-Clovis occupations in the Americas. Debate regarding evidence at this site for potential pre-Clovis occupation of the Americas continues in the archaeological community.

3.2 Archaic

During the Archaic Period, the environment was characterized by a warmer climate and rising sea levels. Regionally specific adaptations to these changes resulted in changes to subsistence strategies and the formation of regionally distinct material assemblages. Archaeological evidence suggests that during this period, humans focused on the procurement of smaller game, fish, and wild plants, as the megafauna of the Pleistocene had become extinct. The Archaic Period is typically subdivided into Early, Middle, and Late periods based on distinct stone tool and other material typologies.

3.2.1 Early Archaic

The Early Archaic Period (roughly 8,000–5,000 B.C.) was a time of climate change. The southeastern United States saw a general increase in temperature and surface water. The thawing or melting of continental glaciers created higher sea levels and increased precipitation. This led to

the development of oak-dominated forest vegetation throughout the Southeast (Delcourt and Delcourt 1987). Human adaptations to a changing environment are visible in the archaeological record; these include regionally specific material culture and specialized lifeways (Anderson and Hanson 1988). The repeated use of rock shelters and inter-riverine terraces and ridge tops suggests a different lifestyle that may be a direct result of post-Pleistocene warming (Claggett and Cable 1982).

According to Anderson and Hanson (1988), Early Archaic groups in South Carolina lived in small, band-level groups and practiced seasonal settlement along major river drainages. Coastal Plain locales were used as spring foraging and logistical camps, while groups of people traversing a river drainage would aggregate at the Fall Line during the winter months (Anderson and Hanson 1988). Material culture specific to the Early Archaic Period in South Carolina includes characteristic side notched and corner notched projectile point/knives such as the Hardaway Side-notched, Palmer Corner-notched, and Kirk Corner-notched. Toward the end of the Early Archaic Period, the corner- and side-notched types give way to a bifurcate tradition such as the Hardaway-Palmer point (Chapman 1975).

3.2.2 Middle Archaic

The Middle Archaic Period (5,000–3,000 B.C.) saw increased regional adaptation and a shift toward a foraging lifestyle, as climate trends allowed for a more homogenous environment. Sassaman (1983) proposed a settlement model based on adaptive flexibility in which Middle Archaic societies could practice a fairly high level of social mobility to take advantage of dispersed but similar resource patches. The material signatures of such societies show a lack of specialized tools for varied resources. While these groups practiced social mobility, their seasonal territories continued to be regionally specific. This can be seen in a shift from the use of cryptocrystalline rock to coarser, locally available lithic material found in the Coastal Plain (Milner 2004). These assemblages are typically recognized by characteristic stemmed projectile points such as the Kirk Serrated and Kirk Stemmed points, and later Stanly Stemmed points.

3.2.3 Late Archaic

During the Late Archaic Period (3,000–1,000 B.C.), the regionally specific adaptation trends continued to develop, and an emphasis on sedentism developed throughout the Southeast. Evidence of long-term habitation can be seen in the form of large middens of oyster shell, which have accumulated along the South Carolina coastline (Smith 1986). The Late Archaic Period also saw the emergence of fired clay pottery in Coastal Plain locations throughout the Southeast. This early pottery type was known as Stallings pottery and is recognized by its distinctive fiber-tempered paste (Simpkins and Scoville 1986). Stallings vessel forms included shallow bowls, wide-mouthed bowls, and jars that were constructed by hand molding as opposed to the coiling method employed in later ceramic types (Sassaman 1993; Trinkley 1986). Surface treatments for Stallings pottery included punctation, finger pinching, and elaborate incising. Other examples of Late Archaic material culture include characteristic stemmed projectile points such as the Savannah River stemmed and the Otarre projectile points (Griffin 1943; Stoltman 1974).

3.3 Woodland Period

As a general theme, many of the cultural phenomena seen in the Late Archaic become more prevalent during the Woodland Period. Pottery, a somewhat isolated phenomenon in the Late Archaic, became common throughout the eastern United States, and variations in style and

decoration quickly became regionally specific (Milner 2004). As archaeological evidence suggests, ever larger groups of people practiced year-round settlement at certain locations and took advantage of local and regional resources. The size, frequency, and complexity of archaeological sites all increased during the Woodland Period. Archaeologists have subdivided the Woodland Period to simplify interpretation of the archaeological record. Early (1,000–300 B.C.), Middle (300 B.C.–A.D. 800), and Late (A.D. 800–1000) divisions frame the discussion and are loosely based on a seriation of diagnostic artifacts.

3.3.1 Early Woodland

The start of the Early Woodland Period is not clearly demarcated. When considering a starting point through a lens of pottery traditions, such as Thom's Creek, it is made even more confusing (Trinkley 1980). Although it was long considered an early Woodland type, Thom's Creek ceramics appear very similar to Stallings wares, exhibiting a similar form and surface treatment. A difference is seen through the type of tempering agent that makers of the traditions used, with some preferring sand instead of fiber (Griffin 1943). Originally seen as an evolution on Stallings type, radiocarbon dates obtained from the Spanish Mount site (38CH62) in Charleston County show that both traditions have been found at contemporaneous contexts (Trinkley 1980). Other dates place these two pottery types within the Early Woodland. Refuge pottery represents another Early Woodland pottery tradition and is often described as very similar to Thom's Creek. Significant changes in settlement patterns are evident where high frequencies of Refuge-type ceramics have been recovered (Brooks et al. 1989; Colquhoun et al. 1980).

3.3.2 Middle Woodland

The Middle Woodland is marked by the appearance of quartz- and grit-tempered pottery types such as the Pigeon and Cartersville series ceramics. Pigeon type ceramics are typically decorated with check-stamped, simple-stamped, or brushed surface treatments applied to quartz-tempered paste. Cartersville pottery is usually recognized by a grit- or sand-tempered paste with cord marking and sometimes simple or check-stamped surface decoration. The Cartersville type is thought to be related to the widespread Deptford series of ceramics, typically seen throughout the Coastal Plain in the American Southeast (Anderson and Schuldenrein 1985). Later in the Middle Woodland, Connestee pottery becomes common in this region. This pottery type is characterized by a thin-walled design comprised of sand-tempered paste and is typically decorated with brushed, simple stamped, or cord marked designs (Keel 1976).

3.3.3 Late Woodland

The Late Woodland Period, in many ways, represents a continuation of the Middle Woodland Period, with the continued preponderance of grit- and sand-tempered wares. Both Cartersville and Deptford ceramics continue into the Late Woodland Period; however, they begin to noticeably decline in frequency (Anderson and Schuldenrein 1985). Sassaman and colleagues (1990) note that Late Woodland assemblages in this region are often difficult to distinguish from the preceding Middle Woodland and subsequent Mississippian occupations. As such, the Late Woodland is often interpreted as a transitional period between the Woodland and Mississippian lifeways. This includes the intensification of sedentism, horticulture, and social inequality—all characteristic signatures of the Mississippian Period that followed.

Increased population density, sedentary habitation, and increasingly stratified social structure eventually led to the rise of the politically centralized Southeastern Mississippian chiefdoms. This

period is typically thought to begin around A.D. 1000 and continued until European contact. The hallmarks of the Mississippian Period in the Southeast include intensive maize agriculture, sedentary villages and towns, ceremonial architecture such as earthen platform mounds, and political stratification among individuals and settlements.

3.4 Mississippian Period

The Mississippian Period saw the rise of chiefdoms, which were made up of hierarchically ranked villages. Ferguson (1971) established a model of Mississippian settlement patterns composed of political centers surrounded by smaller villages and farmsteads. These political centers tended to be approximately 160 km apart often with buffers of unoccupied territory between them (Hally 1993). Mississippian centers have been found along most major river systems in the southeast. Examples of these centers include the Belmont and Mulberry sites along the Wateree River, the Santee/Fort Watson/Scotts Lake site on the Santee River, the Irene site on the Savannah River, the Hollywood, Lawton, Red Lake, and Mason's Plantation sites in the central Savannah Valley, and Town Creek along the Pee Dee River in North Carolina (Anderson 1994).

Mississippian Period diagnostic artifacts typically include small triangular projectile points, ground stone tools, and polished stone objects. Exotic items crafted from stone, bone, shell, mica, and copper are also associated with Mississippian assemblages and are often interpreted as symbols of status and authority. Increased regionalization during the Mississippian Period is also indicated by the diversity of regional ceramic variants found from sites dating to this period.

3.5 Contact and Historic Period

European contact with native populations in what is now South Carolina occurred during the early 1500s. Expeditions to North America by Juan Ponce de León and Pedro de Salazar inspired Lucas Vásquez de Ayllón, Judge of the Royal Audencia of Santo Domingo, to finance his own mission to the new continent. This led to the first known visit to the South Carolina coast by slavers Francisco Gordillo and Pedro de Quejo, who sailed from the Bahamas to the Santee River-Winyah Bay area in 1521. Ayllón was so encouraged by this successful endeavor that he set out to settle the area with an expedition he led personally. Ayllón and as many as 600 settlers first landed at the Santee River in 1526 but then moved to another unknown location within Native American territory to establish the settlement of San Miguel de Gualdape (Swanton 1922; Thomas 1993).

Within two months of its creation, Ayllón was dead, and the colony had failed. While the settlement was short lived, its effects were far reaching for the Native inhabitants. Spanish goods were apparently introduced to the Native American groups of the area and were traded far inland where they were later encountered during the de Soto *entrada* of 1540 (Thomas 1993). The Ayllón expedition also introduced European diseases, which devastated some of the interior settlements described in the chronicles of the de Soto expedition (Clayton et al. 1993). These diseases induced changes and likely population movements in the proto-historic Native groups that were later described in detail by the more intensive Spanish occupation to come. In the vicinity of the Project area, tribes were part of the Cusabo family, which included the Ashepoo, Combahee, Coosa, Edisto, Escamacu, Etiwan, Kiawah, Stono, Wando, and Wimbee tribes (South Carolina Information Highway [SCIWAY] 2023; South 1972)

The next wave of European settlement came with the French, in 1562, to the land they called Carolana, in honor of Charles IX, King of France. This expedition of French Protestants, known as Huguenots, was led by Jean Ribault, who established the short-lived Charlesfort settlement on Parris Island. Ribault's lieutenant, Rene de Laudonniere, detailed the names of powerful local

chieftains in the area around the fort, including "Audusta (Orista)," "Macou (Escumacu)," and "Oade (Guale)" whose names became European monikers for coastal Native American groups as a whole (Laudonniere 1975).

In June of 1562, shortly after establishing Charlesfort, Ribault returned to France for supplies and left 27 volunteers behind to maintain the fort (McGrath 2022; Thomas 1993). Ribault was unable to rescue the men he left behind due to religious upheaval in France. The men who had been left at Charlesfort struggled to feed themselves because they had not planted any crops and a fire had destroyed much of their provisions (Saraceni 1996). With the help of Native Americans from the nearby Orista chiefdom, Charlesfort survivors built a small ship to return to France in 1563 (Saraceni 1996). By the time they were rescued at sea by an English ship, the remaining Charlesfort survivors had resorted to cannibalism (Laudonniere 1975).

The Spanish saw the failed Charlesfort colony as a direct challenge to lands they believed were rightfully theirs. When Ribault did return to North America to establish the Fort Caroline colony, Spain's champion, Pedro Menendez de Aviles, was not far behind. Menendez eventually defeated the French at Fort Caroline and established St. Augustine and a series of outposts along the Georgia Coast. For the capital of his Florida colony, Menendez returned to Parris Island and founded Santa Elena on top of the original Charlesfort colony in 1566. Santa Elena served as Spain's colonial capital in North America until 1587, when it was abandoned due to conflicts with the aboriginal population and its colonial rivals, France and England (Thomas 1993).

Conflicts in Europe led to a virtual stalemate for the colonial occupation of Carolina, and the region remained as a northern frontier of the Spanish La Florida colony for almost a century. Sir Robert Heath, attorney general for King Charles I of England, was granted the "Province of Carolina" in 1629 (Edgar 1998). This broadly defined territory included the modern states of North Carolina, South Carolina, Georgia, Alabama, Tennessee, and Mississippi. The settlement of this land was never realized, however, due largely to broader conflicts such as the English Civil War. The charter was eventually declared invalid, and a new one was established in 1663 granting Carolina to eight "Lords Proprietors" in return for the financial and political backing of the restored English monarchy (Edgar 1998). Of this group, Lord Shaftesbury seemed to take the most active interest in the Carolina Colony. He and his secretary, the philosopher John Locke, drafted the Constitutions of Carolina, which established a government for the colony that was heavily based on the work of English political scientist James Harrington. This government was to consist of a Governor coupled with a strong council heavily influenced by the Lords Proprietors themselves (Edgar 1998) . While Charles Towne was the principal seat of government in the Carolina colony, the northern settlements often operated independently due to their remote location. As a result, they maintained a separate assembly and deputy governor for the northern half of the colony. This laid the groundwork for the eventual separation of the colony in 1729, when half of the Lords Proprietors sold their interests to the Crown and two Royal Colonies were established: North Carolina and South Carolina (Edgar 1998).

3.6 Local History

Before European settlers arrived, the region now known as Beaufort County in South Carolina was inhabited by indigenous peoples, including the Yamasee tribe. These communities thrived in the area's fertile lands and waterways, cultivating crops, fishing, and trading extensively. Their knowledge of the environment shaped the region's development, even as European colonization displaced them. In 1769, Beaufort County was established, originally including present day Jasper and Hampton counties. Named for Henry Somerset, the second Duke of Beaufort and a proprietor

of Carolina between 1700 and 1714, the city of Beaufort serves as the county seat of Beaufort County (Rowland 2022a).

One of the earliest European settlements in the area was Port Royal, named after the Port Royal Sound (Figure 3-1). In 1562, French navigator Jean Ribault called the harbor "Port Royal" and described it as "one of the fayrest and greatest Havens of the worlde" (Harris 1963). Though the deep-water harbor was explored and settled by the French, Spanish, English, and Scottish, the town of Port Royal was not officially incorporated until 1874 (Spieler 2022).

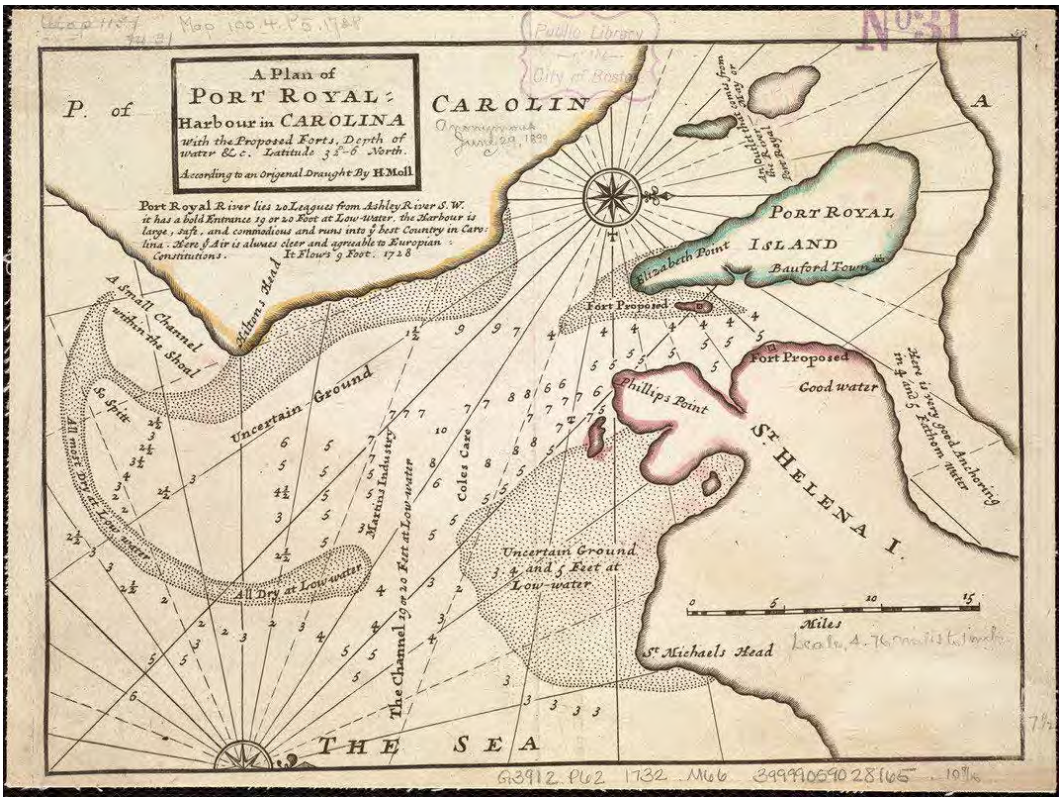

Figure 3-1. A Plan of Port Royal Harbour (Moll 1732).

The Battle of Beaufort, also known as the Battle of Port Royal Island, took place on February 3, 1779, during the American Revolutionary War. This engagement occurred near Beaufort as British forces sought to secure control over the southern colonies following their capture of Savannah, Georgia. American forces, commanded by Brigadier General William Moultrie, confronted the British in a skirmish near Port Royal Island. Despite being outnumbered and less experienced, the American militia and Continental soldiers effectively repelled the British attack, forcing them to retreat. The battle showcased the resilience of American forces and helped bolster local support for the Patriot cause. It also served to delay British efforts to consolidate their position in the Southern Theater of the war, setting the stage for further resistance in South Carolina (Schenawolf 2023).

The Antebellum period was a time of growth and prosperity for the region, but it was also defined by the exploitation of enslaved African Americans. Large plantations dominated the economy, producing rice, indigo, and later, cotton. Enslaved laborers played an essential role in the economy, and their unique cultural traditions evolved into what is now known as Gullah culture. This culture remains a vital part of the local identity (Beaufort County Government 2010).

The American Civil War brought dramatic changes to the area. In November 1861, Union forces captured Port Royal Sound, and nearby Beaufort became one of the first Southern towns to fall to the Union. The Union fleet's conquest of the Sea Islands marked the start of over a century of U.S. naval activity in Port Royal Sound. With its natural depth of nearly 30 feet at all tides, Port Royal Sound became the deepest natural harbor on the Atlantic coast south of New York.

The Union occupation transformed the area into a hub for the Union war effort and a refuge for formerly enslaved people. The Port Royal Experiment, an early effort to educate and empower freed African Americans, took place in the region. Following the Union's capture of the Sea Islands off the coast of South Carolina, including the town of Port Royal, approximately 10,000 formerly enslaved individuals were left behind as plantation owners fled (Figure 3-2).

Figure 3-2. Newly freed African American Women and Children, Port Royal circa 1865 (Lowcountry Digital History Initiative 2024).

Abolitionist groups, missionaries, and educators from the North collaborated with the U.S. government to implement programs focused on agricultural reorganization, wage-based labor, and education. Schools were established to provide literacy and vocational training, fostering a sense of empowerment and self-sufficiency among freed people. Schools like the Penn School, now known as the Penn Center on St. Helena Island, became beacons of progress during Reconstruction. The experiment demonstrated that freed African Americans could live and work independently, manage their own affairs, and contribute to the broader economy as wage laborers. This era saw significant land redistribution, as many former plantations were purchased by freedmen (Lowcountry Digital History Initiative 2024).

In 1873, the completion of the Port Royal and Augusta Railroad allowed the U.S. Navy to stockpile coal for its steam-powered warships at the harbor. By 1876, many capital ships of the Atlantic Fleet spent winters there to avoid frozen northern ports. Officially designated as a fourth-class naval station in 1877, it was named "United States Naval Station, Port Royal, South Carolina." In 1883, the Navy began acquiring land on Parris Island to construct wharves and shoreside facilities, culminating in the 1895 completion of the nation's largest dry dock, the centerpiece of the Port Royal Naval Shipyard. During the Spanish-American War, the station became a key support hub for U.S. naval operations near Cuba (Rowland 2022b).

From the 1870s to the mid-1890s, cotton, timber, rice, shipping, and phosphate mining transformed the area into an agricultural, commercial, and industrial center. By the early 1880s, Port Royal's population rose to nearly 400. In the 1890s, the local economy began to decline due to the Sea Island Hurricane of 1893 that devastated the once prosperous area. Before 1893, it was said that more ships loaded phosphate in and near Port Royal than in Charleston and Savannah combined. The hurricane damaged Port Royal's phosphate boats and installations, and the phosphate industry relocated to Florida (Spieler 2022).

In 1901, Senator Ben Tillman, a member of the Senate Naval Affairs Committee, redirected funding from Port Royal to Charleston, signaling the end of the Port Royal Naval Station and the rise of the Charleston Naval Shipyard. By 1903, a U.S. Marine company was stationed to manage the remaining facilities on Parris Island, which eventually transformed into the U.S. Marine Corps Recruit Depot, Parris Island (Rowland 2022b).

The decline of plantation agriculture in the late nineteenth century and early twentieth century led to economic hardship in Beaufort County. Once a primary rice growing region, the last commercial rice crops in the area were planted in 1914 (Figure 3-3). Cotton prices plummeted due to the arrival of the boll weevil in 1919, bringing an end to the local cotton industry. The establishment of military bases in the early twentieth century, including U.S. Marine Corps Recruit Depot in Parris Island in 1915 and the Marine Corps Air Station (then known as the Naval Air Station Beaufort) in 1943, provided economic stability the area. These military installations remain vital to the local economy today (Spieler 2022).

Figure 3-3. Hoeing Rice in South Carolina (Library of Congress 1904).

Economic growth was slow in the early twentieth century due to geographic isolation, but with the construction of bridges, Beaufort and Port Royal had greater access to the mainland. In the 1920s, Port Royal Island and the mainland were connected by a bridge. In the 1930s, Lady's Islands and

Port Royal were also bridged. In the 1950s, the northern and southern sections of Beaufort County were joined for the first time with bridges crossing the Broad and Chechessee rivers. The construction of roads and bridges during this time led to commercial development and population growth in the area (Beaufort County Government 2010).

Today, Port Royal is a community that is dedicated to preserving its heritage while embracing growth. Known for its deep natural harbor, which played a pivotal role during the American Civil War and later as a naval hub, the town retains a strong connection to its maritime past. Historic preservation efforts and community events celebrate local traditions and honor its history. Named after French explorer Jean Ribaut, Ribaut Road, also known as S.C. Highway 281, is a major thoroughfare in Port Royal. It was constructed between 1924 and 1925 to connect downtown Beaufort and the town of Port Royal. By 1971, it was multilane and called Ribaut Road (Roberson 2015). Recognizing its historical significance, the "Reimagine Ribaut Road" project, a collaborative effort by Beaufort County, the City of Beaufort, and the Town of Port Royal, aims to improve a 5.5-mile length of Ribaut Road from Boundary Street to the Russell Bell Bridge to improve traffic flow, increase pedestrian safety, and support future growth in the area (Town of Port Royal 2024).

4 Research Design and Methods

4.1 Research Design

The purpose of the Phase I survey was to locate, record, and assess cultural resources within the Project area, and survey methods were designed to meet this goal. Chronicle Heritage completed the Phase I survey using Secretary of the Interior (SOI) and other qualified staff and all work was consistent with standard professional practices and Section 106 of the NHPA, as amended (54 U.S.C. § 300101 et seq.). Chronicle Heritage surveyed the Project area according to guidelines outlined in the *South Carolina Standards and Guidelines for Archaeological Investigations* (COSPA 2013), and the *Survey Manual: South Carolina Statewide Survey of Historic Properties* (South Carolina Department of Archives and History [SCDAH] 2013).

Neither the Town of Port Royal nor Beaufort County are Certified Local Governments (CLGs). Chronicle Heritage contacted Mr. Van Willis, the Town Manager for Port Royal, for additional information about the Project area on January 23, 2025. As of the submittal of this report, no response has been received. Chronicle Heritage also contacted Kristen Forbus, the Long Range Planner for Beaufort County, also on January 23, 2025, who had no additional information to provide about the Project area.

The Project area also overlaps traditional homelands of five federally-recognized Native American Nations: the Alabama-Quassarte Tribal Town, the Catawba Indian Nation (aka Catawba Indian Tribe of South Carolina), the Eastern Shawnee Tribe of Oklahoma, the Muscogee (Creek) Nation, and the Tuscarora Nation. Pursuant to 54 U.S. Code § 302706 (b), continual cooperation and consultation with these nations through their Tribal Historic Preservation Offices (THPOs) will be performed.

4.2 Field Methods

Systematic subsurface sampling was conducted using shovel test pits (STPs). During the Phase I survey, the 11-ac tract was surveyed by excavating shovel tests at 30-m intervals along transects spaced 30 m apart. STPs were excavated to a maximum depth of 80 centimeters (cm) below surface (bs) or until the water table, subsoil, or an impenetrable obstacle was reached. STPs were approximately 30 cm wide. In instances where 80 cm was not reached, the maximum depth

reached was noted. Field data were collected using a digital STP form designed to capture stratigraphy with soil descriptions, environmental variables, and presence or absence of artifacts.

Each STP location was plotted with a Global Positioning System (GPS) unit and numbered sequentially (Appendix A). Chronicle Heritage preloaded a GPS unit capable of sub-meter accuracy with STP locations at predefined intervals. During fieldwork, all locations were plotted with a newly recorded point to ensure the GPS points are as accurate as possible. Therefore, maps reflect actual test locations and may show slight deviations from target intervals based on pacing, environmental conditions, and GPS accuracy. STP forms were completed within the GPS, eliminating the possibility for transcription error after fieldwork. All soil was screened through 0.25-inch wire mesh. Chronicle Heritage will submit all Geographic Information System (GIS) data, state archaeological site forms, and other digital project records to the South Carolina Electronic Records Archive (SCERA) and South Carolina Institute of Archaeology and Anthropology (SCIAA) at the completion of the fieldwork.

4.3 Site Criteria and National Register Criteria

All cultural resources that are encountered are assessed as to their significance based on NRHP criteria. Four criteria are applied during the evaluation of an archaeological site's eligibility for inclusion in the NRHP. Normally, a property must be at least 50 years of age and meet at least one of the following four criteria to be considered eligible for listing in the NRHP:

- Be associated with events that have made a significant contribution to the broad patterns of our history (Criterion A); or
- Be associated with the lives of persons significant in our past (Criterion B); or
- Embody the distinct characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction (Criterion C); or
- Yield, or be likely to yield, information important in prehistory or history (Criterion D).

Chronicle Heritage archaeologists used these criteria, in conjunction with evaluations of site integrity, to provide recommendations concerning the NRHP-eligibility status of all archaeological sites located in the Project area. Determinations of ineligibility are not possible when the limits of a site are unknown and only a portion has been sampled, but it may be possible to assess a site as potentially significant or eligible based on an incomplete sample.

5 Archaeological Investigations

5.1 Previous Research

Chronicle Heritage consulted the SCERA, the South Carolina ArchSite (the online GIS database that contains archaeological site information from the SCIAA), and above-ground historic and architectural properties information maintained by the SCDAH, to determine the location of previously recorded cultural resources and previously conducted surveys within 3.2 km of the Project area (Table 5-1, Table 5-2, and Table 5-3; Figure 5-1 and Figure 5-2).

According to SCERA records, 24 professional surveys have been conducted within 3.2 km of the tract, none of which overlap the Project area (Table 5-1; Figure 5-1). Of the 24 investigations

identified, 10 are linear surveys, and 14 are reconnaissance-level surveys. There are 62 known archaeological sites within 3.2 km of the tract, none of which intersect the Project area (Table 5-2; Figure 5-2). Ten of the archaeological sites within 3.2 km of the Project area are listed in the NRHP, and 10 have been evaluated by the SHPO as eligible for listing in the NRHP. Two of the sites (38BK1922 and 38BK2110) have not been evaluated by the SHPO. Twenty of the sites have been evaluated as not eligible for listing in the NRHP, and the remaining archaeological sites do not have an eligibility determination available. Additionally, there are 242 previously recorded historical structures, 4 NRHP-listed resources, and 21 historic areas within 3.2 km of the tract, none of which intersect the Project area (Table 5-3).

Table 5-1. Previously Conducted Surveys within 3.2 km of the Project area

Project Title	Year	Consultant	Type
Reconnaissance Report US 281 Bridge replacement	1979	DOT	Reconnaissance
Archaeological survey of US 21 & bridge over Albergotti Creek widening	1980	DOT	Intensive Archaeological
Archaeological survey of Battery Ck. bridge rplcmt & SC 281 widening	1984	DOT	Intensive Archaeological
Archaeological survey of Battery Ck. Bridge Rplcmt	1990	DOT	Intensive Archaeological
Cultural Resources Survey of The Waddell Road Realignment Corridor	1996	Brockington	Intensive-Archaeological
Cultural Resource Survey of Lowcountry Medical Group Tract	1998	Brockington	Intensive
Archaeological Survey of 35 Acres in Port Royal, Beaufort Co.	2000	Brockington	Intensive
Additional Phase I Archaeological Survey and Phase II Testing, Beaufort Naval Hospital	2002	Brockington	Intensive Archaeological
CR Survey of the Proposed Port Royal Reclamation Facility Transmission	2003	Brockington	Intensive
A Comprehensive Cultural Resource GIS for the Marine Corps Recruit Depot	2003	TRC	GIS
Phase I CR Survey of the Pinckney Retreat Development Site	2004	R.S. Webb	Intensive
Intensive Archaeological Survey of Approx. 127 Acres at MCRD	2005	TRC	Intensive-Archaeological
CR Assessment of the Battery Creek Club Homes Tract	2006	Brockington	Reconnaissance
Cultural Resources Survey of SC Route 802 Widening Project	2007	New South	Intensive
Cultural Resources Survey of the Carsons Tract	2007	Brockington	Intensive
Cultural Resources Survey of the Beaufort River Parcel	2007	Brockington	Intensive-Archaeological

Project Title	Year	Consultant	Type
Cultural Resources Survey and Testing of the Port Royal Harbor Redevelopment Tract	2008	Brockington	Intensive-Archaeological
An Underwater Cultural Resources Survey of a Proposed Marina on Battery Creek	2008	Diversified Wilbanks, Inc & Brockington	Intensive-Archaeological
Cultural Resources Survey of the Military Utilities Consolidation Corridor	2009	Brockington	Intensive-Archaeological
Cultural Resources Survey of the Proposed Bridge Replacement on US 21 over Albergotti Creek	2009	New South	Intensive
Submerged Cultural Resources Survey, Fort Frederick Heritage Preserve, Beaufort River, Beaufort County, South Carolina	2016	SEARCH	Intensive
Phase I Archaeological Survey Beaufort Zinc Ribbon Installation Project Hampton and Beaufort Counties, South Carolina	2020	S&ME, Inc.	Reconnaissance-Archaeological
Intensive Archaeological Survey of the Cross Community Church Tract, Beaufort County	2021	Brockington	Intensive-Archaeological
Phase I CR Survey of the Burton-Frogmore 115kV Transmission Line	2022	Terracon Consultants, Inc.	Intensive

Table 5-2. Previously Recorded Archaeological Sites within 3.2 km of the Project area

Site Number	Site Name	Temporal/Cultural Affiliation	NRHP Status
38BU0028	No Name	Late Archaic; Early–Late Woodland; Mississippian	Not Determined
38BU0038	No Name	Prehistoric	Not Determined
38BU0044	No Name	Middle and Late Woodland; Mississippian	Not Determined
38BU0102	Fort Frederick [38BU0102/38BU1100]	Mississippian; Eighteenth and 19th Century Historic	NRHP Listed
38BU0109	No Name	Historic	Not Determined
38BU0149	Fort Lyttleton [38BU0149/38BU1099]	Eighteenth–20th Century Historic; Prehistoric	NRHP Listed
38BU0152	No Name	Prehistoric; Historic; 19th and 20th Century	Not Eligible
38BU0163	Quarters 140	Late Archaic; Early Woodland; 19th and 20th Century	NRHP Listed
38BU0163	Naval Hospital Site	Unknown	Not Determined
38BU0163	Camp Saxton/Smith Plantation	Late Archaic; Early–Late Woodland; Eighteenth and 19th Century Historic	Not Determined
38BU0163	Smith Plantation/ Old Fort	Early–Late Archaic; Late Woodland; Eighteenth and Nineteenth Century Historic	NRHP Listed
38BU0336	No Name	Late Archaic	Not Determined

Site Number	Site Name	Temporal/Cultural Affiliation	NRHP Status
38BU0338	No Name	Eighteenth and Nineteenth Century Historic	Not Eligible
38BU0482	No Name	Nineteenth and Twentieth Century	Not Eligible
38BU0955	No Name	Middle Woodland	Not Determined
38BU1099	Fort Lyttleton [38BU0149/38BU1099]	Eighteenth–Twentieth Century Historic	NRHP Listed
38BU1100	Fort Frederick [38BU0102/38BU1100]	Mississippian; Eighteenth and Nineteenth Century Historic	NRHP Listed
38BU1101	No Name	Nineteenth Century Historic	Not Determined
38BU1104	PR-3	Middle Woodland; Sixteenth and Nineteenth Century Historic; Historic	Eligible
38BU1104	Jean de la Gaye House	Eighteenth Century Historic	Not Determined
38BU1280	No Name	Twentieth Century Historic	Not Determined
38BU1294	No Name	Eighteenth and Nineteenth Century Historic	Eligible
38BU1295	No Name	Twentieth Century Historic	Not Determined
38BU1579	No Name	Early–Late Woodland; Mississippian	Eligible
38BU1580	No Name	Early and Middle Woodland; Mississippian; Seventeenth and Eighteenth Century Historic	Eligible
38BU1581	No Name	Early and Middle Woodland	Not Eligible
38BU1582	No Name	Early and Middle Woodland	Not Eligible
38BU1583	No Name	Early and Middle Woodland	Not Eligible
38BU1584	No Name	Early and Middle Woodland	Eligible
38BU1585	No Name	Early Woodland	Not Eligible
38BU1586	No Name	Early and Middle Woodland; Mississippian	Eligible
38BU1587	No Name	Middle Woodland	Not Eligible
38BU1588	No Name	Early Woodland	Not Eligible
38BU1730	No Name	Late Woodland; Prehistoric; Historic	Not Eligible
38BU1731	No Name	Late Archaic; Middle and Late Woodland; Prehistoric; Twentieth Century Historic	Not Eligible
38BU1732	No Name	Late Woodland; Prehistoric	Not Eligible
38BU1733	No Name	Twentieth Century Historic	Not Eligible
38BU1734	No Name	Late Woodland	Not Eligible
38BU1817	Cane Island Wreck	Twentieth Century Historic	Not Determined
38BU1867	Site 1	Late Archaic; Twentieth Century Historic	Not Eligible
38BU1891	No Name	Middle and Late Woodland; Nineteenth Century Historic	Not Determined

Site Number	Site Name	Temporal/Cultural Affiliation	NRHP Status
38BU1892	No Name	Early Woodland; Nineteenth Century Historic	Not Determined
38BU2044	No Name	Prehistoric; Nineteenth and Twentieth Century Historic	Eligible
38BU2045	No Name	Early–Late Woodland; Mississippian	Eligible
38BU2094	PR-2	Late Archaic; Middle and Late Woodland; Mississippian; Eighteenth Century	Eligible
38BU2094	[Revisit 1]	Late Archaic; Early and Middle Woodland; Eighteenth–Twentieth Century	Eligible
38BU2096	No Name	Early–Late Woodland	Not Eligible
38BU2097	No Name	Early–Late Woodland	Not Eligible
38BU2098	No Name	Early–Late Woodland; Mississippian	Not Eligible
38BU2099	No Name	Late Archaic; Early–Late Woodland; Mississippian; Nineteenth and Twentieth Century Historic	Not Eligible
38BU2258	No Name	Late Woodland	Not Determined
38BU2260	No Name	Middle Woodland; Nineteenth and Twentieth Century Historic	Not Eligible

Table 5-3. Previously Recorded Historical Resources within 3.2 km of the Project area

Structures

Resource ID	Name/Address	Year Built	Resource Type	SHPO Evaluation
NRHP ID: 19950202	Camp Saxton Site	1862	Structure	NRHP Listed
NRHP ID: 20040622	Scheper, F.W., Store	1885–1950	Structure	NRHP Listed
NRHP ID: 20101117	Nathaniel Gist House	1877–1878	Structure	NRHP Listed
NRHP ID: 14000163	Port Royal Elementary School	1911–1954	Structure	NRHP Listed
025-519	1013 Paris Ave.	ca. 1880	Structure	Not Eligible
025-520	924 9th St.	1930	Structure	Not Eligible
025-521	910 9th St.	ca. 1920	Structure	Not Eligible
025-522	906 9th St.	ca. 1915	Structure	Not Eligible
025-523	904 9th St.	ca. 1915	Structure	Not Eligible
025-524	903 London Ave.	ca. 1920	Structure	Not Eligible
025-525	909 London Ave.	ca. 1920	Structure	Not Eligible

Structures				
Resource ID	**Name/Address**	**Year Built**	**Resource Type**	**SHPO Evaluation**
025-526	1103 11th St.	1937	Structure	Not Eligible
025-527	1003 Paris Ave.	ca. 1946	Structure	Not Eligible
025-528	1004 Paris Ave.	ca. 1950	Structure	Not Eligible
025-529	908 10th St.	ca. 1920	Structure	Not Eligible
025-530	906 10th St.	ca. 1920	Structure	Not Eligible
025-531	1003 London Ave.	ca. 1895	Structure	Not Eligible
025-532	911 11th St.	ca. 1920	Structure	Not Eligible
025-533	909 11th St.	1920	Structure	Not Eligible
025-534	806 Tenth St.	ca. 1940	Structure	Not Eligible
025-535	1108 11th St.	ca. 1950	Structure	Not Eligible
025-536	1102 11th St.	ca. 1895	Structure	Eligible
025-537	1113 12th St.	ca. 1885	Structure	Not Eligible
025-538	1115 12th St.	1946	Structure	Not Eligible
025-539	1004 11th St.	1878	Structure	Eligible
025-540	1103 Paris Ave.	ca. 1920	Structure	Not Eligible
025-541	1005 12th St.	1952	Structure	Not Eligible
025-542	1007 12th St.	1945	Structure	Not Eligible
025-543	915 12th St.	ca. 1940	Structure	Not Eligible
025-544	917 12th St.	ca. 1925	Structure	Not Eligible
025-545	816 11th St.	ca. 1900	Structure	Not Eligible
025-546	Unknown	Unknown	Structure	Not Eligible
025-547	1102 Richmond Ave.	1940	Structure	Not Eligible
025-548	1114 12th St.	ca. 1887	Structure	Not Eligible
025-549	1110 11th St.	19th ca., early	Structure	Not Eligible
025-550	1102 12th St.	1948	Structure	Not Eligible
025-551	1006 12th St.	1940	Structure	Not Eligible
025-552	1203 Paris Ave.	ca. 1887	Structure	Not Eligible
025-553	1215 Paris Ave.	ca. 1909	Structure	Not Eligible
025-554	1210 Madrid Ave.	ca. 1940	Structure	Not Eligible
025-555	1214 12th St.	1911	Structure	Not Eligible
025-556	1202 Richmond Ave.	ca. 1920	Structure	Not Eligible
025-557	1138 13th St.	ca. 1900	Structure	Eligible

Structures

Resource ID	Name/Address	Year Built	Resource Type	SHPO Evaluation
025-558	1108 13th St.	1941	Structure	Not Eligible
025-559	1106 13th St.	1949	Structure	Not Eligible
025-560	1109 14th St.	1949	Structure	Not Eligible
025-561	1115 14th St.	1910	Structure	Not Eligible
025-562	1016 13th St.	1949	Structure	Not Eligible
025-563	1305 Paris Ave.	1941	Structure	Not Eligible
025-564	1305 Paris Ave.	ca. 1941	Structure	Not Eligible
025-565	1011 14th St.	1949	Structure	Not Eligible
025-566	1013 14th St.	1946	Structure	Not Eligible
025-567	1304 Richmond Ave.	ca. 1935	Structure	Not Eligible
025-568	1010 14th St.	ca. 1900	Structure	Not Eligible
025-569	1005 15th St.	ca. 1920	Structure	Not Eligible
025-570	920 14th St.	1940	Structure	Not Eligible
025-571	1503 Paris Ave.	1948	Structure	Not Eligible
025-572	1510 Madrid Ave.	1948	Structure	Not Eligible
025-573	908 15th St.	1940	Structure	Not Eligible
025-574	906 15th St.	1940	Structure	Not Eligible
025-575	911 16th St.	ca. 1930	Structure	Not Eligible
025-576	913 16th St.	1945	Structure	Not Eligible
025-577	1508 Paris Ave.	ca. 1945	Structure	Not Eligible
025-578	1515 Old Shell Rd.	ca. 1925	Structure	Not Eligible
025-579	2100 Berkley Ct.	1940	Structure	Req. Additional Research
025-580	1617 Edinburgh Ave.	1949	Structure	Not Eligible
025-581	1603 Columbia Ave.	1949	Structure	Not Eligible
025-582	1613 Columbia Ave.	1949	Structure	Not Eligible
025-583	1615 Columbia Ave.	1949	Structure	Not Eligible
025-584	1614 Edinburgh Ave.	1949	Structure	Not Eligible
025-585	1612 Edinburgh Ave.	1949	Structure	Not Eligible
025-586	1610 Edinburgh Ave.	1949	Structure	Not Eligible
025-587	1713 Paris Ave.	1935	Structure	Not Eligible
025-588	804 17th St.	1941	Structure	Not Eligible
025-589	712 16th St.	ca. 1935	Structure	Not Eligible

Structures

Resource ID	Name/Address	Year Built	Resource Type	SHPO Evaluation
025-590	710 16th St.	ca. 1900	Structure	Not Eligible
025-591	18th St.	ca. 1900	Structure	Not Eligible
025-592	21 Dawson Pl.	1940	Structure	Not Eligible
025-593	1708 Old Shell Rd.	ca. 1900	Structure	Not Eligible
025-594	1612 Old Shell Rd.	ca. 1900	Structure	Not Eligible
025-595	1629 Paris Ave.	1944	Structure	Not Eligible
025-596	1910 Lenora Dr.	1949	Structure	Not Eligible
025-597	1908 Lenora Dr.	1949	Structure	Not Eligible
025-598	1906 Lenora Dr.	1949	Structure	Not Eligible
025-599	Royal Pines Ext., N end, E side	ca. 1900	Structure	Not Eligible
025-600	1700 Ribaut Rd.	1950	Structure	Not Eligible
025-601	1680 Ribaut Rd.	19th ca., late	Structure	Not Eligible
025-602	2 Mercury Ln.	ca. 1910	Structure	Not Eligible
025-603	1630 Ribaut Rd.	1935 / 1947	Structure	Not Eligible
025-604	1614 Ribaut Rd.	1947	Structure	Not Eligible
025-605	2329 Hillside Ct.	1946	Structure	Not Eligible
025-606	2327 Hillside Ct.	1946	Structure	Not Eligible
025-607	2411 Casablanca Cir.	1945	Structure	Not Eligible
025-608	1570 Ribaut Rd.	ca. 1945	Structure	Not Eligible
025-609	2208 Waddell Rd.	1946	Structure	Not Eligible
025-610	2314 Waddell Rd.	ca. 1950	Structure	Not Eligible
025-611	Fort Frederick Boat Landing	1735 / 1758	Structure	NRHP-Listed; ID No. 19741231
025-612	1414 Ribaut Rd.	ca. 1935	Structure	Not Eligible
025-613	1415 Ribaut Rd.	ca. 1954	Structure	Not Eligible
025-614	8 H. E. Smalls Ct.	ca. 1910	Structure	Not Eligible
025-615	1401 Ribaut Rd.	ca. 1937	Structure	Not Eligible
025-616	1405 Ribaut Rd.	ca. 1940	Structure	Not Eligible
025-617	69 Johnny Morrall Cir.	ca. 1950	Structure	Not Eligible
025-618	49 Johnny Morrall Cir.	ca. 1951	Structure	Not Eligible
025-619	2 Belleview Bluff	ca. 1940	Structure	Not Eligible
025-621	130 Pinckney Retreat Rd.	ca. 1760	Structure	Eligible
025-706	302 Battery Creek Dr.	1949	Structure	Not Eligible

Structures				
Resource ID	**Name/Address**	**Year Built**	**Resource Type**	**SHPO Evaluation**
025-707	300 Battery Creek Dr.	1949	Structure	Not Eligible
025-710	2410 Oak Haven St.	1948	Structure	Not Eligible
025-711	2417 Pinehaven St.	ca. 1940	Structure	Not Eligible
025-712	2613 Mossy Oaks Rd.	ca. 1934	Structure	Not Eligible
025-713	840 Broome Ln.	ca. 1940	Structure	Not Eligible
025-714	2851 Broome Ln.	ca. 1940	Structure	Not Eligible
025-715	2407 Southside Blvd.	ca. 1945	Structure	Not Eligible
025-716	1251 Ribaut Rd.	ca. 1930	Structure	Not Eligible
025-717	2801 Waddell Rd.	ca. 1915	Structure	Not Eligible
025-718	2705 Waddell Rd.	ca. 1935	Structure	Not Eligible
025-719	1509 Wrenhaven Ln.	ca. 1910	Structure	Not Eligible
025-1412	1508 Old Shell Rd.	ca. 1875	Structure	Not Eligible
025-1413	2333 Hillside Ct. (adjacent to S)	19th ca., late	Structure	Not Eligible
389-500	Unknown	Unknown	Structure	Not Eligible
389-501	Unknown	Unknown	Structure	Not Eligible
389-502	Unknown	Unknown	Structure	Not Eligible
389-503	Unknown	Unknown	Structure	Not Eligible
389-504	Unknown	Unknown	Structure	Not Eligible
389-505	Unknown	Unknown	Structure	Not Eligible
389-506	Unknown	Unknown	Structure	Not Eligible
389-507	902 7th St.	1909	Structure	Eligible
389-508	Unknown	Unknown	Structure	Not Eligible
389-509	Unknown	Unknown	Structure	Not Eligible
389-510	918 8th St.	ca. 1885	Structure	Eligible
389-511	Unknown	Unknown	Structure	Not Eligible
389-512	Unknown	Unknown	Structure	Not Eligible
389-513	Unknown	Unknown	Structure	Not Eligible
389-514	Unknown	Unknown	Structure	Not Eligible
389-515	Unknown	Unknown	Structure	Not Eligible
389-516	Unknown	Unknown	Structure	Not Eligible
389-517	Unknown	Unknown	Structure	Not Eligible
389-518	Unknown	Unknown	Structure	Not Eligible

