

APPENDIX A

Scoping Documents

- **2023 SCARNG MPMG Agency Notification Letter**
- **SCDHEC Response**
- **SCDNR Response**
- **2011 & 2019 SHPO Responses**
- **2011 & 2019 Tribal Responses**

The State of South Carolina

Military Department



R. VAN MCCARTY
MAJOR GENERAL
THE ADJUTANT GENERAL

OFFICE OF THE ADJUTANT GENERAL
1 NATIONAL GUARD ROAD
COLUMBIA, S. C. 29201-4752

12 October 2023

SUBJECT: McCrady Training Center Multi-purpose Machine Gun Range Construction,
Richland County, South Carolina.

I am writing to inform you the Army National Guard - Environmental Programs Division and South Carolina Army National Guard (SCARNG) are preparing environmental documentation for the construction and operation of a Multi-purpose Machine Gun (MPMG) Range at the McCrady Training Center (MTC), Richland County, South Carolina. As this proposed action is federally funded, we are preparing an Environmental Assessment (EA) to evaluate the environmental, cultural, and socioeconomic effects associated with the proposed action, pursuant to the National Environmental Policy Act (NEPA) of 1969. While the SCARNG maintains a wealth of current data concerning the MTC, Fort Jackson, and its vicinity, we are seeking your input into this process concerning any specific issues or concerns your agency may have with the proposed action.

MTC occupies approximately 15,000 acres of the eastern third of the Fort Jackson footprint and is licensed to SCARNG by the Department of the Army (DA). The project site is located within the MTC's licensed area of Fort Jackson (See Figure 1). MTC is the primary training facility for the SCARNG.