Structures				
Resource ID	**Name/Address**	**Year Built**	**Resource Type**	**SHPO Evaluation**
5019	1608 S-7 116 Road	ca. 1950	Structure	Not Eligible
5020	1605 S-7 116 Road	ca. 1950	Structure	Not Eligible
5021	1607 S-7 116 Road	ca. 1950	Structure	Not Eligible
5022	1606 S-7 116 Road	ca. 1950	Structure	Not Eligible
5023	1609 S-7 116 Road	ca. 1950	Structure	Not Eligible
5024	1608 S-7 116 Road	ca. 1950	Structure	Not Eligible
5025	1610 S-7 116 Road	ca. 1950	Structure	Not Eligible
5026	1613 S-7 116 Road	ca. 1950	Structure	Not Eligible
5027	1613 S-7 116 Road	ca. 1950	Structure	Not Eligible
5028	1611 Edinburgh Avenue	ca. 1960	Structure	Not Eligible
5029	1609 Edinburgh Avenue	ca. 1960	Structure	Not Eligible
5030	1607 Edinburgh Avenue	ca. 1960	Structure	Not Eligible
5031	1213 16th Street	ca. 1950	Structure	Not Eligible
5032	1207 16th Street	ca. 1950	Structure	Not Eligible
5033	1205 16th Street	ca. 1950	Structure	Not Eligible
5034	1203 16th Street	ca. 1950	Structure	Not Eligible
5035	1201 16th Street	ca. 1950	Structure	Not Eligible
5036	1210 15th Street	ca. 1950	Structure	Not Eligible
5037	1206 15th Street	ca. 1950	Structure	Not Eligible
5038	1204 15th Street	ca. 1950	Structure	Not Eligible
5039	1109 13th Street	ca. 1950	Structure	Not Eligible
5180	Facility No. 896	1954	Structure	Not Eligible
5197	Facility No. 201657	1952	Structure	Not Eligible
5476	1530 Ribaut Road	ca. 1960s	Structure	Not Eligible
5477	2213 Waddell Road	ca. 1960s	Structure	Not Eligible
5478	14 Bell Drive	ca. 1930s	Structure	Not Eligible
5479	12 Bell Drive	1959	Structure	Not Eligible
5480	8 Bell Drive	ca. 1950s	Structure	Not Eligible
5481	6 Bell Drive	ca. 1950s	Structure	Not Eligible
5482	2206 Southside Wireless Boulevard	ca. 1970s	Structure	Not Eligible
5483	1440 Ribaut Road	1947	Structure	Not Eligible
5484	2204 Southside Boulevard	1963	Structure	Not Eligible

Structures				
Resource ID	**Name/Address**	**Year Built**	**Resource Type**	**SHPO Evaluation**
5485	2211 State Road S-7-277	1964	Structure	Not Eligible
5486	2400 Southside Boulevard	ca. 1960s	Structure	Not Eligible
5487	2405 Southside Boulevard	1966	Structure	Not Eligible
5488	2403 Southside Boulevard	1966	Structure	Not Eligible
5489	2401 Southside Boulevard	1966	Structure	Not Eligible
5490	2313 Southside Boulevard	1966	Structure	Not Eligible
5491	2311 Southside Boulevard	1963	Structure	Not Eligible
5492	2309 Southside Boulevard	1971	Structure	Not Eligible
5493	2307 Southside Boulevard	1964	Structure	Not Eligible
5494	2305 Southside Boulevard	1965	Structure	Not Eligible
5495	2303 Southside Boulevard	1970	Structure	Not Eligible
5496	2301 Southside Boulevard	1965	Structure	Not Eligible
5497	2210 Southside Boulevard	1964	Structure	Not Eligible
5498	2301 Waverly Way	1938	Structure	Not Eligible
5499	2301 State Road S-7-227	1958	Structure	Not Eligible
5500	2305 Waverly Way	1958	Structure	Not Eligible
5501	2307 Waverly Way	1958	Structure	Not Eligible
5502	2309 Waverly Way	1958	Structure	Not Eligible
5503	2311 Waverly Way	1958	Structure	Not Eligible
5504	2401 Waverly Way	1958	Structure	Not Eligible
5505	2403 Waverly Way	1958	Structure	Not Eligible
5506	2405 Waverly Way	1957	Structure	Not Eligible
5507	2407 Waverly Way	1940	Structure	Not Eligible
5508	2409 Waverly Way	1957	Structure	Not Eligible
5509	2505 Waverly Way	1958	Structure	Not Eligible
5510	2511 Waverly Way	1957	Structure	Not Eligible
5511	1112 Duncan Drive	1957	Structure	Not Eligible
5512	1200 Duncan Drive	1958	Structure	Not Eligible
5513	1202 Duncan Drive	1958	Structure	Not Eligible
5514	1204 Duncan Drive	1958	Structure	Not Eligible
5515	1203 Duncan Drive	ca. 1940s	Structure	Not Eligible
5516	2512 Southside Boulevard	1962	Structure	Not Eligible

Structures				
Resource ID	**Name/Address**	**Year Built**	**Resource Type**	**SHPO Evaluation**
5517	2506 Waverly Way	1958	Structure	Not Eligible
5518	2504 Waverly Way	1957	Structure	Not Eligible
5519	2502 Waverly Way	1957	Structure	Not Eligible
5520	2410 Waverly Way	1958	Structure	Not Eligible
5521	2408 Waverly Way	1957	Structure	Not Eligible
5522	1508 Old Shell Rd.	ca. 1875	Structure	Not Eligible
5523	2404 Waverly Way	1957	Structure	Not Eligible
5524	2402 Waverly Way	1957	Structure	Not Eligible
5525	2312 Waverly Way	1957	Structure	Not Eligible
5526	2310 Waverly Way	1958	Structure	Not Eligible
5527	2308 Waverly Way	1958	Structure	Not Eligible
5528	2306 Waverly Way	1958	Structure	Not Eligible
5529	2607 Waverly Way	1963	Structure	Not Eligible
5530	2615 Southside Boulevard	1963	Structure	Not Eligible
5531	2703 Southside Boulevard	1966	Structure	Not Eligible
5532	2703 Southside Boulevard	1966	Structure	Not Eligible
5533	2705 Southside Boulevard	1966	Structure	Not Eligible
5534	2709 Southside Boulevard	1957	Structure	Not Eligible
5535	1114 Battery Creek Road	ca. 1970s	Structure	Not Eligible
5536	1116 Battery Creek Road	ca. 1970s	Structure	Not Eligible
5537	1002 Brotherhood Road	1956	Structure	Not Eligible
5538	1110 Battery Creek Road	1956	Structure	Not Eligible
5539	1112 Battery Creek Road	1956	Structure	Not Eligible
5540	Unknown	ca. 1900s	Structure	Not Eligible
5563	2815 Broome Lane	1956	Structure	Not Eligible
5564	2813 Broome Lane	1965	Structure	Not Eligible
5565	2811 Broome Lane	1965	Structure	Not Eligible
5566	2618 Rodgers Drive	1965	Structure	Not Eligible
5567	2614 Rodgers Drive	1952	Structure	Not Eligible
5568	2614 Legare Street	1953	Structure	Not Eligible
5569	2611 Legare Street	1955	Structure	Not Eligible
5570	2617 Live Oak Circle	1966	Structure	Not Eligible

Structures

Resource ID	Name/Address	Year Built	Resource Type	SHPO Evaluation
5571	2615 Live Oak Circle	1966	Structure	Not Eligible
5572	2613 Live Oak Circle	1966	Structure	Not Eligible
5573	2611 Live Oak Circle	1967	Structure	Not Eligible
5574	2609 Live Oak Circle	1969	Structure	Not Eligible
5575	2607 Live Oak Circle	1969	Structure	Not Eligible
5576	2605 Live Oak Circle	1967	Structure	Not Eligible
5577	2603 Live Oak Circle	1967	Structure	Not Eligible
5578	300 Battery Creek Road	1949	Structure	Not Eligible
5579	208 Battery Creek Road	1948	Structure	Not Eligible
5580	206 Battery Creek Road	1948	Structure	Not Eligible

Historic Area

Resource ID	Name	Date	SHPO Evaluation
Unavailable	Naval Hospital Beaufort Historic District	1940–1950	Eligible

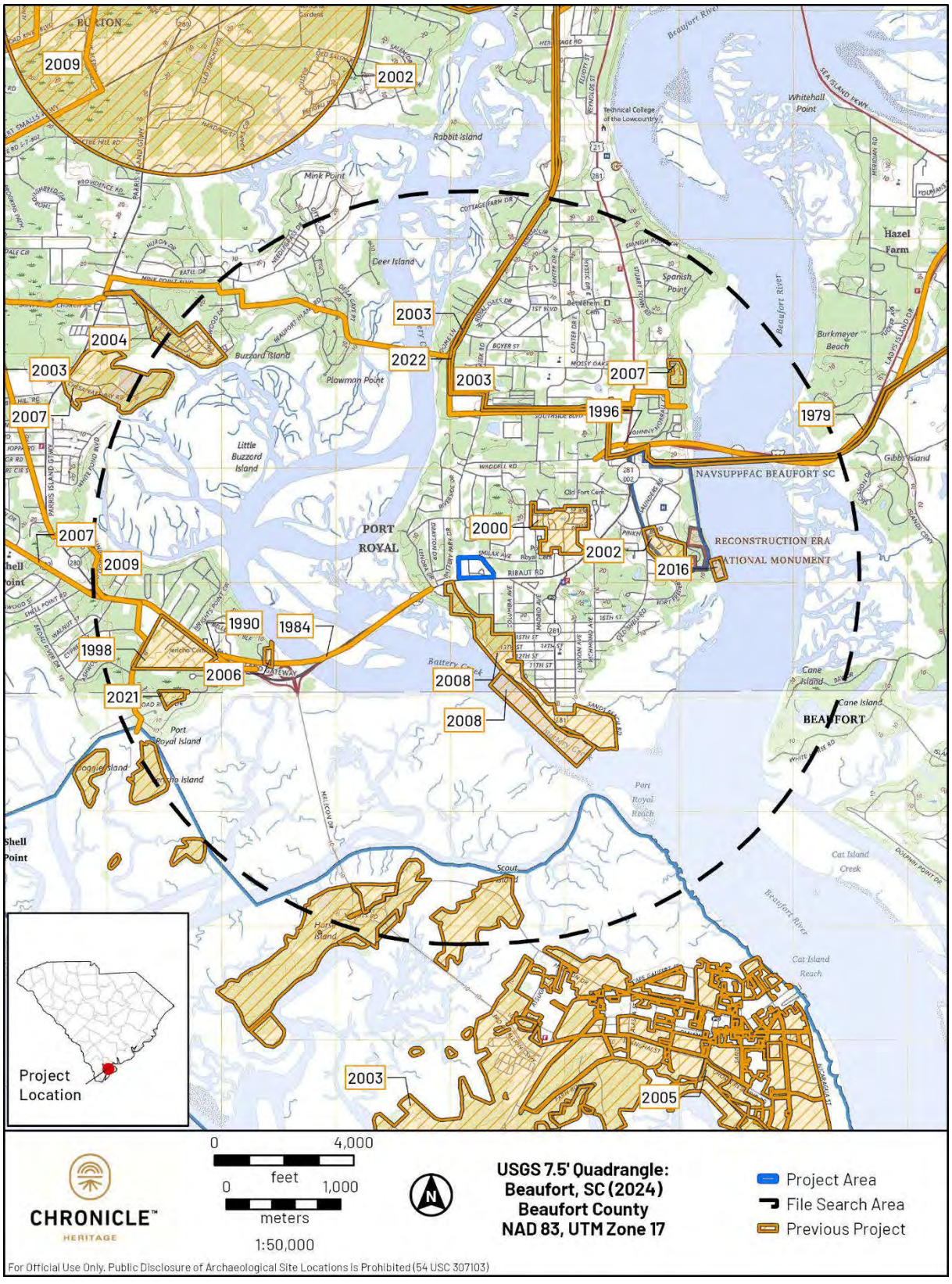

Figure 5-1. Map of surveys within 3.2 km of the Project area.

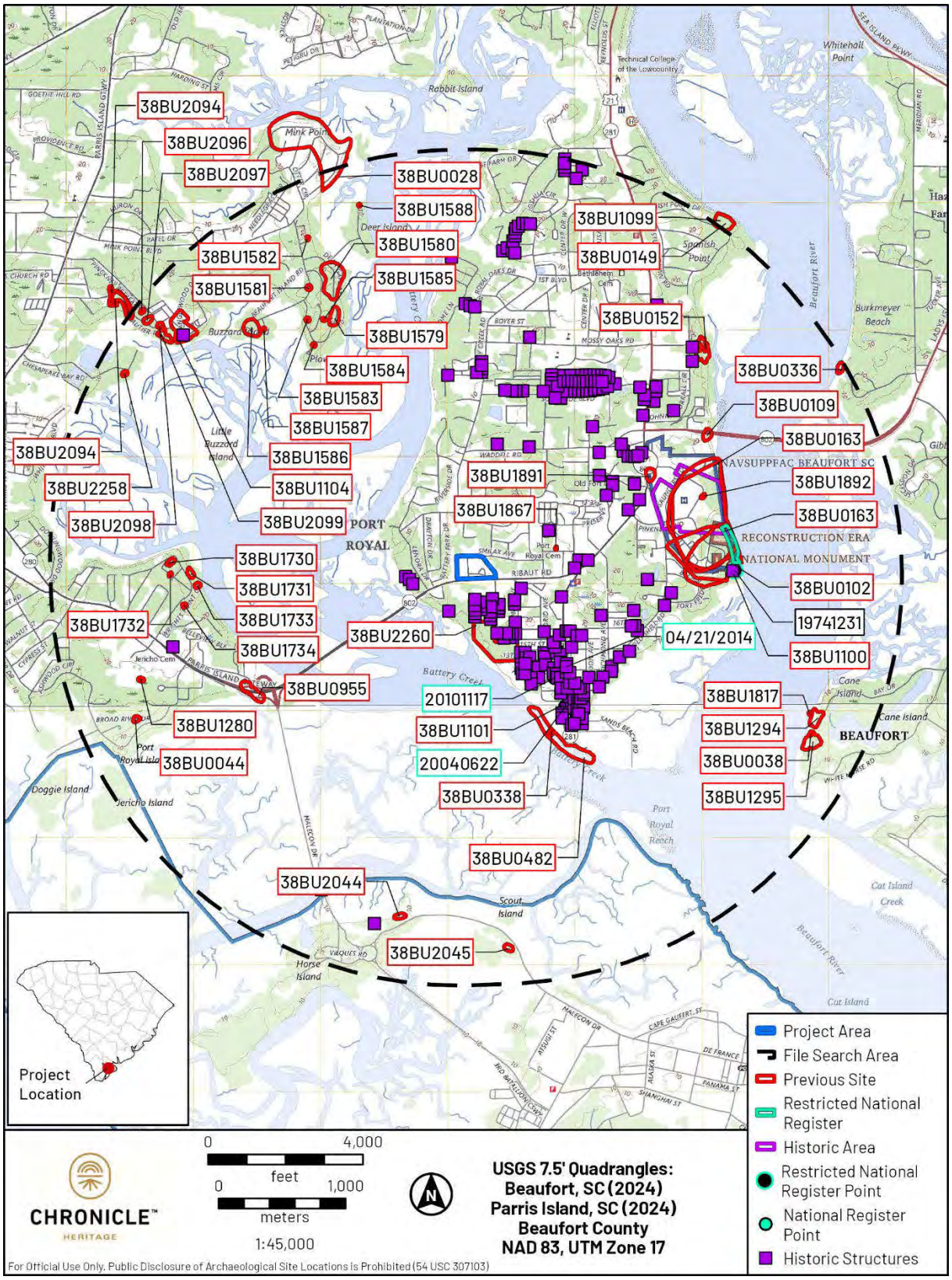

Figure 5-2. Map of recorded resources within 3.2 km of the Project area.

5.2 Results of Survey

From December 19 to 20, 2024, Chronicle Heritage conducted subsurface testing within the Project area at 30-m intervals, excavating a total of 15 STPs, none of which contained artifacts (Figure 5-3). Nine STPs were excavated to a depth of at least 80 cmbs. Of the STPs where excavation was terminated early (*n* = 6), excavation of three was terminated after clay subsoil was encountered prior to reaching 80 cmbs (between 30–40 cmbs), while excavation of three other STPs was terminated early as the result of a rock impasse at 60 cmbs. The three STPs that encountered a rocky impasse contained disturbed soils or fill between 5 and 60 cmbs. Sixteen STPs were precluded from excavation due to presence existing structures and paved surfaces. No sites or isolated finds were identified as a result of the survey.

A representative soil profile (STP 22) in the eastern portion of the Project area consisted of approximately 20 cm of very dark brown (10YR 2/2) loamy sand, underlain by at least 60 cm of dark yellowish brown (10YR 3/4) sand that exceeded 80 cmbs (Figure 5-4). A representative soil profile with shallow subsoil in the southeastern portion of the Project area consisted of 10 cm of very dark grayish brown (10YR 3/2) loamy sand overlying 20 cm of dark yellowish brown (10YR 4/6) clay subsoil that exceeded 30 cmbs (Figure 5-5).

Figure 5-3. Results map of the Project area.

Figure 5-4. STP 22 showing a representative soil profile in the eastern portion of the Project area.

Figure 5-5. STP 28 showing a representative soil profile depicting shallow soils in the southeastern portion of the Project area.

6 Conclusions and Recommendations

On behalf of the Department of Veterans Affairs and under subcontract to Mabbett, Chronicle Heritage completed a CRS for the potential siting of an OPC at 1844 Ribaut Road on an approximately 11-ac site in Beaufort County, South Carolina. The Project area comprises the footprint of the proposed development and staging areas within five parcels (Parcel ID Nos. R110 008 000 0114 0000, R110 008 000 0115 0000, R110 008 000 0116 0000, R110 008 000 116A 0000, and R110 008 000 0118 0000) on the USGS 2024 Beaufort, South Carolina, 7.5-minute topographic quadrangle.

The archaeological survey was completed in accordance with federal and state regulations, and it was undertaken to comply with the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (48 CFR 44716), Professional Qualification Standards (36 CFR Part 61), and the *South Carolina Standards and Guidelines for Archaeological Investigations* (COSPA 2013). Additionally, the requirements of Article 8, Section 8.500, of the Beaufort County Zoning Ordinance will be followed.

Fieldwork was carried out over two days, from December 19 to 20, 2024. STPs were pre-plotted at 30-m intervals. Chronicle Heritage plotted 31 total STPs and excavated 15, none of which contained cultural material. Sixteen STPs were precluded from excavation due to the presence of existing structures and paved surfaces. Considering these conditions, it is highly unlikely that intact cultural resources that would be adversely affected by the planned project exist within these disturbed areas.

Chronicle Heritage's CRS concluded that **no historic properties will be affected** by this Project in accordance with 36 CFR § 800.4 (d)(1). Chronicle Heritage recommends **no additional archaeological investigation** within the Project area at this time.

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Appendix A.
Shovel Test Pit Locations

Table A-1. UTM NAD 83 Zone 17

STP	Results	Easting	Northing
1	Negative	528164.0359	3583205.703
2	Not Excavated	528166.4399	3583175.892
3	Negative	528167.8977	3583145.827
4	Negative	528169.7651	3583115.98
5	Not Excavated	528171.7591	3583085.952
6	Not Excavated	528173.6899	3583056.014
7	Not Excavated	528203.6277	3583057.945
8	Negative	528201.6969	3583087.882
9	Negative	528199.7965	3583117.489
10	Not Excavated	528197.8355	3583147.758
11	Negative	528195.6047	3583178.138
12	Not Excavated	528193.9739	3583207.634
13	Not Excavated	528223.9117	3583209.565
14	Negative	528226.1273	3583179.287
15	Negative	528227.7733	3583149.689
16	Not Excavated	528231.6347	3583089.813
17	Not Excavated	528233.5655	3583059.875
18	Not Excavated	528263.5033	3583061.806
19	Not Excavated	528259.7947	3583122.049
20	Negative	528257.7111	3583151.62
21	Negative	528253.8495	3583211.495
22	Negative	528285.6847	3583183.422
23	Not Excavated	528287.6487	3583153.55
24	Negative	528289.7179	3583123.668
25	Not Excavated	528291.5105	3583093.675
26	Not Excavated	528293.4411	3583063.737
27	Negative	528323.3789	3583065.668
28	Negative	528321.4483	3583095.606
29	Not Excavated	528351.3861	3583097.536
30	Not Excavated	528078.0843	3583140.035
31	Negative	528134.0981	3583203.772

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APPENDIX D

REGULATORY AGENCY CORRESPONDENCE

U.S. Department of Veterans Affairs

Office of Construction & Facilities Management
425 I Street, NW, Ste. 2E.250
Washington DC 20420
www.cfm.va.gov

07 May 2025

Melanie Olds
Fish and Wildlife Biologist, Ecological Services
U.S. Fish and Wildlife Service, South Carolina Ecological Services Field Office
Charleston, South Carolina 29407

Via email to: Charleston_Regulatory@fws.gov

Re: Technical Assistance for 'Env. Assessment for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC,' USFWS IPAC PROJECT CODE: 2025-0082526

The U.S. Department of Veterans Affairs (VA) is proposing a project to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort, Beaufort County, South Carolina. The purpose of the Proposed Action is to provide outpatient health care services to area Veterans. The Proposed Action is needed to address space gaps and operational inefficiencies at existing clinics within the VA Charleston Health Care System that were identified through the VA Strategic Capital Investment Planning process. By expanding its capacity, VA would be able to provide area Veterans with timely access to state-of-the-art health care and mental health services in a modern facility commensurate with current and projected demands.

VA is considering three possible alternative sites for the OPC. The site we are consulting on with you, which VA identifies as Alternative 1, is located at 708 Robert Smalls Parkway, Beaufort, Beaufort County, SC. The Alternative 1 site is approximately 28.3 acres, and consists of undeveloped, wooded land surrounded by residential development (Parcel IDs: R112-031-000-017C-0000 and R112-031-000-0017-0000).

Although a final design has not been selected, under the proposed action, the OPC is expected to be no more than three stories, with a building footprint between 48,000-66,000 square feet (SF). The OPC development would include parking lots with spaces for approximately 600 vehicles, a main entrance and a separate ambulatory entrance, and associated infrastructure and utility improvements. The limit of disturbance (LOD) for the proposed OPC development is approximately 15.6 acres for Alternative 1. The LOD would be cleared and graded for the new OPC development. A conceptual site development plan is included as Attachment 1.

In December 2024, VA's consultants completed a biological survey at the Alternative 1 site. The Alternative 1 site was determined to have habitat present for two (2) federally listed species: tricolored bat (*Perimyotis subflavus)* and pondberry (*Lindera melissifolia*). The Alternative 1 site also has potential habitat for three bird species, identified as birds of conservation concern (BCC), protected under the Migratory Bird Treaty Act (MBTA).

Because habitat for listed species would be removed, a 'may affect, not likely to adversely affect' biological conclusion was made for the tricolored bat and pondberry, and 'no effect' for the BCC birds. For the tricolored bat, this conclusion is based on the requirement that the private entity avoid tree removal during the tri-colored bat pup season (May 1st to July 15th) and the winter torpor (December 15th to February 15th). For the pondberry, the private entity would be required to conduct a pre-construction presence/absence survey during the optimal survey window for pondberry in February, March, September, or October. If present, the private entity would develop a mitigation plan for the loss of this species.

To avoid adverse impacts to the three BCC bird species with moderate potential to occur, the private entity would either avoid tree clearing during the breeding season of the American kestrel (April 1st to August 31st), prothonotary warbler (April 1st to July 31st), and red-headed woodpecker (May 1st to September 10th); or conduct a tree cavity search prior to clearing of trees.

For all other MBTA birds with moderate potential to occur, but with habitat unlikely to be suitable, the private entity would implement best management practices (BMPs) including avoidance of construction activities that could result in take during the nesting season (February-August), or if construction begins during the nesting season, then preconstruction clearance surveys for nesting birds would be performed to determine nesting bird presence and the need for non-disturbance buffers.

VA subsequently completed the IPaC determination key using an updated IPaC species list and also uploaded the December 2024 biological survey report. These documents are available to USFWS through the IPaC system and therefore are not attached to this letter. Through the IPaC system, VA received two technical assistance letters, which stated that further consultation with your office is necessary. Copies of the technical assistance letters are attached, as well as the conceptual site development plan for the Alternative 1 site. For awareness, VA has also consulted with the South Carolina Department of Natural Resources regarding state-listed species.

VA is requesting USFWS concurrence with our determination and requests that your office identify and describe any additional mitigation required to ensure no adverse impacts occur to these species during construction of the OPC at the Alternative 1 site. Should you have any questions about this project, you may contact me at (224) 628-1946 or at Jason.Sturm@va.gov.

Sincerely,

JASON STURM

Digitally signed by JASON STURM
Date: 2025.05.07 13:06:59 -06'00'

Jason Sturm

Office of Construction and Facilities Management
U.S. Department of Veterans Affairs

Attachment 1: Conceptual Site Development Plan
Attachment 2: USFWS IPaC Technical Assistance Letters for Project Code 2025-0082526, dated May 05, 2025

Attachment 1: Conceptual Site Development Plan

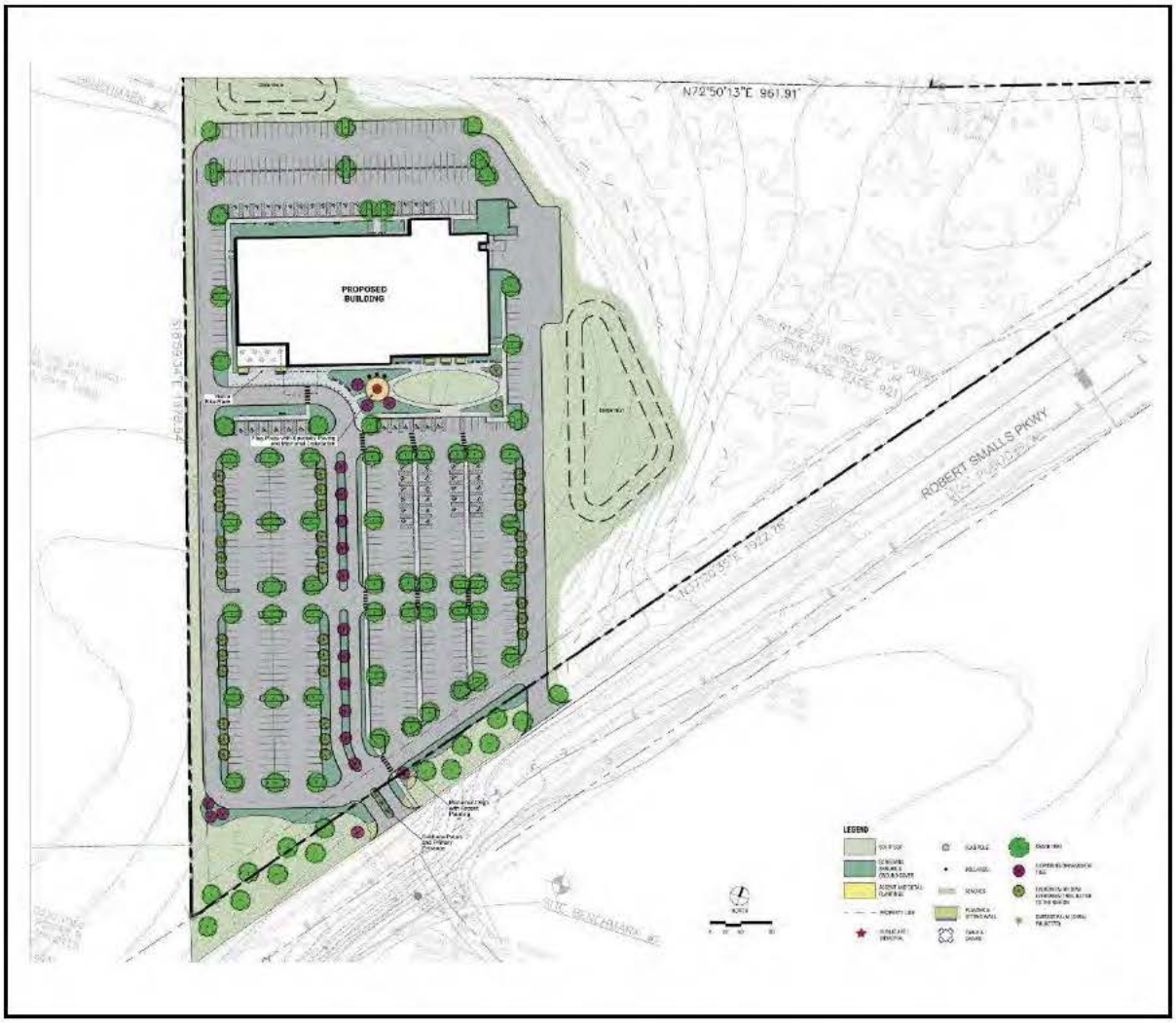

Figure 1. Conceptual Site Development Plan for Alternative 1

Attachment 2: USFWS IPaC Technical Assistance Letter for Project Code 2025-0082526, dated May 05, 2025

United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Carolina Ecological Services
176 Croghan Spur Road, Suite 200
Charleston, SC 29407-7558
Phone: (843) 727-4707 Fax: (843) 727-4218

In Reply Refer To: 05/05/2025 17:52:55 UTC
Project code: 2025-0082526
Project Name: EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC - 708 Robert Smalls

Federal Nexus: yes
Federal Action Agency (if applicable): Department of Veterans Affairs

Subject: Technical assistance for 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC - 708 Robert Smalls'

Dear Lauren Marshall:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on May 05, 2025, for 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC - 708 Robert Smalls' (here forward, Project). This project has been assigned Project Code 2025-0082526 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements are not complete.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project. **Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (Dkey), invalidates this letter.**

Determination for the Northern Long-Eared Bat and Tricolored Bat

Based on your IPaC submission and a standing analysis completed by the Service, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Tricolored Bat (*Perimyotis subflavus*)	Proposed Endangered	May affect

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- American Chaffseed *Schwalbea americana* Endangered
- Canby's Dropwort *Oxypolis canbyi* Endangered
- Eastern Black Rail *Laterallus jamaicensis ssp. jamaicensis* Threatened
- Green Sea Turtle *Chelonia mydas* Threatened
- Kemp's Ridley Sea Turtle *Lepidochelys kempii* Endangered
- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Piping Plover *Charadrius melodus* Threatened
- Pondberry *Lindera melissifolia* Endangered
- Red-cockaded Woodpecker *Dryobates borealis* Threatened
- Rufa Red Knot *Calidris canutus rufa* Threatened
- Wood Stork *Mycteria americana* Threatened

You may coordinate with our Office to determine whether the Action may cause prohibited take of the species listed above.

Conclusion

Consultation with the Service is not complete. Further consultation or coordination with the Service is necessary for those species or designated critical habitats with a determination of “May Affect.” A “May Affect” determination in this key indicates that the project, as entered, is not consistent with the questions in the key. Not all projects that reach a “May Affect” determination are anticipated to result in adverse impacts to listed species. These projects may result in a “No Effect”, “May Affect, Not Likely to Adversely Affect”, or “May Affect, Likely to Adversely Affect” determination depending on the details of the project. Please contact our South Carolina Ecological Services to discuss methods to avoid or minimize potential adverse effects to those species or designated critical habitats.

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate. Projects that receive a may affect determination for tricolored bat

through the key, should contact the appropriate Ecological Services Field Office if they want to conference on this species.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC - 708 Robert Smalls

2. Description

The following description was provided for the project 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC - 708 Robert Smalls':

> The U.S. Department of Veterans Affairs (VA) is proposing a project to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort, Beaufort County, South Carolina. The purpose of the Proposed Action is to provide health care services to area Veterans.
>
> The Alternative 1 site is approximately 28.3 acres and consists of undeveloped, wooded land in a residential area (Parcel IDs: R112-031-000-017C-0000 and R112-031-000-0017-0000).
>
> Although a final design has not been selected, under the proposed plan, the OPC is expected to be no more than three stories, with a building footprint of between 48,000-66,000 square feet (SF). The OPC development would include parking lots with spaces for approximately 600 vehicles, a main entrance and a separate ambulatory entrance, and associated infrastructure and utility improvements. Approximately 15.6 acres of the site would be developed.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@32.404948649999994,-80.75897553144773,14z

DETERMINATION KEY RESULT

Based on the answers provided, the proposed Action is consistent with a determination of “may affect” for a least one species covered by this determination key.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species?

   Note: Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

   No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   No

3. Does the action area intersect Zone 1 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   Yes

4. Your project overlaps with an area where northern long-eared bats or tricolored bats may be present and roosting in trees year-round.

   Do you understand that your project may impact bats roosting in trees at any time during the year?

   Yes

5. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

   Note: For federal actions, answer ‘yes’ if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

   No

6. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

   Yes

7. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

   No

8. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

   Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

   Yes

9. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

   No

10. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

    No

11. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered

    No

12. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

    No

13. Does the action area contain (1) talus or (2) anthropogenic or naturally formed rock shelters or crevices in rocky outcrops, rock faces or cliffs?

    No

14. Will the action cause effects to a bridge?

    Note: Covered bridges should be considered as bridges in this question.

    No

15. Will the action result in effects to a culvert or tunnel at any time of year?

    No

16. Are trees present within 1000 feet of the action area?

    Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines.

    Yes

17. Does the action include the intentional exclusion of bats from a building or structure?

    Note: Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats or tricolored bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local Ecological Services Field Office to help assess whether northern long-eared bats or tricolored bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures.

    No

18. Does the action involve removal, modification, or maintenance of a human-made structure (barn, house, or other building) **known or suspected to contain roosting bats?**

    No

19. Will the action cause construction of one or more new roads open to the public?

    For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

    No

20. Will the action include or cause any construction or other activity that is reasonably certain to increase average night-time traffic permanently or temporarily on one or more existing roads? **Note:** For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.). .

    No

21. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

    For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

    No

22. Will the proposed Action involve the creation of a new water-borne contaminant source (e.g., leachate pond, pits containing chemicals that are not NSF/ANSI 60 compliant)?

    Note: For information regarding NSF/ANSI 60 please visit https://www.nsf.org/knowledge-library/nsf-ansi-standard-60-drinking-water-treatment-chemicals-health-effects

    No

23. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

    No

24. Will the action include drilling or blasting?

    No

25. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use)?

    No

26. Will the proposed action involve the use of herbicides or other pesticides other than herbicides (e.g., fungicides, insecticides, or rodenticides)?

    No

27. Will the action include or cause activities that are reasonably certain to cause chronic or intense nighttime noise (above current levels of ambient noise in the area) in suitable summer habitat for the northern long-eared bat or tricolored bat during the active season?

    Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time. Sources of chronic or intense noise that could cause adverse effects to bats may include, but are not limited to: road traffic; trains; aircraft; industrial activities; gas compressor stations; loud music; crowds; oil and gas extraction; construction; and mining.

    Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines.

    No

28. Does the action include, or is it reasonably certain to cause, the use of permanent or temporary artificial lighting within 1000 feet of suitable northern long-eared bat or tricolored bat roosting habitat?

    Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines.

    Yes

29. Will the action cause an increase in the extent of suitable forested habitat exposed to artificial lighting?

    Yes

30. Will the action use only downward-facing, full cut-off lens lights (with same intensity or less for replacement lighting) when installing new or replacing existing permanent lights?

    Or for those transportation agencies using the Backlight, Uplight, Glare (BUG) system developed by the Illuminating Engineering Society, will all three ratings (backlight, uplight, and glare) be as close to zero as is possible, with a priority of "uplight" of 0?

    Yes

31. Will the action direct any temporary lighting away from suitable northern long-eared bat or tricolored bat roosting habitat when bats may be present?

    Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines.

    Yes

32. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

    Yes

33. Will the proposed action occur exclusively in an already established and currently maintained utility right-of-way?

    No

34. Does the action include emergency cutting or trimming of hazard trees in order to remove an imminent threat to human safety or property? See hazard tree note at the bottom of the key for text that will be added to response letters

    Note: A "hazard tree" is a tree that is an immediate threat to lives, public health and safety, or improved property.

    No

35. Does the project intersect with the 0- 9.9% forest density category?

    Automatically answered
    No

36. Does the project intersect with the 10.0- 19.9% forest density category map?

    Automatically answered
    Yes

37. Does the project intersect with the 20.0- 29.9% forest density category map?

    Automatically answered
    No

38. Does the project intersect with the 30.0- 100% forest density category map?

    Automatically answered
    Yes

39. Will the action cause trees to be cut, knocked down, or otherwise brought down across an area greater than 5 acres in total extent?

    Yes

40. Does the action area intersect the tricolored bat species list area?

    Automatically answered
    Yes

41. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

42. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

    Has a presence/probable absence survey for the tricolored bat following the Service's Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines been conducted within the project area? If unsure, answer "No."

    No

43. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

    Is suitable tricolored bat habitat present within 1000 feet of project activities? Note: If there are trees within the action area that may provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pines) answer "Yes." Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines.

    Yes

44. Do you have any documents that you want to include with this submission?

    Yes

    SUBMITTED DOCUMENTS

    - *SC_708RobertSmalls_VA ESA Biological Survey_2-25-2025.pdf https://ipac.ecosphere.fws.gov/project/2MMMKAAY6JA3DCKY4TZGELHU2Y/projectDocuments/161684829*

PROJECT QUESTIONNAIRE

Enter the extent of the action area (in acres) from which trees will be removed - round up to the nearest tenth of an acre. For this question, include the entire area where tree removal will take place, even if some live or dead trees will be left standing.

15.6

IPAC USER CONTACT INFORMATION

Agency: Department of Veterans Affairs
Name: Lauren Marshall
Address: 105 Central St
City: Stoneham
State: MA
Zip: 02180
Email marshall@mabbett.com
Phone: 7812756050

United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Carolina Ecological Services
176 Croghan Spur Road, Suite 200
Charleston, SC 29407-7558
Phone: (843) 727-4707 Fax: (843) 727-4218

In Reply Refer To: 05/05/2025 18:59:41 UTC
Project code: 2025-0082526
Project Name: EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC - 708 Robert Smalls

Subject: Consistency letter for 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC - 708 Robert Smalls' for specified federally threatened and endangered species and designated critical habitat that may occur in your proposed project area consistent with the South Carolina Ecological Services Field Office (ESFO) Determination Key (DKey) for project review and guidance for federally listed species.

Lauren Marshall:

The U.S. Fish and Wildlife Service (Service) received on **May 05, 2025** your effect determination(s) for the 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC - 708 Robert Smalls' (the Action) using the South Carolina ESFO DKey for project review and guidance for federally-listed species within the Information for Planning and Consultation (IPaC) application. The Service developed this application in accordance with the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

Based on your answers and the assistance of the Service's South Carolina ESFO DKey, you made the following effect determination(s) for the proposed Action:

Species	**Listing Status**	**Determination**
American Chaffseed (*Schwalbea americana*)	Endangered	No effect
Canby's Dropwort (*Oxypolis canbyi*)	Endangered	No effect
Eastern Black Rail (*Laterallus jamaicensis ssp. jamaicensis*)	Threatened	No effect
Green Sea Turtle (*Chelonia mydas*)	Threatened	No effect
Kemp's Ridley Sea Turtle (*Lepidochelys kempii*)	Endangered	No effect
Piping Plover (*Charadrius melodus*)	Threatened	NLAA
Pondberry (*Lindera melissifolia*)	Endangered	May affect
Red-cockaded Woodpecker (*Dryobates borealis*)	Threatened	No effect
Rufa Red Knot (*Calidris canutus rufa*)	Threatened	NLAA
Wood Stork (*Mycteria americana*)	Threatened	No effect

Consultation with the Service is not complete. Further consultation with the South Carolina ESFO is required for those species with a determination of "may affect" listed above. Please contact our office at Charleston_Regulatory@fws.gov to discuss methods to avoid or minimize potential adverse effects to those species

The following species and/or critical habitats may also occur in your project area and **are not** covered by this conclusion:

- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered

Please note the Service shares jurisdiction with the Fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries) over sea turtles. The Service exerts jurisdiction when sea turtles are nesting on coastal beaches while NOAA Fisheries has jurisdiction when sea turtles inhabit coastal and offshore waters.

In-water activities may require consultation with NOAA Fisheries. Please visit the NOAA Fisheries website at https://www.fisheries.noaa.gov/topic/endangered-species-conservation to review their consultation requirements. Also, NOAA Fisheries should be contacted if you think your project will affect Atlantic and/or shortnose sturgeon.

Please note that due to obligations under the ESA, potential impacts of this project must be reconsidered if: (1) new information reveals impacts of this identified action may affect any listed species or critical habitat in a manner not previously considered; (2) this action is subsequently modified in a manner which was not considered in this assessment; or (3) a new species is listed or critical habitat is designated that may be affected by the identified action. If any of the above conditions occurs, additional consultation with the South Carolina ESFO should take place before project changes are final or resources committed.

Bald and Golden Eagle Protection Act (BGEPA): Bald and golden eagles are not included in this section 7(a)(2) consultation and this information does not constitute a determination of effects by the Service. The Service developed the National Bald Eagle Management Guidelines to advise landowners, land managers, and others who share public and private lands with bald eagles when and under what circumstances the protective provisions of the BGEPA may apply to their activities. The guidelines should be consulted prior to conducting new or intermittent activity near an eagle nest.

If the Federal Action may impact bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act (BGEPA) (54 Stat. 250, as amended, 16 U.S.C. 668a-d) may be required. Please contact Ulgonda Kirkpatrick (phone: 321/972-9089, e-mail: ulgonda_kirkpatrick@fws.gov) with any questions regarding potential impacts to bald or golden eagles.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC - 708 Robert Smalls

2. Description

The following description was provided for the project 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC - 708 Robert Smalls':

> The U.S. Department of Veterans Affairs (VA) is proposing a project to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort, Beaufort County, South Carolina. The purpose of the Proposed Action is to provide health care services to area Veterans.
>
> The Alternative 1 site is approximately 28.3 acres and consists of undeveloped, wooded land in a residential area (Parcel IDs: R112-031-000-017C-0000 and R112-031-000-0017-0000).
>
> Although a final design has not been selected, under the proposed plan, the OPC is expected to be no more than three stories, with a building footprint of between 48,000-66,000 square feet (SF). The OPC development would include parking lots with spaces for approximately 600 vehicles, a main entrance and a separate ambulatory entrance, and associated infrastructure and utility improvements. Approximately 15.6 acres of the site would be developed.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@32.404948649999994,-80.75897553144773,14z

QUALIFICATION INTERVIEW

1. Does the proposed project involve research or other actions that include the collection, capture, handling, or harassment of any individual federally listed threatened, endangered or proposed species?

   No

2. Is the action authorized, funded, or being carried out by a Federal agency?

   Yes

3. Are you the Federal agency or designated non-federal representative?

   Yes

4. Is the project an existing structure that requires maintenance, repair, or replacement?

   No

5. Does the project intersect the piping plover AOI?

   Automatically answered
   Yes

6. Will the proposed action impact docks, piers, and/or bulkheads?

   No

7. Will the project affect shorebird resting/foraging behavior, foraging habitat (i.e.,), AND/ OR roosting habitat?

   No

8. Does the project intersect the red knot AOI?

   Automatically answered
   Yes

9. Does the project intersect the red-cockaded woodpecker AOI?

   Automatically answered
   Yes

10. Is the action area located within suitable Red-cockaded woodpecker foraging habitat (pine or pine/hardwood stands in which 50% or more of the dominant trees are pines and the dominant pine trees are 30 years of age or older or >10-inches diameter breast height (dbh) and the midstory height does not exceed 12 feet)?

    No

11. Does the project intersect the wood stork AOI?

    Automatically answered
    Yes

12. [Semantic] Does the proposed action action intersect the 2,500-foot buffer zone of a known colony?

    Automatically answered
    No

13. Is there suitable wood stork foraging habitat (SFH) within the project area?

    Note: SFH contains patches of relatively open (< 25%) aquatic vegetation, calm water, and a permanent or seasonal water depth between 2 and 15 inches. Examples of SFH include, but are not limited to, freshwater marshes, seasonally flooded roadside or agricultural ditches, narrow tidal creeks or shallow tidal pools, managed impoundments, and depressions in cypress heads and swamp sloughs.

    No

14. Is the action area on a sandy beach above the mean high-water line?

    No

15. Does the project intersect the Kemp's Ridley sea turtle AOI?

    Automatically answered
    Yes

16. Does the project intersect the green sea turtle AOI?

    Automatically answered
    Yes

17. Does the project intersect the pondberry AOI?

    Automatically answered
    Yes

18. Is there suitable pondberry habitat (e.g., pond margins, swampy depressions, sandy sinks, and seasonally flooded wetlands) for pondberry located within the project area?

    Yes

19. Will the project impact suitable pondberry habitat?

    Yes

20. Was the action area surveyed for the presence of pondberry using recommended survey guidance?

    Note: Survey Guidance – Surveys should be conducted by qualified biologists who are able to distinguish Pondberry from similar species, such as spicebush (Lindera benzoin), sassafras (Sassafras albidum), persimmon (Diospyros virginiana), and Styrax spp. It is best to conduct surveys for this species during the flowering season, when the species is highly visible (February and April); however, surveys are still possible later in the season following leaf-out and into the fruiting season (late summer—fall). Since Pondberry is a deciduous shrub, it is necessary that a nearby known site be visited prior to initiating any surveys to confirm adequate visibility of the species for a determination of its presence or absence at a project site.

    No

21. Does the project intersect the American chaffseed AOI?

    Automatically answered
    Yes

22. Is there suitable habitat for American chaffseed located within the project area?

    Note: American Chaffseed occurs in sandy (sandy peat, sandy loam), acidic, seasonally moist to dry soils. It is generally found in early successional habitats described as open, moist pine flatwoods, fire-maintained savannas, ecotonal areas between peaty wetlands and xeric (dry) sandy soils, bog borders, and other open grass-sedge systems. American Chaffseed is dependent on factors such as fire and mowing to maintain the open to partly open conditions that it requires. They can be found in habitat that is managed for the red-cockaded woodpecker. The species appears to be shade intolerant. American Chaffseed occurs in species-rich plant communities where grasses, sedges, and savanna dicots are numerous. For more information see: American Chaffseed (Schwalbea americana) Recovery Plan. ECOS: https://ecos.fws.gov/docs/recovery_plan/950929c.pdf

    No

23. Does the project intersect the Canby's dropwort AOI?

    Automatically answered

    Yes

24. Is there suitable habitat for Canby's dropwort located within the project area?

    Note: Canby’s Dropwort can be found in a variety of coastal plain habitats, including natural ponds dominated by pond cypress, grass-sedge-dominated Carolina bays, wet pine savannas, shallow pineland ponds and cypress-pine swamps or sloughs. The largest and most vigorous populations have been found in open bays or ponds that are wet throughout most of the year, but which have little or no canopy cover. Soils are sandy loams or acidic peat mucks underlain by clay layers which, along with the slight gradient of the areas, result in the retention of water.

    No

25. Does the project intersect the eastern black rail AOI?

    Automatically answered

    Yes

26. Will the project impact suitable habitat for the eastern black rail?

    Note: suitable eastern black rail habitat consists of consistently shallow (moist soil to 1-3cm deep pools) wetlands with dense emergent herbaceous plant cover, hydric soil, and/or wetland upland transition zones with dense herbaceous plant cover adjacent to these wetlands. Go here for more information on eastern black rail habitat.

    No

27. This determination key does not cover the Northern long-eared bat. Have you or will you complete the Determination Key for the Northern long-eared bat?

    Yes

IPAC USER CONTACT INFORMATION

Agency: Department of Veterans Affairs
Name: Lauren Marshall
Address: 105 Central St
City: Stoneham
State: MA
Zip: 02180
Email marshall@mabbett.com
Phone: 7812756050

U.S. Department of Veterans Affairs

Office of Construction & Facilities Management
425 I Street, NW, Ste. 2E.250
Washington DC 20420
www.cfm.va.gov

07 May 2025

Melanie Olds
Fish and Wildlife Biologist, Ecological Services
U.S. Fish and Wildlife Service, South Carolina Ecological Services Field Office
Charleston, South Carolina 29407

Via email to: Charleston_Regulatory@fws.gov

Re: Technical Assistance for 'Env. Assessment for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC,' USFWS IPAC PROJECT CODE: 2025-0082745

The U.S. Department of Veterans Affairs (VA) is proposing a project to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort, Beaufort County, South Carolina. The purpose of the Proposed Action is to provide outpatient health care services to area Veterans. The Proposed Action is needed to address space gaps and operational inefficiencies at existing clinics within the VA Charleston Health Care System that were identified through the VA Strategic Capital Investment Planning process. By expanding its capacity, VA would be able to provide area Veterans with timely access to state-of-the-art health care and mental health services in a modern facility commensurate with current and projected demands.

VA is considering three possible alternative sites for the OPC. The site we are consulting on with you, which VA identifies as Alternative 2, is located at the intersection of Robert Smalls Parkway and Goethe Hill Road in Beaufort, Beaufort County, SC. The Alternative 2 site is approximately 16.5 acres, and consists of undeveloped, wooded land surrounded by residential development (Parcel ID: R120-028-000-0138-0000).

Although a final design has not been selected, under the proposed action, the OPC is expected to be no more than three stories, with a building footprint between 48,000-66,000 square feet (SF). The OPC development would include parking lots with spaces for approximately 600 vehicles, a main entrance and a separate ambulatory entrance, and associated infrastructure and utility improvements. The limit of disturbance (LOD) for the proposed OPC development is approximately 15.3 acres for Alternative 2. The LOD would be cleared and graded for the new OPC development. A conceptual site development plan is included as Attachment 1.

In December 2024, VA's consultants completed a biological survey at the Alternative 2 site. The Alternative 2 site was determined to have habitat present for two (2) federally listed species: tricolored bat (*Perimyotis subflavus)* and pondberry (*Lindera melissifolia*). The Alternative 2 site also has potential habitat for two bird species, identified as birds of conservation concern (BCC), protected under the Migratory Bird Treaty Act (MBTA).

Because habitat for listed species would be removed, a 'may affect, not likely to adversely affect' biological conclusion was made for the tricolored bat and pondberry, and 'no effect' for the BCC birds. For the tricolored bat, this conclusion is based on the requirement that the private entity avoid tree removal during the tri-colored bat pup season (May 1st to July 15th) and the winter torpor (December 15th to February 15th). For the pondberry, the private entity would be required to conduct a pre-construction presence/absence survey during the optimal survey window for pondberry in February, March, September, or October. If present, the private entity would develop a mitigation plan for the loss of this species.

To avoid adverse impacts to the two BCC bird species with moderate potential to occur, the private entity would either avoid tree clearing during the breeding season of the American kestrel (April 1st to August 31st) and red-headed woodpecker (May 1st to September 10th); or conduct a tree cavity search prior to clearing of trees.

For all other MBTA birds with moderate potential to occur, but with habitat unlikely to be suitable, the private entity would implement best management practices (BMPs) including avoidance of construction activities that could result in take during the nesting season (February-August), or if construction begins during the nesting season, then preconstruction clearance surveys for nesting birds would be performed to determine nesting bird presence and the need for non-disturbance buffers.

VA subsequently completed the IPaC determination key using an updated IPaC species list and also uploaded the December 2024 biological survey report. These documents are available to USFWS through the IPaC system and therefore are not attached to this letter. Through the IPaC system, VA received two technical assistance letters, which stated that further consultation with your office is necessary. Copies of the technical assistance letters are attached, as well as the conceptual site development plan for the Alternative 2 site. For awareness, VA has also consulted with the South Carolina Department of Natural Resources regarding state-listed species.

VA is requesting USFWS concurrence with our determination and requests that your office identify and describe any additional mitigation required to ensure no adverse impacts occur to these species during construction of the OPC at the Alternative 2 site. Should you have any questions about this project, you may contact me at (224) 628-1946 or at Jason.Sturm@va.gov.

Sincerely,

JASON STURM

Digitally signed by JASON STURM
Date: 2025.05.07 13:41:03 -06'00'

Jason Sturm

Office of Construction and Facilities Management
U.S. Department of Veterans Affairs

Attachment 1: Conceptual Site Development Plan
Attachment 2: USFWS IPaC Technical Assistance Letters for Project Code 2025-0082745, dated May 05, 2025

Attachment 1: Conceptual Site Development Plan

Figure 1. Conceptual Site Development Plan for Alternative 2

Attachment 2: USFWS IPaC Technical Assistance Letters for Project Code 2025-0082745, dated May 05, 2025

United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Carolina Ecological Services
176 Croghan Spur Road, Suite 200
Charleston, SC 29407-7558
Phone: (843) 727-4707 Fax: (843) 727-4218

In Reply Refer To: 05/05/2025 20:08:13 UTC
Project code: 2025-0082745
Project Name: EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC-Robert Smalls&Goethe

Federal Nexus: yes
Federal Action Agency (if applicable): Department of Veterans Affairs

Subject: Technical assistance for 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC-Robert Smalls&Goethe'

Dear Lauren Marshall:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on May 05, 2025, for 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC-Robert Smalls&Goethe' (here forward, Project). This project has been assigned Project Code 2025-0082745 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements are not complete.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project. **Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (Dkey), invalidates this letter.**

Determination for the Northern Long-Eared Bat and Tricolored Bat

Based on your IPaC submission and a standing analysis completed by the Service, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination

Tricolored Bat (*Perimyotis subflavus*)	Proposed Endangered	May affect

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- American Chaffseed *Schwalbea americana* Endangered
- Canby's Dropwort *Oxypolis canbyi* Endangered
- Eastern Black Rail *Laterallus jamaicensis ssp. jamaicensis* Threatened
- Green Sea Turtle *Chelonia mydas* Threatened
- Kemp's Ridley Sea Turtle *Lepidochelys kempii* Endangered
- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Piping Plover *Charadrius melodus* Threatened
- Pondberry *Lindera melissifolia* Endangered
- Red-cockaded Woodpecker *Dryobates borealis* Threatened
- Rufa Red Knot *Calidris canutus rufa* Threatened
- Wood Stork *Mycteria americana* Threatened

You may coordinate with our Office to determine whether the Action may cause prohibited take of the species listed above.

Conclusion

Consultation with the Service is not complete. Further consultation or coordination with the Service is necessary for those species or designated critical habitats with a determination of “May Affect.” A “May Affect” determination in this key indicates that the project, as entered, is not consistent with the questions in the key. Not all projects that reach a “May Affect” determination are anticipated to result in adverse impacts to listed species. These projects may result in a “No Effect”, “May Affect, Not Likely to Adversely Affect”, or “May Affect, Likely to Adversely Affect” determination depending on the details of the project. Please contact our South Carolina Ecological Services to discuss methods to avoid or minimize potential adverse effects to those species or designated critical habitats.

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored

bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate. Projects that receive a may affect determination for tricolored bat through the key, should contact the appropriate Ecological Services Field Office if they want to conference on this species.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC-Robert Smalls&Goethe

2. Description

The following description was provided for the project 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC-Robert Smalls&Goethe':

> The U.S. Department of Veterans Affairs (VA) is proposing a project to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort, Beaufort County, South Carolina. The purpose of the Proposed Action is to provide health care services to area Veterans.
>
> The Alternative 2 site is located at the intersection of Robert Smalls Parkway and Goethe Hill Road (Parcel ID: R120-028-000-0138-0000), is approximately 16.5 acres, and consists of undeveloped, wooded land surrounded by residential development.
>
> Although a final design has not been selected, under the proposed action, the OPC is expected to be no more than three stories, with a building footprint between 48,000-66,000 square feet (SF). The OPC development would include parking lots with spaces for approximately 600 vehicles, a main entrance and a separate ambulatory entrance, and associated infrastructure and utility improvements.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@32.418579199999996,-80.74527328995188,14z

DETERMINATION KEY RESULT

Based on the answers provided, the proposed Action is consistent with a determination of “may affect” for a least one species covered by this determination key.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species?

   Note: Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

   No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   No

3. Does the action area intersect Zone 1 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   Yes

4. Your project overlaps with an area where northern long-eared bats or tricolored bats may be present and roosting in trees year-round.

   Do you understand that your project may impact bats roosting in trees at any time during the year?

   Yes

5. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

   Note: For federal actions, answer ‘yes’ if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

   No

6. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

   Yes

7. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

   No

8. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

   Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

   Yes

9. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

   No

10. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

    No

11. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered

    No

12. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

    No

13. Does the action area contain (1) talus or (2) anthropogenic or naturally formed rock shelters or crevices in rocky outcrops, rock faces or cliffs?

    No

14. Will the action cause effects to a bridge?

    Note: Covered bridges should be considered as bridges in this question.

    No

15. Will the action result in effects to a culvert or tunnel at any time of year?

    No

16. Are trees present within 1000 feet of the action area?

    Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines.

    Yes

17. Does the action include the intentional exclusion of bats from a building or structure?

    Note: Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats or tricolored bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local Ecological Services Field Office to help assess whether northern long-eared bats or tricolored bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures.

    No

18. Does the action involve removal, modification, or maintenance of a human-made structure (barn, house, or other building) **known or suspected to contain roosting bats?**

    No

19. Will the action cause construction of one or more new roads open to the public?

    For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

    Yes

20. Will any new road go through any area of contiguous forest that is greater than or equal to 10 acres in total extent?

    Note: "Contiguous forest" of 10 acres or more may includes areas where multiple forest patches are separated by less than 1,000 feet of non-forest if the forested patches, added together, comprise at least 10 acres.

    No

21. Will any new road pass between two patches of contiguous forest that are each greater than or equal to 10 acres in extent and are separated by less than 1,000 feet? Bats may cross a road by flying between forest patches that are up to 1,000 feet apart.

    Note: "Contiguous forest" of 10 acres or more may includes areas where multiple forest patches are separated by less than 1,000 feet of non-forested area if the forested patches, added together, comprise at least 10 acres.

    No

22. Will the action include or cause any construction or other activity that is reasonably certain to increase average night-time traffic permanently or temporarily on one or more existing roads? **Note:** For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.). .

    No

23. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

    For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

    Yes

24. Will the new travel lanes lie between any two patches of contiguous forest that are each greater than or equal to 10 acres in extent and separated by less than 1,000 feet? Bats may cross a road by flying between forest patches that are up to 1,000 feet apart.

    Note: "Contiguous forest" of 10 acres or more may includes areas where multiple forest patches are separated by less than 1,000 feet of non-forested area if the forested patches, added together, comprise at least 10 acres.

    No

25. Will the proposed Action involve the creation of a new water-borne contaminant source (e.g., leachate pond, pits containing chemicals that are not NSF/ANSI 60 compliant)?

    Note: For information regarding NSF/ANSI 60 please visit https://www.nsf.org/knowledge-library/nsf-ansi-standard-60-drinking-water-treatment-chemicals-health-effects

    No

26. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

    No

27. Will the action include drilling or blasting?

    No

28. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use)?

    No

29. Will the proposed action involve the use of herbicides or other pesticides other than herbicides (e.g., fungicides, insecticides, or rodenticides)?

    No

30. Will the action include or cause activities that are reasonably certain to cause chronic or intense nighttime noise (above current levels of ambient noise in the area) in suitable summer habitat for the northern long-eared bat or tricolored bat during the active season?

    Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time. Sources of chronic or intense noise that could cause adverse effects to bats may include, but are not limited to: road traffic; trains; aircraft; industrial activities; gas compressor stations; loud music; crowds; oil and gas extraction; construction; and mining.

    Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines.

    No

31. Does the action include, or is it reasonably certain to cause, the use of permanent or temporary artificial lighting within 1000 feet of suitable northern long-eared bat or tricolored bat roosting habitat?

    Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines.

    Yes

32. Will the action cause an increase in the extent of suitable forested habitat exposed to artificial lighting?

    Yes

33. Will the action use only downward-facing, full cut-off lens lights (with same intensity or less for replacement lighting) when installing new or replacing existing permanent lights?

    Or for those transportation agencies using the Backlight, Uplight, Glare (BUG) system developed by the Illuminating Engineering Society, will all three ratings (backlight, uplight, and glare) be as close to zero as is possible, with a priority of "uplight" of 0?

    Yes

34. Will the action direct any temporary lighting away from suitable northern long-eared bat or tricolored bat roosting habitat when bats may be present?

    Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines.

    Yes

35. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

    Yes

36. Will the proposed action occur exclusively in an already established and currently maintained utility right-of-way?

    No

37. Does the action include emergency cutting or trimming of hazard trees in order to remove an imminent threat to human safety or property? See hazard tree note at the bottom of the key for text that will be added to response letters

    Note: A "hazard tree" is a tree that is an immediate threat to lives, public health and safety, or improved property.

    No

38. Does the project intersect with the 0- 9.9% forest density category?

    Automatically answered
    No

39. Does the project intersect with the 10.0- 19.9% forest density category map?

    Automatically answered
    No

40. Does the project intersect with the 20.0- 29.9% forest density category map?

    Automatically answered
    No

41. Does the project intersect with the 30.0- 100% forest density category map?

    Automatically answered
    Yes

42. Will the action cause trees to be cut, knocked down, or otherwise brought down across an area greater than 100 acres in total extent?

    No

43. Will the proposed action result in the use of prescribed fire?

    Note: If the prescribed fire action includes other activities than application of fire (e.g., tree cutting, fire line preparation) please consider impacts from those activities within the previous representative questions in the key. This set of questions only considers impacts from flame and smoke.

    No

44. Does the action area intersect the tricolored bat species list area?

    Automatically answered
    Yes

45. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

46. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

    Has a presence/probable absence survey for the tricolored bat following the Service's Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines been conducted within the project area? If unsure, answer "No."

    No

47. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

    Is suitable tricolored bat habitat present within 1000 feet of project activities? Note: If there are trees within the action area that may provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pines) answer "Yes." Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines.

    Yes

48. Do you have any documents that you want to include with this submission?

    Yes

    SUBMITTED DOCUMENTS

    - *SC_RobertSmalls_Goethe_VA ESA Biological Survey_2-25-25.pdf https://ipac.ecosphere.fws.gov/project/LIE2OA7VEVGFBEHDUYYEGXGKII/projectDocuments/161696141*

PROJECT QUESTIONNAIRE

Enter the extent of the action area (in acres) from which trees will be removed - round up to the nearest tenth of an acre. For this question, include the entire area where tree removal will take place, even if some live or dead trees will be left standing.

15.6

IPAC USER CONTACT INFORMATION

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Name: Lauren Marshall
Address: 105 Central St
City: Stoneham
State: MA
Zip: 02180
Email marshall@mabbett.com
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United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Carolina Ecological Services
176 Croghan Spur Road, Suite 200
Charleston, SC 29407-7558
Phone: (843) 727-4707 Fax: (843) 727-4218

In Reply Refer To: 05/05/2025 20:20:11 UTC
Project code: 2025-0082745
Project Name: EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC-Robert Smalls&Goethe

Subject: Consistency letter for 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC-Robert Smalls&Goethe' for specified federally threatened and endangered species and designated critical habitat that may occur in your proposed project area consistent with the South Carolina Ecological Services Field Office (ESFO) Determination Key (DKey) for project review and guidance for federally listed species.

Lauren Marshall:

The U.S. Fish and Wildlife Service (Service) received on **May 05, 2025** your effect determination(s) for the 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC-Robert Smalls&Goethe' (the Action) using the South Carolina ESFO DKey for project review and guidance for federally-listed species within the Information for Planning and Consultation (IPaC) application. The Service developed this application in accordance with the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

Based on your answers and the assistance of the Service's South Carolina ESFO DKey, you made the following effect determination(s) for the proposed Action:

Species	**Listing Status**	**Determination**
American Chaffseed (*Schwalbea americana*)	Endangered	No effect
Canby's Dropwort (*Oxypolis canbyi*)	Endangered	No effect
Eastern Black Rail (*Laterallus jamaicensis ssp. jamaicensis*)	Threatened	No effect
Green Sea Turtle (*Chelonia mydas*)	Threatened	No effect
Kemp's Ridley Sea Turtle (*Lepidochelys kempii*)	Endangered	No effect
Piping Plover (*Charadrius melodus*)	Threatened	NLAA
Pondberry (*Lindera melissifolia*)	Endangered	May affect
Red-cockaded Woodpecker (*Dryobates borealis*)	Threatened	No effect
Rufa Red Knot (*Calidris canutus rufa*)	Threatened	NLAA
Wood Stork (*Mycteria americana*)	Threatened	No effect

Consultation with the Service is not complete. Further consultation with the South Carolina ESFO is required for those species with a determination of "may affect" listed above. Please contact our office at Charleston_Regulatory@fws.gov to discuss methods to avoid or minimize potential adverse effects to those species

The following species and/or critical habitats may also occur in your project area and **are not** covered by this conclusion:

- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered

Please note the Service shares jurisdiction with the Fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries) over sea turtles. The Service exerts jurisdiction when sea turtles are nesting on coastal beaches while NOAA Fisheries has jurisdiction when sea turtles inhabit coastal and offshore waters.

In-water activities may require consultation with NOAA Fisheries. Please visit the NOAA Fisheries website at https://www.fisheries.noaa.gov/topic/endangered-species-conservation to review their consultation requirements. Also, NOAA Fisheries should be contacted if you think your project will affect Atlantic and/or shortnose sturgeon.

Please note that due to obligations under the ESA, potential impacts of this project must be reconsidered if: (1) new information reveals impacts of this identified action may affect any listed species or critical habitat in a manner not previously considered; (2) this action is subsequently modified in a manner which was not considered in this assessment; or (3) a new species is listed or critical habitat is designated that may be affected by the identified action. If any of the above conditions occurs, additional consultation with the South Carolina ESFO should take place before project changes are final or resources committed.

Bald and Golden Eagle Protection Act (BGEPA): Bald and golden eagles are not included in this section 7(a)(2) consultation and this information does not constitute a determination of effects by the Service. The Service developed the National Bald Eagle Management Guidelines to advise landowners, land managers, and others who share public and private lands with bald eagles when and under what circumstances the protective provisions of the BGEPA may apply to their activities. The guidelines should be consulted prior to conducting new or intermittent activity near an eagle nest.

If the Federal Action may impact bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act (BGEPA) (54 Stat. 250, as amended, 16 U.S.C. 668a-d) may be required. Please contact Ulgonda Kirkpatrick (phone: 321/972-9089, e-mail: ulgonda_kirkpatrick@fws.gov) with any questions regarding potential impacts to bald or golden eagles.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC-Robert Smalls&Goethe

2. Description

The following description was provided for the project 'EA for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC-Robert Smalls&Goethe':

> The U.S. Department of Veterans Affairs (VA) is proposing a project to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort, Beaufort County, South Carolina. The purpose of the Proposed Action is to provide health care services to area Veterans.
>
> The Alternative 2 site is located at the intersection of Robert Smalls Parkway and Goethe Hill Road (Parcel ID: R120-028-000-0138-0000), is approximately 16.5 acres, and consists of undeveloped, wooded land surrounded by residential development.
>
> Although a final design has not been selected, under the proposed action, the OPC is expected to be no more than three stories, with a building footprint between 48,000-66,000 square feet (SF). The OPC development would include parking lots with spaces for approximately 600 vehicles, a main entrance and a separate ambulatory entrance, and associated infrastructure and utility improvements.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@32.418579199999996,-80.74527328995188,14z

QUALIFICATION INTERVIEW

1. Does the proposed project involve research or other actions that include the collection, capture, handling, or harassment of any individual federally listed threatened, endangered or proposed species?

   No

2. Is the action authorized, funded, or being carried out by a Federal agency?

   Yes

3. Are you the Federal agency or designated non-federal representative?

   Yes

4. Is the project an existing structure that requires maintenance, repair, or replacement?

   No

5. Does the project intersect the piping plover AOI?

   Automatically answered
   Yes

6. Will the proposed action impact docks, piers, and/or bulkheads?

   No

7. Will the project affect shorebird resting/foraging behavior, foraging habitat (i.e.,), AND/ OR roosting habitat?

   No

8. Does the project intersect the red knot AOI?

   Automatically answered
   Yes

9. Does the project intersect the red-cockaded woodpecker AOI?

   Automatically answered
   Yes

10. Is the action area located within suitable Red-cockaded woodpecker foraging habitat (pine or pine/hardwood stands in which 50% or more of the dominant trees are pines and the dominant pine trees are 30 years of age or older or >10-inches diameter breast height (dbh) and the midstory height does not exceed 12 feet)?

    No

11. Does the project intersect the wood stork AOI?

    Automatically answered
    Yes

12. [Semantic] Does the proposed action action intersect the 2,500-foot buffer zone of a known colony?

    Automatically answered
    No

13. Is there suitable wood stork foraging habitat (SFH) within the project area?

    Note: SFH contains patches of relatively open (< 25%) aquatic vegetation, calm water, and a permanent or seasonal water depth between 2 and 15 inches. Examples of SFH include, but are not limited to, freshwater marshes, seasonally flooded roadside or agricultural ditches, narrow tidal creeks or shallow tidal pools, managed impoundments, and depressions in cypress heads and swamp sloughs.

    No

14. Is the action area on a sandy beach above the mean high-water line?

    No

15. Does the project intersect the Kemp's Ridley sea turtle AOI?

    Automatically answered
    Yes

16. Does the project intersect the green sea turtle AOI?

    Automatically answered
    Yes

17. Does the project intersect the pondberry AOI?

    Automatically answered
    Yes

18. Is there suitable pondberry habitat (e.g., pond margins, swampy depressions, sandy sinks, and seasonally flooded wetlands) for pondberry located within the project area?

    Yes

19. Will the project impact suitable pondberry habitat?

    Yes

20. Was the action area surveyed for the presence of pondberry using recommended survey guidance?

    Note: Survey Guidance – Surveys should be conducted by qualified biologists who are able to distinguish Pondberry from similar species, such as spicebush (Lindera benzoin), sassafras (Sassafras albidum), persimmon (Diospyros virginiana), and Styrax spp. It is best to conduct surveys for this species during the flowering season, when the species is highly visible (February and April); however, surveys are still possible later in the season following leaf-out and into the fruiting season (late summer—fall). Since Pondberry is a deciduous shrub, it is necessary that a nearby known site be visited prior to initiating any surveys to confirm adequate visibility of the species for a determination of its presence or absence at a project site.

    No

21. Does the project intersect the American chaffseed AOI?

    Automatically answered
    Yes

22. Is there suitable habitat for American chaffseed located within the project area?

    Note: American Chaffseed occurs in sandy (sandy peat, sandy loam), acidic, seasonally moist to dry soils. It is generally found in early successional habitats described as open, moist pine flatwoods, fire-maintained savannas, ecotonal areas between peaty wetlands and xeric (dry) sandy soils, bog borders, and other open grass-sedge systems. American Chaffseed is dependent on factors such as fire and mowing to maintain the open to partly open conditions that it requires. They can be found in habitat that is managed for the red-cockaded woodpecker. The species appears to be shade intolerant. American Chaffseed occurs in species-rich plant communities where grasses, sedges, and savanna dicots are numerous. For more information see: American Chaffseed (Schwalbea americana) Recovery Plan. ECOS: https://ecos.fws.gov/docs/recovery_plan/950929c.pdf

    No

23. Does the project intersect the Canby's dropwort AOI?

    Automatically answered
    Yes

24. Is there suitable habitat for Canby's dropwort located within the project area?

    Note: Canby’s Dropwort can be found in a variety of coastal plain habitats, including natural ponds dominated by pond cypress, grass-sedge-dominated Carolina bays, wet pine savannas, shallow pineland ponds and cypress-pine swamps or sloughs. The largest and most vigorous populations have been found in open bays or ponds that are wet throughout most of the year, but which have little or no canopy cover. Soils are sandy loams or acidic peat mucks underlain by clay layers which, along with the slight gradient of the areas, result in the retention of water.

    No

25. Does the project intersect the eastern black rail AOI?

    Automatically answered
    Yes

26. Will the project impact suitable habitat for the eastern black rail?

    Note: suitable eastern black rail habitat consists of consistently shallow (moist soil to 1-3cm deep pools) wetlands with dense emergent herbaceous plant cover, hydric soil, and/or wetland upland transition zones with dense herbaceous plant cover adjacent to these wetlands. Go here for more information on eastern black rail habitat.

    No

27. This determination key does not cover the Northern long-eared bat. Have you or will you complete the Determination Key for the Northern long-eared bat?

    No

IPAC USER CONTACT INFORMATION

Agency: Department of Veterans Affairs
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U.S. Department of Veterans Affairs

Office of Construction & Facilities Management
425 I Street, NW, Ste. 2E.250
Washington DC 20420
www.cfm.va.gov

07 May 2025

Emily Cope
Deputy Director
South Carolina Department of Natural Resources
Columbia, South Carolina 29201

Via email to: speciesreview@dnr.sc.gov

Re: Technical Assistance for 'Env. Assessment for Proposed Construction & Operation of an Outpatient Clinic, Beaufort, SC,'

The U.S. Department of Veterans Affairs (VA) is proposing a project to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort, Beaufort County, South Carolina. The purpose of the Proposed Action is to provide outpatient health care services to area Veterans. The Proposed Action is needed to address space gaps and operational inefficiencies at existing clinics within the VA Charleston Health Care System that were identified through the VA Strategic Capital Investment Planning process. By expanding its capacity, VA would be able to provide area Veterans with timely access to state-of-the-art health care and mental health services in a modern facility commensurate with current and projected demands.

VA is considering three possible sites for the OPC. The sites we are consulting on with you, which VA identifies as Alternatives 1 and 2, are located at 708 Robert Smalls Parkway and Robert Smalls and Goethe Hill Road, Beaufort, Beaufort County, SC. The Alternative 1 site is located at 708 Robert Smalls Parkway, is approximately 28.3 acres, and consists of undeveloped, wooded land in a residential area (Parcel IDs: R112-031-000-017C-0000 and R112-031-000-0017-0000). The Alternative 2 site is approximately 16.5 acres and consists of undeveloped, wooded land in a residential area at the intersection of Robert Smalls Parkway and Goethe Hill Road (Parcel ID: R120-028-000-0138-0000).

Although a final design has not been selected, under the proposed action, the selected site would be cleared and graded for the new OPC development. The OPC is expected to be no more than three stories, with a building footprint of between 48,000-66,000 square feet (SF). The OPC development would include parking lots with spaces for approximately 600 vehicles, a main entrance and a separate ambulatory entrance, and associated infrastructure and utility improvements. The limit of disturbance (LOD) for the proposed OPC development is approximately 15.6 acres for Alternative 1 and 15.3 acres for Alternative 2. The LOD would be cleared and graded for the new OPC development. The conceptual site development plans are included in Attachment 2.

In December 2024, VA's consultants completed a biological survey at the proposed Alternative 1 and 2 sites. The Alternative 1 and Alternative 2 sites were determined to have suitable habitat present for three (3) state listed species: spotted turtle *(Clemmys guttata)*, broad striped dwarf siren *(Pseudobranchus striatus)*, and rafinesque's big-eared bat (*Corynorhinus rafinesquii*). Because most of the site would be redeveloped, a 'may affect' biological conclusion was made for the above listed species. For rafinesque's big-eared bat, the SCDNR NHD report recommends that where suitable habitat exists, assume presence of the species and avoid tree clearing from May 1st to July 31st to minimize disturbance and destruction of habitat that may be used by females during gestation or maternal care for pups. For the spotted turtle, tree clearing should only occur August to December to prevent impacts to spotted turtles during reproduction. Suitable habitat also exists for the broad striped dwarf siren, but there are no requirements or recommended best management practices listed in the SCDNR NHD report.

Attached is supporting documentation from the December 2024 biological survey reports and the conceptual site development plans. VA is requesting concurrence with our determination and requests that your office identify and describe any additional mitigation required to ensure no adverse impacts occur to these species during construction of the OPC. Should you have any questions about this project, you may contact me at (224) 628-1946 or at Jason.Sturm@va.gov.

Sincerely,

JASON STURM
Digitally signed by JASON STURM
Date: 2025.05.07 13:55:12 -06'00'

Jason Sturm

Office of Construction and Facilities Management
U.S. Department of Veterans Affairs

Attachments: 1. December 2024 Biological Habitat Assessment Survey Reports
2. Conceptual Site Development Plans

Attachment 1. December 2024 Biological Habitat Assessment Survey Reports

AECOM

BIOLOGICAL HABITAT ASSESSMENT, CLIN 030 – 708 Robert Smalls Parkway

Environmental Resource Report for an Outpatient Clinic in Beaufort, South Carolina

Project number: 60739566

February 2025

Delivering a better world

Quality information

Prepared by	Checked by	Verified by	Approved by
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Revision History

Revision	Revision date	Details	Authorized	Name	Position

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1. INTRODUCTION

The U.S. Department of Veterans Affairs (VA) is assessing the environmental issues present at a parcel located at 708 Robert Smalls Parkway (Study Area) where a private entity proposes to construct an outpatient clinic for lease by VA (Project). The Study Area, CLIN 030 Robert Smalls Parkway Site (Study Area) is located in the City of Beaufort, Beaufort County, South Carolina and on the Laurel Bay, South Carolina United States (U.S.) Geological Survey (USGS) 7.5-minute topographic quadrangle (**Figure 1**). The Study Area is approximately 33-acres and consists of a large, wooded area (**Figure 2**).

On behalf of Mabbett & Associates, Inc., AECOM conducted a biological habitat assessment within the Study Area. The assessment involved a desktop review of known federally and state listed species known within the Project vicinity. Information collected during the desktop review was used in conjunction with the field assessment of land cover types to identify potential effects pursuant to the U.S. Endangered Species Act (ESA). The purpose of this report is to determine the potential for federal and state protected species, critical habitats, or other sensitive resources to occur within the Study Area.

2. METHODS

This section defines the sources used in the desktop data review and the methods used during field surveys.

2.1 Desktop Analysis

A desktop data review of existing information was conducted to assess the potential occurrence of federal and state protected species, critical habitats, and other sensitive resources within the Study Area. Information reviewed included:

- Google Earth Pro aerial imagery (recent and historical; Google Earth Pro 2024)
- U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) species list for the Study Area (USFWS, 2024a) (**Appendix A**)
- South Carolina Department of Natural Resources (SCDNR) South Carolina Natural Heritage Program (SCNHP) Natural Heritage Database (NHD) report for the Study Area (SCDNR, 2025) (**Appendix B**)

Prior to the field assessment, an AECOM ecologist preliminarily delineated the land cover classifications based on aerial imagery. These preliminary land cover types and boundaries were field verified.

2.2 Field Assessment Methods

On December 3 and 4, 2024, AECOM ecologists performed a pedestrian survey of the Study Area for general habitat/land cover classification and wetlands. The survey on December 3rd occurred from the hours of 0830 to 1630. The survey on December 4th occurred from the hours of 0700 to 1300. In general, the surveys focused on natural areas, especially areas with potential wetlands and/or streams. AECOM planned the survey in accordance with USFWS and state agency methodology and applicable USFWS and state species-specific survey guidelines.

Habitat quality for each of the species identified by the IPaC species list (**Appendix A**) and NHD report (**Appendix B**) was assessed, and land cover polygons were verified, reclassified, and/or remapped based upon the principal land characteristics and vegetation present. Ecologists assessed the Study Area's features such as the age and size of trees, the size of land cover types (acres), connectivity with surrounding ecosystems (e.g., wetlands and streams), presence/absence of microhabitat features (e.g., peeling bark, dead/decaying trees), influence of human disturbance, and diversity of native plants. The relative quality of these habitats, in the context of adjacent and/or surrounding land cover, was also assessed.

During the site visit, AECOM ecologists collected field data including photos and notes of the flora and faunas present to provide a biological survey of the site for the presence or absence of species listed under the ESA and state laws. AECOM conducted the surveys in accordance with this approved site survey plan.

3. DESKTOP RESULTS

The following provides the results of the desktop data review conducted for federal and state listed species within the Study Area. All federally protected species within the Study Area are also state protected.

3.1 Land Cover Types

Historical aerial imagery was reviewed to assess potential prior-existing natural resource features and land cover changes prior to AECOM's site visit. The Study Area has been undeveloped since at least 1985. The Study Area was part of a larger forested area until 2008 when a residential development was constructed outside of the Study Area to the northeast. In 2011 another housing development, outside of the Study Area, was built to the north. There appears to have been some logging or disturbance within the western portion of the Study Area in 2012.

3.2 Federally Listed Species

AECOM obtained federally threatened, endangered, proposed and candidate species data from USFWS IPaC (**Appendix A**), which generates a list of species and other resources that may occur within or near the Study Area (**Table 1**). AECOM identified thirteen potential species protected under the ESA that have potential to occur within the site, including: one mammal, five birds, three reptiles, one insect species, and three flowering plants (USFWS, 2024a). Rational conclusions for federally listed species (**Table 1**) are discussed further within **Sections 4.2**. There are no critical habitats within the site.

TABLE 1. FEDERALLY PROTECTED SPECIES WITHIN PROJECT VICINITY

Scientific Name	Common Name	Federal Status	Potential to Occur	Biological Conclusion
Mammals				
Perimyotis subflavus	Tricolored Bat	Proposed Endangered	Moderate	May affect, not likely to adversely affect
Birds				
Laterallus jamaicensis	Eastern Black Rail	Threatened	None	No effect
Charadrius melodus	Piping Plover	Threatened	None	No effect
Picoides borealis	Red-Cockaded Woodpecker	Endangered	None	No effect
Calidris canutus rufa	Rufa Red Knot	Threatened	None	No effect
Mycteria americana	Wood Stork	Threatened	None	No effect
Reptiles				
Chelonia mydas	Green Sea Turtle	Threatened	None	No effect
Lepidochelys kempii	Kemp's Ridley Sea Turtle	Endangered	None	No effect
Dermochelys coriacea	Leatherback Sea Turtle	Endangered	None	No effect
Insects				
Danaus plexippus	Monarch Butterfly	Candidate	None	No effect
Flowering Plants				
Schwalbea americana	American Chaffseed	Endangered	None	No effect
Oxypolis canbyi	Canby's Dropwort	Endangered	None	No effect
Lindera melissifolia	Pondberry	Endangered	Moderate	May affect, not likely to adversely affect
Migratory Birds				
Falco sparverius paulus	American Kestrel	BCC	Moderate	No effect
Haematopus palliatus	American Oystercatcher	BCC	None	No effect

Scientific Name	Common Name	Federal Status	Potential to Occur	Biological Conclusion
Haematopus palliatus	Bald Eagle	BCC	Moderate	No effect
Rynchops niger	Black Skimmer	BCC	None	No effect
Sitta pusilla	Brown-headed Nuthatch	BCC	Moderate	No effect
Chaetura pelagica	Chimney Swift	BCC	None	No effect
Antrostomus vociferus	Eastern Whip-poor-will	BCC	Moderate	No effect
Ammodramus savannarum	Grasshopper Sparrow	BCC	None	No effect
Gelochelidon nilotica	Gull-billed Tern	BCC	None	No effect
Rallus elegans	King Rail	BCC	None	No effect
Sternula antillarum antillarum	Least Tern	BCC	None	No effect
Tringa avipes	Lesser Yellowlegs	BCC	None	No effect
Limosa fedoa	Marbled Godwit	BCC	None	No effect
Passerina ciris	Painted Bunting	BCC	None	No effect
Calidris melanotos	Pectoral Sandpiper	BCC	None	No effect
Setophaga discolor	Prairie Warbler	BCC	None	No effect
Protonotaria citrea	Prothonotary Warbler	BCC	Moderate	No effect
Melanerpes erythrocephalus	Red-headed Woodpecker	BCC	Moderate	No effect
Arenaria interpres morinella	Ruddy Turnstone	BCC	None	No effect
Euphagus carolinus	Rusty Blackbird	BCC	None	No effect
Ammospiza caudacuta	Saltmarsh Sparrow	BCC	None	No effect
Calidris pusilla	Semipalmated Sandpiper	BCC	None	No effect
Limnodromus griseus	Short-billed Dowitcher	BCC	None	No effect
Elanoides for catus	Swallow-tailed Kite	BCC	Moderate	No effect
Numenius phaeopus hudsonicus	Whimbrel	BCC	None	No effect
Tringa semipalmata	Willet	BCC	None	No effect
Hylocichla mustelina	Wood Thrush	BCC	Moderate	No effect

BCC – Birds of Conservation Concern

3.3 State Listed Species

The South Carolina Department of Natural Resources (SCDNR) Under S.C. Code of Laws Title 50 Chapter 15, is charged with protecting species listed as endangered or threatened. To determine what protected state listed species may exist within the Study Area and surrounding areas, AECOM ecologists utilized the SCDNR's Natural Heritage Database (NHD) to check which species have records found within the Study Area (SCDNR, 2025). The NHD report is included as **Appendix B**.

As part of the NHD report it also generates a table of all the federally and state listed species with the potential to occur in Beaufort County (SCDNR, 2025). Only those species that are state listed as threatened or endangered (T&E) and not already federally listed are included below in **Table 2.** AECOM's provisional biological conclusions for each of these species are discussed further within **Sections 4.3**.

Table 2. STATE LISTED T&E SPECIES WITHIN BEAUFORT COUNTY

Scientific Name	Common Name	State Status	Potential to Occur
Birds			
Charadrius wilsonia	Wilson's Plover	Threatened	None
Haliaeetus leucocephalus	Bald Eagle	Threatened	Moderate
Sternula antillarum	Least Tern	Threatened	None
Mammals			
Corynorhinus rafinesquii	Rafinesque's Big-eared Bat	Endangered	Moderate
Reptiles			
Heterodon simus	Southern Hog-nosed Snake	Threatened	None
Clemmys guttata	Spotted Turtle	Threatened	Moderate
Amphibians			
Pseudobranchus striatus striatus	Broad-striped Dwarf Siren	Threatened	Moderate

4. FIELD ASSESSMENT RESULTS

The following are the results of field surveys for federal and state protected species within the Study Area.

4.1 Land Cover Types

The general habitat survey conducted within the Study Area identified four land cover classifications (**Table 3**), including mixed oak-pine forest, forested (PFO) wetland, shrub/scrub (PSS) wetland, and riverine (**Figure 3**). Representative photos of these four landcover types are provided in the photolog attached as **Appendix C**.

TABLE 3. LAND COVER IDENTIFIED IN THE STUDY AREA

Land Cover Type	Description	Approximate Acreage Within the Study Area	Percentage of Study Area
Mixed Oak-Pine Forest	Forested upland areas with mature trees forming a closed canopy. Dominant trees consisting of loblolly pine (*Pinus taeda*), live oak (*Quercus virginiana*), water oak (*Quercus nigra*), laurel oak (*Quercus laurifolia*), sweet gum (*Liquidambar styraciflua*), and Southern magnolia (*Magnolia grandiflora*).	20.82	63.28%
Forested (PFO) Wetland	Forested wetland areas within depressional low lying portions of the Study Area. Dominant trees consisting of water oak, laurel oak, swamp chestnut oak (*Quercus michauxii*), sweet gum, and black gum (*Nyssa sylvatica*). Herbaceous species consisting of giant cane (*Arundinaria gigantea*) and bush palmetto (*Sabal minor*).	9.12	27.72%
Shrub/Scrub (PSS) Wetland	Sapling dominated wetlands present within depressional low lying portions of the Study Area. Dominant Saplings consisted of red maple (*Acer rubrum*) and Chinese tallow (*Triadica sebifera*). Herbaceous species consisting of lizards' tail (*Saururus cernuus*) and marsh pennywort (*Hydrocotyle vulgaris*).	2.65	8.05%
Riverine	An excavated canal with perennial flow running through the center of the Study Area.	0.31	0.95%

Land Cover Type	Description	Approximate Acreage Within the Study Area	Percentage of Study Area
	Totals	**32.9**	**100%**

4.2 Potential for Federally Listed Threatened and Endangered Species

AECOM ecologists made preliminary effect determinations for the federally listed species that have the potential to occur within the Study Area based on both the desktop assessments and the information gained during the field surveys on December 3-4, 2024. USFWS will make the final determination if Endangered Species Act (ESA) Section 7 consultation is initiated for permitting (USFWS, 2024b). The federal action agency may make one of the following determinations for each listed species:

"**No effect**" means there will be no impacts, positive or negative, to listed or proposed resources. Generally, this means no listed resources will be exposed to action and its environmental consequences. Concurrence from USFWS is not required.

"**May affect, not likely to adversely affect**" means that all effects are beneficial, insignificant, or discountable. Beneficial effects have contemporaneous positive effects without any adverse effects to the species or habitat. Insignificant effects relate to the size of the impact and should never reach the scale where take occurs. Discountable effects are those extremely unlikely to occur. Based on best judgment, a person would not: (1) be able to meaningfully measure, detect, or evaluate insignificant effects; or (2) expect discountable effects to occur.

"**May affect, likely to adversely affect**" means that listed resources are likely to be exposed to the action or its environmental consequences and will respond in a negative manner to the exposure. ESA requires the federal action agency request initiation of formal consultation with the Service when this determination is made. A written request for formal consultation should accompany the biological assessment/biological evaluation.

4.2.1 Tricolored Bat

Optimal Survey Window: Year-round (USFWS, 2022)

During the spring, summer, and fall, tricolored bats (*Perimyotis subflavus*) primarily roost among live and dead leaf clusters of live or recently dead deciduous hardwood trees. In the southern portions of their range, tricolored bats will also roost in Spanish moss (*Tillandsia usneoides*). In addition, tricolored bats have been observed roosting during summer among pine needles, within artificial roosts like barns, beneath porch roofs, bridges, concrete bunkers, and rarely within caves. Female tricolored bats exhibit high site fidelity, returning year after year to the same summer roosting locations. Female tricolored bats form maternity colonies and switch roost trees regularly. During the winter, tricolored bats hibernate in caves and mines however, in the southern U.S., where caves are sparse, tricolored bats often roost in drainage culverts and trees, remaining active and feeding throughout winter. Tricolored bat individuals returning year after year to the same hibernaculum (USFWS, 2024c).

AECOM provisionally determined that tricolored bats are likely to occur within the Study Area due to the large number of mature trees with suitable roost characteristics, the presence of a potential maternity roost tree (large trees greater than 15-inches DBH (diameter at breast height) with good roosting characteristics and 100% solar exposure), connectivity to other forested areas, and ready access to a perennial source of water. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of "may affect, not likely to adversely affect" the tricolored bat. Through the Northern Long-eared Bat and Tricolored Bat Voluntary Environmental Review Process for Development Projects (Version 1), USFWS has developed minimum conservation measures for the tricolored bat. The minimum conservation measures for the South Carolina year-round active range, call for avoiding tree removal during the pup season (May 1 to July 15) and the winter torpor (December 15 to February 15).

4.2.2 Eastern Black Rail

Optimal Survey Window: April-June (USFWS, 2022)

The eastern black rail (*Laterallus jamaicensis*) is listed as threatened by USFWS due to habitat loss resulting from fragmentation, land management activities, hydrologic changes, prescribed burns, climate change, environmental contaminants, and invasive exotic species impacts on native habitat. This species is found along the coast within tidally or non-tidally influenced salt, brackish, and freshwater habitats with dense cover. The eastern black rail can also be found in upland areas adjacent to marsh wetlands. Impounded and un-impounded intermediate marshes closer to higher elevation areas also provide habitat. Within the interior of the U.S., easter black rails use wet sedge meadows with dense cover, or shallow wetlands dominated by cattails (*Typha* spp.) (USFWS, 2024c).

No suitable habitat for the eastern black rail exists within the Study Area, which is surrounded by residential communities, a major roadway, and forested areas. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of “no effect” for the eastern black rail.

4.2.3 Piping Plover

Optimal Survey Window: July 15-May 1 (USFWS, 2022)

Piping plovers (*Charadrius melodus*) use a variety of habitats and frequently move among those in response to local weather and tidal conditions. Coastal habitats include sand spits, small islands, tidal flats, shoals, and sandbars with inlets. Primary foraging habitats include sandy mud flats, ephemeral pools, and seasonally emergent seagrass beds with abundant invertebrates (USFWS, 2024c).

The Study Area does not overlap with any suitable habitat for this species; therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of “no effect” for the piping plover.

4.2.4 Red-Cockaded Woodpecker

Optimal Survey Window: March 1-July 31 (USFWS, 2022)

Red-cockaded woodpeckers (*Picoides borealis*) inhabit open mature pine forests/savannas. Cavities are excavated in mature pines, generally more than 80 years old. Longleaf pines are commonly preferred, but slash and loblolly pines are also acceptable. Cavity trees typically are in open pine stands with little to no hardwood in the canopy or midstory. Once the hardwood midstory reaches the height of the cavities, the woodpeckers will usually leave the area because predators will have easier access to the cavities (USFWS, 2024c).

The Study Area did not contain suitable habitat for this species. Though there are older pine trees present within the Study Area they are part of a mixed oak-pine forest which differs from the species’ preferred forest type of open pine forests/savannahs. No individuals nor nest cavities were observed during the field surveys. Therefore, this species has no potential to occur in the Study Area, and it is anticipated that the proposed project would result in an ESA determination of “no effect” for the red-cockaded woodpecker.