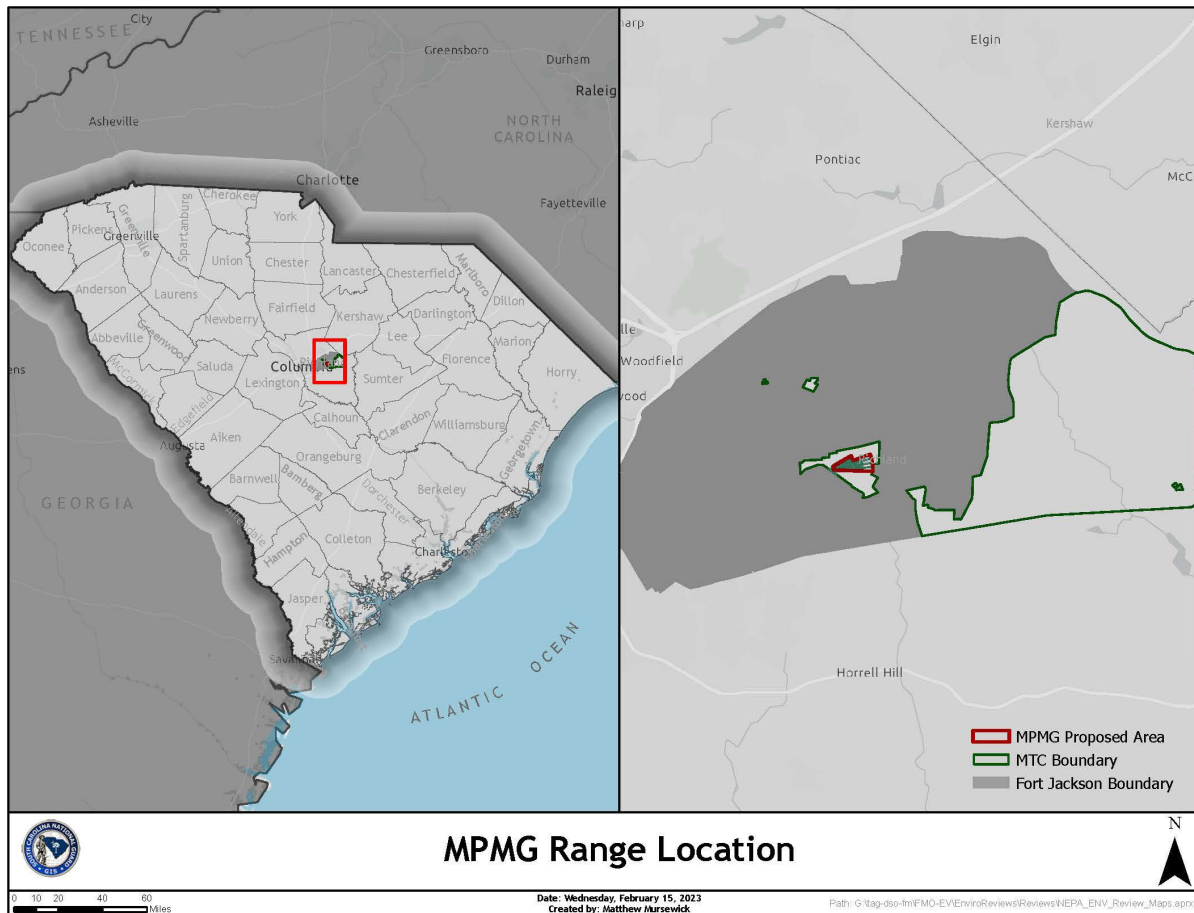


Figure 1: Multi-Purpose Machine Gun Range (MPMG) proposed location at McCrady Training Center (MTC) on Fort Jackson in Richland County, SC.

The proposed MPMG range would be located, within the existing impact area, on an existing active range complex managed by Fort Jackson (See Figure 2). The Impact Area is an existing area where weapons, bombs, explosive munition, etc. have been and can be fired or detonated. Fort Jackson has conducted field artillery operations in the range complex since World War I. There are currently three active shooting ranges located within 2600 yards of the proposed range footprint. One of the existing ranges, fires the same munitions as the proposed MPMG. It overlaps the northern edge of the MPMG footprint; based on this overlap, this existing range would not be able to fire at the same time as MPMG.