4.2.5 Rufa Red Knot

Optimal Survey Window: August 1-May 31 (USFWS, 2022)

Red knots (*Calidris canutus rufa*) winter in the coastal U.S. from Cape Cod to Mexico and South America and spend the summer on islands in the high Arctic (USFWS, 2024c). They prefer sandy beaches and mud flats. Red knot flocks roost on inlets of barrier beaches and islands.

The Study Area is not located on any beaches or barrier islands. Because there is no suitable habitat present, it is anticipated that the proposed project would result in an ESA effect determination of “no effect” for the Rufa red knot.

4.2.6 Wood Stork

Optimal Survey Window: February 15-September 1 (USFWS, 2022)

Wood storks (*Mycteria americana*) are distributed from South Carolina to southern South America. In the U.S., wood storks concentrate on coastal areas of Florida, Georgia, and South Carolina. In South Carolina, wood storks' nest in four counties, including Beaufort County. Nests are typically located on trees surrounded by water, such as in cypress swamps, shallow creeks, and impoundments. Wood storks can form nesting colonies that may contain up to 10,000 nests. In South Carolina, the seven nesting colonies in existence contain an average of 102 nests. They forage in wetlands, swamps, ponds, and marshes with water depths of around 4–12 inches. They tend to use open wetlands more frequently for foraging than closed canopy wetlands. Storks roost in trees along the water's edge (USFWS, 2024c).

No suitable habitat for the wood stork exists within the Study Area, which is surrounded by residential communities, a major roadway, and forested areas. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of "no effect" for the wood stork.

4.2.7 Sea Turtles

Optimal Survey Window: May 1-October 31 (USFWS, 2022)

There are three sea turtle species which have the potential to occur in the Study Area, according to the IPaC. They are the green sea turtle (*Chelonia mydas*), Kemp's Ridley Sea turtle (*Lepidochelys kempii*), and the leather back sea turtle (*Dermochelys coriacea*). As these species are found in marine environments, and there are no beaches or ocean waters in or connected to the Study Area, there is no potential for the species to occur. Therefore, it is anticipated that the proposed project would result in an ESA effect determination of "no effect" on sea turtles.

4.2.8 Monarch Butterfly

Optimal Survey Window: August-December (USFWS, 2022)

The monarch butterfly (*Danaus plexippus*) is a large and conspicuous orange and black butterfly species. It's well known for having a generation that annually makes a large migration south across the U.S. and winters in Mexico. During spring migration, important nectar sources typically include tickseed, arrowwood and phlox species. Although adult monarch butterflies forage for nectar on a wide variety of flowering plants through migration and breeding, they only breed and lay eggs on their host plant, the milkweed (*Asclepias* spp.; USFWS 2024c). Monarch butterfly larvae, or caterpillars, are completely dependent on milkweed host plants. This species is dependent on approximately 25 different species of milkweed in eastern North America. Milkweed decline in both agricultural and urban landscapes is one of the primary reasons that monarchs are in trouble today (National Wildlife Federation 2022).

In December of 2020, USFWS determined that listing the monarch butterfly under the ESA was warranted, but that other agency priorities prevented its listing. Instead, the species was added to the Candidate Species list. On December 12, 2024, USFWS proposed to list the species under the ESA as Threatened and simultaneously proposed the designation of critical habitat in California to protect overwintering sites (89 FR 100662). Per the recent proposed listing by USFWS "…activities that may remove milkweed and nectar resources within the breeding and migratory range, but that do not result in conversion of native or naturalized grassland, shrubland, or forested habitats [are] not considered key population drivers" (89 FR 100662).

No host plants (milkweeds) or butterflies were observed within the Study Area. Therefore, it is anticipated that the proposed project would result in an ESA effect determination of "no effect" for the monarch butterfly.

4.2.9 American Chaffseed

Optimal Survey Window: May-August, 1-2 months after a fire event (USFWS, 2022)

American chaffseed (*Schwalbea americana*) occurs in fire-maintained longleaf pine flatwoods and savannas. Often it is found in ecotonal areas between peaty wetlands and xeric sandy soils. Chaffseed is dependent on factors like fire, mowing, or fluctuating water tables to maintain the open to partly open conditions that it requires. Historically, the species probably existed on savannas and pinelands throughout the coastal plain and on sandstone knobs and plains inland where frequent, naturally occurring fires maintained these sub-climax communities. Most of the surviving

populations, and all of the most vigorous populations, are in areas that are still subject to frequent fire. Fire may be important to the species in ways that are not yet understood, such as for germination of seed or in the formation of the connection to the host plant (USFWS, 2024c).

No suitable habitat for the American chaffseed exists within the Study Area due to a lack of frequent fire disturbance and the closed canopy forest present within the majority of the Study Area. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of "no effect" for the American chaffseed.

4.2.10 Pondberry

Optimal Survey Window: February-March; September-October (USFWS, 2022)

Pondberry (*Lindera melissifolia*) can grow in a variety of habitats as long as hydrological requirements are met. This plant occurs in seasonally flooded wetlands such as floodplain/bottomland hardwood forests and forested swales, on the bottoms and edges of shallow seasonal ponds in old dune fields, along the margins of ponds and depressions in pinelands, around the edges of sinkholes in coastal areas with karst topography, and along the borders of Sphagnum bogs. Usually in shade but tolerates full sun (USFWS, 2024c).

During the field surveys, AECOM ecologists found suitable habitat for this species. The forested wetland areas present within the Study Area would provide suitable habitat for the pondberry. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of "may affect, not likely to adversely affect" for this species.

4.2.11 Canby's Dropwort

Optimal Survey Window: Late July-September (USFWS, 2022)

Canby's dropwort (*Oxypolis canbyi*) is a perennial herbaceous plant which grows from 30 to 50 inches tall. Canby's dropwort has been found in a variety of coastal plain communities, including pond cypress savannahs, the shallows and edges of cypress/pond pine ponds, sloughs, and wet pine savannas. Canby's dropwort was federally listed as endangered on February 25, 1986. Only twenty-five populations of the species are currently known to exist, one of which is found in the ACE Basin. The site of this population in the ACE is on state-owned land, so it is protected from habitat alterations. The most serious threat to the population is drought or too much rain (USFWS, 2024c).

No suitable habitat for Canby's dropwort exists within the Study Area. There are wetland areas present within the Study Area; however, they are either forested or shrub/scrub wetlands with very minimal herbaceous cover. The species also reproduces asexually by extending rhizomes, so it is unlikely to be present within the Study Area as there are not any recorded populations within the vicinity of the Study Area. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of "no effect" for this species.

4.3 Critical Habitat

No critical habitat for any listed species as designated by USFWS was identified within the Study Area.

4.4 Potential for Birds of Conservation Concern

4.4.1 American Kestrel

The American kestrel (*Falco sparverius paulus*) is the smallest and most colorful falcon in North America. They are found in a variety of habitats including open grasslands, prairies, the edges of forests, cities, and farmlands. The species nests in cavities, such as old woodpecker holes, and lay eggs directly on the cavity floor. The species breeds from April 1 to August 31.

This species was not observed on site during the survey. Clearing of trees should be timed to avoid the breeding season or a cavity survey should be performed prior to clearing to ensure the American kestrel is not found on site. With clearing of trees conducted outside of the breeding season or implementation of cavity surveys prior to tree clearing, the Project will have "no effect" on the American kestrel.

4.4.2 Bald Eagle

Discussed in Section 4.5.2.

4.4.3 Shore Birds

Several of the identified BCC are found in coastal habitats such as shorelines, beaches, coastal hammocks, and estuarine wetlands such as saltmarsh habitat (Audubon 2024). These species include the American oystercatcher (*Haematopus palliates*), black skimmer (*Rynchops niger*), gull-billed tern (*Gelochelidon nilotica*), king rail (*Rallus elegans*), least tern (*Sternula antillarum antillarum*), lesser yellowlegs (*Tringa avipes*), marbled godwit (*Limosa fedoa*), painted bunting (*Passerina ciris*), pectoral sandpiper (*Calidris melanotos*), prairie warbler (*Setophaga discolor*), ruddy turnstone (*Arenaria interpres morinella*), saltmarsh sparrow (*Ammospiza caudacuta*), semipalmated sandpiper (*Calidris pusilla*), short billed dowitcher (*Limnodromus griseus*), whimbrel (*Numenius phaeopus hudsonicus*), and willet (*Tringa semipalmata*).

The Study Area is inland and coastal habitats preferred by these species do not occur on site. Therefore, the preliminary determination is that the Project will have “no effect” on shore birds.

4.4.4 Brown-headed Nuthatch

The brown-headed nuthatch (*Sitta pusilla*) is a small bird with a distinctive squeaky call (Audubon 2024). Their preferred habitat is mature pine forest with an open understory and typically are found in family groups.

Forested habitat on the site is a mixed of hardwoods and pines. As the species favors pure stand of pine habitat, the preliminary determination is that the Project will have “no effect” on the brown-headed nuthatch.

4.4.5 Chimney Swift

The chimney swift (*Chaetura pelagica*) is a small gray bird that spends most of its life airborne (Audubon 2024). They typically nest in chimneys, hollow trees, and caves.

Caves do not occur on site. Hollow trees were not observed on site. Therefore, the preliminary determination is that the Project will have “no effect” on the chimney swift.

4.4.6 Eastern Whip-Poor-Will

The eastern whip-poor-will (*Antrostomus vociferus*) is found throughout the eastern U.S., often migrating to the southern U.S. for the winter. This bird is most identifiable by its distinct call and has mottled brown and gray feathers. It is found most in woodlands (Audubon 2024). The preferred habitat for the species has little to no understory.

The forested habitat identified on site is poor habitat for the eastern whip-poor-will due to the amount of understory. Therefore, the preliminarily determination is that the Project will have “no effect” this species.

4.4.7 Grasshopper Sparrow

The grasshopper sparrow (*Ammodramus savannarum*) is a small bird that prefers to stay close to the ground (Audubon 2024). The species is typically identified by its distinctive orange-yellow spot in front of the eye. This species favors open grassland, prairie, hayfields, and pastures.

Habitat favored by the grasshopper sparrow does not occur on site. Therefore, the preliminarily determination is that the Project will have “no effect” on the grasshopper sparrow.

4.4.8 Prothonotary Warbler

The prothonotary warbler (*Protonotaria citrea*) has a bright yellow head and chest, with darker gray wings and a long, pointed bill. This bird is most often found in swamps and wet forests, and commonly along open water or streams. The species breeds from April 1 to July 31.

Poor quality stream habitat occurs in the Study Area for this species and there is low potential for habitat for the prothonotary warbler. This species was not observed on site during the survey. Clearing of trees should be timed to

avoid the breeding season or a cavity survey should be performed prior to clearing to ensure the prothonotary warbler is not found on site. With clearing of trees conducted outside of the breeding season or implementation of cavity surveys prior to tree clearing, the Project will have “no effect” on the prothonotary warbler.

4.4.9 Red-Headed Woodpecker

Red-headed woodpeckers (*Melanerpes erythrocephalus*) are common throughout the southeast. The species can use a variety of habitats including open woodlands, orchards, and groves (Audubon 2024). Red-headed woodpeckers’ nest in cavities that are excavated in dead trees or large branches. The species breeds from May 10 to September 10.

This species was not observed on site during the survey. Clearing of trees should be timed to avoid the breeding season or a cavity survey should be performed prior to clearing to ensure the red-headed woodpecker is not found on site. With clearing of trees conducted outside of the breeding season or implementation of cavity surveys prior to tree clearing, the Project will have “no effect” on the red-headed woodpecker.

4.4.10 Rusty Blackbird

The rusty blackbird (*Euphagus carolinus*) is a medium sized blackbird with a curved bill. The species displays sexual dimorphism, with the males glossy black and the females dark brown during the breeding season (Audubon 2024). The species is typically found in freshwater pond and marsh habitat.

Habitat favored by the rusty blackbird does not occur on site. Therefore, the preliminarily determination is that the Project will have “no effect” on the rusty blackbird.

4.4.11 Swallow-Tailed Kite

Swallow-tailed kites (*Elanoides for catus*) can be found in a variety of habitats. They inhabit swamps, marshes, and river edges in the southeastern United States (Audubon 2024). The species nests high in trees, often near water.

This species could use wetland and surface water habitat found on site but no nesting habitat for this species was observed within the Study Area. Because nesting habitat does not occur on site, the preliminary determination is that the Project will have “no effect” on the swallow-tailed kite.

4.4.12 Wood Thrush

Wood thrushes (*Hylocichla mustelina*) migrate from south of the gulf up to the eastern U.S. They have brown backs and black and white spots on their chest. Wood thrushes are found in woodland understories and prefer damp habitats and streams to dry woods. They can also be found in suburban areas (Audubon 2024).

Forested habitat identified within the Study Area may provide habitat for the wood thrush, the species favors areas forested areas near streams. Due to the lack of stream habitat, the preliminarily determination is that the Project will have “no effect” this species.

4.5 Potential for State Listed Threatened and Endangered Species

The SCDNR has published a protection guidance document that describes habitat information and survey times/avoidance measures for each of South Carolina’s state threatened and endangered species. This document was used to generate the species preferred habitat descriptions below, and to determine if suitable habitat for the species was present in the Study Area (SCDNR, 2024).

4.5.1 Wilson's Plover

Wilson’s plovers (*Charadrius wilsonia*) inhabit South Carolina primarily during the summer months for nesting. Suitable habitat for nesting includes primarily dune systems. The species also utilizes intertidal sand flats, mud flats, dredge spoil islands and shell rakes. Foraging occurs in tidal sloughs, beach edges, as well as dune and marsh habitats.

The Study Area does not overlap with any beach areas or marsh areas, meaning there is not suitable nesting or foraging habitat for this species. Therefore, AECOM anticipates that construction of the proposed project would have no impact on Wilson’s Plover.

4.5.2 Bald Eagle

Bald eagles (*Haliaeetus leucocephalus*) forage in fresh and salt water along reservoirs, impoundments and rivers). Suitable habitat for nesting includes large trees, typically pines, but occasionally cypress trees and hardwood trees, that stand above the canopy within contiguous forest. Nest sites are typically located near foraging sites. Bald eagle nests are generally about 4 to 6 feet in diameter and 3 to 4 feet tall. These nests are reused in subsequent years.

There is potentially suitable habitat present for bald eagles due to the forested land cover and large trees within the Study Area. However, during the field surveys AECOM ecologists did not observe any large raptor stick nests or signs of bald eagle nesting activity within the study area. No bald eagles were seen or heard during the field surveys. Therefore, AECOM anticipates that construction of the proposed project would have no impact on bald eagles.

4.5.3 Least Tern

Least terns (*Sternula antillarum*) inhabit South Carolina during the spring and summer months for nesting. Suitable habitat for nesting includes bare or sparsely vegetated beaches (typically near inlets or areas of accretion), sand flats/spits, and sand bars. Least terns will also use unvegetated dredge spoil areas and artificial habitats such as gravel parking lots, rooftops, piers, and bridges.

The Study Area does not overlap with any beach or coastal areas, meaning there is not suitable nesting or foraging habitat for this species. Therefore, AECOM anticipates that construction of the proposed project would have no impact on least terns.

4.5.4 Rafinesque' s Big-eared Bat

Suitable habitat for Rafinesque's big-eared bats (*Corynorhinus rafinesquii*) within the Coastal Plain of South Carolina includes black gum (*Nyssa sylvatica*) and water tupelo (*Nyssa aquatic*) stands, bald cypress (*Taxodium distichum*) swamp forests, maritime forests, and hardwood or mixed mature forested bottomlands.

AECOM determined that Rafinesque's big-eared bats have potential to occur within the Study Area due to the large number of mature trees with suitable roost characteristics, the presence of a potential maternity roost tree (large trees greater than 15-inches DBH (diameter at breast height) with good roosting characteristics and 100% solar exposure), connectivity to other forested areas, and ready access to a perennial source of water. The SCDNR recommends that where suitable habitat exists, assume presence of the species and avoid tree clearing from May 1st to July 31st to minimize disturbance and destruction of habitat that may be used by females during gestation or maternal care for pups. Therefore, AECOM has provisionally determined that construction of the proposed project would have a potential to impact this bat species if tree clearing is conducted between May 1st to July 31st.

4.5.5 Southern Hog-nosed Snake

Suitable habitat for the southern hog-nosed snake (*Heterodon simus*) includes sandhills that typically consists of a rolling topography and deep sand substrate within a savanna of widely spaced longleaf pine (*Pinus palustris*) and/or turkey oak (*Quercus laevis*), often with a wiregrass (*Aristida stricta*) understory; or scrubby pine flatwoods with low relief having deep, sandy soils within a savanna of widely spaced longleaf pine, with a wiregrass and scrub-shrub understory.

No suitable habitat for this species exists within the Study Area. The majority of the Study Area consisted of wetter oak-gum forests. Though there are upland areas within the Study Area they are not open canopy type savannah areas and lean more towards an oak-pine forest type with a closed canopy. The Study Area is also not adjacent to any preferred habitat for this species. Therefore, AECOM anticipates that construction of the proposed project would have no impact on the southern hog-nosed snake.

4.5.6 Spotted Turtle

Suitable habitat for the spotted turtle (*Clemmys guttata*) includes heavily vegetated, shallow wetlands with standing or flowing water including Carolina Bays, bogs, swamps, marshes, and ditches. While often associated predominantly with wetlands, spotted turtle spend a considerable amount of time on land throughout the year; however, preferred upland habitat types have not been identified.

During the field surveys, AECOM ecologists found suitable habitat for this species. The wetland and stream areas present within the Study Area would provide suitable habitat for the spotted turtle; therefore, it is anticipated that construction of the proposed project has potential to impact this turtle species.

4.5.7 Broad-striped Dwarf Siren

Suitable habitat for the broad-striped dwarf siren (*Pseudobranchus striatus striatus*) consists of heavily vegetated cypress swamps and ponds and flooded ditches, marshes and other permanent and semi-permanent aquatic habitats in the Coastal Plain. They also inhabit small Coastal Plain streams that exhibit little or no flow and have muck bottoms.

During the field surveys, AECOM ecologists found suitable habitat for this species. The wetland and stream areas present within the Study Area would provide suitable habitat for the broad-striped dwarf siren; therefore, it is anticipated that construction of the proposed project has potential to impact this siren species.

5. REGULATORY

5.1 Endangered Species Act

Consultation with USFWS may be required if the project could result in adverse impacts or "take" of a federally listed species. To determine applicability of the ESA (16 U.S.C. § 1531 et seq.), early coordination with USFWS and/or field surveys such as a habitat assessment of the Study Area could be conducted to assess the suitability of habitat and to measure presence/absence of threatened and endangered species.

The ESA requires that all project proponents ensure that any action authorized, funded, or conducted by the federal government does not jeopardize the continued existence of a federally listed threatened or endangered species, or result in the adverse modification of the federally designated critical habitat of a federally listed species. If a project has a federal nexus such as a federal permit or funding, then consultation with USFWS under Section 7 of the ESA would also apply. In this case, a Biological Assessment would be prepared, and USFWS would issue a concurrence or Biological Opinion to authorize the project. The most likely federal nexus for the Project is CWA (33 U.S.C. 1344) Section 404 permitting for impacts to wetlands.

If threatened and endangered species impacts cannot be avoided, technical assistance and ESA Section 10 incidental take permit may be required if there is no federal nexus. In some cases, achieving authorization under the ESA may require a habitat conservation plan to be developed for the project. Additionally, if deemed sufficiently complex or impactful, USFWS may require an Environmental Assessment or Environmental Impact Statement to meet their statutory requirements under the National Environmental Policy Act.

AECOM evaluated the site and determined that the ecosystems present are suitable habitats for two federally listed species. Tricolored bat and pondberry have a moderate potential of occurring in the Study Area. AECOM anticipates that construction of the proposed project would result in an ESA determination of "may affect, not likely to adversely affect" to these two species and "no effect" to the remaining species identified.

5.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA; 16 U.S.C. 703-712) prohibits the pursuit, hunting, take, capture, kill, or sale of listed migratory bird species. Best management practices (BMPs) should be implemented during development and operation of the Project to minimize potential impacts to migratory birds. USFWS recommends implementation of BMPs to minimize take of migratory birds, including avoidance of construction activities that could result in take during the nesting season (February-August). If construction begins during the nesting season, preconstruction clearance surveys for nesting birds would facilitate determination of nesting bird presence and the need for non-disturbance buffers.

5.3 Bald Eagle and Golden Eagle Protection Act

The Bald Eagle and Golden Eagle Protection Act (BGEPA; 16 U.S.C. 668-668c) enacted in 1940, and amended several times since then, prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" eagles, including their parts, nests, or eggs. The BGEPA provides criminal penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle

or any golden eagle, alive or dead, or any part, nest, or egg thereof." The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb."

The IPaC report states that there are likely bald eagles (*Haliaeetus leucocephalus*) present in the vicinity of the Study Area. Suitable nesting habitat for the bald eagle was observed in the Study Area, however, no eagles or eagle nests were observed during the field surveys. Therefore, it is AECOM's professional opinion that Project activities would result in no take of the bald eagle.

6. SUMMARY AND CONCLUSIONS

AECOM conducted a survey of the approximately 33-acres of the Study Area on December 3-4, 2024, and this report has determined the following:

- Four land cover types are present including:
  - Mixed Oak-Pine Forest (63.28%)
  - Forested (PFO) Wetland (27.72%)
  - Shrub/scrub (PSS) Wetland (8.05%)
  - Riverine (0.95%)
- A "may affect, not likely to adversely affect" determination was given for the tricolored bat and pondberry.
- For the tricolored bat, minimum conservation measures developed by USFWS call for avoiding tree removal during the pup season (May 1 to July 15) and the winter torpor (December 15 to February 15).
- Obtain written concurrence from USFWS for the tricolored bat and pondberry.
- No effect determination for all BCC's.
- Avoid tree clearing during the breeding season of the American kestrel (April 1 to August 31), prothonotary warbler (April 1 to July 31), and red-headed woodpecker (May 1 to September 10) or conduct a tree cavity search prior to clearing of trees.
- SCDNR state listed species, Rafinesque's big-eared bat, spotted turtle, and broad striped dwarf siren, have a potential to occur within the Study Area.
- No Species with either state or federal protections have occurrence data within the Study Area

AECOM's effect determinations are preliminary and are subject to review by USACE, prior to submittal to USFWS, under Section 7 consultation. During consultation, USFWS will review the determinations for all species and may change these determinations and request further actions to minimize or avoid potential impacts to protected species. Consultation with SCDNR is not required for permitting; however, it is recommended as part of the NEPA process.

7. REFERENCES

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USFWS. 2024b. Endangered Species ACT Federal Project Review-Understanding Species Effect Determinations. https://www.fws.gov/story/endangered-species-act-federal-project-review-understanding-species-effect-determinations

USFWS. 2024c. Environmental Conservation Online System (ECOS) Listed Species Reports. https://ecos.fws.gov/ecp/species-reports

FIGURES

Figure 1
Location Map
Beaufort VA Site 1:
708 Robert Smalls Pkwy
Beaufort County, South Carolina

AECOM

N

0 2,000 Feet

1 inch =2,000 Feet

12/13/2024

Legend

Project Boundary (32.90 ac)

USGS Quad: Laurel Bay,1964 and Beaufort, 1979

Figure 2
Topographic Map
Beaufort VA Site 1:
708 Robert Smalls Pkwy
Beaufort County, South Carolina

AECOM

N

0 150 300 Feet

Date 12/17/2024.

Legend

- Project Boundary (32.90 ac.)
- Mixed Oak-Pine Forest
- Palustrine Forested Wetland
- Palustrine Scrub-Shrub
- Riverine

Figure 3

Land Cover Map

Beaufort VA Site 1:
708 Robert Smalls Pkwy

Beaufort County, South Carolina

APPENDIX A:
USFWS IPaC Unofficial Species List

IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Beaufort County, South Carolina

Local office

South Carolina Ecological Services

(843) 727-4707
(843) 727-4218

176 Croghan Spur Road, Suite 200

Charleston, SC 29407-7558

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of in uence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly a ected by activities in that area (e.g., placing a dam upstream of a sh population even if that sh does not occur at the dam site, may indirectly impact the species by reducing or eliminating water ow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential e ects to species, additional site-speci c and project-speci c information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local o ce and a species list which ful lls this requirement can **only** be obtained by requesting an o cial species list from either the Regulatory Review section in IPaC (see directions below) or from the local eld o ce directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an o cial species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the sheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).

2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an o ce of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially a ected by activities in this location:

Mammals

NAME	STATUS
Tricolored Bat Perimyotis sub avus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

Birds

NAME	STATUS
Eastern Black Rail Laterallus jamaicensis ssp. jamaicensis Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/10477	Threatened
Piping Plover Charadrius melodus There is **nal** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/6039	Threatened
Red-cockaded Woodpecker Picoides borealis Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/7614	Endangered
Rufa Red Knot Calidris canutus rufa Wherever found There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/1864	Threatened
Wood Stork Mycteria americana No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8477	Threatened

Reptiles

NAME	STATUS
Green Sea Turtle Chelonia mydas There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/6199	Threatened
Kemp's Ridley Sea Turtle Lepidochelys kempii Wherever found There is **proposed** critical habitat for this species. https://ecos.fws.gov/ecp/species/5523	Endangered
Leatherback Sea Turtle Dermochelys coriacea Wherever found There is **nal** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/1493	Endangered

Insects

NAME	STATUS
Monarch Butter y Danaus plexippus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9743	Candidate

Flowering Plants

NAME	STATUS
American Cha seed Schwalbea americana Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1286	Endangered
Canby's Dropwort Oxypolis canbyi Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/7738	Endangered
Pondberry Lindera melissifolia Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1279	Endangered

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act[1] and the Migratory Bird Treaty Act[2].

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats[3], should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles"

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

There are likely bald eagles present in your project area. For additional information on bald eagles, refer to Bald Eagle Nesting and Sensitivity to Human Activity

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence( )

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season ( )

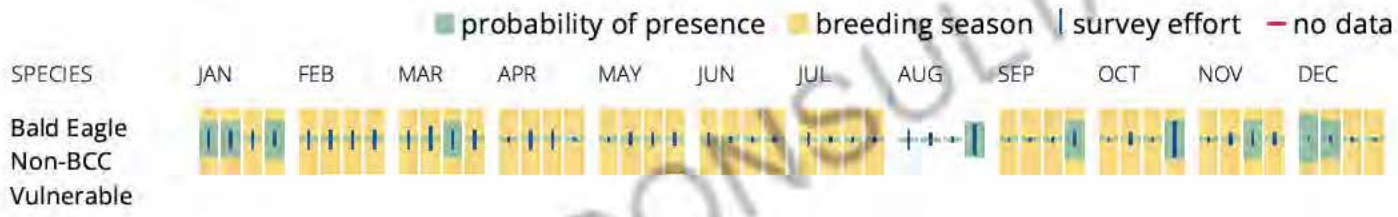
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply). To see a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs of bald and golden eagles in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur. Please contact your local Fish and Wildlife Service Field Office if you have questions.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats[3] should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles"

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your

list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Kestrel Falco sparverius paulus This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9587	Breeds Apr 1 to Aug 31
American Oystercatcher Haematopus palliatus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8935	Breeds Apr 15 to Aug 31
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in o shore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31
Black Skimmer Rynchops niger This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/5234	Breeds May 20 to Sep 15
Brown-headed Nuthatch Sitta pusilla This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 1 to Jul 15
Chimney Swift Chaetura pelagica This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25
Eastern Whip-poor-will Antrostomus vociferus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Aug 20

Grasshopper Sparrow Ammodramus savannarum perpallidus — Breeds Jun 1 to Aug 20

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/8329

Gull-billed Tern Gelochelidon nilotica — Breeds May 1 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9501

King Rail Rallus elegans — Breeds May 1 to Sep 5

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8936

Least Tern Sternula antillarum antillarum — Breeds Apr 25 to Sep 5

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Lesser Yellowlegs Tringa avipes — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9679

Marbled Godwit Limosa fedoa — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9481

Painted Bunting Passerina ciris — Breeds Apr 25 to Aug 15

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Pectoral Sandpiper Calidris melanotos — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Prairie Warbler Setophaga discolor — Breeds May 1 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Prothonotary Warbler Protonotaria citrea — Breeds Apr 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Red-headed Woodpecker Melanerpes erythrocephalus — Breeds May 10 to Sep 10
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Ruddy Turnstone Arenaria interpres morinella — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Rusty Blackbird Euphagus carolinus — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Saltmarsh Sparrow Ammospiza caudacuta — Breeds May 15 to Sep 5
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9719

Semipalmated Sandpiper Calidris pusilla — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Short-billed Dowitcher Limnodromus griseus — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9480

Swallow-tailed Kite Elanoides for catus — Breeds Mar 10 to Jun 30
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8938

Whimbrel Numenius phaeopus hudsonicus — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Willet Tringa semipalmata — Breeds Apr 20 to Aug 5
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Wood Thrush Hylocichla mustelina Breeds May 10 to Aug 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles" specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence(■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

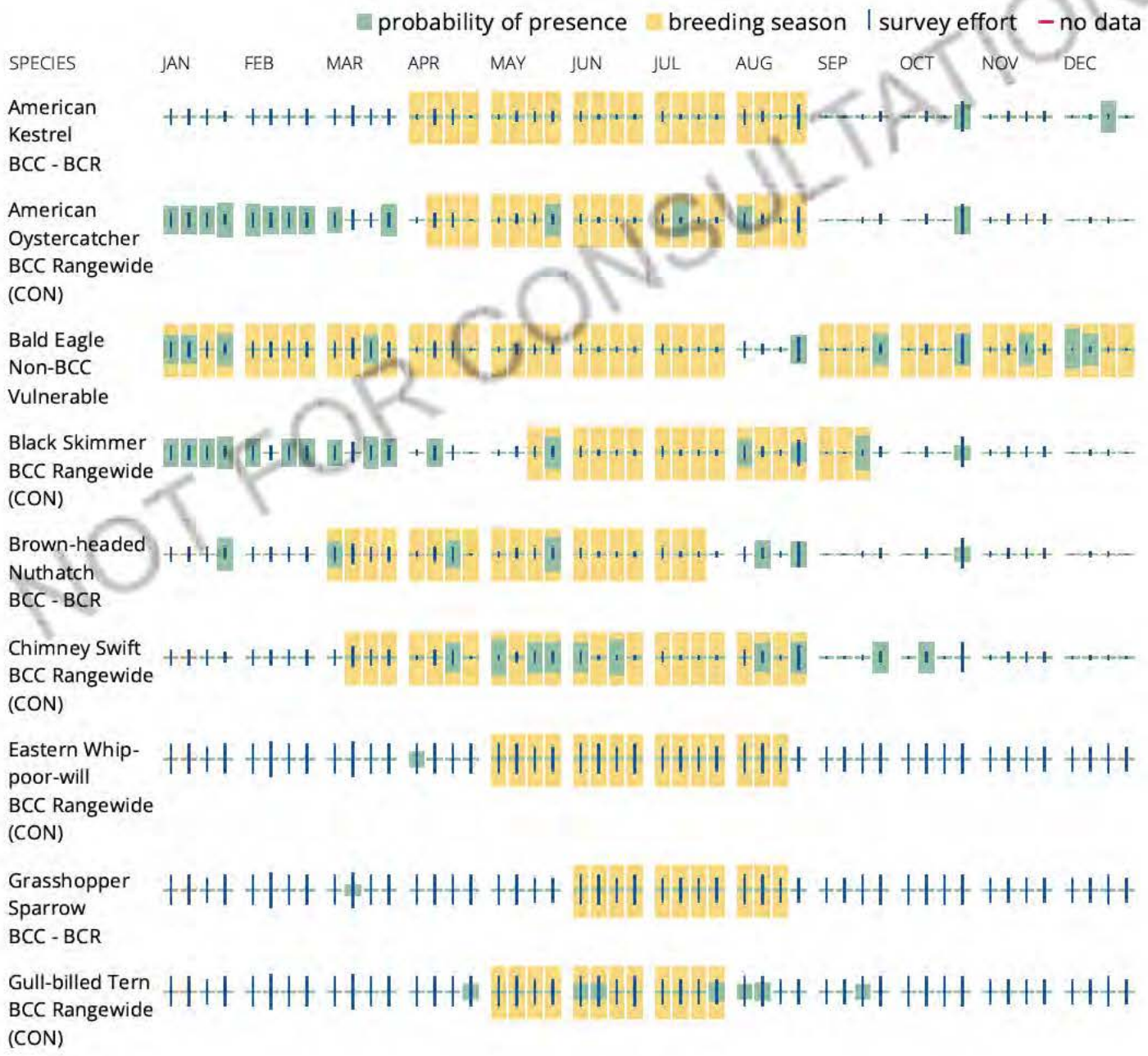
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

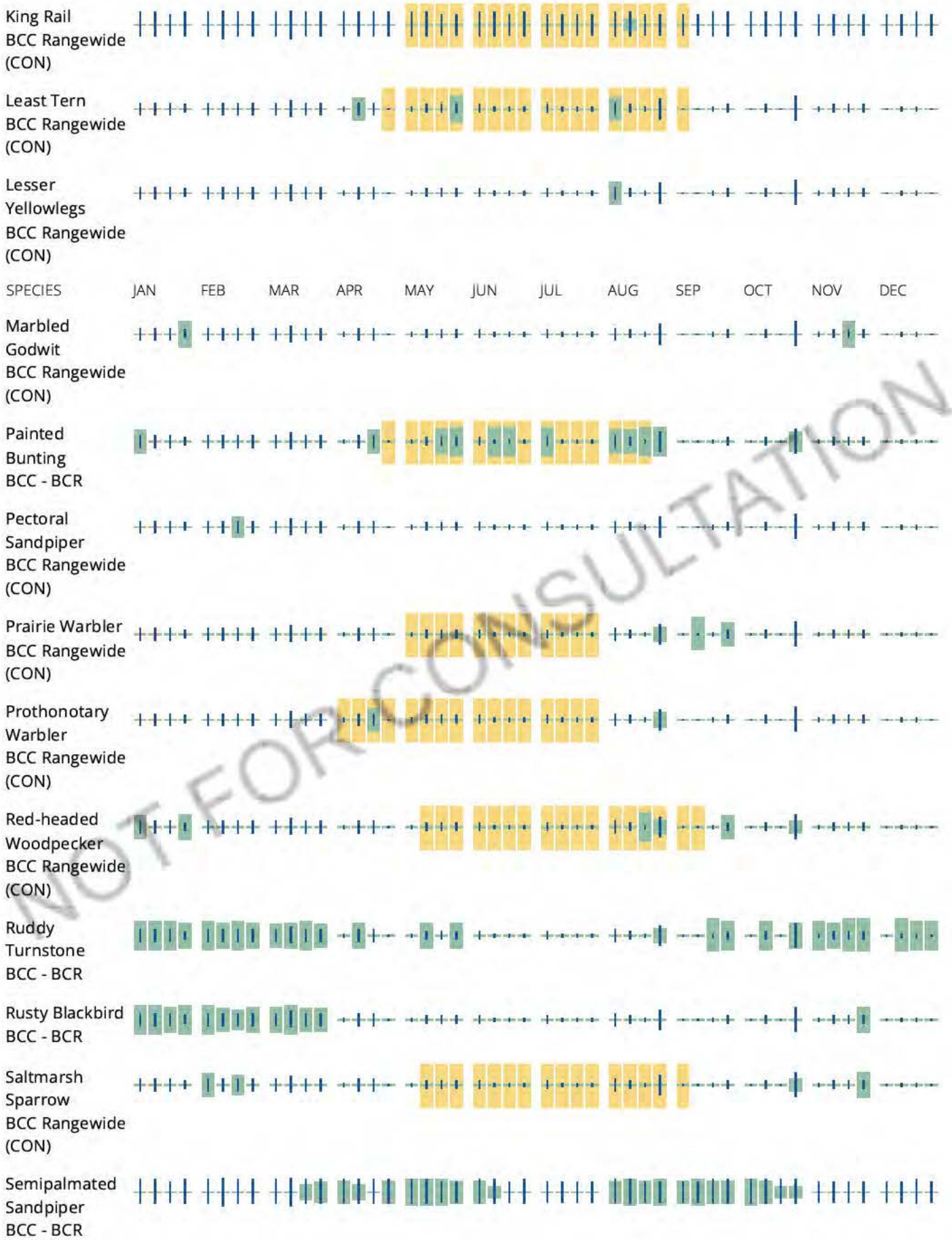
No Data (–)

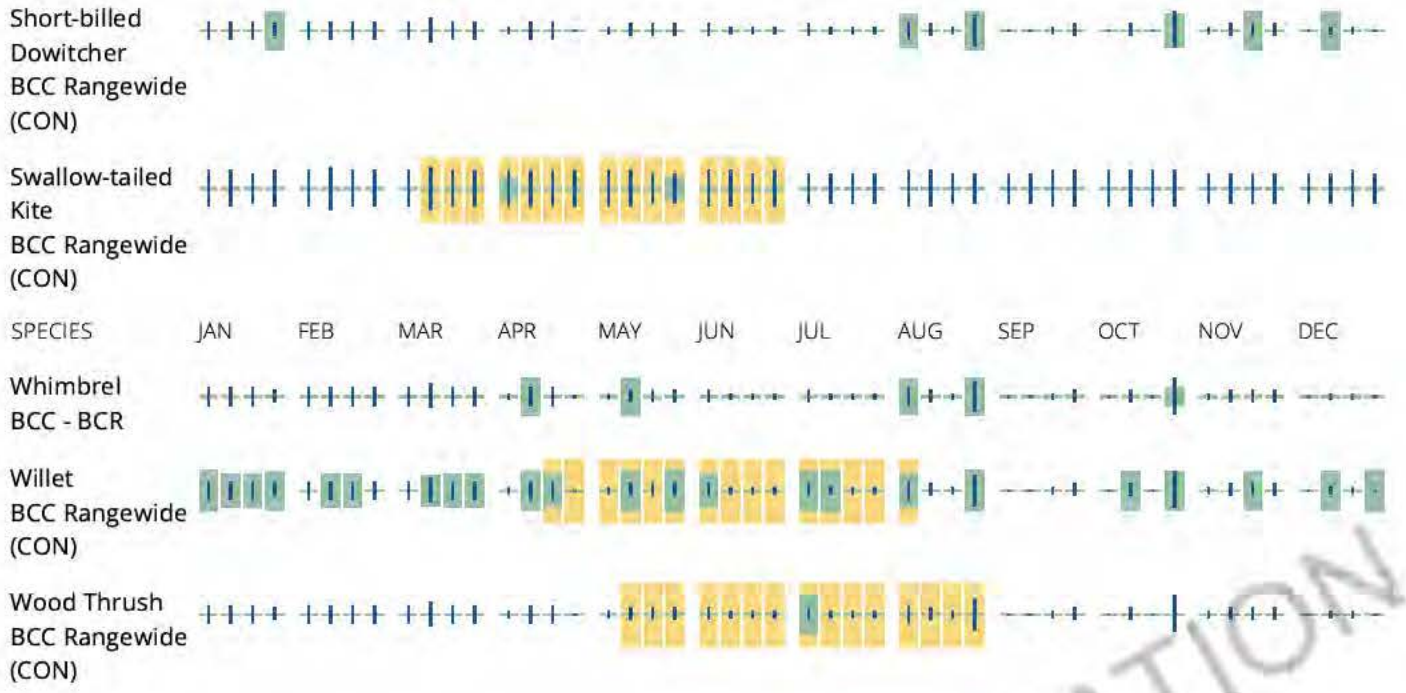
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.







Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the RAIL Tool and look at the range maps provided for birds in your area at the bottom of the pro les provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe speci ed. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Paci c Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in o shore areas from certain types of development or activities (e.g. o shore energy development or longline shing).

Although it is important to try to avoid and minimize impacts to all birds, e orts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially a ected by o shore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area o the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also o ers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results les underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my speci ed location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey e ort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey e ort is the key component. If the survey e ort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey e ort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to con rm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be con rmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no sh hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

FRESHWATER FORESTED/SHRUB WETLAND

PFO1C
PFO1A

RIVERINE

R2UBHx

A full description for each wetland code can be found at the National Wetlands Inventory website

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identi ed based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classi cation established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth veri cation work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or eld work. There may be occasional di erences in polygon boundaries or classi cations between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuber cid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may de ne and describe wetlands in a di erent manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to de ne the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modi cations within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning speci ed agency regulatory programs and proprietary jurisdictions that may a ect such activities.

Appendix B:
SCDNR NHD Report

State of South Carolina
Department of Natural Resources

P.O. Box 167
Columbia, SC 29202
803-734-3886

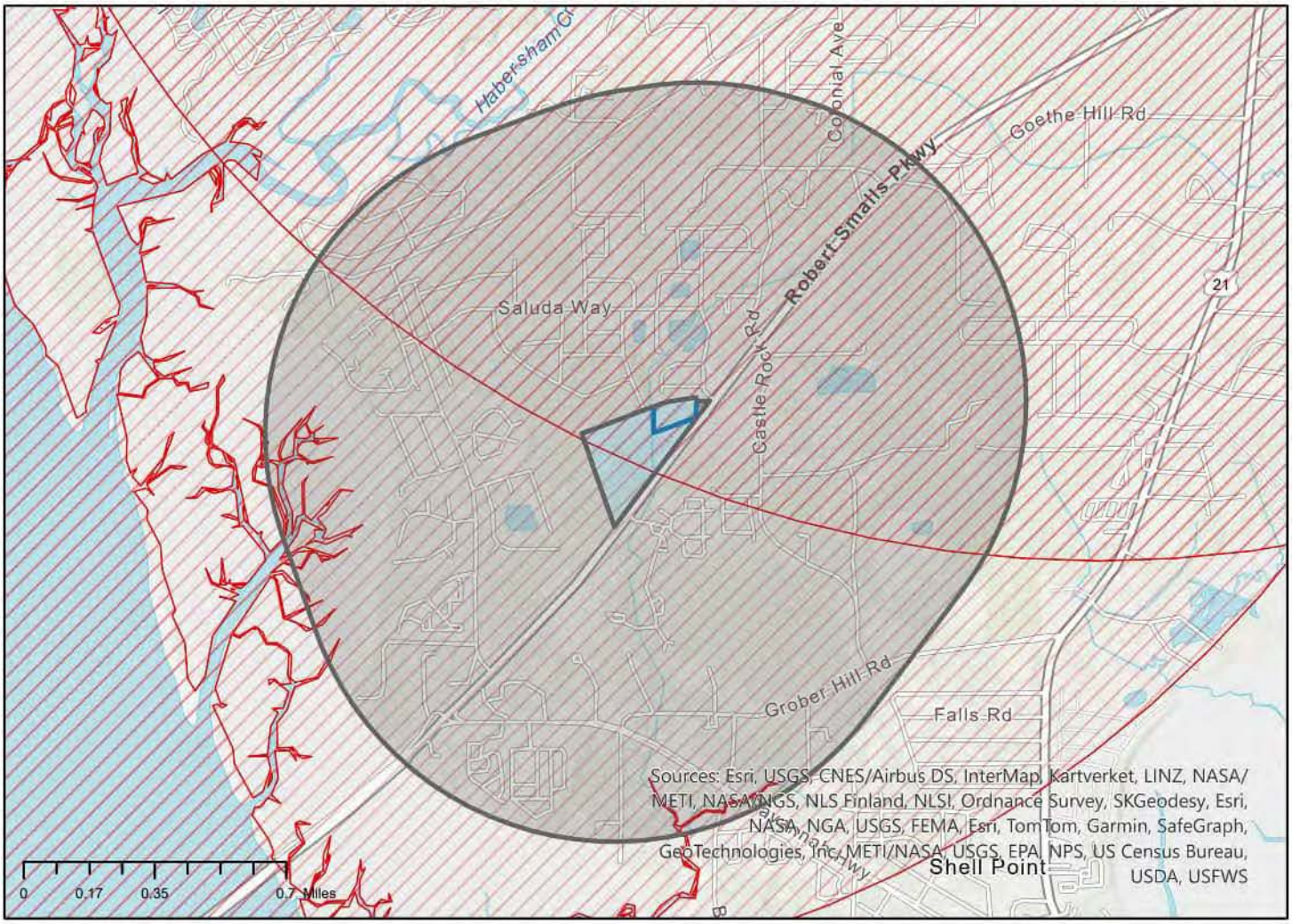
Robert H. Boyles, Jr., *Director*
Emily C. Cope, *Deputy Director, Wildlife and Freshwater Fisheries*

PO Box 167
Columbia, SC 29202
(803) 734-1396
speciesreview@dnr.sc.gov

Requested on Thursday, February 13, 2025 by *Cameron Wyse.*

Re: Request for Threatened and Endangered Species Consultation
Cameron Wyse - Site 1 Robert Smalls Parkway - Development (Commercial/Residential) - Beaufort County, South Carolina

The South Carolina Department of Natural Resources (SCDNR) has received your request for threatened and endangered species consultation of the above named project in Beaufort County, South Carolina. The following map depicts the project area and a 1 mile buffer surrounding:



State of South Carolina
Department of Natural Resources

P.O. Box 167
Columbia, SC 29202
803-734-3886

Robert H. Boyles, Jr., *Director*
Emily C. Cope, *Deputy Director, Wildlife and Freshwater Fisheries*

This report includes the following items:
A - A report for species which intersect the project area
B - A report for species which intersect the buffer around the project area
C - A list of best management practices relevant to species near to or within the project area
D - A list of best management practices relevant to the project type
E - A list of state & federally listed species within the county of the project area
F - Other important information on conservation status, listed species, and how to submit observations to the program.

Please be advised:

The contents of this report, including all tables, maps, recommendations, and various other text, are produced as a direct result of the information a user provides at the time of submission. The SCDNR assumes that all information submitted by the user represents the project scope as proposed, and recommends that additional reports be requested should the scope deviate from how the project was initially represented to the SCDNR.

The technical comments outlined in this report are submitted to speak to the general impacts of the activities as described through inquiry by parties outside the South Carolina Department of Natural Resources. These technical comments are submitted as guidance to be considered and are not submitted as final agency comments that might be related to any unspecified local, state or federal permit, certification or license applications that may be needed by any applicant or their contractors, consultants or agents presently under review or not yet made available for public review. In accordance with its policy 600.01, Comments on Projects Under Department Review, the South Carolina Department of Natural Resources, reserves the right to comment on any permit, certification or license application that may be published by any regulatory agency which may incorporate, directly or by reference, these technical comments.

Interested parties are to understand that SCDNR may provide a final agency position to regulatory agencies if any local, state or federal permit, certification or license applications may be needed by any applicant or their contractors, consultants or agents. For further information regarding comments and input from SCDNR on your project, please contact our Office of Environmental Programs by emailing environmental@dnr.sc.gov or by visiting www.dnr.sc.gov/environmental. Pursuant to Section 7 of the Endangered Species Act, requests for formal letters of concurrence with regards to federally listed species should be directed to the USFWS.

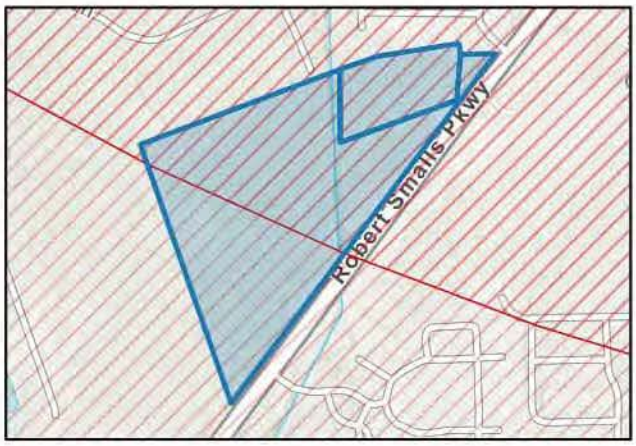
Should you have any questions or need more information, please do not hesitate to contact our office by email at speciesreview@dnr.sc.gov or by phone at 803-734-1396.

Sincerely,

Joseph Lemeris, Jr.
Heritage Trust Program
SC Department of Natural Resources

A. Project Area - Species Report

There are 2 tracked species records found within the project foot print. The following table outlines occurrences found within the project footprint (if any), sorted by listing status and species name. Please keep in mind that this information is derived from existing databases and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. You can find more information about global and state rank status definitions by visiting Natureserve's web page. Please note that certain sensitive species found on site may be listed in this table but are not represented on the map. Please contact speciesreview@dnr.sc.gov should you have further questions related to sensitive species found within the project area.

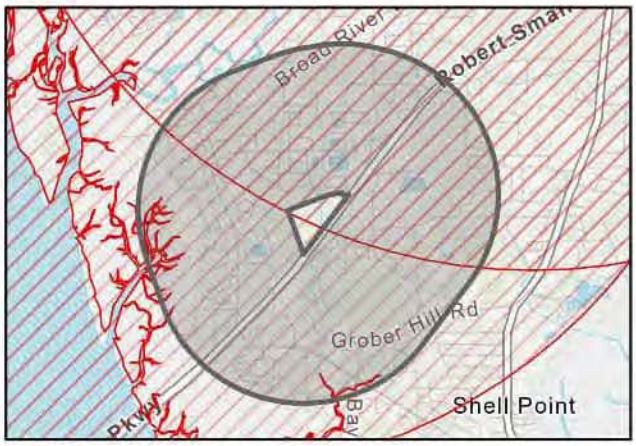


Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census

Scientific Name	Common Name	Federal Status	State Status	G Rank	S Rank	SWAP Priority	Last Obs. Date
Crotalus adamanteus	Eastern Diamond-backed	ARS	NA	G3	S2	2	2024-06-25
Anaxyrus quercicus	Oak Toad	NA	NA	G5	S3	0	1967-06-04

B. Buffer Area - Species Report

The following table outlines rare, threatened or endangered species found within 1 miles of the project footprint, arranged in order of protection status and species name. Please keep in mind that this information is derived from existing databases and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. You can find more information about global and state rank status definitions by visiting Natureserve's web page. Please note that certain sensitive species found within the buffer area may be listed in this table but are not represented on the map.

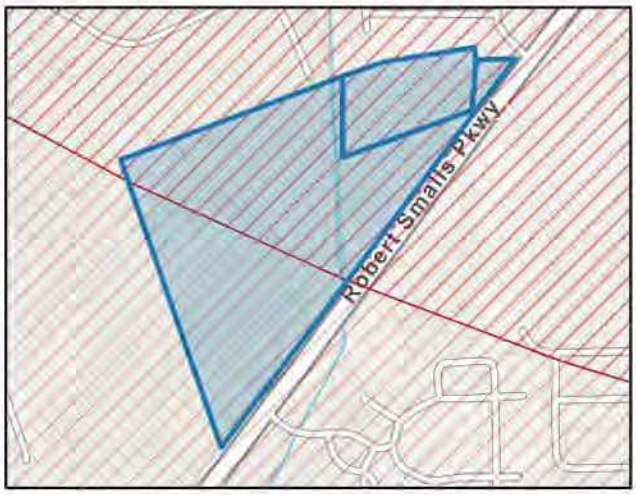


Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Scientific Name	Common Name	Federal Status	State Status	G Rank	S Rank	SWAP Priority	Last Obs. Date
Crotalus adamanteus	Eastern Diamond-backed	ARS	NA	G3	S2	2	2024-06-25
Trichechus manatus latirostris	Florida Manatee	LT	SE	G2G3	S2S3	1	2023
Anaxyrus quercicus	Oak Toad	NA	NA	G5	S3	0	1967-06-04

C. Species Best Management Practices (1 of 3)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to species of concern which may be found on or near to the project area. Please contact speciesreview@dnr.sc.gov should you have further questions with regard to survey methods, consultation, or other species-related concerns.



Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census

One or more occurrences of state listed species are found within or near to your project area. Please note that take of these species are prohibited under S.C. Code of Laws §50-15-30.

Three listed species of bats have been known to occur in the coastal plain ecoregions of South Carolina, including the state-endangered Rafinesque's big-eared bat (Corynorhinus rafinesquii); the federally endangered northern long-eared bat (NLEB) (Myotis septentrionalis); and the federally at-risk & proposed endangered tricolored bat (Perimyotis subflavus). Please note that take of a state endangered species is prohibited under S.C. Code of Laws §50-15-30. Prior to any land-clearing activities in the proposed project area, the SCDNR recommends a threatened and endangered species assessment be conducted to identify suitable habitat and provided to SCDNR for review.

Regarding Rafinesque's big-eared bat (1 of 2): Suitable habitat for Rafinesque's big-eared bat is defined as swamp forests, hardwood or mixed mature bottomlands, maritime forests and black gum (Nyssa sylvatica) and water tupelo (Nyssa aquatic) stands (Cochran 1999, Hofmann et al. 1999, Lance et al. 2001, Gooding and Langford 2004, Trousdale and Beckett 2005).

If suitable habitat exists within the project, the SCDNR recommends assumption of presence of Rafinesque's big-eared bat within areas of forested wetlands and to further protect these areas, surround them with a 1000-foot buffers and avoid tree clearing from May 1st to July 31st to minimize disturbance and destruction of habitat that may be used by females during gestation or maternal care for pups.

All other tree clearing outside of the forested wetlands and its associated buffer may occur in areas that are not wetlands or other aquatic resources in non-Rafinesque's big-eared bat maternity roosting habitat anytime. Where wetlands occur that are not Rafinesque's big-eared bat habitat, but they are spotted turtle habitat, tree clearing should only occur August to December to prevent impacts to spotted turtles during reproduction. However, if wetlands are dry January to June, they may be cleared, but they must be completely dry (no surface water present).

For future right-of-way management (if applicable), use heavy equipment and herbicide treatment for right-of-way vegetation management in wetlands only during the months of July to November. If wetlands are completely dry (no surface water present), heavy equipment may be used January to June, but the wetlands must be completely dry.

Please note that tricolored bat was proposed for listing by the U.S. Fish and Wildlife Service on September 13, 2022. Therefore, due to the conservation concerns surrounding this species, the SCDNR strongly suggests acoustic surveys be conducted by a qualified individual during the summer months to assess the use of the area to be cleared by tricolored bats. Should the species occur in the proposed area slated for clearing, coordination should occur with SCDNR and USFWS regarding avoidance and minimization measures.

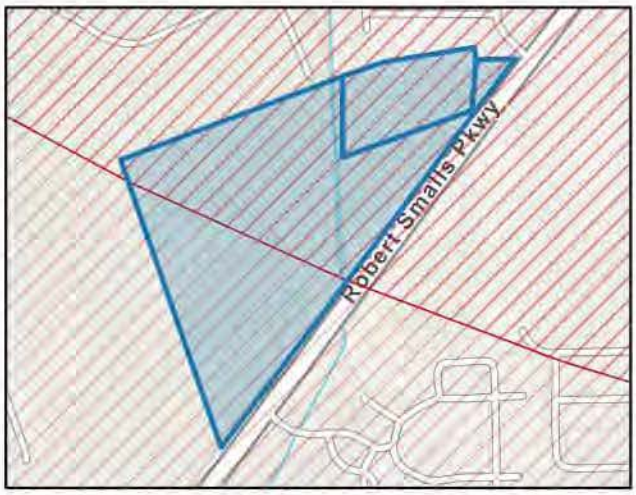
Tricolored bat utilize caves, rock crevices, tree foliage and basal cavities, Spanish moss and man-made structures, such as houses, barns and culverts, as maternity roosts during the summer months and they will use more than one roost location.

If this species are found on-site, please contact the U.S. Fish & Wildlife Service and SCDNR. The SCDNR recommends the assumption of presence of the the species and abide by a clearing moratorium from May 1st to July 31st if suitable habitat for the species is likely or are explicitly identified within the project footprint.

Species in the above table with SWAP priorities of High, Highest or Moderate are designated as having conservation priority under the South Carolina State Wildlife Action Plan (SWAP). SWAP species are those species of greatest conservation need not traditionally covered under any federal funded programs. Species are listed in the SWAP because they are rare or designated as at-risk due to knowledge deficiencies; species common in South Carolina but listed rare or declining elsewhere; or species that serve as indicators of detrimental environmental conditions. SCDNR recommends that appropriate measures should be taken to minimize or avoid impacts to the aforementioned species of concern.

C. Species Best Management Practices (2 of 3)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to species of concern which may be found on or near to the project area. Please contact speciesreview@dnr.sc.gov should you have further questions with regard to survey methods, consultation, or other species-related concerns.



Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census

This project falls within an area that supports black bear (Ursus americanus) populations, a moderate SWAP conservation priority species that requires fire-dependent habitats. The SCDNR recommends that any project area be developed with that in mind. Black bears are attracted to human foods, food waste and packaging (e.g. trash cans, litter, outdoor grills, bird feeders, etc.) and other scented substances and may become habituated to the presence of such attractants if they are obtained. Therefore, the development should be designed in a manner that will substantially minimize the availability of unnatural bear attractants. For example, any exterior trash receptacles must be designed and operated to be 'bear proof' and storage areas should be appropriately secured to prevent access by bears, etc. Some helpful bear-wise tactics can be found at https://bearwise.org/six-bearwise-basics/.

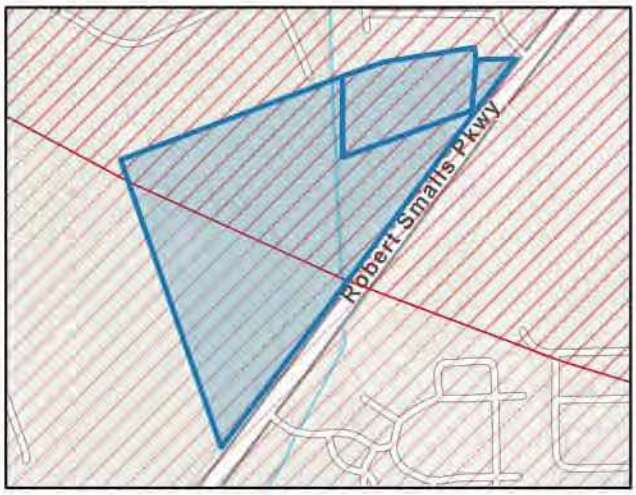
Related to American alligator (1 of 3):
American alligator (Alligator mississippiensis), a federally and state regulated species, is common throughout freshwater habitats in the Coastal Plain of South Carolina. Juvenile alligators frequently utilize stormwater or stormwater-like ponds, such as golf course ponds or resort lagoons, to avoid being preyed upon by larger adult alligators. Alligators are ambush predators that spend most of their lives in water. They have a natural fear of people unless they become habituated. Most often alligators become habituated when people feed them, either purposefully or accidentally. Please note it is illegal to feed, entice or molest an alligator pursuant to S.C. Code of Laws §50-15-500(C); it is also illegal to kill or possess an alligator without a permit pursuant to S.C. Code §50-15-500(D). Accidental feeding can occur when people do not properly dispose of food or fish carcasses associated with recreational fishing or indirect feeding of other wildlife, such as fish, turtles, or ducks, where alligators resides. A habituated alligator is more likely to approach or be near people and pose a potential threat. Therefore, any development should be designed in a manner that will substantially minimize the interaction of alligators and people.

Related to American alligator (2 of 3):
The SCDNR recommends the following best management practices to deter human and alligator interactions:

- Any private property or private yards near ponds or waterways should be fenced to limit unexpected alligator encounters. If fencing individual yards is not possible, fencing around the pond should occur. Keeping people, pets, and children from the edge of the water is the single best way to prevent alligator interactions. Due to the alligator's ability to ambush and lunge a great distance to capture its prey, walking paths around ponds should be a minimum of 10 feet from the shoreline. However, to provide greater protection, the SCDNR recommends this distance be increased to 30 feet to reduce alligator and human conflicts. Brush near the water's edge should be managed and considered in the minimum distance as alligators will utilize vegetation to rest and hunting to wait and ambush prey. If vegetation extends five feet from the edge of the water, then the walkway should be a minimum of 10 to ideally 30 feet beyond the farthest edge of vegetation from the water. Additionally, consideration should be given to require that all dogs on walkways near stormwater ponds or pond-like features in the neighborhood must be leashed to prevent alligator from targeting pets as prey. There should be a designated area included in design plans to provide a place for fishermen to properly dispose of fish carcasses or bait to avoid the accidental feeding and habituation of alligators.

C. Species Best Management Practices (3 of 3)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to species of concern which may be found on or near to the project area. Please contact speciesreview@dnr.sc.gov should you have further questions with regard to survey methods, consultation, or other species-related concerns.



Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census

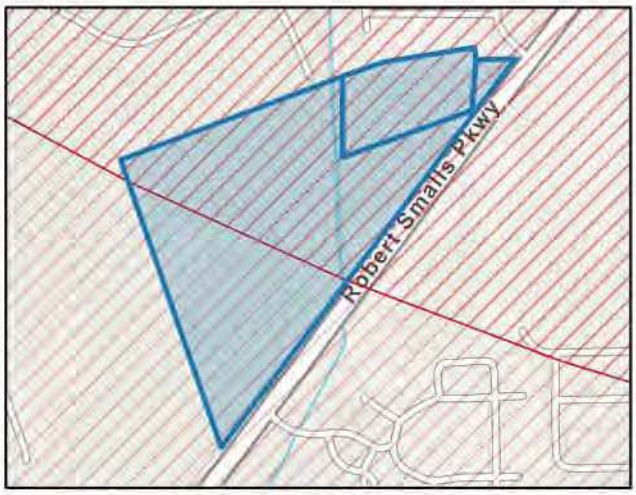
Related to American alligator (3 of 3):

The SCDNR recommends the following best management practices to deter human and alligator interactions:

- Retention ponds, lagoons and other water features should be designed to limit the occurrence of alligator basking adjacent to homes and walkways. As alligators are more likely to bask on shallow slopes, this can be achieved by construction of shallow bank slopes away from the homes and steeper bank slopes near homes or walkways.
- Warning signs noting the presence of alligators and that feeding is illegal should be posted at the entrances to the neighborhood and at any access point where people may be able to approach the water's edge. Signs can be acquired by callingSCDNR at 843-546-6062 or can be purchased on our website at www.gooutdoorssouthcarolina.com.
- The SCDNR recommends that the HOA/management company for the residential development should provide information and educational handouts to all residents on an annual basis prior to spring and summer before alligator activity increases. Informationand educational handouts are available on our website www.dnr.sc.gov/wildlife/herps/alligator.

D. Project Best Management Practices (1 of 4)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to natural resources within or surrounding the project area. Please contact our Office of Environmental Programs at environmental@dnr.sc.gov should you have further questions with regard to best management practices related to this project area.



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Please be aware that the proposed development is in close proximity to property managed to maintain high-quality wildlife habitats using prescribed burning. Future property owners in this area should be made aware of the potential for smoke and hazardous conditions during seasonal prescribed burning events. In an effort to inform the public and allow for the continued use of this essential management tool, the SCDNR strongly encourages the use of smoke easement restrictive covenant and contract language associated with individual lots such that the owners of each individual lots will be required to acknowledge and agree that they may experience noise and smoke emanating from time to time from adjacent protected lands in connection with prescribed burning techniques employed to reduce understory growth, improve wildlife habitat and decrease chances of wildfire.

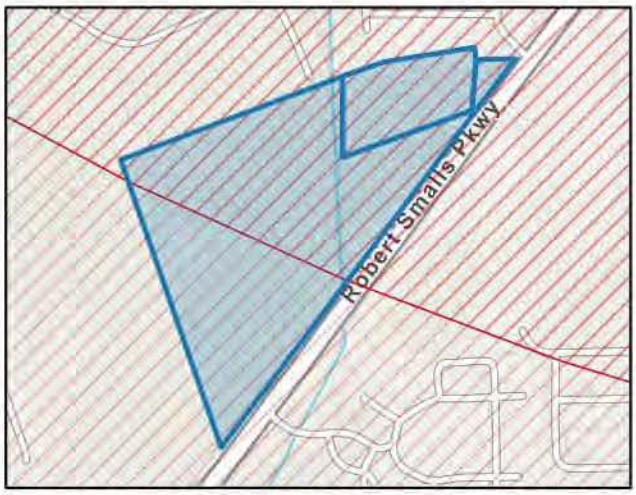
Review of available data, National Wetlands Inventory and hydric soils, indicate that wetlands or waters of the United States are present within your project area. These areas may require a permit from the U.S. Army Corps of Engineers (USACE), as well as a compensatory mitigation plan. SCDNR advises that you consult with the USACE Regulatory to determine if jurisdictional wetlands are present and if a permit and mitigation is required for any activities impacting these areas. For more information, please visit their website at www.sac.usace.army.mil/Missions/Regulatory. Additionally, a 401 Water Quality Certification may also be required from the SC Department of Health & Environmental Control. For more information, please visit their website at https://www.scdhec.gov/environment/water-quality/water-quality-certification-section-401-clean-water-act.

- If clearing must occur, riparian vegetation within wetlands and waters of the U.S. must be conducted manually and low growing, woody vegetation and shrubs must be left intact to maintain bank stability and reduce erosion.
- Construction activities must avoid and minimize, to the greatest extent practicable, disturbance of woody shoreline vegetation within the project area. Removal of vegetation should be limited to only what is necessary for construction of the proposed structures.
- Where necessary to remove vegetation, supplemental plantings should be installed following completion of the project. These plantings should consist of appropriate native species for this ecoregion and exclude plant species found on the exotic pest plant council list: https://www.se-eppc.org/southcarolina/SCEPPC_LIST2014finalOct.pdf.

Excavation/Construction activities must not occur during fish spawning season from March through June due to its negative impacts on eggs and reproduction activities.

D. Project Best Management Practices (2 of 4)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to natural resources within or surrounding the project area. Please contact our Office of Environmental Programs at environmental@dnr.sc.gov should you have further questions with regard to best management practices related to this project area.



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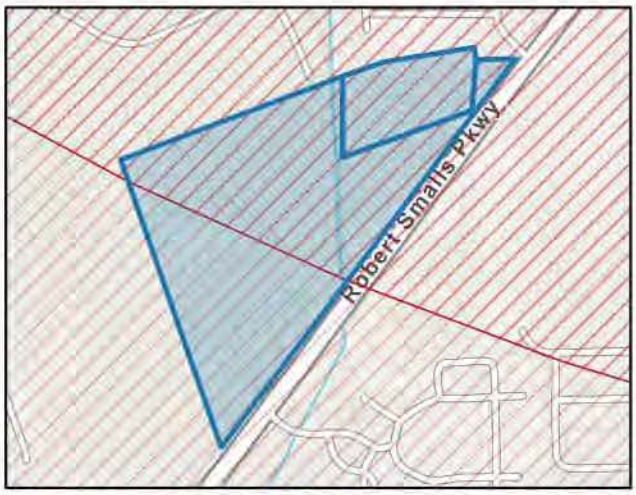
- All necessary measures must be taken to prevent oil, tar, trash and other pollutants from entering the adjacent offsite areas/wetlands/water.
- Once the project is initiated, it must be carried to completion in an expeditious manner to minimize the period of disturbance to the environment.
- Upon project completion, all disturbed areas must be permanently stabilized with vegetative cover (preferable), riprap or other erosion control methods as appropriate.
- The project must be in compliance with any applicable floodplain, stormwater, land disturbance, shoreline management guidance or riparian buffer ordinances.
- Prior to beginning any land disturbing activity, appropriate erosion and siltation control measures (e.g. silt fences or barriers) must be in place and maintained in a functioning capacity until the area is permanently stabilized.
- Materials used for erosion control (e.g., hay bales or straw mulch) will be certified as weed free by the supplier.
- Inspecting and ensuring the maintenance of temporary erosion control measures at least:
  a. on a daily basis in areas of active construction or equipment operation;
  b. on a weekly basis in areas with no construction or equipment operation; and
  c. within 24 hours of each 0.5 inch of rainfall.
- Ensuring the repair of all ineffective temporary erosion control measures within 24 hours of identification, or as soon as conditions allow if compliance with this time frame would result in greater environmental impacts.
- Land disturbing activities must avoid encroachment into any wetland areas (outside the permitted impact area).Wetlands that are unavoidably impacted must be appropriately mitigated.
- Your project may require a Stormwater Permit from the SC Department of Health & Environmental Control, please visit https://www.scdhec.gov/environment/water-quality/stormwater

D. Project Best Management Practices (3 of 4)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to natural resources within or surrounding the project area. Please contact our Office of Environmental Programs at environmental@dnr.sc.gov should you have further questions with regard to best management practices related to this project area.



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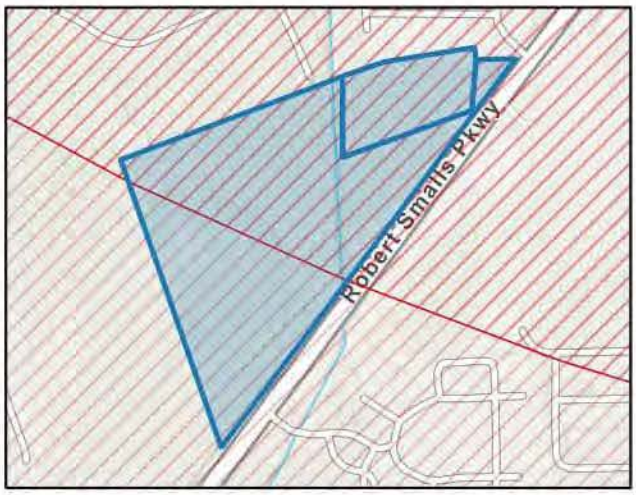
- Residential and commercial development has grown exponentially in recent years. Activities associated with these developments can have detrimental impacts on wildlife and aquatic resources such as habitat fragmentation, loss of available habitats and pollution, especially stormwater pollution. The result of these impacts causes the displacement of species and increases wildlife and human interactions. However, properly planned and sited development activities may allow for economic expansion with minimal negative impacts.
- Where appropriate, particularly adjacent to wetlands and water bodies, drainage plans and construction measures for residential and commercial development should be designed to control erosion and sedimentation, water quality degradation and other negative impacts on adjacent water and wetlands utilizing the best available design research. Developers proposing development activities should contact and work closely with local community development planning entities.
- Developments should be planned where growth is most compatible with natural resources utilizing residential and commercial cluster development methods, maximizing green spaces which can both be beneficial to protect natural resources and provide recreational opportunities for outdoor enthusiasts.
- Developments should be designed and constructed to avoid impact to wetland and stream areas whenever possible and to minimize unavoidable wetland and stream impacts to the maximum extent possible. Aquatic habitats and other sensitive natural areas should be identified in the initial planning stages of the project and incorporated in their natural state into the overall development plan.
- Developments should be designed to maintain the integrity and contiguity of wetland and stream systems and their associated riparian corridors, including the establishment of protective upland buffers around and between undisturbed aquatic systems whenever possible. Projects should be designed to minimize habitat fragmentation, including the construction of a limited number of road and utility crossings through streams and wetlands.

- The SCDNR recommends that the applicant incorporate vegetated bioswales, catch basins and/or bioretention cells/rain gardens into development plans beyond the regulatory requirements of the Stormwater Permitting requirements to add additional features to aid in capturing and filtering runoff from hardened surfaces. These structures can protect water quality and prevent oil, gas and other pollutants from directly entering nearby waterways. In addition, the SCDNR strongly recommends the use of permeable or porous pavement surfaces when possible. Permeable surfaces allow for rainfall to filter through the soil which aids in flood control and improves water quality.
- The following resources are available from Clemson Extension to assist:
  - https://hgic.clemson.edu/factsheet/an-introduction-to-bioswales/
  - https://hgic.clemson.edu/factsheet/rain-garden-plants-introduction/
  - https://hgic.clemson.edu/factsheet/bioretention-cells-a-guide-for-your-residents/
  - https://hgic.clemson.edu/factsheet/an-introduction-to-porous-pavement/
  - https://hgic.clemson.edu/factsheet/trees-for-stormwater-management/

D. Project Best Management Practices (4 of 4)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to natural resources within or surrounding the project area. Please contact our Office of Environmental Programs at environmental@dnr.sc.gov should you have further questions with regard to best management practices related to this project area.



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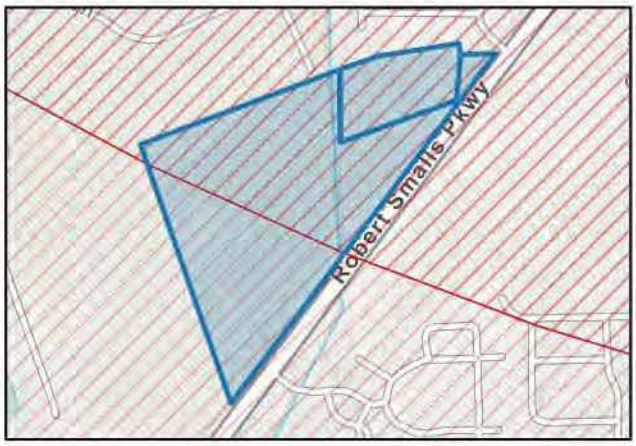
- Your project boundary lies within a coastal county in South Carolina which means you may also need a Coastal Zone Consistency Certification for your project from the SC Department of Health and Environmental Control. For more information, visit: https://www.scdhec.gov/environment/your-water-coast/ocean-coastal-management/beach-management/coastal-permits/coastal-zone
- If your project could affect coastal waters, tidelands, beaches and beach/dune systems, you may also need a critical area permit from the SC Department of Health and Environmental Control. For more information, visit: https://www.scdhec.gov/environment/your-water-coast/ocean-coastal-management/beach-management/coastal-permits/critical-1

E. State & Federally Listed Species in Beaufort County



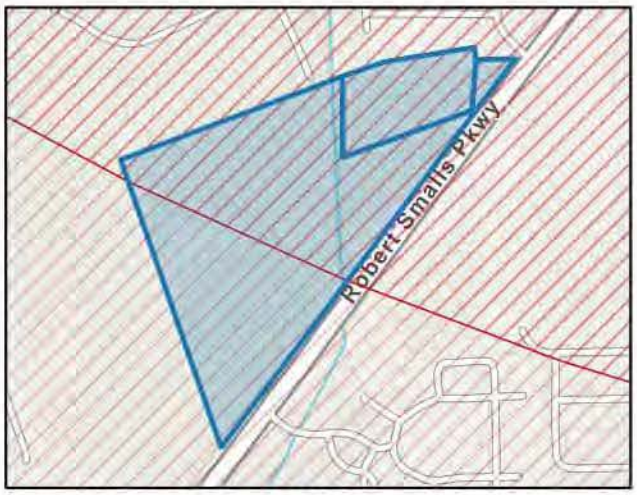
The South Carolina Department of Natural Resources' Heritage Trust Program organizes a database that captures and tracks element of occurrence data for rare, threatened and endangered species, both federal and state. Please keep in mind that this information included within this report is derived from existing databases, and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. If your project requires the assessment of potential threatened or endangered species that could be within the project area, the SCDNR asks that you include a review of the state listed species within the county or watershed in addition to those that may be within the report as being within the project footprint or within 1-mile of the proposed project area. Consideration should be given to the occurrence of suitable habitat onsite, species movement and connectivity of habitat when assessing the likelihood of a state listed species on the project area.

Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau,

County	Scientific Name	Common Name	G Rank	S Rank	Federal Status	State Status	Group Type
Beaufort	*Acipenser brevirostrum*	Shortnose Sturgeon	G3	S3	LE: Federally Endangered	SE: State Endangered	Zoological
Beaufort	*Acipenser oxyrinchus oxyrinchus*	Atlantic Sturgeon	G3T3	S3	LE: Federally Endangered	Not Applicable	Zoological
Beaufort	*Ambystoma cingulatum*	Frosted Flatwoods Salamander	G2	S1	LT: Federally Threatened	SE: State Endangered	Zoological
Beaufort	*Bombus fraternus*	Southern Plains Bumble Bee	G3G4	SNR	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Bombus pensylvanicus*	American Bumble Bee	G3G4	SNR	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Calidris canutus rufa*	Red Knot	G4T2	S2N	LT: Federally Threatened	Not Applicable	Zoological
Beaufort	*Caretta caretta*	Loggerhead Sea Turtle	G3	S3	LT: Federally Threatened	ST: State Threatened	Zoological
Beaufort	*Charadrius melodus*	Piping Plover	G3	S2N	LT: Federally Threatened	SE: State Endangered	Zoological
Beaufort	*Charadrius wilsonia*	Wilson's Plover	G5	S3	MBTA: Migratory Bird Treaty Act	ST: State Threatened	Zoological
Beaufort	*Chelonia mydas*	Green Sea Turtle	G3	S1	LT: Federally Threatened	ST: State Threatened	Zoological
Beaufort	*Clemmys guttata*	Spotted Turtle	G5	S2	ARS: At-Risk Species	ST: State Threatened	Zoological
Beaufort	*Coreopsis integrifolia*	Chipola Dye-flower; Cileate-leaf	G1G2	S1	ARS: At-Risk Species	Not Applicable	Botanical
Beaufort	*Corynorhinus rafinesquii*	Rafinesque's Big-eared Bat	G3G4	S2	Not Applicable	SE: State Endangered	Zoological
Beaufort	*Crotalus adamanteus*	Eastern Diamond-backed Rattlesnake	G3	S2	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Danaus plexippus*	Monarch Butterfly	G4	S4	C: Candidate	Not Applicable	Zoological
Beaufort	*Dermochelys coriacea*	Leatherback Sea Turtle	G2	S1	LE: Federally Endangered	SE: State Endangered	Zoological
Beaufort	*Dryobates borealis*	Red-cockaded Woodpecker	G3	S2	LE: Federally Endangered	SE: State Endangered	Zoological
Beaufort	*Haliaeetus leucocephalus*	Bald Eagle	G5	S3B,S3N	Bald & Golden Eagle Protection Act	ST: State Threatened	Zoological
Beaufort	*Heterodon simus*	Southern Hog-nosed Snake	G2	S1	Not Applicable	ST: State Threatened	Zoological
Beaufort	*Lasiurus cinereus*	Hoary Bat	G3G4	S2	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Laterallus jamaicensis*	Black Rail	G3	S1	LT: Federally Threatened	Not Applicable	Zoological
Beaufort	*Lepidochelys kempii*	Kemp's Ridley Sea Turtle	G1	S1N	LE: Federally Endangered	SE: State Endangered	Zoological
Beaufort	*Lindera melissifolia*	Southern Spicebush, Pondberry	G3	S2	LE: Federally Endangered	Not Applicable	Botanical
Beaufort	*Mycteria americana*	Wood Stork	G4	S2	LT: Federally Threatened	SE: State Endangered	Zoological
Beaufort	*Myotis lucifugus*	Little Brown Bat	G3G4	S2	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Myotis septentrionalis*	Northern Long-eared Bat	G2G3	S1	LE: Federally Endangered	Not Applicable	Zoological
Beaufort	*Perimyotis subflavus*	Tricolored Bat	G3G4	S3	LEP: Federally Endangered (Proposed)	Not Applicable	Zoological
Beaufort	*Pseudobranchus striatus striatus*	Broad-striped Dwarf Siren	G5T1T3	S1	Not Applicable	ST: State Threatened	Zoological
Beaufort	*Setophaga virens waynei*	Wayne's Black-throated Green	G5T1	S1S2B	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Sternula antillarum*	Least Tern	G4	S2B	MBTA: Migratory Bird Treaty Act	ST: State Threatened	Zoological
Beaufort	*Trichechus manatus*	Florida Manatee	G2G3	S2S3	LT: Federally Threatened	SE: State Endangered	Zoological

F. Important Information & Instructions for Submitting Species Observations

The SC Natural Heritage Dataset relies on continuous monitoring and surveying for species of concern throughout the state. Any records of species of concern found within this project area would greatly benefit the quality and comprehensiveness of the statewide dataset for rare, threatened and endangered species. Below are instructions for how to download the SC Natural Heritage Occurrence Reporting Form through the Survey123 App.



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Conservation Ranks & SWAP Priority Status

The SC Natural Heritage Program assigns S Ranks for species tracked within the state of South Carolina based on ranking methodology developed by NatureServe and its state program network. For information conservation rank definitions, please visit https://explorer.natureserve.org/AboutTheData/Statuses

The SCDNR maintains and updates it's State Wildlife Action Plan (SWAP) every 10 years. This plan categorizes species of concern by Moderate, High, and Highest Priority. Please visit https://www.dnr.sc.gov/swap/index.html for more information about the SC SWAP.

Important Information Regarding Element Occurrence Data:

The South Carolina Department of Natural Resources' Heritage Trust Program organizes a database that captures and tracks element of occurrence data for rare, threatened and endangered species, both federal and state. Please keep in mind that this information included within this report is derived from existing databases, and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. If your project requires the assessment of potential threatened or endangered species that could be within the project area, the SCDNR asks that you include a review of the state listed species within the county or watershed in addition to those that may be within the report as being within the project footprint or within 1-mile of the proposed project area. Consideration should be given to the occurrence of suitable habitat onsite, species movement and connectivity of habitat when assessing the likelihood of a state listed species on the project area. To view these lists please visit our county and watershed dashboards at our website: https://natural-heritage-program-scdnr.hub.arcgis.com/#track

State-listed Species Guidance

The South Carolina Department of Natural Resources has released a document to provide clarity for the avoidance of a take of a state listed species and what may be needed from permit applicants, for each species listed as threatened or endangered under SC Code of Regulations 123-150 and 123-150.2. Please review this document for information on species-habitat requirements, survey protocol, and other information regarding environmental review: https://dnr.sc.gov/environmental/docs/SCDNRStateListedSpeciesProtectionGuidance.pdf

Instructions for accessing the SC Natural Heritage Occurrence Reporting Form

1) Follow https://arcg.is/1a0jzC0 or use the QR code here.
2) Select 'Open in browser' or 'Open in the Survey123 field app' depending on your preference. The browser option will only work when connected to the internet.
3) If using in the Survey123 field app, be sure to download the app from your app store beforehand.

Appendix C:
Representative Photolog

AECOM

Photographic Log

Client:	Site Location:	Project No.
Mabbett & Associates, Inc.	Site 1 Beaufort, South Carolina	60739566

Photo No.	Date:
1	12/03/2024

Direction Photo Taken:
South

Description:

Representative view of mixed oak-pine forest land cover.

Photo No.	Date:
2	12/03/2024

Direction Photo Taken:
East

Description:

Representative view of forested wetland land cover.

AECOM

Photographic Log

Client:	Site Location:	Project No.
Mabbett & Associates, Inc.	Site 1 Beaufort, South Carolina	60739566

Photo No.	Date:
3	12/03/2024

Direction Photo Taken: West

Description:

Representative view of shrub/scrub wetland land cover.

Photo No.	Date:
4	12/03/2024

Direction Photo Taken: South

Description:

Representative view of riverine land cover.

AECOM

BIOLOGICAL HABITAT ASSESSMENT, CLIN 030 – Robert Smalls Pkwy at Goethe Hill Road

Environmental Resource Report for an Outpatient Clinic in Beaufort, South Carolina

Project number: 60739566

February 2025

Delivering a better world

Quality information

Prepared by	Checked by	Verified by	Approved by
Cameron Wyse	Amy Vargas	Kelley Samuels	Ramon Mendieta

Revision History

Revision	Revision date	Details	Authorized	Name	Position

Distribution List

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1. INTRODUCTION

The U.S. Department of Veterans Affairs (VA) is assessing the environmental issues present at a parcel located at Robert Smalls Parkway at Goethe Hill Road (Study Area) where a private entity proposes to construct an outpatient clinic for lease by VA (Project). The Study Area, CLIN 030 Beaufort, South Carolina Site (Study Area) is located in the City of Beaufort, Beaufort County, SC and on the Beaufort, South Carolina United States (U.S.) Geological Survey (USGS) 7.5-minute topographic quadrangle (**Figure 1**). The Study Area is approximately 16.6-acres and consists of a large, wooded area (**Figure 2**).

On behalf of Mabbett & Associates, Inc., AECOM conducted a biological habitat assessment within the Study Area. The assessment involved a desktop review of known federally and state listed species known within the Project vicinity. Information collected during the desktop review was used in conjunction with the field assessment of land cover types to identify potential effects pursuant to the U.S. Endangered Species Act (ESA). The purpose of this report is to determine the potential for federal and state protected species, critical habitats, or other sensitive resources to occur within the Study Area.

2. METHODS

This section defines the sources used in the desktop data review and the methods used during field surveys.

2.1 Desktop Analysis

A desktop data review of existing information was conducted to assess the potential occurrence of federal and state protected species, critical habitats, and other sensitive resources within the Study Area. Information reviewed included:

- Google Earth Pro aerial imagery (recent and historical; Google Earth Pro 2024)
- U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) species list for the Study Area (USFWS, 2024a) (**Appendix A**)
- South Carolina Department of Natural Resources (SCDNR) South Carolina Natural Heritage Program (SCNHP) Natural Heritage Database (NHD) report for the Study Area (SCDNR, 2025) (**Appendix B**)

Prior to the field assessment, an AECOM ecologist preliminarily delineated the land cover classifications based on aerial imagery. These preliminary land cover types and boundaries were field verified.

2.2 Field Assessment Methods

On December 4, 2024, AECOM ecologists performed a pedestrian survey of the Study Area for general habitat/land cover classification and wetlands. The survey occurred from the hours of 1015 to 1545. In general, the surveys focused on natural areas, especially areas with potential wetlands and/or streams. AECOM planned the survey in accordance with USFWS and state agency methodology and applicable USFWS and state species-specific survey guidelines.

Habitat quality for each of the species identified by the IPaC unofficial species list (**Appendix A**) and NHD report (Appendix B) was assessed and land cover polygons were verified, reclassified, and/or remapped based upon the principal land characteristics and vegetation present. Ecologists assessed the Study Area's features such as the age and size of trees, the size of land cover types (acres), connectivity with surrounding ecosystems (e.g., wetlands and streams), presence/absence of microhabitat features (e.g., peeling bark, dead/decaying trees), influence of human disturbance, and diversity of native plants. The relative quality of these habitats, in the context of adjacent and/or surrounding land cover, was also assessed.

During the site visit, AECOM ecologists collected field data including photos and notes of the flora and faunas present to provide a biological survey of the site for the presence or absence of species listed under the ESA and state laws. AECOM conducted the surveys in accordance with this approved site survey plan.

3. DESKTOP RESULTS

The following provides the results of the desktop data review conducted for federal and state listed species within the Study Area. All federally protected species within the Study Area are also state protected.

3.1 Land Cover Types

Historical aerial imagery was reviewed to assess potential prior-existing natural resource features and land cover changes prior to AECOM's site visit. The Study Area has been an undeveloped forested area since at least 1985. The Study Area was part of a larger forested area until 2023 when an apartment complex was developed outside of the Study Area to the northeast.

3.2 Federally Listed Species

AECOM obtained federally threatened, endangered, proposed and candidate species data from USFWS IPaC (**Appendix A**), which generates a list of species and other resources that may occur within or near the Study Area (**Table 1**). AECOM identified thirteen potential species protected under the ESA that have potential to occur within the site, including: one mammal, five birds, three reptiles, one insect species, and three flowering plants (USFWS, 2024a). Rational conclusions for federally listed species (**Table 1**) are discussed further within **Sections 4.2**. There are no critical habitats within the site.

TABLE 1. FEDERALLY PROTECTED SPECIES WITHIN PROJECT VICINITY

Scientific Name	Common Name	Federal Status	Potential to Occur	Biological Conclusion
Mammals				
Perimyotis subflavus	Tricolored Bat	Proposed Endangered	Moderate	May affect, not likely to adversely affect
Birds				
Laterallus jamaicensis	Eastern Black Rail	Threatened	None	No effect
Charadrius melodus	Piping Plover	Threatened	None	No effect
Picoides borealis	Red-Cockaded Woodpecker	Endangered	None	No effect
Calidris canutus rufa	Rufa Red Knot	Threatened	None	No effect
Mycteria americana	Wood Stork	Threatened	None	No effect
Reptiles				
Chelonia mydas	Green Sea Turtle	Threatened	None	No effect
Lepidochelys kempii	Kemp's Ridley Sea Turtle	Endangered	None	No effect
Dermochelys coriacea	Leatherback Sea Turtle	Endangered	None	No effect
Insects				
Danaus plexippus	Monarch Butterfly	Candidate	None	No effect
Flowering Plants				
Schwalbea americana	American Chaffseed	Endangered	None	No effect
Oxypolis canbyi	Canby's Dropwort	Endangered	None	No effect
Lindera melissifolia	Pondberry	Endangered	Moderate	May affect, not likely to adversely affect
Migratory Birds				
Falco sparverius paulus	American Kestrel	BCC	Moderate	No effect
Haematopus palliatus	American Oystercatcher	BCC	None	No effect

Scientific Name	Common Name	Federal Status	Potential to Occur	Biological Conclusion
Haematopus palliatus	Bald Eagle	BCC	Moderate	No effect
Rynchops niger	Black Skimmer	BCC	None	No effect
Sitta pusilla	Brown-headed Nuthatch	BCC	Moderate	No effect
Chaetura pelagica	Chimney Swift	BCC	None	No effect
Antrostomus vociferus	Eastern Whip-poor-will	BCC	Moderate	No effect
Ammodramus savannarum	Grasshopper Sparrow	BCC	None	No effect
Gelochelidon nilotica	Gull-billed Tern	BCC	None	No effect
Rallus elegans	King Rail	BCC	None	No effect
Sternula antillarum antillarum	Least Tern	BCC	None	No effect
Tringa avipes	Lesser Yellowlegs	BCC	None	No effect
Limosa fedoa	Marbled Godwit	BCC	None	No effect
Passerina ciris	Painted Bunting	BCC	None	No effect
Calidris melanotos	Pectoral Sandpiper	BCC	None	No effect
Setophaga discolor	Prairie Warbler	BCC	None	No effect
Protonotaria citrea	Prothonotary Warbler	BCC	Moderate	No effect
Melanerpes erythrocephalus	Red-headed Woodpecker	BCC	Moderate	No effect
Arenaria interpres morinella	Ruddy Turnstone	BCC	None	No effect
Euphagus carolinus	Rusty Blackbird	BCC	None	No effect
Ammospiza caudacuta	Saltmarsh Sparrow	BCC	None	No effect
Calidris pusilla	Semipalmated Sandpiper	BCC	None	No effect
Limnodromus griseus	Short-billed Dowitcher	BCC	None	No effect
Elanoides for catus	Swallow-tailed Kite	BCC	Moderate	No effect
Numenius phaeopus hudsonicus	Whimbrel	BCC	None	No effect
Tringa semipalmata	Willet	BCC	None	No effect
Hylocichla mustelina	Wood Thrush	BCC	Moderate	No effect

BCC – Birds of Conservation Concern

3.3 State Listed Species

The South Carolina Department of Natural Resources (SCDNR) Under S.C. Code of Laws Title 50 Chapter 15, is charged with protecting species listed as endangered or threatened. To determine what protected state listed species may exist within the Study Area and surrounding areas, AECOM ecologists utilized the SCDNR's Natural Heritage Database (NHD) to check which species have records found within the Study Area (SCDNR, 2025). The NHD report is included as **Appendix B**.

As part of the NHD report it also generates a table of all the federally and state listed species with the potential to occur in Beaufort County (SCDNR, 2025). Only those species that are state listed as threatened or endangered (T&E) and not already federally listed are included below in **Table 2.** AECOM's provisional biological conclusions for each of these species are discussed further within **Sections 4.3**.

Table 2. STATE LISTED T&E SPECIES WITHIN BEAUFORT COUNTY

Scientific Name	Common Name	State Status	Potential to Occur
Birds			
Charadrius wilsonia	Wilson's Plover	Threatened	None
Haliaeetus leucocephalus	Bald Eagle	Threatened	Moderate
Sternula antillarum	Least Tern	Threatened	None
Mammals			
Corynorhinus rafinesquii	Rafinesque's Big-eared Bat	Endangered	Moderate
Reptiles			
Heterodon simus	Southern Hog-nosed Snake	Threatened	None
Clemmys guttata	Spotted Turtle	Threatened	Moderate
Amphibians			
Pseudobranchus striatus striatus	Broad-striped Dwarf Siren	Threatened	Moderate

4. FIELD ASSESSMENT RESULTS

The following are the results of field surveys for federal and state protected species within the Study Area.

4.1 Land Cover Types

The general habitat survey conducted within the Study Area identified four land cover classifications (**Table 3**), including mixed oak-pine forest, forested (PFO) wetland, and riverine (**Figure 3**). Representative photos of these four landcover types are provided in the photolog attached as **Appendix C**.

TABLE 3. LAND COVER IDENTIFIED IN THE STUDY AREA

Land Cover Type	Description	Approximate Acreage Within the Study Area	Percentage of Study Area
Mixed Oak-Pine Forest	Forested upland areas with mature trees forming a closed canopy. Dominant trees consisting of loblolly pine (*Pinus taeda*), live oak (*Quercus virginiana*), water oak (*Quercus nigra*), laurel oak (*Quercus laurifolia*), sweet gum (*Liquidambar styraciflua*), and Southern magnolia (*Magnolia grandiflora*).	12.85	77.32%
Forested (PFO) Wetland	Forested wetland areas within depressional low lying portions of the Study Area. Dominant trees consisting of water oak, laurel oak, swamp chestnut oak (*Quercus michauxii*), sweet gum, and black gum (*Nyssa sylvatica*). Herbaceous species consisting of giant cane (*Arundinaria gigantea*) and bush palmetto (*Sabal minor*).	3.61	21.72%
Riverine	An excavated canal with perennial flow running through the center of the Study Area.	0.16	0.96%
	Totals	**16.62**	**100%**

4.2 Potential for Threatened and Endangered Species

AECOM ecologists made recommended effect determinations for the federally listed species that have the potential to occur within the Study Area based on both the desktop assessments and the information gained during the field surveys on December 4, 2024. Only the federal action agency may make the final determination effect (USFWS, 2024b). The federal action agency may make one of the following determinations for each listed species:

"**No effect**" means there will be no impacts, positive or negative, to listed or proposed resources. Generally, this means no listed resources will be exposed to action and its environmental consequences. Concurrence from the Service is not required.

"**May affect, not likely to adversely affect**" means that all effects are beneficial, insignificant, or discountable. Beneficial effects have contemporaneous positive effects without any adverse effects to the species or habitat. Insignificant effects relate to the size of the impact and should never reach the scale where take occurs. Discountable effects are those extremely unlikely to occur. Based on best judgment, a person would not: (1) be able to meaningfully measure, detect, or evaluate insignificant effects; or (2) expect discountable effects to occur.

"**May affect, likely to adversely affect**" means that listed resources are likely to be exposed to the action or its environmental consequences and will respond in a negative manner to the exposure. The Endangered Species Act (ESA) requires the federal action agency request initiation of formal consultation with the Service when this determination is made. A written request for formal consultation should accompany the biological assessment/biological evaluation.

4.2.1 Tricolored Bat

Optimal Survey Window: Year-round (USFWS, 2022)

During the spring, summer and fall tricolored bats primarily roost among live and dead leaf clusters of live or recently dead deciduous hardwood trees. In the southern portions of their range, tricolored bats (*Perimyotis subflavus*) will also roost in Spanish moss (*Tillandsia usneoides*). In addition, tricolored bats have been observed roosting during summer among pine needles, within artificial roosts like barns, beneath porch roofs, bridges, concrete bunkers, and rarely within caves. Female tricolored bats exhibit high site fidelity, returning year after year to the same summer roosting locations. Female tricolored bats form maternity colonies and switch roost trees regularly. Males roost singly. During the winter, tricolored bats hibernate in caves and mines; although, in the southern U.S., where caves are sparse, tricolored bats often roost in drainage culverts and trees, remaining active and feeding throughout winter. Tricolored bats exhibit high site fidelity with individuals returning year after year to the same hibernaculum (USFWS, 2024c).

AECOM provisionally determined that tricolored bats are likely to occur within the Study Area due to the large number of mature trees with suitable roost characteristics, connectivity to other forested areas, and ready access to a perennial source of water. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of "may affect, not likely to adversely affect" the tricolored bat. Through the Northern Long-eared Bat and Tricolored Bat Voluntary Environmental Review Process for Development Projects (Version 1), USFWS has developed minimum conservation measures for the tricolored bat. The minimum conservation measures for the South Carolina year-round active range, call for avoiding tree removal during the pup season (May 1 to July 15) and the winter torpor (December 15 to February 15).

4.2.2 Eastern Black Rail

Optimal Survey Window: April-June (USFWS, 2022)

The eastern black rail (*Laterallus jamaicensis*) is listed as threatened by USFWS due to habitat loss resulting from fragmentation, land management activities, hydrologic changes, prescribed burns, climate change, environmental contaminants, and invasive exotic species impacts on native habitat. This species is found along the coast within tidally or non-tidally influenced salt, brackish, and freshwater habitats with dense cover. The eastern black rail can also be found in upland areas adjacent to marsh wetlands. Impounded and un-impounded intermediate marshes closer to higher elevation areas also provide habitat. Within the interior of the U.S., easter black rails use wet sedge meadows with dense cover, or shallow wetlands dominated by cattails (*Typha* spp.) (USFWS, 2024c).

No suitable habitat for the eastern black rail exists within the Study Area, which is surrounded by residential communities, a major roadway, and forested areas. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of “no effect” for the eastern black rail.

4.2.3 Piping Plover

Optimal Survey Window: July 15-May 1 (USFWS, 2022)

Piping plovers (*Charadrius melodus*) use a variety of habitats and frequently move among those in response to local weather and tidal conditions. Coastal habitats include sand spits, small islands, tidal flats, shoals, and sandbars with inlets. Primary foraging habitats include sandy mud flats, ephemeral pools, and seasonally emergent seagrass beds with abundant invertebrates (USFWS, 2024c).

The Study Area does not overlap with any suitable habitat for this species; therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of “no effect” for the piping plover.

4.2.4 Red-Cockaded Woodpecker

Optimal Survey Window: March 1-July 31 (USFWS, 2022)

Red-cockaded woodpeckers (*Picoides borealis*) inhabit open mature pine forests/savannas. Cavities are excavated in mature pines, generally more than 80 years old. Longleaf pines are commonly preferred, but slash and loblolly pines are also acceptable. Cavity trees typically are in open pine stands with little to no hardwood in the canopy or midstory. Once the hardwood midstory reaches the height of the cavities, the woodpeckers will usually leave the area because predators will have easier access to the cavities (USFWS, 2024c).

The Study Area did not contain suitable habitat for this species. Though there are older pine trees present within the Study Area they are part of a mixed oak-pine forest which differs from the species’ preferred forest type of open pine forests/savannahs. No individuals nor nest cavities were observed during the field surveys. Therefore, this species has no potential to occur in the Study Area, and it is anticipated that the proposed project would result in an ESA determination of “no effect” for the red-cockaded woodpecker.

4.2.5 Rufa Red Knot

Optimal Survey Window: August 1-May 31 (USFWS, 2022)

Red knots (*Calidris canutus rufa*) winter in the coastal U.S. from Cape Cod to Mexico and South America and spend the summer on islands in the high Arctic (USFWS, 2024c). They prefer sandy beaches and mud flats. Red knot flocks roost on inlets of barrier beaches and islands.

The Study Area is not located on any beaches or barrier islands. Because there is no suitable habitat present, it is anticipated that the proposed project would result in an ESA effect determination of “no effect” for the rufa red knot.

4.2.6 Wood Stork

Optimal Survey Window: February 15-September 1 (USFWS, 2022)

Wood storks (*Mycteria americana*) are distributed from South Carolina to southern South America. In the U.S., wood storks concentrate on coastal areas of Florida, Georgia, and South Carolina. In South Carolina, wood storks’ nest in four counties, including Beaufort County. Nests are typically located on trees surrounded by water, such as in cypress swamps, shallow creeks, and impoundments. Wood storks can form nesting colonies that may contain up to 10,000 nests. In South Carolina, the seven nesting colonies in existence contain an average of 102 nests. They forage in wetlands, swamps, ponds, and marshes with water depths of around 4–12 inches. They tend to use open wetlands more frequently for foraging than closed canopy wetlands. Storks roost in trees along the water's edge (USFWS, 2024c).

No suitable habitat for the wood stork exists within the Study Area, which is surrounded by residential communities, a major roadway, and forested areas. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of “no effect” for the wood stork.

4.2.7 Sea Turtles

Optimal Survey Window: May 1-October 31 (USFWS, 2022)

There are three sea turtle species which have the potential to occur in the Study Area, according to the IPaC. They are the green sea turtle (*Chelonia mydas*), Kemp's Ridley Sea turtle (*Lepidochelys kempii*), and the leather back (*Dermochelys coriacea*) sea turtle. As these species are found in marine environments, and there are no beaches or ocean waters in or connected to the Study Area, there is no potential for the species to occur. Therefore, it is anticipated that the proposed project would result in an ESA effect determination of "no effect" for the sea turtle species.

4.2.8 Monarch Butterfly

Optimal Survey Window: August-December (USFWS, 2022)

The monarch butterfly (*Danaus plexippus*) is a large and conspicuous orange and black butterfly species. It's well known for having a generation that annually makes a large migration south across the U.S. and winters in Mexico. During spring migration, important nectar sources typically include tickseed, arrowwood and phlox species. Although adult monarch butterflies forage for nectar on a wide variety of flowering plants through migration and breeding, they only breed and lay eggs on their host plant, the milkweed (*Asclepias* spp.; USFWS 2024c). Monarch butterfly larvae, or caterpillars, are completely dependent on milkweed host plants. This species is dependent on approximately 25 different species of milkweed in eastern North America. Milkweed decline in both agricultural and urban landscapes is one of the primary reasons that monarchs are in trouble today (National Wildlife Federation 2022).

In December of 2020, USFWS determined that listing the monarch butterfly under the ESA was warranted, but that other agency priorities prevented its listing. Instead, the species was added to the Candidate Species list. On December 12, 2024, USFWS proposed to list the species under the ESA as Threatened and simultaneously proposed the designation of critical habitat in California to protect overwintering sites (89 FR 100662). Per the recent proposed listing by USFWS "…activities that may remove milkweed and nectar resources within the breeding and migratory range, but that do not result in conversion of native or naturalized grassland, shrubland, or forested habitats [are] not considered key population drivers" (89 FR 100662).

No host plants (milkweeds) or butterflies were observed within the Study Area. Therefore, it is anticipated that the proposed project would result in an ESA effect determination of "no effect" for the Monarch butterfly.

4.2.9 American Chaffseed

Optimal Survey Window: May-August, 1-2 months after a fire event (USFWS, 2022)

American chaffseed (*Schwalbea americana*) occurs in fire-maintained longleaf pine flatwoods and savannas. Often it is found in ecotonal areas between peaty wetlands and xeric sandy soils. Chaffseed is dependent on factors like fire, mowing, or fluctuating water tables to maintain the open to partly open conditions that it requires. Historically, the species probably existed on savannas and pinelands throughout the coastal plain and on sandstone knobs and plains inland where frequent, naturally occurring fires maintained these sub-climax communities. Most of the surviving populations, and all of the most vigorous populations, are in areas that are still subject to frequent fire. Fire may be important to the species in ways that are not yet understood, such as for germination of seed or in the formation of the connection to the host plant (USFWS, 2024c).

No suitable habitat for the American chaffseed exists within the Study Area due to a lack of frequent fire disturbance and the closed canopy forest present within the majority of the Study Area. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of "no effect" for the American chaffseed.

4.2.10 Pondberry

Optimal Survey Window: February-March; September-October (USFWS, 2022)

Pondberry (*Lindera melissifolia*) can grow in a variety of habitats as long as hydrological requirements are met. This plant occurs in seasonally flooded wetlands such as floodplain/bottomland hardwood forests and forested swales, on the bottoms and edges of shallow seasonal ponds in old dune fields, along the margins of ponds and depressions in pinelands, around the edges of sinkholes in coastal areas with karst topography, and along the borders of Sphagnum bogs. Usually in shade but tolerates full sun (USFWS, 2024c).

During the field surveys, AECOM ecologists found suitable habitat for this species. The PFO wetland areas present within the Study Area would provide suitable habitat for the pondberry. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of “may affect, not likely to adversely affect” for this species.

4.2.11 Canby’s Dropwort

Optimal Survey Window: Late July-September (USFWS, 2022)

Canby's dropwort (*Oxypolis canbyi*) is a perennial herbaceous plant which grows from 30 to 50 in tall. Canby's dropwort has been found in a variety of coastal plain communities, including pond cypress savannahs, the shallows and edges of cypress/pond pine ponds, sloughs, and wet pine savannas. Canby's dropwort was federally listed as endangered on February 25, 1986. Only twenty-five populations of the species are currently known to exist, one of which is found in the ACE Basin. The site of this population in the ACE is on state-owned land, so it is protected from habitat alterations. The most serious threat to the population is drought or too much rain (USFWS, 2024c).

No suitable habitat for Canby’s dropwort exists within the Study Area. There are wetland areas present within the Study Area however they are either PFO or PSS wetlands with very minimal herbaceous cover. The species also reproduces asexually by extending rhizomes, so it is unlikely to be present within the Study Area as there are not any recorded populations within the vicinity of the Study Area. Therefore, it is anticipated that construction of the proposed project would result in an ESA effect determination of “no effect” for this species.

4.3 Critical Habitat

No critical habitat for any listed species as designated by USFWS was identified within the Study Area.

4.4 Potential for Birds of Conservation Concern

4.4.1 American Kestrel

The American kestrel (*Falco sparverius paulus*) is the smallest and most colorful falcon in North America. They are found in a variety of habitats including open grasslands, prairies, the edges of forests, cities, and farmlands. The species nests in cavities, such as old woodpecker holes, and lay eggs directly on the cavity floor. The species breeds from April 1 to August 31.

This species was not observed on site during the survey. Clearing of trees should be timed to avoid the breeding season or a cavity survey should be performed prior to clearing to ensure the American kestrel is not found on site. With clearing of trees conducted outside of the breeding season or implementation of cavity surveys prior to tree clearing, the Project will have “no effect” on the American kestrel.

4.4.2 Bald Eagle

Discussed in Section 4.5.2.

4.4.3 Shore Birds

Several of the identified BCC are found in coastal habitats such as shorelines, beaches, coastal hammocks, and estuarine wetlands such as saltmarsh habitat (Audubon 2024). These species include the American oystercatcher (*Haematopus palliates*), black skimmer (*Rynchops niger*), gull-billed tern (*Gelochelidon nilotica*), king rail (*Rallus elegans*), least tern (*Sternula antillarum antillarum*), lesser yellowlegs (*Tringa avipes*), marbled godwit (*Limosa fedoa*), painted bunting (*Passerina ciris*), pectoral sandpiper (*Calidris melanotos*), prairie warbler (*Setophaga discolor*), ruddy turnstone (*Arenaria interpres morinella*), saltmarsh sparrow (*Ammospiza caudacuta*), semipalmated sandpiper (*Calidris pusilla*), short billed dowitcher (*Limnodromus griseus*), whimbrel (*Numenius phaeopus hudsonicus*), and willet (*Tringa semipalmata*).

The Study Area is inland and coastal habitats preferred by these species do not occur on site. Therefore, the preliminary determination is that the Project will have “no effect” on shore birds.

4.4.4 Brown-headed Nuthatch

The brown-headed nuthatch (*Sitta pusilla*) is a small bird with a distinctive squeaky call (Audubon 2024). Their preferred habitat is mature pine forest with an open understory and typically are found in family groups.

Forested habitat on the site is a mixed of hardwoods and pines. As the species favors pure stand of pine habitat, the preliminary determination is that the Project will have “no effect” on the brown-headed nuthatch.

4.4.5 Chimney Swift

The chimney swift (*Chaetura pelagica*) is a small gray bird that spends most of its life airborne (Audubon 2024). They typically nest in chimneys, hollow trees, and caves.

Caves do not occur on site. Hollow trees were not observed on site. Therefore, the preliminary determination is that the Project will have “no effect” on the chimney swift.

4.4.6 Eastern Whip-Poor-Will

The eastern whip-poor-will (*Antrostomus vociferus*) is found throughout the eastern U.S., often migrating to the southern U.S. for the winter. This bird is most identifiable by its distinct call and has mottled brown and gray feathers. It is found most in woodlands (Audubon 2024). The preferred habitat for the species has little to no understory.

The forested habitat identified on site is poor habitat for the eastern whip-poor-will due to the amount of understory. Therefore, the preliminarily determination is that the Project will have “no effect” this species.

4.4.7 Grasshopper Sparrow

The grasshopper sparrow (*Ammodramus savannarum*) is a small bird that prefers to stay close to the ground (Audubon 2024). The species is typically identified by its distinctive orange-yellow spot in front of the eye. This species favors open grassland, prairie, hayfields, and pastures.

Habitat favored by the grasshopper sparrow does not occur on site. Therefore, the preliminarily determination is that the Project will have “no effect” on the grasshopper sparrow.

4.4.8 Prothonotary Warbler

The prothonotary warbler (*Protonotaria citrea*) has a bright yellow head and chest, with darker gray wings and a long, pointed bill. This bird is most often found in swamps and wet forests, and commonly along open water or streams.

Due to the lack of open water and streams in the Study Area, there is low potential for habitat for the prothonotary warbler. The preliminarily determination is that the Project will have “no effect” on this species.

4.4.9 Red-Headed Woodpecker

Red-headed woodpeckers (*Melanerpes erythrocephalus*) are common throughout the southeast. The species can use a variety of habitats including open woodlands, orchards, and groves (Audubon 2024). Red-headed woodpeckers’ nest in cavities that are excavated in dead trees or large branches. The species breeds from May 10 to September 10.

This species was not observed on site during the survey. Clearing of trees should be timed to avoid the breeding season or a cavity survey should be performed prior to clearing to ensure the red-headed woodpecker is not found on site. With clearing of trees conducted outside of the breeding season or implementation of cavity surveys prior to tree clearing, the Project will have “no effect” on the red-headed woodpecker.

4.4.10 Rusty Blackbird

The rusty blackbird (*Euphagus carolinus*) is a medium sized blackbird with a curved bill. The species displays sexual dimorphism, with the males glossy black and the females dark brown during the breeding season (Audubon 2024). The species is typically found in freshwater pond and marsh habitat.

Habitat favored by the rusty blackbird does not occur on site. Therefore, the preliminarily determination is that the Project will have “no effect” on the rusty blackbird.

4.4.11 Swallow-Tailed Kite

Swallow-tailed kites (*Elanoides for catus*) can be found in a variety of habitats. They inhabit swamps, marshes, and river edges in the southeastern United States (Audubon 2024). The species nests high in trees, often near water.

This species could use wetland and surface water habitat found on site but no nesting habitat for this species was observed within the Study Area. Because nesting habitat does not occur on site, the preliminary determination is that the Project will have “no effect” on the swallow-tailed kite.

4.4.12 Wood Thrush

Wood thrushes (*Hylocichla mustelina*) migrate from south of the gulf up to the eastern U.S. They have brown backs and black and white spots on their chest. Wood thrushes are found in woodland understories and prefer damp habitats and streams to dry woods. They can also be found in suburban areas (Audubon 2024).

Forested habitat identified within the Study Area may provide habitat for the wood thrush, the species favors areas forested areas near streams. Due to the lack of stream habitat, the preliminarily determination is that the Project will have “no effect” this species.

4.5 Potential for State Listed Threatened and Endangered Species

The SCDNR has published a protection guidance document that describes habitat information and survey times/avoidance measures for each of South Carolina’s state threatened and endangered species. This document was used to generate the species preferred habitat descriptions below, and to determine if suitable habitat for the species was present in the Study Area (SCDNR, 2024).

4.5.1 Wilson's Plover

Wilson’s plovers (*Charadrius wilsonia*) inhabit South Carolina primarily during the summer months for nesting. Suitable habitat for nesting includes primarily dune systems. The species also utilizes intertidal sand flats, mud flats, dredge spoil islands and shell rakes. Foraging occurs in tidal sloughs, beach edges, as well as dune and marsh habitats.

The Study Area does not overlap with any beach areas or marsh areas, meaning there is not suitable nesting or foraging habitat for this species. Therefore, AECOM anticipates that construction of the proposed project would have no impact on Wilson’s Plover.

4.5.2 Bald Eagle

Bald eagles (*Haliaeetus leucocephalus*) forage in fresh and salt water along reservoirs, impoundments and rivers). Suitable habitat for nesting includes large trees, typically pines, but occasionally cypress trees and hardwood trees, that stand above the canopy within contiguous forest. Nest sites are typically located near foraging sites. Bald eagle nests are generally about 4 to 6 feet in diameter and 3 to 4 feet tall. These nests are reused in subsequent years.

There is potentially suitable habitat present for bald eagles due to the forested land cover and large trees within the Study Area. However, during the field surveys AECOM ecologists did not observe any large raptor stick nests or signs of bald eagle nesting activity within the study area. No bald eagles were seen or heard during the field surveys. Therefore, AECOM anticipates that construction of the proposed project would have no impact on bald eagles.

4.5.3 Least Tern

Least terns (*Sternula antillarum*) inhabit South Carolina during the spring and summer months for nesting. Suitable habitat for nesting includes bare or sparsely vegetated beaches (typically near inlets or areas of accretion), sand flats/spits, and sand bars. Least terns will also use unvegetated dredge spoil areas and artificial habitats such as gravel parking lots, rooftops, piers, and bridges.

The Study Area does not overlap with any beach or coastal areas, meaning there is not suitable nesting or foraging habitat for this species. Therefore, AECOM anticipates that construction of the proposed project would have no impact on least terns.

4.5.4 Rafinesque' s Big-eared Bat

Suitable habitat for this species within the Coastal Plain of South Carolina includes black gum (*Nyssa sylvatica*) and water tupelo (*Nyssa aquatic*) stands, bald cypress (*Taxodium distichum*) swamp forests, maritime forests, and hardwood or mixed mature forested bottomlands.

AECOM determined that Rafinesque's big-eared bats (Corynorhinus rafinesquii) have potential to occur within the Study Area due to the large number of mature trees with suitable roost characteristics, the presence of a potential maternity roost tree (large trees greater than 15-inches diameter at breast height (DBH) with good roosting characteristics and 100% solar exposure), connectivity to other forested areas, and ready access to a perennial source of water. The SCDNR recommends that where suitable habitat exists, assume presence of the species and avoid tree clearing from May 1st to July 31st to minimize disturbance and destruction of habitat that may be used by females during gestation or maternal care for pups. Therefore, AECOM has provisionally determined that construction of the proposed project would have a potential to impact this bat species if tree clearing is conducted between May 1st to July 31st.

4.5.5 Southern Hog-nosed Snake

Suitable habitat for the southern hog-nosed snake (*Heterodon simus*) includes sandhills that typically consists of a rolling topography and deep sand substrate within a savanna of widely spaced longleaf pine (*Pinus palustris*) and/or turkey oak (*Quercus laevis*), often with a wiregrass (*Aristida stricta*) understory; or scrubby pine flatwoods with low relief having deep, sandy soils within a savanna of widely spaced longleaf pine, with a wiregrass and scrub-shrub understory.

No suitable habitat for this species exists within the Study Area. The majority of the Study Area consisted of wetter oak-gum forests. Though there are upland areas within the Study Area they are not open canopy type savannah areas and lean more towards an oak-pine forest type with a closed canopy. The Study Area is also not adjacent to any preferred habitat for this species. Therefore, AECOM anticipates that construction of the proposed project would have no impact on the southern hog-nosed snake.

4.5.6 Spotted Turtle

Suitable habitat for spotted turtles (*Clemmys guttata*) includes heavily vegetated, shallow wetlands with standing or flowing water including Carolina Bays, bogs, swamps, marshes, and ditches. While often associated predominantly with wetlands, spotted turtle spend a considerable amount of time on land throughout the year; however, preferred upland habitat types have not been identified.

During the field surveys, AECOM ecologists found suitable habitat for this species. The wetland and stream areas present within the Study Area would provide suitable habitat for the spotted turtle; therefore, it is anticipated that construction of the proposed project has potential to impact this turtle species.

4.5.7 Broad-striped Dwarf Siren

Suitable habitat for the broad-striped dwarf siren (*Pseudobranchus striatus striatus*) consists of heavily vegetated cypress swamps and ponds and flooded ditches, marshes and other permanent and semi-permanent aquatic habitats in the Coastal Plain. They also inhabit small Coastal Plain streams that exhibit little or no flow and have muck bottoms.

During the field surveys, AECOM ecologists found suitable habitat for this species. The wetland and stream areas present within the Study Area would provide suitable habitat for the broad-striped dwarf siren; therefore, it is anticipated that construction of the proposed project has potential to impact this siren species.

5. REGULATORY

5.1 Endangered Species Act

Consultation with USFWS may be required if the project could result in adverse impacts or "take" of a federally listed species. To determine applicability of the ESA (16 U.S.C. § 1531 et seq.), early coordination with USFWS and/or field surveys such as a habitat assessment of the Study Area could be conducted to assess the suitability of habitat and to measure presence/absence of threatened and endangered species.

The ESA requires that all project proponents ensure that any action authorized, funded, or conducted by the federal government does not jeopardize the continued existence of a federally listed threatened or endangered species, or result in the adverse modification of the federally designated critical habitat of a federally listed species. If a project has a federal nexus such as a federal permit or funding, then consultation with USFWS under Section 7 of the ESA would also apply. In this case, a Biological Assessment would be prepared, and USFWS would issue a concurrence or Biological Opinion to authorize the project. The most likely federal nexus for the Project is CWA (33 U.S.C. 1344) Section 404 permitting for impacts to wetlands.

If threatened and endangered species impacts cannot be avoided, technical assistance and ESA Section 10 incidental take permit may be required if there is no federal nexus. In some cases, achieving authorization under the ESA may require a habitat conservation plan to be developed for the project. Additionally, if deemed sufficiently complex or impactful, USFWS may require an Environmental Assessment or Environmental Impact Statement to meet their statutory requirements under the National Environmental Policy Act.

AECOM evaluated the site and determined that the ecosystems present are suitable habitats for two federally listed species. Tricolored bat and pondberry have a moderate potential of occurring in the Study Area. AECOM anticipates that construction of the proposed project would result in an ESA determination of “may affect, not likely to adversely affect” to these two species and “no effect” to the remaining species identified.

5.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA; 16 U.S.C. 703-712) prohibits the pursuit, hunting, take, capture, kill, or sale of listed migratory bird species. Best management practices (BMPs) should be implemented during development and operation of the Project to minimize potential impacts to migratory birds. USFWS recommends implementation of BMPs to minimize take of migratory birds, including avoidance of construction activities that could result in take during the nesting season (February-August). If construction begins during the nesting season, preconstruction clearance surveys for nesting birds would facilitate determination of nesting bird presence and the need for non-disturbance buffers.

5.3 Bald Eagle and Golden Eagle Protection Act

The Bald Eagle and Golden Eagle Protection Act (BGEPA; 16 U.S.C. 668-668c) enacted in 1940, and amended several times since then, prohibits anyone, without a permit issued by the Secretary of the Interior, from “taking” eagles, including their parts, nests, or eggs. The BGEPA provides criminal penalties for persons who “take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle or any golden eagle, alive or dead, or any part, nest, or egg thereof.” The Act defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.”

The IPaC report states that there are likely bald eagles present in the vicinity of the Study Area. Suitable nesting habitat for the bald eagle was observed in the Study Area, however, no eagles or eagle nests were observed during the field surveys. Therefore, it is AECOM’s professional opinion that Project activities would result in no take of the bald eagle.

6. SUMMARY AND CONCLUSIONS

AECOM conducted a survey of the approximately 16.6-acres of the Study Area on December 4, 2024, and this report has determined the following:

- Three land cover types are present including:
  - Mixed Oak-Pine Forest (77.32%)
  - Forested (PFO) Wetland (21.72%)
  - Riverine (0.96%)
- A “may affect, not likely to adversely affect” determination was given for the tricolored bat and the pondberry.
- For the tricolored bat, minimum conservation measures developed by USFWS call for avoiding tree removal during the pup season (May 1 to July 15) and the winter torpor (December 15 to February 15).
- Obtain written concurrence from USFWS for the tricolored bat and pondberry.
- No effect determination for all BCC’s.

- Avoid tree clearing during the breeding season of the American kestrel (April 1 to August 31) and red-headed woodpecker (May 1 to September 10) or conduct a tree cavity search prior to clearing of trees.
- SCDNR state listed species, Rafinesque's big-eared bat, spotted turtle, and broad striped dwarf siren, have a potential to occur within the Study Area.
- No Species with either state or federal protections have occurrence data within the Study Area

AECOM's effect determinations are preliminary and are subject to review by USACE, prior to submittal to USFWS, under Section 7 consultation. During consultation, USFWS will review the determinations for all species and may change these determinations and request further actions to minimize or avoid potential impacts to protected species. Consultation with SCDNR is not required for permitting; however, it is recommended as part of the NEPA process.

7. REFERENCES

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FIGURES

AECOM

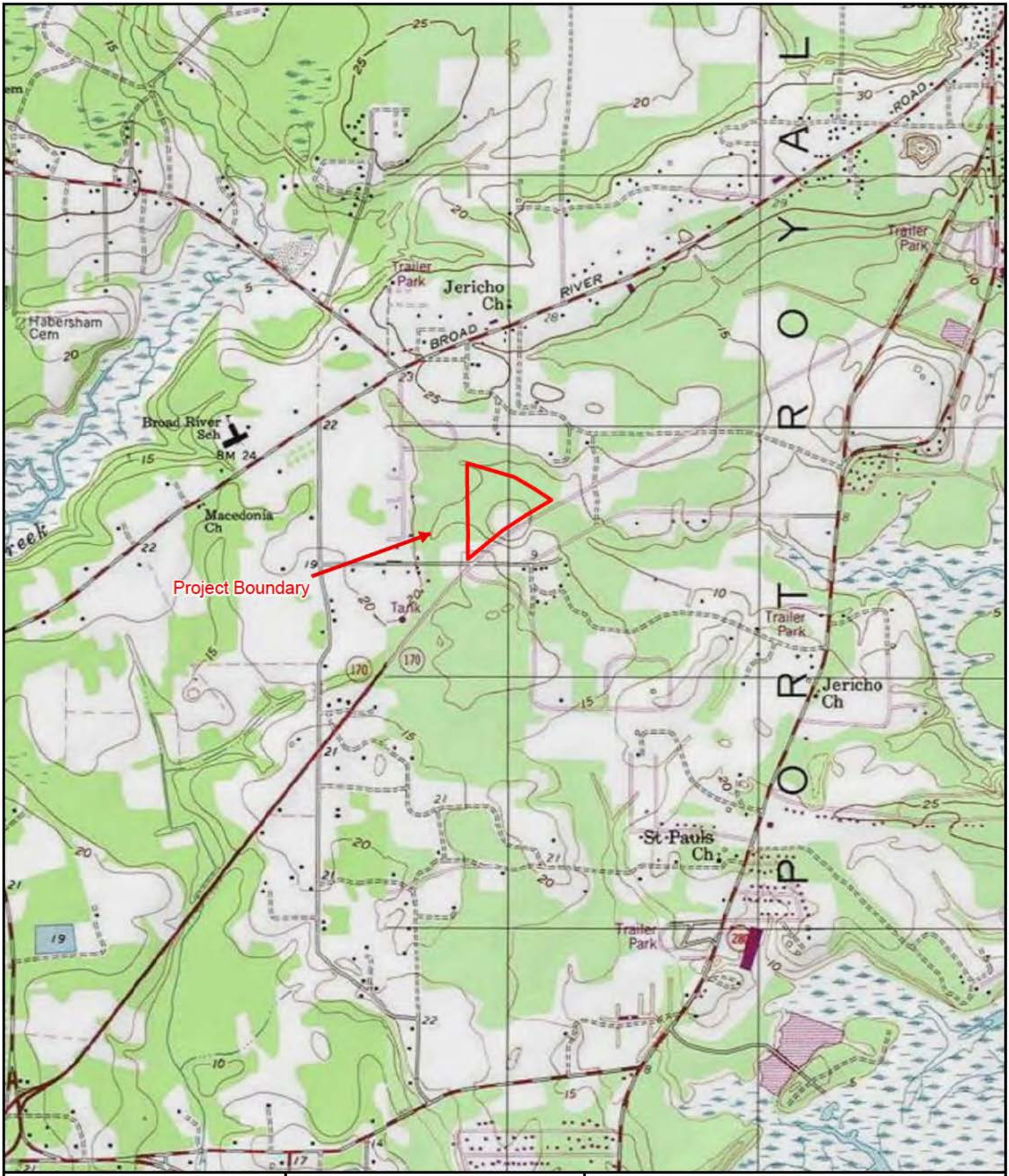
0 8,000 Feet

Date: 12/13/2024

Legend

- Military Areas
- Project Boundary (16.62 ac)

Figure 1
Location Map
Beaufort VA Site 2: Robert Smalls Pkwy at Goethe Hill Rd
Beaufort County, South Carolina



N

AECOM

0 2,000 Feet

1 inch =2,000 Feet

12/13/2024

Legend

Project Boundary (16.62 ac)

USGS Quad: Laurel Bay,1964 and Beaufort, 1979

Figure 2
Topographic Map
Beaufort VA Site 2: Robert Smalls Pkwy at Goethe Hill Rd
Beaufort County, South Carolina

AECOM

N

0 150 300 Feet

Date 12/17/2024.

Legend

- Project Boundary (16.62 ac.)
- Mixed Oak-Pine Forest
- Palustrine Forested Wetland
- Riverine

Figure 3

Land Cover Map

Beaufort VA Site 2:
Robert Smalls Pkwy at Goethe Hill Rd
Beaufort County, South Carolina

APPENDIX A:
USFWS IPaC Unofficial Species List

IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Beaufort County, South Carolina

Local office

South Carolina Ecological Services

(843) 727-4707
(843) 727-4218

176 Croghan Spur Road, Suite 200

Charleston, SC 29407-7558

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of in uence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly a ected by activities in that area (e.g., placing a dam upstream of a sh population even if that sh does not occur at the dam site, may indirectly impact the species by reducing or eliminating water ow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential e ects to species, additional site-speci c and project-speci c information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local o ce and a species list which ful lls this requirement can **only** be obtained by requesting an o cial species list from either the Regulatory Review section in IPaC (see directions below) or from the local eld o ce directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an o cial species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the sheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).

2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an o ce of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially a ected by activities in this location:

Mammals

NAME	STATUS
Tricolored Bat Perimyotis sub avus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

Birds

NAME	STATUS
Eastern Black Rail Laterallus jamaicensis ssp. jamaicensis Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/10477	Threatened
Piping Plover Charadrius melodus There is **nal** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/6039	Threatened
Red-cockaded Woodpecker Picoides borealis Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/7614	Endangered
Rufa Red Knot Calidris canutus rufa Wherever found There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/1864	Threatened
Wood Stork Mycteria americana No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8477	Threatened

Reptiles

NAME	STATUS
Green Sea Turtle Chelonia mydas There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/6199	Threatened
Kemp's Ridley Sea Turtle Lepidochelys kempii Wherever found There is **proposed** critical habitat for this species. https://ecos.fws.gov/ecp/species/5523	Endangered
Leatherback Sea Turtle Dermochelys coriacea Wherever found There is **nal** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/1493	Endangered

Insects

NAME	STATUS
Monarch Butter y Danaus plexippus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9743	Candidate

Flowering Plants

NAME	STATUS
American Cha seed Schwalbea americana Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1286	Endangered
Canby's Dropwort Oxypolis canbyi Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/7738	Endangered
Pondberry Lindera melissifolia Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1279	Endangered

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act[1] and the Migratory Bird Treaty Act[2].

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats[3], should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles"

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

There are likely bald eagles present in your project area. For additional information on bald eagles, refer to Bald Eagle Nesting and Sensitivity to Human Activity

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence( )

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season ( )

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply). To see a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs of bald and golden eagles in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur. Please contact your local Fish and Wildlife Service Field Office if you have questions.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats[3] should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles"

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your

list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Kestrel Falco sparverius paulus This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9587	Breeds Apr 1 to Aug 31
American Oystercatcher Haematopus palliatus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8935	Breeds Apr 15 to Aug 31
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in o shore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31
Black Skimmer Rynchops niger This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/5234	Breeds May 20 to Sep 15
Brown-headed Nuthatch Sitta pusilla This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 1 to Jul 15
Chimney Swift Chaetura pelagica This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25
Eastern Whip-poor-will Antrostomus vociferus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Aug 20

Grasshopper Sparrow Ammodramus savannarum perpallidus — Breeds Jun 1 to Aug 20

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/8329

Gull-billed Tern Gelochelidon nilotica — Breeds May 1 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9501

King Rail Rallus elegans — Breeds May 1 to Sep 5

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8936

Least Tern Sternula antillarum antillarum — Breeds Apr 25 to Sep 5

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Lesser Yellowlegs Tringa avipes — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9679

Marbled Godwit Limosa fedoa — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9481

Painted Bunting Passerina ciris — Breeds Apr 25 to Aug 15

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Pectoral Sandpiper Calidris melanotos — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Prairie Warbler Setophaga discolor — Breeds May 1 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Prothonotary Warbler Protonotaria citrea — Breeds Apr 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Red-headed Woodpecker Melanerpes erythrocephalus — Breeds May 10 to Sep 10
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Ruddy Turnstone Arenaria interpres morinella — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Rusty Blackbird Euphagus carolinus — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Saltmarsh Sparrow Ammospiza caudacuta — Breeds May 15 to Sep 5
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9719

Semipalmated Sandpiper Calidris pusilla — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Short-billed Dowitcher Limnodromus griseus — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9480

Swallow-tailed Kite Elanoides for catus — Breeds Mar 10 to Jun 30
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8938

Whimbrel Numenius phaeopus hudsonicus — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Willet Tringa semipalmata — Breeds Apr 20 to Aug 5
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Wood Thrush Hylocichla mustelina Breeds May 10 to Aug 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles" specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence(■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

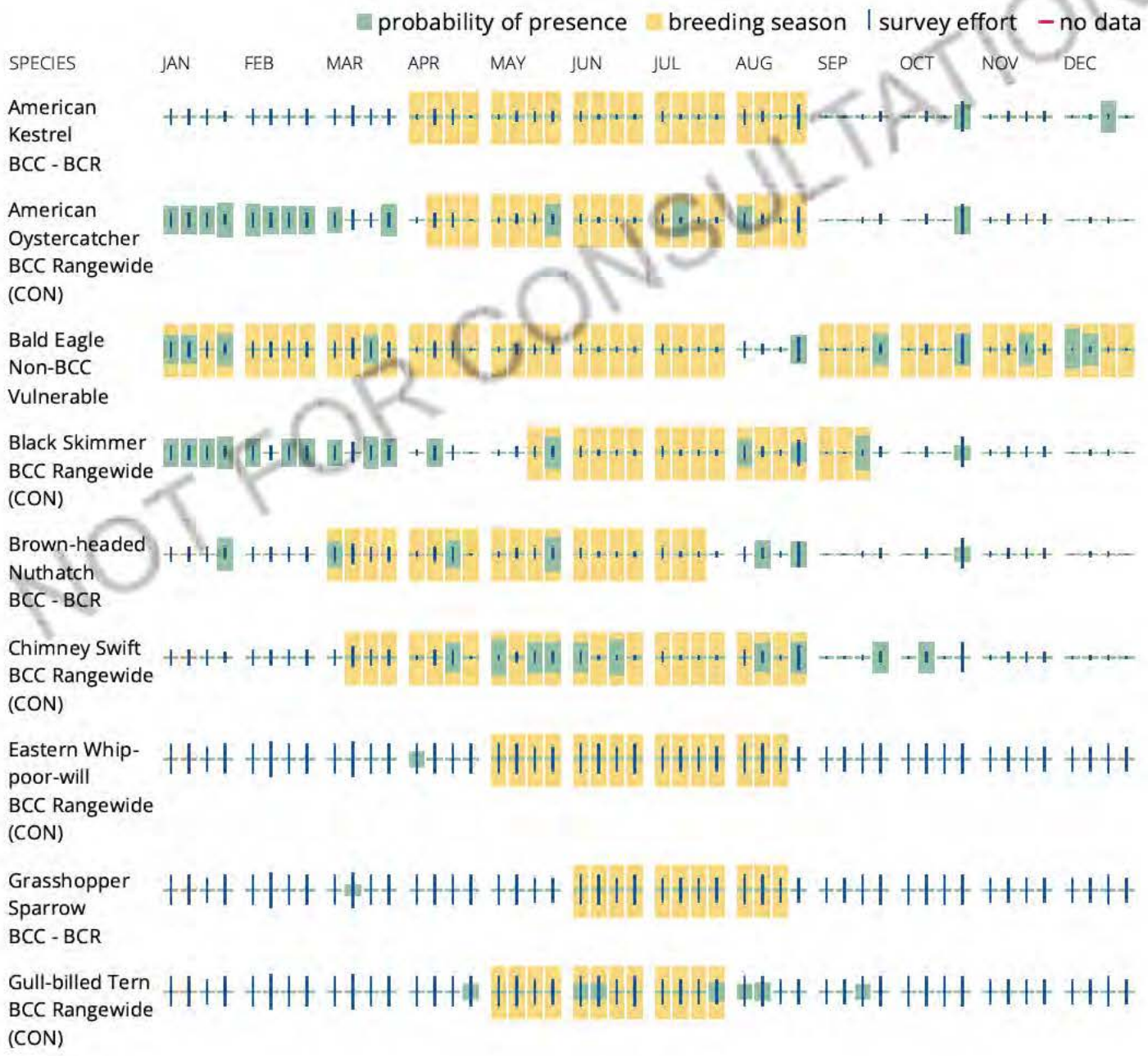
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

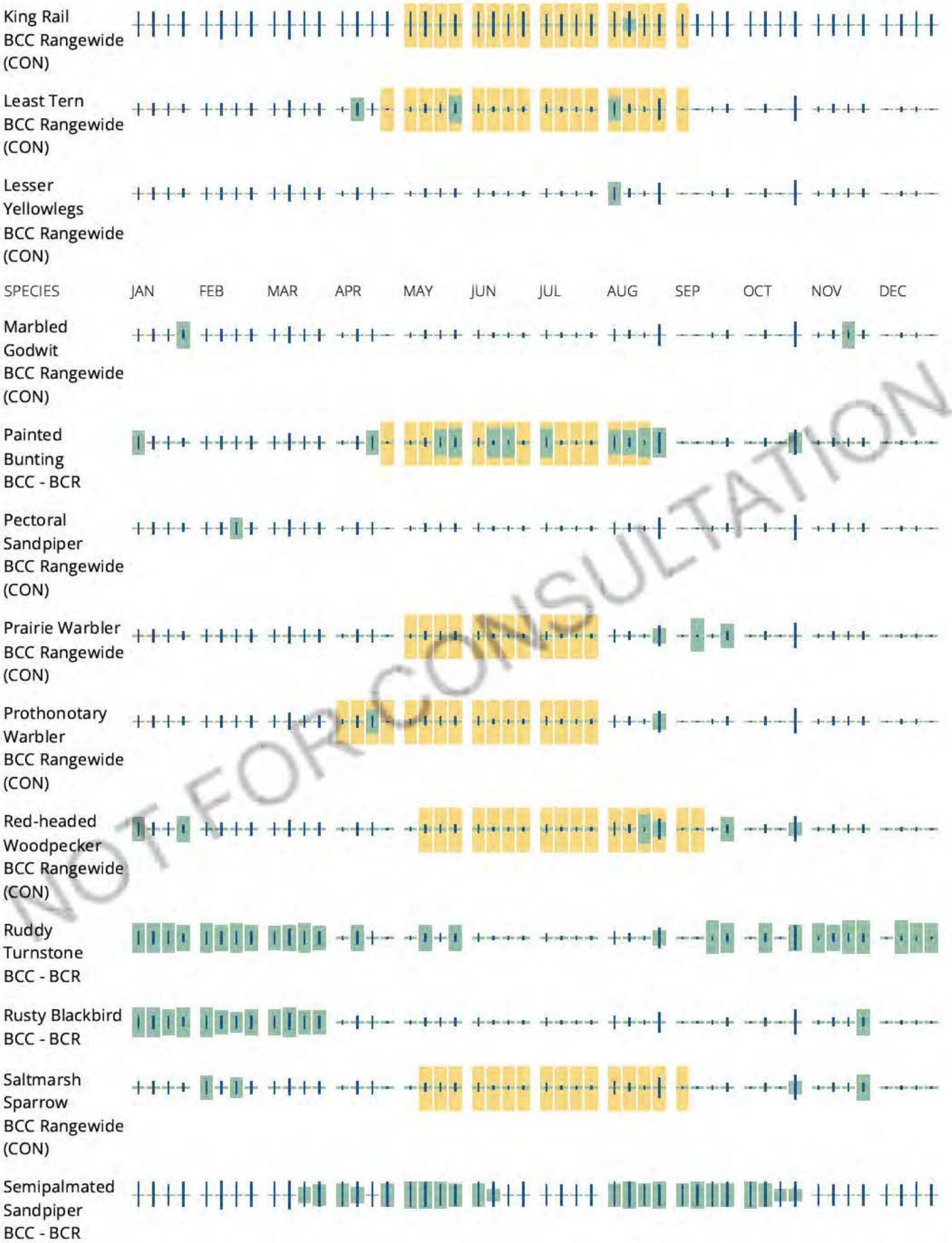
No Data (–)

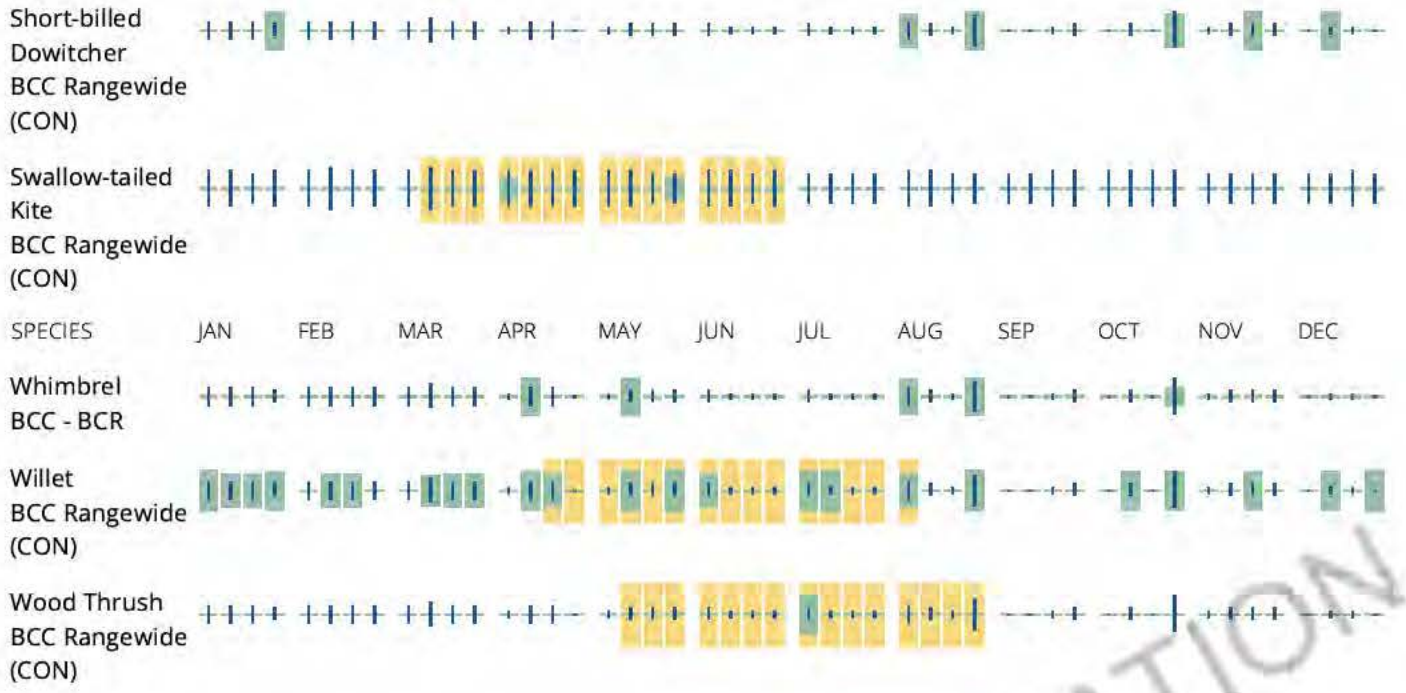
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.







Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the RAIL Tool and look at the range maps provided for birds in your area at the bottom of the pro les provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe speci ed. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Paci c Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in o shore areas from certain types of development or activities (e.g. o shore energy development or longline shing).

Although it is important to try to avoid and minimize impacts to all birds, e orts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially a ected by o shore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area o the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also o ers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results les underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my speci ed location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey e ort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey e ort is the key component. If the survey e ort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey e ort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to con rm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be con rmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no sh hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Wetland information is not available at this time

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the NWI map to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identi ed based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classi cation established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth veri cation work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or eld work. There may be occasional di erences in polygon boundaries or classi cations between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuber cid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may de ne and describe wetlands in a di erent manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to de ne the limits of proprietary jurisdiction of any Federal, state, or local

government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modi cations within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning speci ed agency regulatory programs and proprietary jurisdictions that may a ect such activities.

APPENDIX B:
SCDNR NHD Report

State of South Carolina
Department of Natural Resources

P.O. Box 167
Columbia, SC 29202
803-734-3886

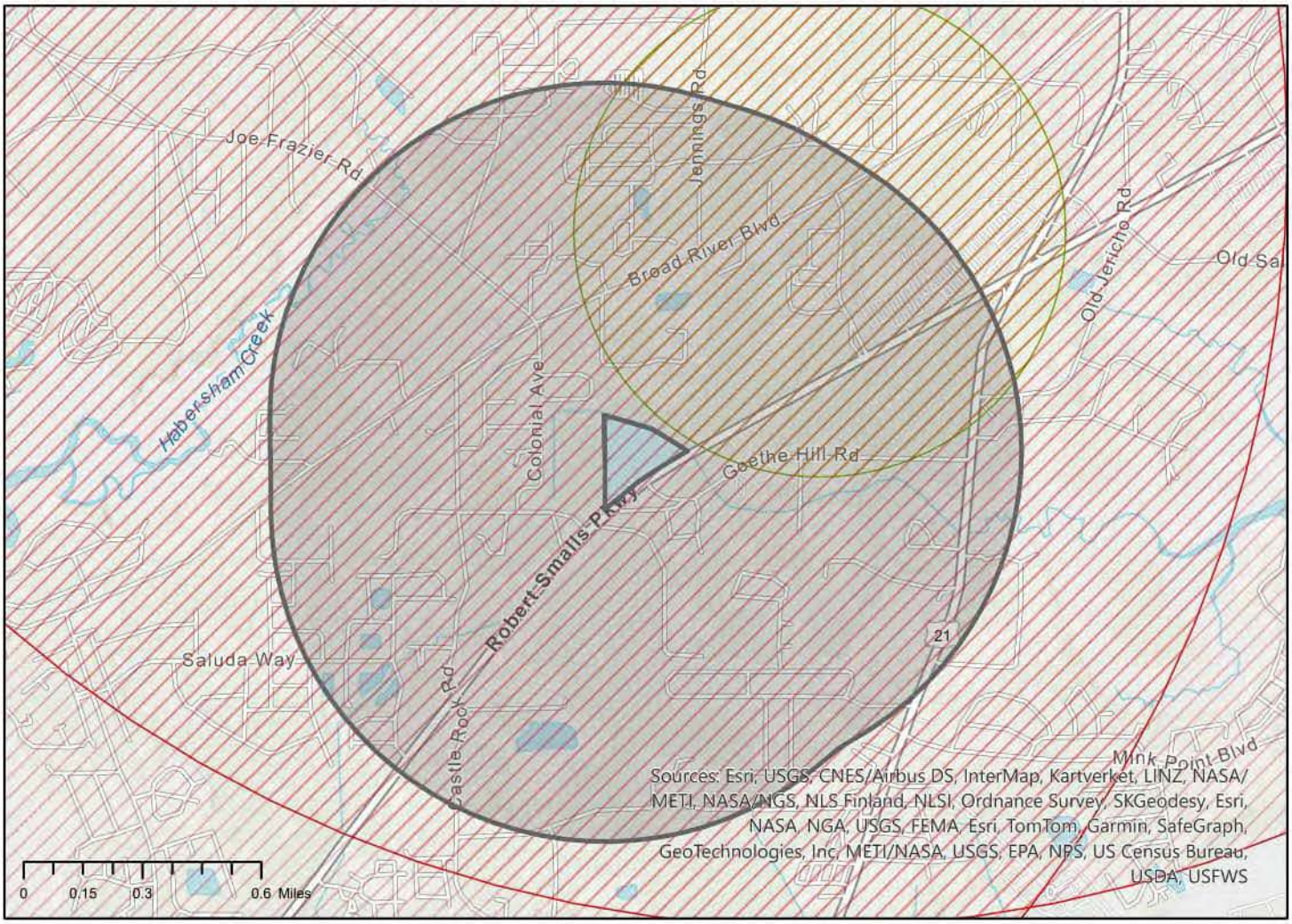
Robert H. Boyles, Jr., *Director*
Emily C. Cope, *Deputy Director, Wildlife and Freshwater Fisheries*

PO Box 167
Columbia, SC 29202
(803) 734-1396
speciesreview@dnr.sc.gov

Requested on Thursday, February 13, 2025 by *Cameron Wyse.*

Re: Request for Threatened and Endangered Species Consultation
Cameron Wyse - Site 2 Robert Smalls Parkway - Development (Commercial/Residential) - Beaufort County, South Carolina

The South Carolina Department of Natural Resources (SCDNR) has received your request for threatened and endangered species consultation of the above named project in Beaufort County, South Carolina. The following map depicts the project area and a 1 mile buffer surrounding:



State of South Carolina
Department of Natural Resources

P.O. Box 167
Columbia, SC 29202
803-734-3886

Robert H. Boyles, Jr., *Director*
Emily C. Cope, *Deputy Director, Wildlife and Freshwater Fisheries*

This report includes the following items:
A - A report for species which intersect the project area
B - A report for species which intersect the buffer around the project area
C - A list of best management practices relevant to species near to or within the project area
D - A list of best management practices relevant to the project type
E - A list of state & federally listed species within the county of the project area
F - Other important information on conservation status, listed species, and how to submit observations to the program.

Please be advised:

The contents of this report, including all tables, maps, recommendations, and various other text, are produced as a direct result of the information a user provides at the time of submission. The SCDNR assumes that all information submitted by the user represents the project scope as proposed, and recommends that additional reports be requested should the scope deviate from how the project was initially represented to the SCDNR.

The technical comments outlined in this report are submitted to speak to the general impacts of the activities as described through inquiry by parties outside the South Carolina Department of Natural Resources. These technical comments are submitted as guidance to be considered and are not submitted as final agency comments that might be related to any unspecified local, state or federal permit, certification or license applications that may be needed by any applicant or their contractors, consultants or agents presently under review or not yet made available for public review. In accordance with its policy 600.01, Comments on Projects Under Department Review, the South Carolina Department of Natural Resources, reserves the right to comment on any permit, certification or license application that may be published by any regulatory agency which may incorporate, directly or by reference, these technical comments.

Interested parties are to understand that SCDNR may provide a final agency position to regulatory agencies if any local, state or federal permit, certification or license applications may be needed by any applicant or their contractors, consultants or agents. For further information regarding comments and input from SCDNR on your project, please contact our Office of Environmental Programs by emailing environmental@dnr.sc.gov or by visiting www.dnr.sc.gov/environmental. Pursuant to Section 7 of the Endangered Species Act, requests for formal letters of concurrence with regards to federally listed species should be directed to the USFWS.

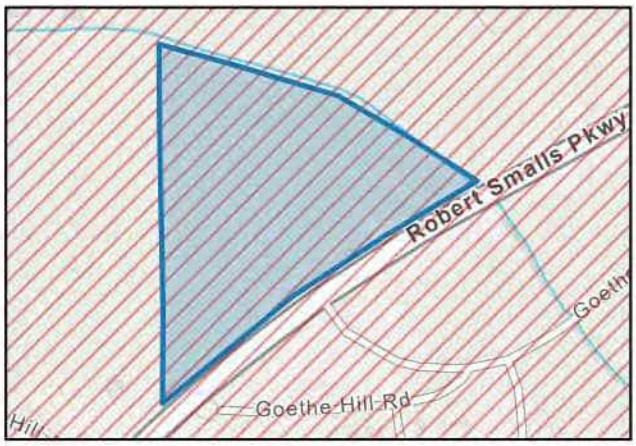
Should you have any questions or need more information, please do not hesitate to contact our office by email at speciesreview@dnr.sc.gov or by phone at 803-734-1396.

Sincerely,

Joseph Lemeris, Jr.
Heritage Trust Program
SC Department of Natural Resources

A. Project Area - Species Report

There are 2 tracked species records found within the project foot print. The following table outlines occurrences found within the project footprint (if any), sorted by listing status and species name. Please keep in mind that this information is derived from existing databases and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. You can find more information about global and state rank status definitions by visiting Natureserve's web page. Please note that certain sensitive species found on site may be listed in this table but are not represented on the map. Please contact speciesreview@dnr.sc.gov should you have further questions related to sensitive species found within the project area.

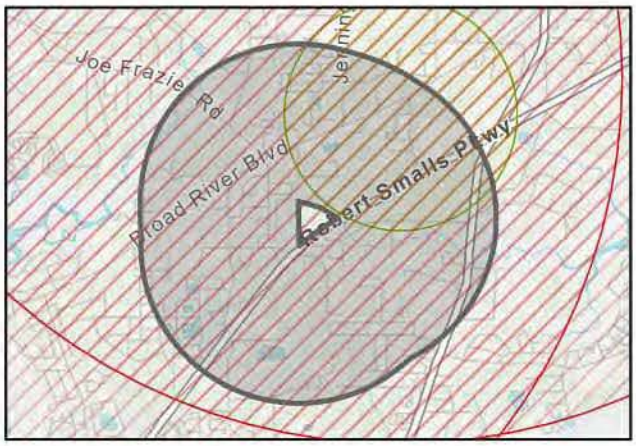


Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA,

Scientific Name	Common Name	Federal Status	State Status	G Rank	S Rank	SWAP Priority	Last Obs. Date
Crotalus adamanteus	Eastern Diamond-backed	ARS	NA	G3	S2	2	2024-06-25
Anaxyrus quercicus	Oak Toad	NA	NA	G5	S3	0	1967-06-04

B. Buffer Area - Species Report

The following table outlines rare, threatened or endangered species found within 1 miles of the project footprint, arranged in order of protection status and species name. Please keep in mind that this information is derived from existing databases and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. You can find more information about global and state rank status definitions by visiting Natureserve's web page. Please note that certain sensitive species found within the buffer area may be listed in this table but are not represented on the map.

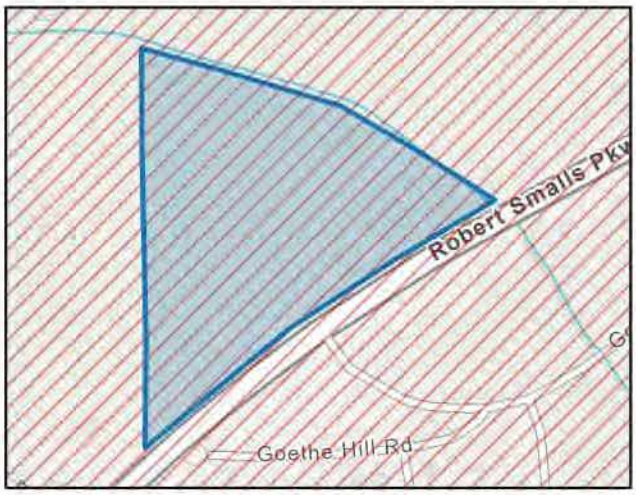


Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri, TomTom, Garmin, SafeGraph, GeoTechnologics, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Scientific Name	Common Name	Federal Status	State Status	G Rank	S Rank	SWAP Priority	Last Obs. Date
Crotalus adamanteus	Eastern Diamond-backed	ARS	NA	G3	S2	2	2024-06-25
Anaxyrus quercicus	Oak Toad	NA	NA	G5	S3	0	1967-06-04
Nyssa ogeche	Ogeechee Lime, Ogeechee	NA	NA	G4G5	S1	3	1931-09-01

C. Species Best Management Practices (1 of 3)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to species of concern which may be found on or near to the project area. Please contact speciesreview@dnr.sc.gov should you have further questions with regard to survey methods, consultation, or other species-related concerns.



Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA,

Three listed species of bats have been known to occur in the coastal plain ecoregions of South Carolina, including the state-endangered Rafinesque's big-eared bat (Corynorhinus rafinesquii); the federally endangered northern long-eared bat (NLEB) (Myotis septentrionalis); and the federally at-risk & proposed endangered tricolored bat (Perimyotis subflavus). Please note that take of a state endangered species is prohibited under S.C. Code of Laws §50-15-30. Prior to any land-clearing activities in the proposed project area, the SCDNR recommends a threatened and endangered species assessment be conducted to identify suitable habitat and provided to SCDNR for review.

Regarding Rafinesque's big-eared bat (1 of 2): Suitable habitat for Rafinesque's big-eared bat is defined as swamp forests, hardwood or mixed mature bottomlands, maritime forests and black gum (Nyssa sylvatica) and water tupelo (Nyssa aquatic) stands (Cochran 1999, Hofmann et al. 1999, Lance et al. 2001, Gooding and Langford 2004, Trousdale and Beckett 2005).

If suitable habitat exists within the project, the SCDNR recommends assumption of presence of Rafinesque's big-eared bat within areas of forested wetlands and to further protect these areas, surround them with a 1000-foot buffers and avoid tree clearing from May 1st to July 31st to minimize disturbance and destruction of habitat that may be used by females during gestation or maternal care for pups.

All other tree clearing outside of the forested wetlands and its associated buffer may occur in areas that are not wetlands or other aquatic resources in non-Rafinesque's big-eared bat maternity roosting habitat anytime. Where wetlands occur that are not Rafinesque's big-eared bat habitat, but they are spotted turtle habitat, tree clearing should only occur August to December to prevent impacts to spotted turtles during reproduction. However, if wetlands are dry January to June, they may be cleared, but they must be completely dry (no surface water present).

For future right-of-way management (if applicable), use heavy equipment and herbicide treatment for right-of-way vegetation management in wetlands only during the months of July to November. If wetlands are completely dry (no surface water present), heavy equipment may be used January to June, but the wetlands must be completely dry.

Please note that tricolored bat was proposed for listing by the U.S. Fish and Wildlife Service on September 13, 2022. Therefore, due to the conservation concerns surrounding this species, the SCDNR strongly suggests acoustic surveys be conducted by a qualified individual during the summer months to assess the use of the area to be cleared by tricolored bats. Should the species occur in the proposed area slated for clearing, coordination should occur with SCDNR and USFWS regarding avoidance and minimization measures.

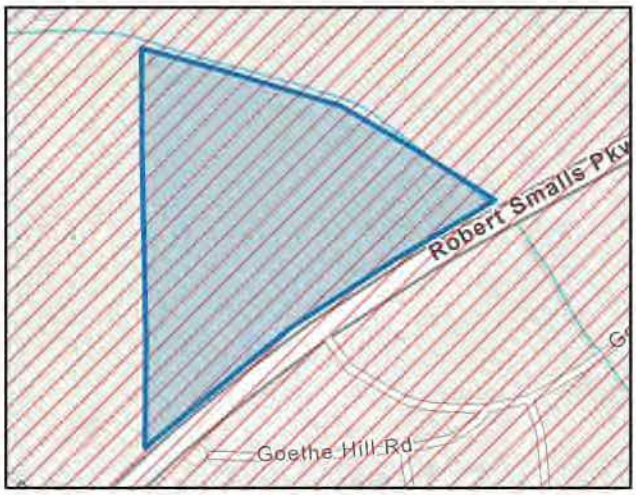
Tricolored bat utilize caves, rock crevices, tree foliage and basal cavities, Spanish moss and man-made structures, such as houses, barns and culverts, as maternity roosts during the summer months and they will use more than one roost location.

If this species are found on-site, please contact the U.S. Fish & Wildlife Service and SCDNR. The SCDNR recommends the assumption of presence of the the species and abide by a clearing moratorium from May 1st to July 31st if suitable habitat for the species is likely or are explicitly identified within the project footprint.

In the interest of preserving plant diversity, the South Carolina Plant Conservation Alliance performs native plant rescues in order to protect and preserve our diversity of native plants. If you are interested in assisting with this important endeavor please contact the SCDNR Botanist at botany@dnr.sc.gov before any development occurs onsite. There may be plants of interest on the project site that the Alliance would like to preserve.

C. Species Best Management Practices (2 of 3)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to species of concern which may be found on or near to the project area. Please contact speciesreview@dnr.sc.gov should you have further questions with regard to survey methods, consultation, or other species-related concerns.



Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA,

Species in the above table with SWAP priorities of High, Highest or Moderate are designated as having conservation priority under the South Carolina State Wildlife Action Plan (SWAP). SWAP species are those species of greatest conservation need not traditionally covered under any federal funded programs. Species are listed in the SWAP because they are rare or designated as at-risk due to knowledge deficiencies; species common in South Carolina but listed rare or declining elsewhere; or species that serve as indicators of detrimental environmental conditions. SCDNR recommends that appropriate measures should be taken to minimize or avoid impacts to the aforementioned species of concern.

Please note your project may be located near shellfish resources. Activities in the eight coastal counties, may require additional water quality requirements to comply with the Department of Health and Environmental Control (DHEC) Office of Ocean and Coastal Resource Management (OCRM) Stormwater Management Guidelines, specifically S.C. Code of Regulations 72-307C(5)(g). Per DHEC OCRM's Coastal Zone Consistency Stormwater Management Policies and Procedures, Policy Group XIII A.a, if the project is within 1000ft of shellfish beds, the applicant must demonstrate that the first one and a half inches of runoff from the built upon portion of the property is retained onsite. Please see DHEC OCRM's Coastal Zone Consistency Polices and Procedures for more information: https://scdhec.gov/sites/default/files/docs/HomeAndEnvironment/Docs/OCRM_Policies_Procedures.pdf

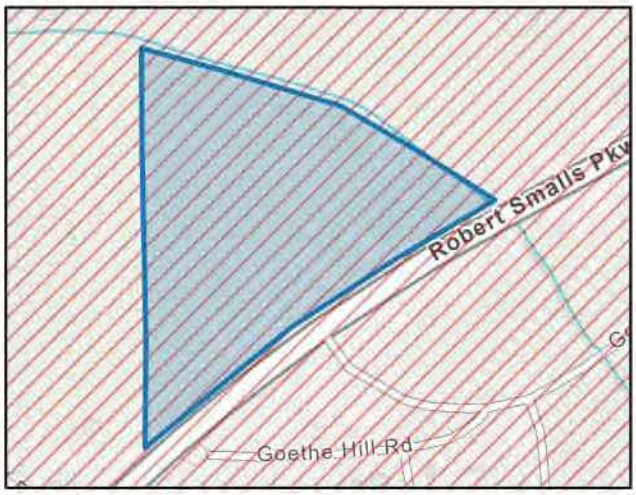
Related to American alligator (1 of 3):
American alligator (Alligator mississippiensis), a federally and state regulated species, is common throughout freshwater habitats in the Coastal Plain of South Carolina. Juvenile alligators frequently utilize stormwater or stormwater-like ponds, such as golf course ponds or resort lagoons, to avoid being preyed upon by larger adult alligators. Alligators are ambush predators that spend most of their lives in water. They have a natural fear of people unless they become habituated. Most often alligators become habituated when people feed them, either purposefully or accidentally. Please note it is illegal to feed, entice or molest an alligator pursuant to S.C. Code of Laws §50-15-500(C); it is also illegal to kill or possess an alligator without a permit pursuant to S.C. Code §50-15-500(D). Accidental feeding can occur when people do not properly dispose of food or fish carcasses associated with recreational fishing or indirect feeding of other wildlife, such as fish, turtles, or ducks, where alligators resides. A habituated alligator is more likely to approach or be near people and pose a potential threat. Therefore, any development should be designed in a manner that will substantially minimize the interaction of alligators and people.

Related to American alligator (2 of 3):
The SCDNR recommends the following best management practices to deter human and alligator interactions:

- Any private property or private yards near ponds or waterways should be fenced to limit unexpected alligator encounters. If fencing individual yards is not possible, fencing around the pond should occur. Keeping people, pets, and children from the edge of the water is the single best way to prevent alligator interactions. Due to the alligator's ability to ambush and lunge a great distance to capture its prey, walking paths around ponds should be a minimum of 10 feet from the shoreline. However, to provide greater protection, the SCDNR recommends this distance be increased to 30 feet to reduce alligator and human conflicts. Brush near the water's edge should be managed and considered in the minimum distance as alligators will utilize vegetation to rest and hunting to wait and ambush prey. If vegetation extends five feet from the edge of the water, then the walkway should be a minimum of 10 to ideally 30 feet beyond the farthest edge of vegetation from the water. Additionally, consideration should be given to require that all dogs on walkways near stormwater ponds or pond-like features in the neighborhood must be leashed to prevent alligator from targeting pets as prey. There should be a designated area included in design plans to provide a place for fishermen to properly dispose of fish carcasses or bait to avoid the accidental feeding and habituation of alligators.

C. Species Best Management Practices (3 of 3)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to species of concern which may be found on or near to the project area. Please contact speciesreview@dnr.sc.gov should you have further questions with regard to survey methods, consultation, or other species-related concerns.



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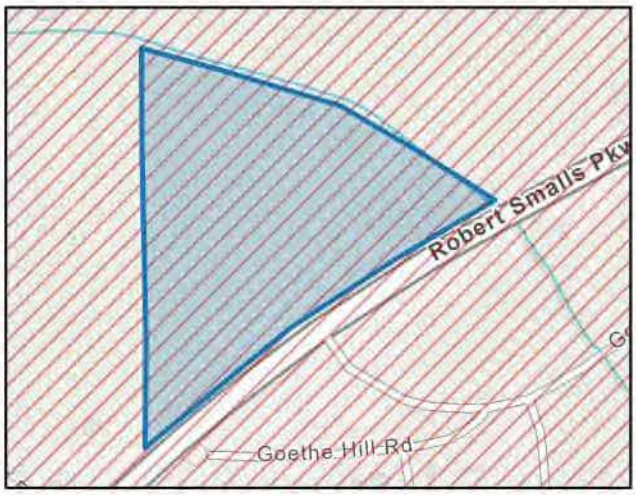
Related to American alligator (3 of 3):

The SCDNR recommends the following best management practices to deter human and alligator interactions:

- Retention ponds, lagoons and other water features should be designed to limit the occurrence of alligator basking adjacent to homes and walkways. As alligators are more likely to bask on shallow slopes, this can be achieved by construction of shallow bank slopes away from the homes and steeper bank slopes near homes or walkways.
- Warning signs noting the presence of alligators and that feeding is illegal should be posted at the entrances to the neighborhood and at any access point where people may be able to approach the water's edge. Signs can be acquired by callingSCDNR at 843-546-6062 or can be purchased on our website at www.gooutdoorssouthcarolina.com.
- The SCDNR recommends that the HOA/management company for the residential development should provide information and educational handouts to all residents on an annual basis prior to spring and summer before alligator activity increases. Informationand educational handouts are available on our website www.dnr.sc.gov/wildlife/herps/alligator.

D. Project Best Management Practices (1 of 4)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to natural resources within or surrounding the project area. Please contact our Office of Environmental Programs at environmental@dnr.sc.gov should you have further questions with regard to best management practices related to this project area.



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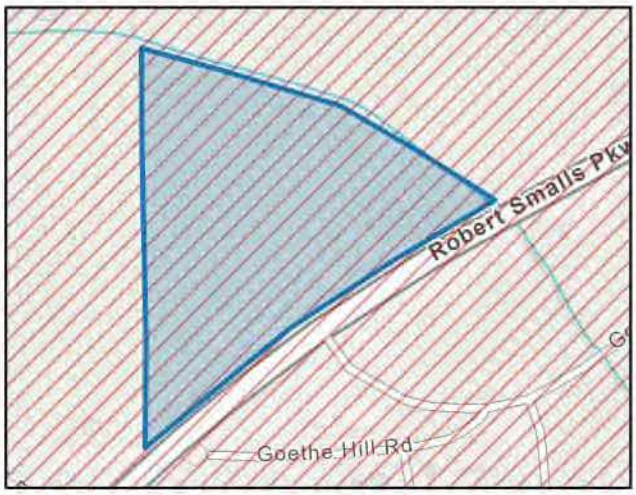
Review of available data, National Wetlands Inventory and hydric soils, indicate that wetlands or waters of the United States are present within your project area. These areas may require a permit from the U.S. Army Corps of Engineers (USACE), as well as a compensatory mitigation plan. SCDNR advises that you consult with the USACE Regulatory to determine if jurisdictional wetlands are present and if a permit and mitigation is required for any activities impacting these areas. For more information, please visit their website at www.sac.usace.army.mil/Missions/Regulatory. Additionally, a 401 Water Quality Certification may also be required from the SC Department of Health & Environmental Control. For more information, please visit their website at https://www.scdhec.gov/environment/water-quality/water-quality-certification-section-401-clean-water-act.

- If clearing must occur, riparian vegetation within wetlands and waters of the U.S. must be conducted manually and low growing, woody vegetation and shrubs must be left intact to maintain bank stability and reduce erosion.
- Construction activities must avoid and minimize, to the greatest extent practicable, disturbance of woody shoreline vegetation within the project area. Removal of vegetation should be limited to only what is necessary for construction of the proposed structures.
- Where necessary to remove vegetation, supplemental plantings should be installed following completion of the project. These plantings should consist of appropriate native species for this ecoregion and exclude plant species found on the exotic pest plant council list: https://www.se-eppc.org/southcarolina/SCEPPC_LIST2014finalOct.pdf.

D. Project Best Management Practices (2 of 4)

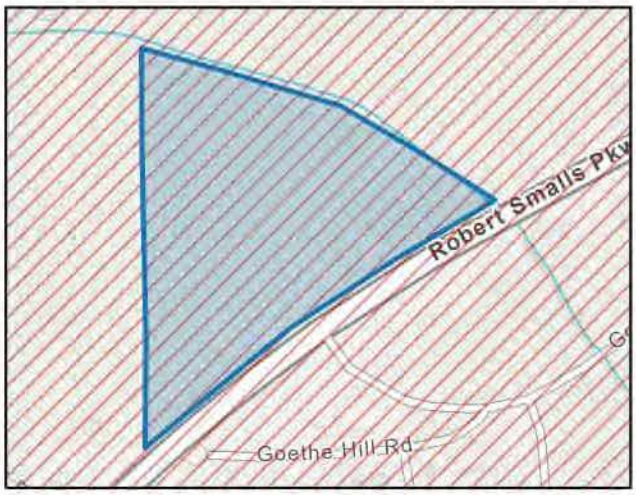
SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to natural resources within or surrounding the project area. Please contact our Office of Environmental Programs at environmental@dnr.sc.gov should you have further questions with regard to best management practices related to this project area.



- All necessary measures must be taken to prevent oil, tar, trash and other pollutants from entering the adjacent offsite areas/wetlands/water.
- Once the project is initiated, it must be carried to completion in an expeditious manner to minimize the period of disturbance to the environment.
- Upon project completion, all disturbed areas must be permanently stabilized with vegetative cover (preferable), riprap or other erosion control methods as appropriate.
- The project must be in compliance with any applicable floodplain, stormwater, land disturbance, shoreline management guidance or riparian buffer ordinances.
- Prior to beginning any land disturbing activity, appropriate erosion and siltation control measures (e.g. silt fences or barriers) must be in place and maintained in a functioning capacity until the area is permanently stabilized.
- Materials used for erosion control (e.g., hay bales or straw mulch) will be certified as weed free by the supplier.
- Inspecting and ensuring the maintenance of temporary erosion control measures at least:
  a. on a daily basis in areas of active construction or equipment operation;
  b. on a weekly basis in areas with no construction or equipment operation; and
  c. within 24 hours of each 0.5 inch of rainfall.
- Ensuring the repair of all ineffective temporary erosion control measures within 24 hours of identification, or as soon as conditions allow if compliance with this time frame would result in greater environmental impacts.
- Land disturbing activities must avoid encroachment into any wetland areas (outside the permitted impact area).Wetlands that are unavoidably impacted must be appropriately mitigated.
- Your project may require a Stormwater Permit from the SC Department of Health & Environmental Control, please visit https://www.scdhec.gov/environment/water-quality/stormwater

D. Project Best Management Practices (3 of 4)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to natural resources within or surrounding the project area. Please contact our Office of Environmental Programs at environmental@dnr.sc.gov should you have further questions with regard to best management practices related to this project area.



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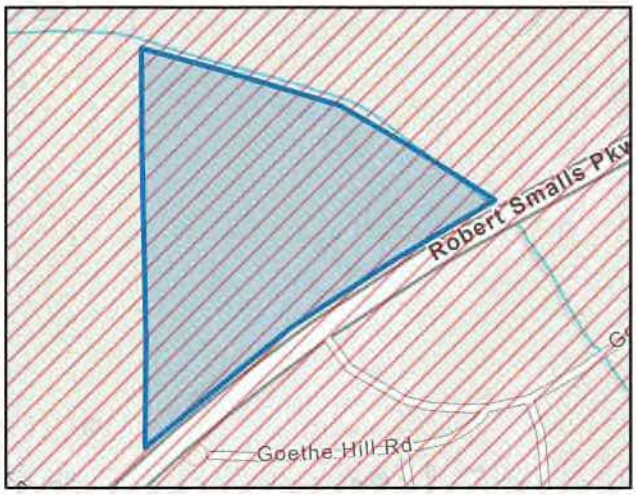
- Residential and commercial development has grown exponentially in recent years. Activities associated with these developments can have detrimental impacts on wildlife and aquatic resources such as habitat fragmentation, loss of available habitats and pollution, especially stormwater pollution. The result of these impacts causes the displacement of species and increases wildlife and human interactions. However, properly planned and sited development activities may allow for economic expansion with minimal negative impacts.
- Where appropriate, particularly adjacent to wetlands and water bodies, drainage plans and construction measures for residential and commercial development should be designed to control erosion and sedimentation, water quality degradation and other negative impacts on adjacent water and wetlands utilizing the best available design research. Developers proposing development activities should contact and work closely with local community development planning entities.
- Developments should be planned where growth is most compatible with natural resources utilizing residential and commercial cluster development methods, maximizing green spaces which can both be beneficial to protect natural resources and provide recreational opportunities for outdoor enthusiasts.
- Developments should be designed and constructed to avoid impact to wetland and stream areas whenever possible and to minimize unavoidable wetland and stream impacts to the maximum extent possible. Aquatic habitats and other sensitive natural areas should be identified in the initial planning stages of the project and incorporated in their natural state into the overall development plan.
- Developments should be designed to maintain the integrity and contiguity of wetland and stream systems and their associated riparian corridors, including the establishment of protective upland buffers around and between undisturbed aquatic systems whenever possible. Projects should be designed to minimize habitat fragmentation, including the construction of a limited number of road and utility crossings through streams and wetlands.

- The SCDNR recommends that the applicant incorporate vegetated bioswales, catch basins and/or bioretention cells/rain gardens into development plans beyond the regulatory requirements of the Stormwater Permitting requirements to add additional features to aid in capturing and filtering runoff from hardened surfaces. These structures can protect water quality and prevent oil, gas and other pollutants from directly entering nearby waterways. In addition, the SCDNR strongly recommends the use of permeable or porous pavement surfaces when possible. Permeable surfaces allow for rainfall to filter through the soil which aids in flood control and improves water quality.
- The following resources are available from Clemson Extension to assist:
  - https://hgic.clemson.edu/factsheet/an-introduction-to-bioswales/
  - https://hgic.clemson.edu/factsheet/rain-garden-plants-introduction/
  - https://hgic.clemson.edu/factsheet/bioretention-cells-a-guide-for-your-residents/
  - https://hgic.clemson.edu/factsheet/an-introduction-to-porous-pavement/
  - https://hgic.clemson.edu/factsheet/trees-for-stormwater-management/

D. Project Best Management Practices (4 of 4)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to natural resources within or surrounding the project area. Please contact our Office of Environmental Programs at environmental@dnr.sc.gov should you have further questions with regard to best management practices related to this project area.



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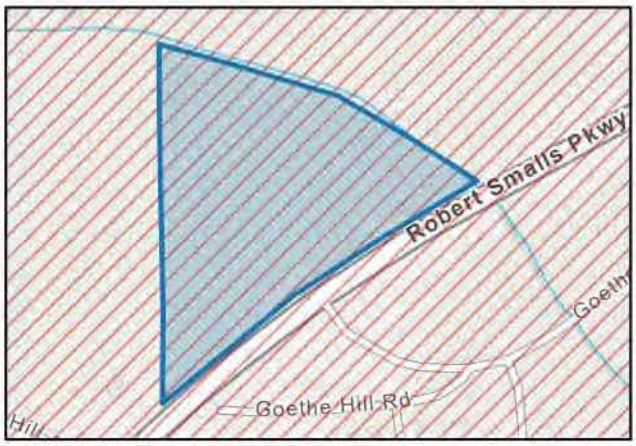
- Your project boundary lies within a coastal county in South Carolina which means you may also need a Coastal Zone Consistency Certification for your project from the SC Department of Health and Environmental Control. For more information, visit: https://www.scdhec.gov/environment/your-water-coast/ocean-coastal-management/beach-management/coastal-permits/coastal-zone
- If your project could affect coastal waters, tidelands, beaches and beach/dune systems, you may also need a critical area permit from the SC Department of Health and Environmental Control. For more information, visit: https://www.scdhec.gov/environment/your-water-coast/ocean-coastal-management/beach-management/coastal-permits/critical-1

E. State & Federally Listed Species in Beaufort County



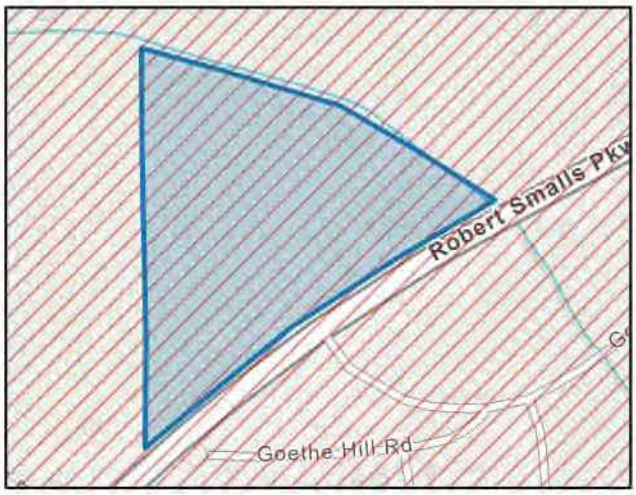
The South Carolina Department of Natural Resources' Heritage Trust Program organizes a database that captures and tracks element of occurrence data for rare, threatened and endangered species, both federal and state. Please keep in mind that this information included within this report is derived from existing databases, and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. If your project requires the assessment of potential threatened or endangered species that could be within the project area, the SCDNR asks that you include a review of the state listed species within the county or watershed in addition to those that may be within the report as being within the project footprint or within 1-mile of the proposed project area. Consideration should be given to the occurrence of suitable habitat onsite, species movement and connectivity of habitat when assessing the likelihood of a state listed species on the project area.

Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA.

County	Scientific Name	Common Name	G Rank	S Rank	Federal Status	State Status	Group Type
Beaufort	*Acipenser brevirostrum*	Shortnose Sturgeon	G3	S3	LE: Federally Endangered	SE: State Endangered	Zoological
Beaufort	*Acipenser oxyrinchus oxyrinchus*	Atlantic Sturgeon	G3T3	S3	LE: Federally Endangered	Not Applicable	Zoological
Beaufort	*Ambystoma cingulatum*	Frosted Flatwoods Salamander	G2	S1	LT: Federally Threatened	SE: State Endangered	Zoological
Beaufort	*Bombus fraternus*	Southern Plains Bumble Bee	G3G4	SNR	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Bombus pensylvanicus*	American Bumble Bee	G3G4	SNR	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Calidris canutus rufa*	Red Knot	G4T2	S2N	LT: Federally Threatened	Not Applicable	Zoological
Beaufort	*Caretta caretta*	Loggerhead Sea Turtle	G3	S3	LT: Federally Threatened	ST: State Threatened	Zoological
Beaufort	*Charadrius melodus*	Piping Plover	G3	S2N	LT: Federally Threatened	SE: State Endangered	Zoological
Beaufort	*Charadrius wilsonia*	Wilson's Plover	G5	S3	MBTA: Migratory Bird Treaty Act	ST: State Threatened	Zoological
Beaufort	*Chelonia mydas*	Green Sea Turtle	G3	S1	LT: Federally Threatened	ST: State Threatened	Zoological
Beaufort	*Clemmys guttata*	Spotted Turtle	G5	S2	ARS: At-Risk Species	ST: State Threatened	Zoological
Beaufort	*Coreopsis integrifolia*	Chipola Dye-flower; Cileate-leaf	G1G2	S1	ARS: At-Risk Species	Not Applicable	Botanical
Beaufort	*Corynorhinus rafinesquii*	Rafinesque's Big-eared Bat	G3G4	S2	Not Applicable	SE: State Endangered	Zoological
Beaufort	*Crotalus adamanteus*	Eastern Diamond-backed Rattlesnake	G3	S2	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Danaus plexippus*	Monarch Butterfly	G4	S4	C: Candidate	Not Applicable	Zoological
Beaufort	*Dermochelys coriacea*	Leatherback Sea Turtle	G2	S1	LE: Federally Endangered	SE: State Endangered	Zoological
Beaufort	*Dryobates borealis*	Red-cockaded Woodpecker	G3	S2	LE: Federally Endangered	SE: State Endangered	Zoological
Beaufort	*Haliaeetus leucocephalus*	Bald Eagle	G5	S3B,S3N	Bald & Golden Eagle Protection Act	ST: State Threatened	Zoological
Beaufort	*Heterodon simus*	Southern Hog-nosed Snake	G2	S1	Not Applicable	ST: State Threatened	Zoological
Beaufort	*Lasiurus cinereus*	Hoary Bat	G3G4	S2	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Laterallus jamaicensis*	Black Rail	G3	S1	LT: Federally Threatened	Not Applicable	Zoological
Beaufort	*Lepidochelys kempii*	Kemp's Ridley Sea Turtle	G1	S1N	LE: Federally Endangered	SE: State Endangered	Zoological
Beaufort	*Lindera melissifolia*	Southern Spicebush, Pondberry	G3	S2	LE: Federally Endangered	Not Applicable	Botanical
Beaufort	*Mycteria americana*	Wood Stork	G4	S2	LT: Federally Threatened	SE: State Endangered	Zoological
Beaufort	*Myotis lucifugus*	Little Brown Bat	G3G4	S2	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Myotis septentrionalis*	Northern Long-eared Bat	G2G3	S1	LE: Federally Endangered	Not Applicable	Zoological
Beaufort	*Perimyotis subflavus*	Tricolored Bat	G3G4	S3	LEP: Federally Endangered (Proposed)	Not Applicable	Zoological
Beaufort	*Pseudobranchus striatus striatus*	Broad-striped Dwarf Siren	G5T1T3	S1	Not Applicable	ST: State Threatened	Zoological
Beaufort	*Setophaga virens waynei*	Wayne's Black-throated Green	G5T1	S1S2B	ARS: At-Risk Species	Not Applicable	Zoological
Beaufort	*Sternula antillarum*	Least Tern	G4	S2B	MBTA: Migratory Bird Treaty Act	ST: State Threatened	Zoological
Beaufort	*Trichechus manatus*	Florida Manatee	G2G3	S2S3	LT: Federally Threatened	SE: State Endangered	Zoological

F. Important Information & Instructions for Submitting Species Observations

The SC Natural Heritage Dataset relies on continuous monitoring and surveying for species of concern throughout the state. Any records of species of concern found within this project area would greatly benefit the quality and comprehensiveness of the statewide dataset for rare, threatened and endangered species. Below are instructions for how to download the SC Natural Heritage Occurrence Reporting Form through the Survey123 App.



Conservation Ranks & SWAP Priority Status

The SC Natural Heritage Program assigns S Ranks for species tracked within the state of South Carolina based on ranking methodology developed by NatureServe and its state program network. For information conservation rank definitions, please visit https://explorer.natureserve.org/AboutTheData/Statuses

The SCDNR maintains and updates it's State Wildlife Action Plan (SWAP) every 10 years. This plan categorizes species of concern by Moderate, High, and Highest Priority. Please visit https://www.dnr.sc.gov/swap/index.html for more information about the SC SWAP.

Important Information Regarding Element Occurrence Data:

The South Carolina Department of Natural Resources' Heritage Trust Program organizes a database that captures and tracks element of occurrence data for rare, threatened and endangered species, both federal and state. Please keep in mind that this information included within this report is derived from existing databases, and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. If your project requires the assessment of potential threatened or endangered species that could be within the project area, the SCDNR asks that you include a review of the state listed species within the county or watershed in addition to those that may be within the report as being within the project footprint or within 1-mile of the proposed project area. Consideration should be given to the occurrence of suitable habitat onsite, species movement and connectivity of habitat when assessing the likelihood of a state listed species on the project area. To view these lists please visit our county and watershed dashboards at our website: https://natural-heritage-program-scdnr.hub.arcgis.com/#track

State-listed Species Guidance

The South Carolina Department of Natural Resources has released a document to provide clarity for the avoidance of a take of a state listed species and what may be needed from permit applicants, for each species listed as threatened or endangered under SC Code of Regulations 123-150 and 123-150.2. Please review this document for information on species-habitat requirements, survey protocol, and other information regarding environmental review: https://dnr.sc.gov/environmental/docs/SCDNRStateListedSpeciesProtectionGuidance.pdf

Instructions for accessing the SC Natural Heritage Occurrence Reporting Form

1) Follow https://arcg.is/1a0jzC0 or use the QR code here.
2) Select 'Open in browser' or 'Open in the Survey123 field app' depending on your preference. The browser option will only work when connected to the internet.
3) If using in the Survey123 field app, be sure to download the app from your app store beforehand.

APPENDIX C:
Representative Photolog

AECOM

Photographic Log

Client:	Site Location:	Project No.
Mabbett & Associates, Inc.	Site 2 Beaufort, South Carolina	60739566

Photo No.	Date:
1	12/04/2024

Direction Photo Taken: South

Description:

Representative view of mixed oak-pine forest land cover.

Photo No.	Date:
2	12/04/2024

Direction Photo Taken: East

Description:

Representative view of forested wetland land cover.

AECOM		Photographic Log
Client: **Mabbett & Associates, Inc.**	**Site Location:** **Site 2 Beaufort, South Carolina**	**Project No.** **60739566**

Photo No.	**Date:**
3	12/04/2024
Direction Photo Taken: Southwest	
Description: Representative view of riverine land cover.	

Attachment 2. Conceptual Site Development Plans

Figure 1. Conceptual Site Development Plan for Alternative 1

Figure 2. Conceptual Site Development Plan for Alternative 2

State of South Carolina
Department of Natural Resources

Thomas S. Mullikin, PhD, JD, *Director*
Lorianne Riggin, *Director,*
Office of Environmental Programs

June 9, 2025

Jason Sturm
United States Department of Veterans Affairs
Office of Construction and Facilities Management
425 I Street, NW, STE. 2E.250
Washington DC 20420

Electronic submittal

RE: Technical Assistance for "Env. Assessment for Proposed Construction & Operation of an Outpatient Clinic", Beaufort, SC

Dear Mr. Sturm,

The South Carolina Department of Natural Resources (SCDNR) is the state agency charged by state law with the management, protection, and enhancement of wildlife, fisheries, and marine resources in South Carolina. In addition to natural resource management responsibilities through research, management and licensing, the SCDNR is also charged with statewide responsibilities for regulating watercraft operation and associated recreation on state waters, conducting geological surveys and mapping, promoting soil and water conservation, flood mitigation, drought response planning and coordination, and the coordination of the state scenic rivers program. SCDNR's mission is to serve as the principal advocate for and steward of South Carolina's natural resources. (SCDNR authorities and responsibilities are described in Titles 48, 49 and 50, South Carolina Code of Laws (1976), as amended). As such, personnel with the SCDNR have reviewed the proposed project, evaluated its impact on natural resources and offer the comments below.

Project Summary

The proposed project is construction of an outpatient clinic facility for the Office of Veteran's Affairs (VA) to lease and operate in Beaufort County. The purpose of the action is to provide outpatient health care services to Veterans in the region and address gaps and inefficiencies identified in the area. The VA is considering three possible alternatives in the area, of which two are presented in the request for concurrence. Alternative 1 is located at 708 Robert Smalls Parkway and is approximately 28.3 acres of undeveloped wooded land. Alternative 2 is located at the intersection of Robert Smalls Parkway and Goethe Hill Road and is approximately 16.5 acres of undeveloped wooded land. Approximately 11.7 acres of wetlands occur within the first alternative. Approximately 3.77 acres of wetlands occur within the second alternative. A final design has not been selected but the selected site will consist of a 3-story building, parking, main and ambulatory entrances, infrastructure and utilities. The proposed limits of disturbance is 15.3 – 15.6 acres.

SCDNR Comments

As this project is still in the planning stages, we are unable to provide specific comments on potential impacts to natural resources at this time. However, we can provide general comments regarding protected species and best management practices to consider when preparing and finalizing project plans. Please

note that the SCDNR reserves the right to comment on any permit, certification, or license application that may be published by any regulatory agency, such as an individual 401 Water Quality Certification in the future.

Rare, Threatened & Endangered Species

According to the SCDNR Natural Heritage database, there are no occurrence records for threatened or endangered species within the project footprint of either alternative. Please keep in mind that this information is derived from existing databases, and do not assume that it is complete. Areas not yet inventoried by SCDNR biologists may contain significant species or communities.

While there are no known records of threatened or endangered species within either proposed site, the Biological Habitat Assessment Report provided with the request indicates that both alternatives were determined to have potential habitat present for three state listed species: the state threatened spotted turtle (*Clemmys guttata*), state threatened broad striped dwarf siren (*Pseudobranchus striatus*), and state endangered Rafinesque's big-eared bat (*Corynorhinus rafinesquii*). The request also included a SCDNR NHD report that includes recommended best management practices (BMPs) for state listed species. In addition to these recommendations, the SCDNR provides the following additional recommendations for avoidance and minimization of these species below and in Appendix 1.

Spotted Turtle

The spotted turtle is a state-threatened species and a federal At-Risk species (ARS). Suitable habitat includes heavily vegetated, shallow wetlands with standing or flowing water including Carolina Bays, bogs, swamps, marshes, and wet meadows (wetlands with soft, mucky substrates are preferred) (Jensen et al. 2008). While often associated predominantly with wetlands, spotted turtle spend a considerable amount of time on land throughout the year; however, preferred upland habitat types have not been identified. Keep in mind that spotted turtles are known to move considerable distances between and within habitats; a male can have a home range of 5 hectares, where females have been documented to have home ranges of 16 hectares (Litzgus and Mousseau 2004).

Because the proposed alternatives contain wetlands and the fact that spotted turtles are known to move considerable distances between and within habitats and the fact that they are known to occur within Beaufort, the SCDNR recommends the applicant assume spotted turtle presence on the proposed project site. To prevent the take of a spotted turtle the applicant can either choose to avoid any construction in areas within or adjacent to aquatic resources (wetlands, streams, etc.) from January 15th through July 15th or utilize exclusion methods provided in Appendix 1.

Dwarf Siren

Dwarf Siren (*Pseudobranchus striatus*) are a state-listed threatened species that inhabit heavily vegetated, cypress swamps and ponds, flooded ditches, marshes and other permanent and semi-permanent aquatic habitats in the Coastal Plain. The avoidance and minimization measures provided for spotted turtle above and in Appendix 1 are likely to be protective of dwarf siren. If the project plans shift to the point of impacting considerable acreage of wetlands, the SCDNR would request trapping efforts to survey for and relocate as many individuals as possible prior to construction. Additional details can be found in Appendix 1.

Bats

As indicated in the provided Biological Assessment Report and SCDNR NHD Report, three species of listed bat can be found in Beaufort County: the state endangered Rafinesque's big-eared bat, federally

endangered Northern long-eared bat (*Myotis septentrionalis*) and the proposed endangered[1] tricolored bat (*Perimyotis subflavus*).

Federally Listed Species
Please note that the northern long-eared bat is now listed as federally endangered as of March 31, 2023, making the take prohibited under Section 9 of the Endangered Species Act. Tricolored bat were proposed for listing in September 2022. This species utilizes caves, rock crevices, tree foliage and basal cavities, Spanish moss and man-made structures, such as houses, barns and culverts, as roosts during the summer months and they will use more than one roost location. Therefore, please consult with the USFWS regarding impacts to these species.

Rafinesque's Big-eared Bat
Rafinesque's big-eared bat is a state endangered species in South Carolina. Suitable habitat includes rock outcrops, mesic and cove hardwood forests, dry deciduous forests, pine woodlands, forested wetlands and bottomlands, bottomland agricultural fields, and forested riparian areas (Trousdale and Beckett 2005, Johnson and Lacki 2013). Maternity roosting may occur in a variety of large hollow tree species, caves or rock shelters (Clark 1990, Lucas et al. 2015). As indicated in the SCDNR NHD Report, the SCDNR recommends assuming presence and abiding by a clearing moratorium from May 1st to July 31st. If avoidance of clearing during the recommended window is not practical, additional avoidance and minimization measures are provided in Appendix 1.

SWAP Species
In addition, the hoary bat (*Lasiurus cinereus*) and little brown bat (*Myotis lucifugus*), both of which are listed as highest conservation priority in the SCDNR State Wildlife Action Plan (SWAP), can be found in Beaufort and surrounding counties. SWAP species are those species of greatest conservation need not traditionally covered under any federally funded programs. Species are listed in the SWAP because they are rare or designated as at-risk due to knowledge deficiencies; species common in South Carolina but listed rare or declining elsewhere; or species that serve as indicators of detrimental environmental conditions. Measures to avoid or minimize impacts to these species of conservation importance should be considered in the proposed project.

Because clearing of trees has the potential to disturb the aforementioned bat species, the SCDNR recommends minimizing disturbance which may include protecting and maintaining large diameter roost trees, large snags, decadent trees, hollow trees, and roost structures, especially near water or riparian areas. Additionally, creating or preserving patches of structurally diverse forests in order to provide access to roosting sites will benefit these species.

General Comments
According to National Wetland Inventory Maps, the information provided, and USDA Web Soil Survey data, multiple streams and freshwater wetlands are present in the project area. SCDNR advises that you consult with the U.S. Army Corps of Engineers (USACE) to determine what jurisdictional features are present and if a permit and mitigation is required for activities impacting these areas. The SCDNR

[1] Please note that the U.S. Fish and Wildlife Service (USFWS) published a proposed rule to list the tricolored bat as endangered on September 14, 2022. The USFWS has yet to finalize the rule. https://www.federalregister.gov/documents/2022/09/14/2022-18852/endangered-and-threatened-wildlife-and-plants-endangered-species-status-for-tricolored-bat

recommends that project plans avoid or minimize stream crossings and wetland impacts whenever possible.

Based on review of aerials and FEMA National Flood Hazard data, portions of both properties overlap with Flood Zone X. Although not considered a part of a Special Flood Hazard Area, a low to moderate flood risk is present within these areas. On-site wetlands can mitigate flood damage by slowing and absorbing floodwaters, before gradually releasing them back into rivers and streams. Development of the floodplain, including the placement of structures and fill, reduces flood-carrying capacity, increases flood heights and velocities, and increases flood hazards in areas well beyond the encroachment itself. Continued development of these critical wetlands will magnify documented flooding issues and cumulative effects should be considered. Additionally, considering stronger storms and sea level rise the South Carolina coast is already experiencing, it is crucial to preserve wetlands and their services to the greatest extent possible. Incorporation of Best Management Practices during site planning, and alternative stormwater management strategies that foster maintenance of a site's pre-development hydrologic condition should be given full consideration.

Summary

The SCDNR recognizes the difficulty in balancing healthcare infrastructure needs with environmental concerns and appreciates the opportunity to provide input in the early stages of this project. Should you have any questions or need more information, please do not hesitate to contact me by email at brownmk@dnr.sc.gov or by phone at 803-734-3766.

Sincerely,

Kyle Brown

Kyle Brown
Office of Environmental Programs
South Carolina Department of Natural Resources

References

Clark, M. K. 1990. Roosting ecology of the eastern big-eared bat, *Plecotus rafinesquii*, in North Carolina. M.S. Thesis, North Carolina State University, Raleigh, NC, 111 pp.

Litzgus, J. D., & Mousseau, T. A. 2004. Home range and seasonal activity of southern spotted turtles (*Clemmys guttata*): Implications for management. Copeia, 2004(4), 804–817. https://doi.org/10.1643/CH-04024R1

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Johnson, J. S., and M. J. Lacki. 2013. Summer heterothermy in Rafinesque's big-eared bats (*Corynorhinus rafinesquii*) roosting in tree cavities in bottomland hardwood forests. J. Comp. Physiol. B. 183:709–721.

Appendix 1. Avoidance and Minimization Measures for State Listed Species.
The SCDNR offers the following comments for future assessments and consideration for protected species. Additional information regarding habitat assessments for state protected species can be found in the SCDNR State Listed Species Protection Guidance found here: https://dnr.sc.gov/environmental/docs/SCDNRStateListedSpeciesProtectionGuidance.pdf.

Rafinesque's Big-eared Bat
Habitat Assessment - Coastal Plain
Habitat assessments to identify suitable habitat should be conducted via pedestrian surveys and can be conducted year-round. The SCDNR recommends a survey for maternity roost trees be conducted prior to any clearing activity to avoid and minimize potential impacts. Suitable habitat includes that of black gum (*Nyssa sylvatica*) and water tupelo (*Nyssa aquatic*) stands, bald cypress (*Taxodium distichum*) swamp forests, maritime forests, and hardwood or mixed mature forested bottomlands (Cochran 1999, Lance et al. 2001, Gooding and Langford 2004, Trousdale and Beckett 2005). Trees standing 59 to 82 feet tall with large cavities, defined as 3.6 feet tall by 1.2 feet wide, should be surveyed to determine maternity roost occupancy May 1st to July 31st (Mirowsky 1998, Gooding and Langford 2004, Trousdale and Beckett 2005, Carver and Ashley 2008).

Survey Protocol
The SCDNR recommends that where suitable habitat exists, assume presence of the species and avoid tree clearing from May 1st to July 31st to minimize disturbance and destruction of habitat that may be used by females during gestation or maternal care for pups.

Should the applicant want to conduct surveys for this species to determine presence or fine tune use of any proposed project area, the SCDNR recommends a survey plan be provided to SCDNR for review prior to the survey being conducted. Please note the SCDNR does not recommend or support the use of solely acoustic survey methods for detection of Rafinesque's big-eared bat. Rafinesque's big-eared bat echolocation call signatures have a structure, frequency and intensity that are less easily detected by acoustic methods. Additionally, Rafinesque's big-eared bat use passive-listening to identify prey items (Lacki and Dodd, 2011); thus, likely spending less time emitting echolocation calls while foraging (Bat Conservation International and Southeastern Bat Diversity Network 2013). For these reasons, the absence of acoustic detections may not equate to absence of the species in the project area.

In lieu of mist nest surveys for species presence, the SCDNR recommends the use of surveys for maternity roost trees to protect the species during gestation or maternal care for pups. However, the surveying of maternal roosts is not recommended in the Blue Ridge ecoregion due to lack of data on what is considered suitable maternity roosting habitat. Therefore, the following outlines surveys that would be applicable only in the Coastal Plain Ecoregion.

Surveys for maternity trees may be completed year-round in the Coastal Plain, although high water may deter checking basal hollows for bat presence and should be taken into consideration. To identify potential maternity trees, surveyors shall walk transects across suitable habitat at a spacing based on the density of onsite vegetation. Line of sight should always be maintained between surveyors. Surveyors should be spaced in a manner where all area in between them will be inspected with a slight overlap (e.g., closer for densely vegetated habitat vs. open habitat).

Avoidance & Minimization for Tree Clearing

Option 1
If suitable habitat exists within the project, the SCDNR recommends assumption of presence of Rafinesque's big-eared bat within areas of forested wetlands and to further protect these areas, surround

them with a 1000-foot buffers and avoid tree clearing from May 1st to July 31st to minimize disturbance and destruction of habitat that may be used by females during gestation or maternal care for pups.

All other tree clearing outside of the forested wetlands and its associated buffer may occur in areas that are not wetlands or other aquatic resources in non-Rafinesque's big-eared bat maternity roosting habitat anytime. Where wetlands occur that are not Rafinesque's big-eared bat habitat, but they are spotted turtle habitat, tree clearing should only occur August to December to prevent impacts to spotted turtles during reproduction. However, if wetlands are dry January to June, they may be cleared, but they must be completely dry (no surface water present).

Option 2
To further define areas of Rafinesque's big-eared bat habitat identified in option 1 and to reduce the number of areas being avoided during maternity season, surveys for maternity roosts may be conducted. To identify potential maternity trees, surveyors shall walk transects across suitable habitat at a spacing based on the density of onsite vegetation. Line of sight should always be maintained between surveyors. Surveyors should be spaced in a manner where all area in between them will be inspected with a slight overlap (e.g., closer for densely vegetated habitat vs. open habitat). Any maternity roost tree identified must then be buffered with a 1000-foot radius and an avoidance for tree clearing implemented May 1st to July 31st. Maternity roost trees are defined as trees standing 59 to 82 feet tall with large, hollow, cavities – 4 feet tall by 1 feet wide external width, with large basal cavities potentially being preferential (Mirowsky 1998, Gooding and Langford 2004, Trousdale and Beckett 2005, Carver and Ashley 2008, Bat Conservation International and Southeastern Bat Diversity Network 2013).

All other tree clearing may occur in areas that are not wetlands or other aquatic resources in non-Rafinesque's big-eared bat maternity roosting habitat anytime. Where wetlands occur that are not Rafinesque's big-eared bat habitat, but they are spotted turtle habitat, tree clearing should only occur August to December to prevent impacts to spotted turtles during reproduction. However, if wetlands are dry January to June, they may be cleared, but they must be completely dry (no surface water present).

Spotted Turtle
For areas where wetlands are being avoided, the SCDNR recommends the following:

- Prior to any construction activity, install silt fencing from November 15th through January 15th. Silt fencing should include 45-degree arms to direct spotted turtles to the uplands adjacent to the waterbody and away from the construction site. The 45-degree arms should be placed at a minimum of 100 ft from the waterbody and no more than 300 ft from the waterbody. Additionally, silt fence arms should extend at least 50-ft and extend in each direction so that the ends of each 45-degree angle to the fence meet to form a triangle (schematic below). Silt fencing should remain in place throughout the duration of the proposed construction activities. If silt fencing cannot be placed in accordance with this timing, see additional silt fencing exclusion below.
- Prior to construction, monitor the silt fencing to ensure it is effectively working properly on a monthly basis. This should effectively exclude the species from the project area prior to construction activities. Once construction activities begin, the silt fence should be monitored weekly, at a minimum, for the integrity of the fencing and the presence of spotted turtles or other herpetofauna or small wildlife species. The SCDNR recommends that a permit is in hand prior to exclusion to address handling and relocation of any spotted turtles encountered during the project; see the Spotted Turtle Temporary Relocation Guidance below.

Should the applicant find that the spotted turtle avoidance and minimization measures cannot be completed, the SCDNR would then request that a trap survey for the presence of spotted turtle be

completed. Please note that because take of this state listed species is prohibited under S.C. Code of Laws §50-15-20(C), a permit will be needed from SCDNR prior to completing the survey.

Survey Protocol

All surveys must be completed when water is present in the wetlands. Spotted turtles utilize wetland habitat during certain times of the year, but during periods of drought or low water levels, spotted turtles will aestivate in the surrounding forests adjacent to wetlands. Surveys should be conducted from March 1st – May 15th when air temperatures are between 60-88°F and water temperatures between 60-82°F. The SCDNR recommends only the use of trap surveys due to the low detectability of spotted turtle with the use of visual survey only. Trap surveys should be conducted between March 1st and May 15th. Further survey details can be found in the Spotted Turtle Assessment Protocol developed by the Spotted Turtle Working Group (available upon request).

Trap Surveys

Trapping is usually most effective March to May. Further survey details for trapping can be found in the Spotted Turtle Assessment Protocol developed by the Spotted Turtle Working Group. However, please note that if spotted turtle are detected in areas to be impacted that the applicant would either then need to implement exclusion methods or additional trapping survey efforts for the purposes of relocation.

If silt fencing for exclusion cannot be placed at the appropriate time outlined above, then the following should be abided:

Should the applicant not be able to install the silt fencing in accordance with the proposed window, it will require the applicant to install the exclusion fencing when the species is more active and has the potential to trap individuals with the area of proposed construction. Therefore, the SCDNR recommends checking the perimeter of the fencing twice daily for 14 days prior to ground disturbance and/or clearing in areas adjacent to and near these wetlands to ensure that spotted turtles are not trapped within the proposed project footprint.

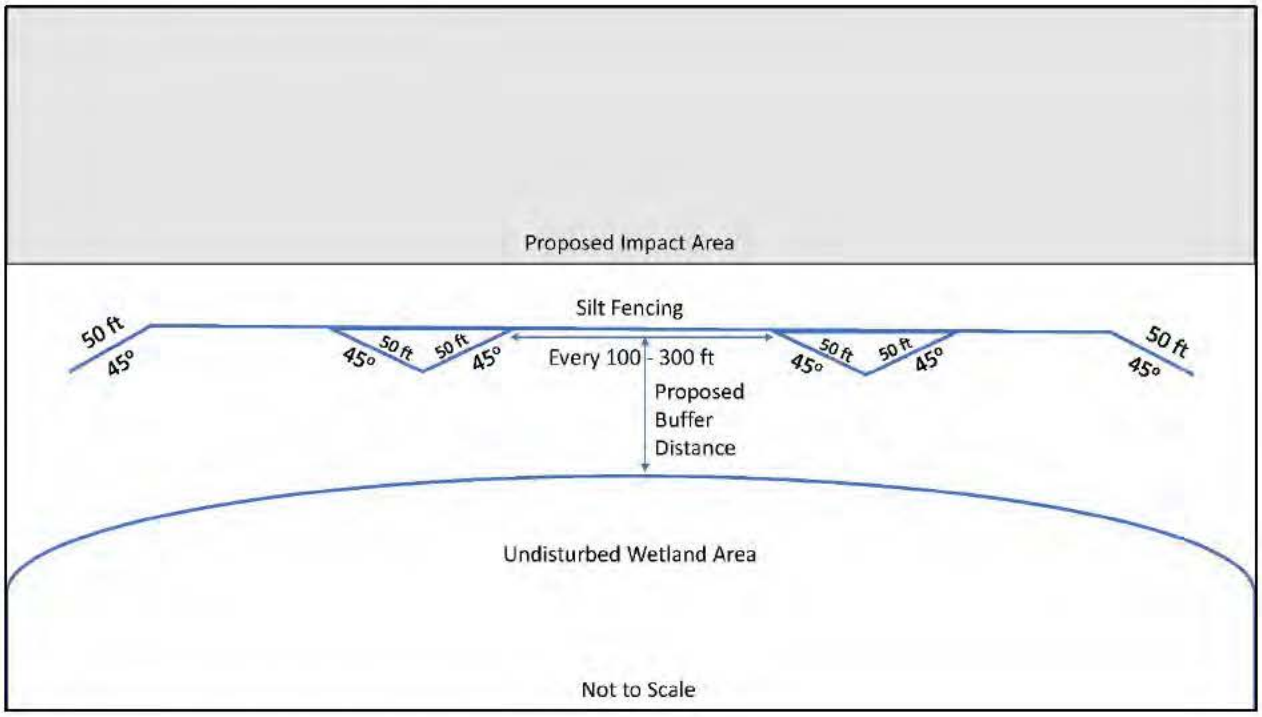
Any turtles found within the construction area during this initial monitoring period and the construction monitoring period described below must be relocated. The relocation plan must be submitted to the SCDNR Permitting Biologist[2] and a permit received from SCDNR prior to the installation of the silt fencing.

During the initial 14 days of monitoring, the construction area should be entirely enclosed within the exclusion fence. After the 14-day installation period, a single point of access may be established in the exclusion fence, utilizing four 45-degree arms (two facing inward and two facing outwards (e.g., ---< >---) as outlined in the guidance below. Please note that the following guidance necessitates that a minimum 100' upland buffer be established between the affected area and the adjacent wetlands.

- Silt fencing should include 45-degree arms to direct spotted turtles to the uplands adjacent to the waterbody and away from the construction site. The 45-degree arms should be placed at a minimum of 100 ft from the waterbody and no more than 300 ft from the waterbody. Additionally, silt fence arms should extend at least 50-ft and extend in each direction so that the ends of each 45-degree angle to the fence meet to form a triangle. Silt fencing should remain in place throughout the duration of the proposed construction activities.
- Prior to construction, monitor the silt fencing to ensure it is working properly on a monthly basis. This should effectively exclude the species from the project area prior to construction activities.

[2] https://www.dnr.sc.gov/wildlife/scientificcollinstructions.pdf

Once construction activities begin, the silt fence should be monitored weekly for the integrity of the fencing and the presence of spotted turtles or other herpetofauna or small wildlife species. The SCDNR recommends that a permit is in hand prior to exclusion to address handling and relocation of any spotted turtles encountered during the project; see the Spotted Turtle Temporary Relocation Guidance below.



SCDNR Spotted Turtle Relocation Guidance

Relocation can occur moving animals to similar habitats onsite or to suitable habitat offsite. The relocation plan for moving spotted turtles away from areas they will be impacted must be submitted to SCDNR for review prior to the installation of the silt fencing and the proper permits acquired from the SCDNR Permitting Biologist[3] for the movement of a state protected species. If you have questions, please contact the State Herpetologist by emailing herps@dnr.sc.gov.

The relocation plan should include the following:

- Maps of where habitat will be impacted and the proposed relocation area.
- Photos of suitable habitat in the proposed relocation area.
- **Temporary Relocations** generally entail translocating individuals immediately outside of exclusion fencing and into adjacent or nearby areas outside of areas of active construction where they were encountered and only in areas that provide similar suitable habitat and cover. Protocols for temporary relocations should include silt fencing monitoring plan and may also include the following best management practices:
    - Reptiles may move during the night and seek shelter, therefore, all machinery and construction materials or debris that remain overnight at the work area shall be inspected by a designated and qualified environmental inspector. All personnel will be responsible for visually inspecting vehicles and equipment throughout the lifecycle of the Project. Details outlining visual inspections will be provided during a Project-specific training for

[3] https://www.dnr.sc.gov/wildlife/scientificcollinstructions.pdf

all on-site Project personnel. Project-specific training material for protected species conservation will be developed and used to inform onsite workers of spotted turtles.
    - Depending upon the specific location for clearing or intrusive work, if a spotted turtle is encountered during the daily pre-work examination, field work/construction may be delayed temporarily in the immediate vicinity until after the animal has voluntarily moved outside the work area or is relocated.
    - If work is in progress after completion of the pre-work examination and a worker observes an animal that may be a spotted turtle, all workers within a 50-foot radius shall cease work immediately and all machines within the same radius shall be turned off. The permit holder's environmental professional shall be contacted immediately. The person that detected the reptile will maintain observation of the specimen until the designated professional arrives, while maintaining a separation distance of no less than 25 feet from the reptile, to avoid being detected and cause the animal to hide. Upon arrival of the approved designated professional, the person that encountered the individual animal will show the professional where the turtle is for relocation as needed.
- **Relocation Trap Assessments** are a more intensive method intended to facilitate the collection of all individuals in an area that will be impacted or completely lost. These sites should be trapped at a minimum of two weeks per month in March, April and May. Each week of trapping should include a 4-night trap run for a total of at least 12 nights during the entire Spotted Turtle active season, March 1 to May 15. The relocation plan must include a trapping protocol and survey schedule with maps that show all wetlands and trapping schedule/plots/protocol/density of traps when applicable.

  Trap Configuration
    - Within each of the four circular sampling plots, place ten traps (recommended: ProMar TR-502 or TR-503 24 or 36"x12" collapsible turtle traps OR crab traps utilized in FL/GA, see equipment section, below) 0–200 m from the reference point at the plot centroid (40 traps total over the four reference plots) in areas within the project footprint that will be impacted.
    - Ideally, all ten traps within a single reference plot should be the same trap type, though different reference plots could have different trap types. The ten traps per sampling plot can be placed in any number of wetlands (e.g., one large wetland or as many as five small wetlands). Ideally, traps should be placed at least 30 m intervals (the average daily movement distance of females in the spring observed by Litzgus and Mosseau [2004] in South Carolina)) in different directions from the reference point (e.g., 30 m to NW; 60 m to NE, etc.); however, the configuration and wetlands and microhabitat will often preclude this strategy. In instances where the wetland configuration is a single linear feature (e.g., a ditch or canal), the traps may be placed in a line along the wetland, separated by at least 30 m, ideally.

  Trap Placement
    - *Microhabitat.*—Traps should be located within high potential use areas, if they exist in the project footprint to be impacted. High potential microhabitat is as follows:
        - In shallow (≤0.2 m, <trap diameter) flow channels that may direct movement of individuals;
        - At the edge of thick vegetation (e.g., sedges, grasses, shrubs) or structure (e.g., logs, debris);
        - Proximal to basking sites;
        - At sites with good solar exposure;
        - Surrounded by cover that conceals traps;

  If high potential use areas aren't available in the project footprint to be surveyed, the consultant should use their expertise of the species to place traps in locations that have the highest potential for capturing spotted turtles.

- *Placement.*—Traps should be firmly staked into the ground (e.g., with 4' plastic-wire coated tomato stakes) or affixed to adjacent structures (e.g., using rope) at two locations to prevent animals, wind, etc. from moving them. The traps should be set so that turtles have adequate headspace to breathe. For ProMar traps, place 1–2 empty plastic bottles (16 oz, with caps on tight) within traps or pool noodles along the outside of traps to ensure breathing space. GPS coordinates should be recorded at each trap once they are placed, and traps should be flagged or marked in accordance with each researcher's preference, including the reference number and trap number. In locations where traps may be seen by the public (e.g., roadsides, boardwalks, etc.), traps can be inconspicuously labeled, instead, so as to not attract attention. On the day of trap deployment, complete the trap set-up field form including habitat suitability information. Surveyors must watch forecast weather conditions and pull or monitor traps if heavy precipitation or flooding is expected. During subsequent DA trap placements, traps should generally be placed in the same location as during the previous run, unless this is impossible due to changing water levels.
- *Trap Checks.*—Traps should be checked at least every 24 hours. On each trap-check day, the trap-check field form should be completed, and the turtle individual field form should be completed for each Spotted Turtle captured in the trap (see protocol for processing individual turtles). Traps should be baited with ~½ can of sardines in oil (e.g., Beach Cliff) and rebaited every 24 hours.

- Protocol for handling captured animals (including target and non-target organisms) – photos verification of each individual and documentation of other species (see photo verification details below). Captured animals shall never be left in the sun, and if relocation cannot take place immediately, animals must be placed in a shaded, cool, dry place that is clear of vehicles and heavy equipment, human activity, and project activities. If an animal needs to be temporarily housed, a labeled, disinfected, plastic container with a lid that has airholes may be used, however, the individual must be relocated within 24 hours. In the event an individual is killed or dies during holding, it will immediately be reported to SCDNR, and the permittee will implement any instruction requested by SCDNR accordingly for specimen disposition. If individuals are encountered, sub-meter accurate GPS coordinates will be collected for the collection location and the translocation location. Any data or information collected during the Project will be compiled and provided to SCDNR. Data will include photographs, GPS coordinates, and any other relevant data available to collect or requested during observations and/or collection.
- Handling and capture of protected species will only occur if individuals are encountered inside the construction areas and relocation will result in avoiding inadvertent adverse impacts to these species. No other handling or capture of these species are allowed.
- Protocol for transporting and releasing captured animals to relocation site including details on when and where.
- Resumes/curriculum vitae of entities completing this work; reptile and amphibian survey trapping experience is required.

Photo Voucher Protocol

General photography procedures

The camera used for photo vouchers should be 1024 x 768 pixels or higher. For all voucher photographs of each individual should include at a minimum, a photo the dorsal view (from above), ventral view (belly) and lateral view should be obtained. It is ideal to photograph the specimen on a light background including a ruler to show size. Photographs in an individual's hand is also acceptable if no other options are available. This also helps to capture the size, but please keep in mind to try to allow the animal to occupy as much of the field of view as possible to capture the detail necessary for identification. In general, effort should be made to photograph any distinguishing features.

Example Photo Vouchers of a Gopher Frog as a reference
Photo 1 (Dorsal view)

Photo 2 (Lateral View)

Dwarf Siren

Dwarf Siren (*Pseudobranchus striatus*) are a state-listed threatened species that inhabit heavily vegetated, cypress swamps and ponds, flooded ditches, marshes and other permanent and semi-permanent aquatic habitats in the Coastal Plain. Take of this state listed species is prohibited under S.C. Code of Laws §50-15-20(C). Please note as a state threatened species, it is unlawful for any person to take, possess, transport, import, export, process, sell, offer for sale, ship, or receive for shipment any dwarf siren without a permit from the SCDNR. Therefore, since habitat for the dwarf siren exists within the proposed project footprint, the SCDNR recommends prior to any habitat disturbance in the proposed work area that surveys be conducted by qualified individuals with dwarf siren survey experience. The detection of dwarf sirens utilizing a visual survey is highly unlikely due to their cryptic nature. The SCDNR recommends a combination of dip net and trap surveys be conducted to identify dwarf siren larvae when water is present.

Survey Protocol

All surveys must be completed when water is present in the wetlands and air temperatures are above freezing. Surveys should be performed by a biologist with wetland amphibian survey experience. Surveys are typically conducted from fall through the spring. Although summer surveys can occur, it is not recommended as this is when the ephemeral wetlands utilized by this species are often dry. Surveys can be conducted using either dip netting or funnel traps. Preferred surveys would consist of a combination of dipnetting and trapping simultaneously.

Dipnetting

Each wetland determined to be suitable habitat shall be sampled via walking transect lines throughout the wetland using a 4 millimeter (mm) or less mesh dipnet. Survey effort should focus solely on areas with emergent or submerged vegetation. For smaller wetlands (0.1 acre or less), it is preferred that transects are spaced tightly enough that the entirety of the aquatic resource surface area is sampled. For larger wetlands, transect spacing does not need to be a set distance; however, at least 50 transects should be sampled throughout the aquatic resource.

The dipnet bag should be initially submerged adjacent to the beginning of the first transect to be sampled. The dipnet should be thrust forward through the submerged vegetation while the surveyor uses their hand or foot to create quick, sweeping motions in the opposite direction they are moving (i.e. towards the net). In deeper, less heavily vegetated wetlands, the dipnet can instead be vigorously swept back-and-forth in a zig-zag pattern through the inundated vegetation (Palis 1997).

Funnel Traps

Funnel traps can result in mortality if neglected. Traps should never be left unchecked for more than 24 hours; however, a successful survey effort should extend for at least 5 days, or 4 trap nights. Trap locations should be well-marked and secured so that traps are not lost. All traps should be "set" so funnels are completely submerged, but at least 25% of the trap remains above the water surface. Additionally, a small floatation device should be left inside each trap in case the trap is moved, or a rain event occurs; this prevents drowning of air breathing organisms. When available, plastic, or mesh, is preferred over metal wire traps to reduce the injury to captured individuals. "Baiting" traps with a glow stick/trap has been shown to increase capture rates for aquatic salamander larvae and should be considered while trapping for this species (Bennett et al. 2012).

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APPENDIX E

PUBLIC ENGAGEMENT

SCOPING

1. *The Island Packet* and *The Beaufort Gazette* Scoping Notices
2. Stakeholder Scoping Letter
3. Scoping Comments

DRAFT EA

1. *The Island Packet* and *The Beaufort Gazette* Draft EA NOAs
2. Stakeholder Letter for Draft EA

PUBLIC NOTICE
SCOPING FOR AN ENVIRONMENTAL ASSESSMENT
U.S. DEPARTMENT OF VETERANS AFFAIRS
DECISION-MAKING PROCESS TO SELECT A PARCEL WHERE A PRIVATE ENTITY WOULD CONSTRUCT AND OPERATE AN OUTPATIENT CLINIC FOR VA TO LEASE IN BEAUFORT, SOUTH CAROLINA

The U.S. Department of Veterans Affairs (VA) is proposing to construct and operate an outpatient clinic (OPC) in Beaufort, SC (the Proposed Action). The purpose of the Proposed Action is to provide enhanced and expanded primary care, mental health services, and add a comprehensive array of specialty care outpatient services to serve Veterans in Beaufort and the surrounding communities in a modern, state-of-the-art-facility. The OPC will be constructed by a private entity for VA to lease and operate at one of the following sites under consideration:

Site 1 – 708 Robert Smalls ParkwaySite 2 – Robert Smalls Parkway & Goethe Hill Road-Site 3 – 1844 Ribault Road

Additional project details are available in the scoping notice posted at www.cfm.va.gov/environmental. If you have comments on the scope of the EA, the range of alternatives, and environmental issues for in-depth analysis, please email your comments to vacoenvironment@va.gov with the subject line "Beaufort OPC EA" by January 20, 2025. VA anticipates publishing the Draft EA for a 30-day public review and comment period in Spring 2025. VA will notify stakeholders, publish a notice of availability of the Draft EA in the *Island Packet*, and invite comments on the Draft EA at that time.

IPL0208857
Dec 20,22 2024

McClatchy

The Beaufort Gazette
The Belleville News-Democrat
Bellingham Herald
Centre Daily Times
Sun Herald
Idaho Statesman
Bradenton Herald
The Charlotte Observer
The State
Ledger-Enquirer

Durham | The Herald-Sun
Fort Worth Star-Telegram
The Fresno Bee
The Island Packet
The Kansas City Star
Lexington Herald-Leader
The Telegraph - Macon
Merced Sun-Star
Miami Herald
El Nuevo Herald

The Modesto Bee
The Sun News - Myrtle Beach
Raleigh News & Observer
Rock Hill | The Herald
The Sacramento Bee
San Luis Obispo Tribune
Tacoma | The News Tribune
Tri-City Herald
The Wichita Eagle
The Olympian

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Amount	Cols	Depth
22593	621072	Print Legal Ad-IPL02088570 - IPL0208857	R2024159.036-Beaufort S	$264.88	1	36 L

Attention: AP

MABBETT & ASSOCIATES
40 OLD LOUISQUISSET PIKE, SUITE 200, BOX 13
NORTH SMITHFIELD, RI 02896

glucksman@mabbett.com

PUBLIC NOTICE
SCOPING FOR AN ENVIRONMENTAL ASSESSMENT
U.S. DEPARTMENT OF VETERANS AFFAIRS
DECISION-MAKING PROCESS TO SELECT A PARCEL WHERE A PRIVATE ENTITY WOULD CONSTRUCT AND OPERATE AN OUTPATIENT CLINIC FOR VA TO LEASE IN BEAUFORT, SOUTH CAROLINA

The U.S. Department of Veterans Affairs (VA) is proposing to construct and operate an outpatient clinic (OPC) in Beaufort, SC (the Proposed Action). The purpose of the Proposed Action is to provide enhanced and expanded primary care, mental health services, and add a comprehensive array of specialty care outpatient services to serve Veterans in Beaufort and the surrounding communities in a modern, state-of-the-art facility. The OPC will be constructed by a private entity for VA to lease and operate at one of the following sites under consideration:
Site 1 – 708 Robert Smalls ParkwaySite 2 – Robert Smalls Parkway & Goethe Hill Road-Site 3 – 1844 Ribault Road
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IPL0208857
Dec 20,22 2024

STATE OF)

SOUTH CAROLINA) AFFIDAVIT

COUNTY OF BEAUFORT)

I, Tara Pennington, makes oath that the advertisment, was published in The Island Packet and The Beaufort Gazette, a newspaper published in Beaufort County, State and County aforesaid, in the issue(s) of

2 insertion(s) published on:
12/20/24, 12/22/24

Tara Pennington

Sworn to and subscribed before me this 23rd day of December in the year of 2024

Margaret K. Wilson

Notary Public in and for the state of Texas, residing in Dallas County

MARGARET KATHLEEN WILSON
My Notary ID # 134916732
Expires May 24, 2028

Extra charge for lost or duplicate affidavits.
Legal document please do not destroy!

PUBLIC NOTICE
SCOPING FOR AN ENVIRONMENTAL ASSESSMENT
U.S. DEPARTMENT OF VETERANS AFFAIRS
DECISION-MAKING PROCESS TO SELECT A PARCEL WHERE A PRIVATE ENTITY WOULD CONSTRUCT AND OPERATE AN OUTPATIENT CLINIC FOR VA TO LEASE IN BEAUFORT, SOUTH CAROLINA

The U.S. Department of Veterans Affairs (VA) is proposing to construct and operate an outpatient clinic (OPC) in Beaufort, SC (the Proposed Action). The purpose of the Proposed Action is to provide enhanced and expanded primary care, mental health services, and add a comprehensive array of specialty care outpatient services to serve Veterans in Beaufort and the surrounding communities in a modern, state-of-the-art-facility. The OPC will be constructed by a private entity for VA to lease and operate at one of the following sites under consideration:

Site 1 – 708 Robert Smalls ParkwaySite 2 – Robert Smalls Parkway & Goethe Hill Road-Site 3 – 1844 Ribault Road

Additional project details are available in the scoping notice posted at www.cfm.va.gov/environmental. If you have comments on the scope of the EA, the range of alternatives, and environmental issues for in-depth analysis, please email your comments to vacoenvironment@va.gov with the subject line "Beaufort OPC EA" by January 20, 2025. VA anticipates publishing the Draft EA for a 30-day public review and comment period in Spring 2025. VA will notify stakeholders, publish a notice of availability of the Draft EA in the *Island Packet*, and invite comments on the Draft EA at that time.

IPL0208857
Dec 20,22 2024

U.S. DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

December 10, 2024
(*Sent via email*)

SUBJECT: Environmental Assessment Scoping Notice for the Proposed Construction and Operation of an Outpatient Clinic in Beaufort, South Carolina **[VA ID# EAXX-029-15-VHA-1733502133]**

Dear Valued Stakeholder:

The U.S. Department of Veterans Affairs (VA) is proposing to construct and operate an outpatient clinic (OPC) in Beaufort, South Carolina (the Proposed Action). The purpose of the Proposed Action is to provide enhanced and expanded primary care, mental health services, and add a comprehensive array of specialty care outpatient services to serve Veterans in Beaufort and the surrounding communities in a modern, state-of-the-art-facility. The OPC will be constructed by a private entity for VA to lease and operate at one of the following sites (Figure l):

- Site 1 – 708 Robert Smalls Parkway
- Site 2 – Robert Smalls Parkway & Goethe Hill Road
- Site 3 – 1844 Ribault Road

VA is preparing an environmental assessment (EA) to analyze the potential environmental impacts of the Proposed Action. VA is seeking input from stakeholders as part of the scoping process in the development of this document. VA is preparing the EA in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S. Code [USC]§ 4321- 4370), as implemented by the Council on Environmental Quality (40 Code of Federal Regulations [CFR] Parts 1500-1508), and VA's NEPA regulations (38 CFR Part 26).

Through this notice, VA is also providing the public with information about the undertaking and seeking input about the undertaking's effects on historic properties pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, (54 USC§ 30610 8), and its implementing regulations (36 CFR Part 800 -Protection of Historic Properties). VA is using its procedures for public involvement under NEPA in lieu of public involvement requirements in Subpart B of the Section l06 regulations per 36 CFR Part 800.2(d)(3). This notice does not serve as an invitation to consult under Section 106, it is solely to seek and consider the views of the public. VA will conduct its Section 106 review and consultation separately.

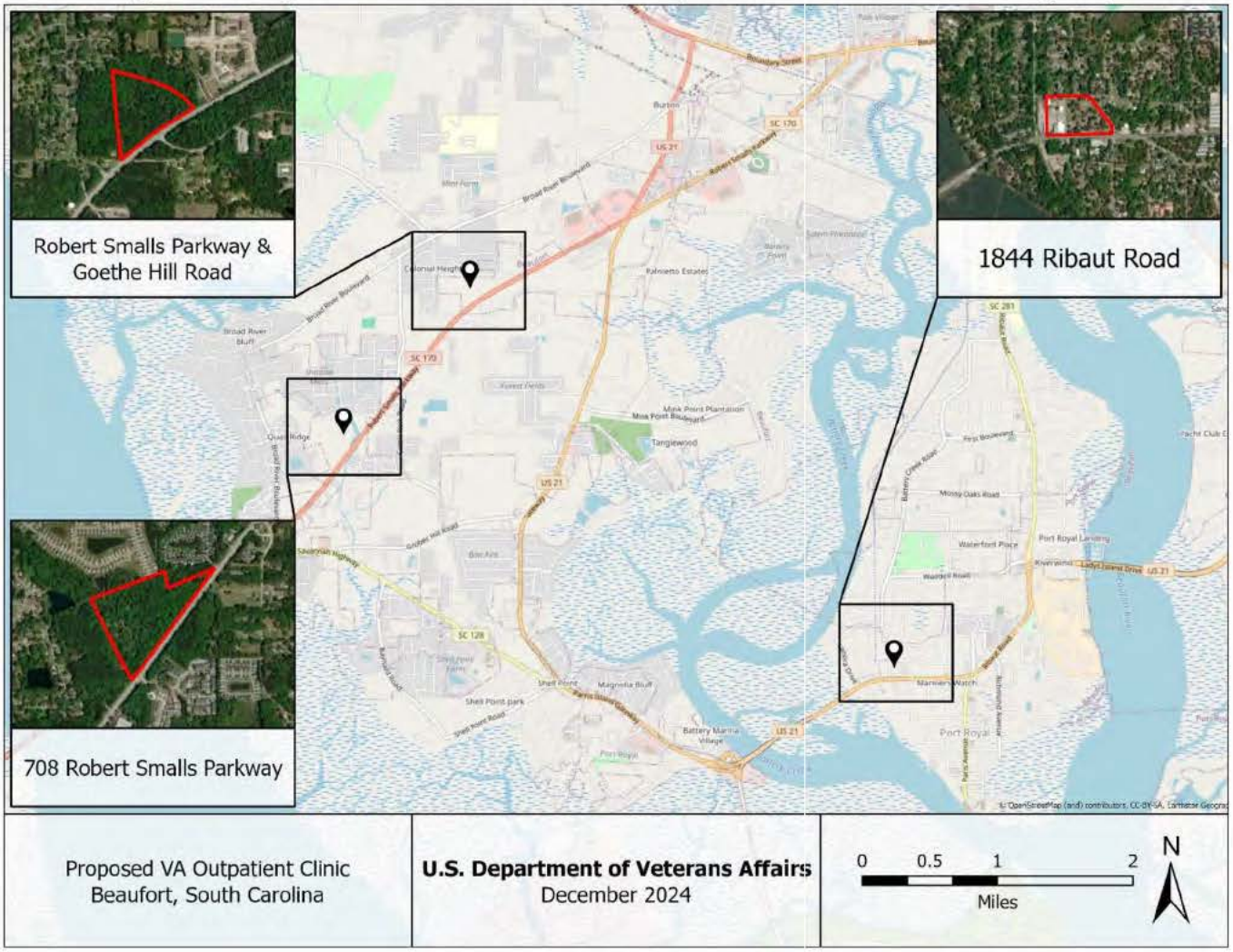
If you have comments on the scope of the EA, the range of alternatives, and environmental issues for in-depth analysis, please email your comments to vacoenvironment@va.gov with the subject line "Beaufort OPC EA". Additionally, VA will publish the Draft EA online at http://www.cfm.va.gov/environmental/index.asp for a 30-day public review and comment period. The Notice of Availability will be posted in the *Beaufort Gazette.*

Respectfully,

GLENN ELLIOTT Digitally signed by GLENN ELLIOTT
Date: 2024.12.10 10:08:04 -05'00'

Glenn Elliott
Director, Project Development Services Division
Office of Construction and Facilities Management

Figure 1. Proposed Location for a VA Outpatient Clinic – Site Vicinity Map



NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT
U.S. DEPARTMENT OF VETERANS AFFAIRS
Proposed Construction and Operation of an Outpatient Clinic in Beaufort County, South Carolina

The U.S. Department of Veterans Affairs (VA) has prepared a Draft Environmental Assessment (EA) to analyze the potential environmental impacts associated with VA's Proposed Action to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort County, SC. The purpose of the Proposed Action is to provide outpatient health care services to area Veterans. The Proposed Action is needed to address space gaps and operational inefficiencies at existing clinics within the VA Charleston Health Care System that were identified through the VA Strategic Capital Investment Planning process. VA is evaluating the following three Proposed Action Alternative sites and would select one for the new OPC:

- Alternative 1 – 708 Robert Smalls Parkway, Port Royal, SC (27 acres)
- Alternative 2 – Robert Smalls Parkway & Goethe Hill Road, Beaufort, SC (16 acres)
- Alternative 3 – 1844 Ribaut Road, Port Royal, SC (11 acres)

VA prepared the Draft EA according to the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code § 4321 et seq.).

The Draft EA is available on the VA website at https://www.cfm.va.gov/environmental/. A hard copy of the Draft EA is available at the Beaufort Branch Library, 311 Scott Street, Beaufort, SC 29902.

Please submit any requests for additional information, questions, or comments on the Draft EA via email to vacoenvironment@va.gov with the subject line "Beaufort, SC OPC EA" within 30 days following publication of this notice. VA will summarize and address substantive comments in the Final EA.

U.S. Department of Veterans Affairs

Office of Construction & Facilities Management
425 I Street, NW, Ste. 2E.250
Washington DC 20420
www.cfm.va.gov

June 17, 2025

Sent via email

SUBJECT: Notice of Availability of Draft Environmental Assessment for Proposed Construction and Operation of an Outpatient Clinic in Beaufort County, South Carolina
[VA ID# EAXX-029-15-VHA-1733502133]

Dear Valued Stakeholder,

The U.S. Department of Veterans Affairs (VA) has prepared a Draft Environmental Assessment (EA) to analyze the potential environmental impacts associated with VA's Proposed Action to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort County, SC. The purpose of the Proposed Action is to provide outpatient health care services to area Veterans. The Proposed Action is needed to address space gaps and operational inefficiencies at existing clinics within the VA Charleston Health Care System that were identified through the VA Strategic Capital Investment Planning process. VA is evaluating the following three Proposed Action Alternative sites and would select one for the new OPC:

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- Alternative 3 – 1844 Ribaut Road, Port Royal, SC (11 acres)

VA prepared the Draft EA according to the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code § 4321 et seq.).

Concurrent with this mailing, a Notice of Availability (NOA) will be published in *The Beaufort Gazette* and *The Island Packet* to inform and solicit input from the public. The Draft EA is available on the VA website at https://www.cfm.va.gov/environmental/. A hard copy of the Draft EA is available at the Beaufort Branch Library, 311 Scott Street, Beaufort, SC 29902.

Please submit any requests for additional information, questions, or comments on the Draft EA via email to vacoenvironment@va.gov with the subject line "Beaufort, SC OPC EA" within 30 days following receipt of this NOA. VA will summarize and address substantive comments in the Final EA.

Respectfully,

Glenn Elliott
Director, Project Development Services Division
Office of Facilities Planning

Attachment: Figure 1 – Beaufort OPC Proposed Action Alternative Site Locations

Figure 1. Beaufort OPC Proposed Action Alternative Site Locations