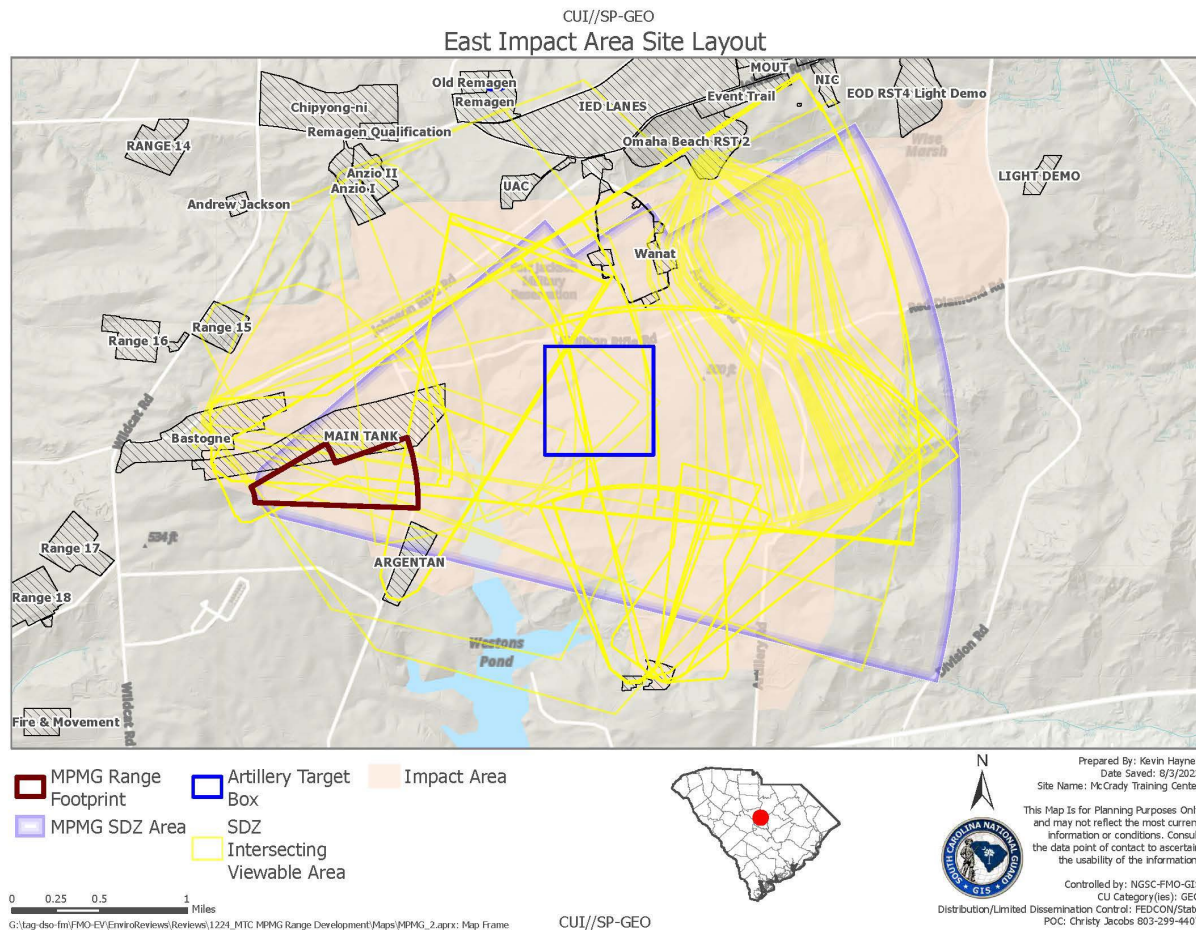


Figure 2: Fort Jackson East Impact Area Site Layout

The proposed action is needed in order to provide a facility to train on crew-served weapons. Crew-served weapons are weapon systems that require more than one individual to operate due to system complexity. Currently during Inactive Duty Training (IDT) weekends personnel must travel to active duty locations over three (3) hours (each way) at Ft. Stewart, Georgia or Ft. Liberty (formerly Ft. Bragg), North Carolina. The travel for each training session reduces valuable training time on IDT weekends that could be used for meeting other training requirements, if a closer training location were available. There are no other MPMG ranges within two (2) hours travel distance that meet qualification requirements. The proposed action would ensure the SCARNG provides a complete, sustainable, and viable training facility for its Soldiers to attain and maintain a full readiness posture. Implementation of the proposed action would support higher quality, mission-essential training activities at the MTC, while limiting the need for out-of-state travel.

The proposed MPMG is currently at the 30% design phase and the final details may change slightly, however it is not anticipated that the project would expand beyond the footprint described. Public and agency involvement are critical to successful design refinement.

Based on the 30% design, the proposed footprint for the range is approximately 208 acres including the Range Operations and Control Area (ROCA). The range would be secured by two main access gates that would open to two separate driveways that would lead to a gravel or asphalt parking area, depending on funding. Range signs and flagpoles would also be installed along the gated entrance. The SCARNG proposes to construct several buildings within the ROCA including a Covered Mess Hall, a Classroom, an Operations Storage Building, a Range Control Tower, and an Ammo Breakdown Building. An enclosed bleacher area would also be installed. The MPMG Range itself would consist of six firing lanes. No moving targets are proposed for the MPMG. Security light poles would be installed around the perimeter and within the range. Existing telephone, electric, and fiber optic lines would be extended from existing ranges to provide power to the new MPMG Range.

The SCARNG conducted a preliminary evaluation of alternatives to determine its potential direct, indirect, and cumulative effect(s) on the physical, environmental, cultural, and socioeconomic aspects of the proposed construction of the MPMG. Technical resource areas initially evaluated by the SCARNG include:

- Land Use
- Air Quality
- Noise
- Geology, Topography, and Soils
- Water Resources and Wetlands
- Biological Resources
- Cultural Resources
- Socioeconomics, including Environmental Justice
- Infrastructure, including traffic and transportation
- Hazardous Materials and Waste (HTMW)

The SCARNG used the findings of the [*Final Programmatic Environmental Assessment \(PEA\) for Constructing and Operating Training Ranges on Previous or Existing Range Sites on Army Training Areas*](#) (US Army Environmental Command [USAEC] 2013) to “identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (40 CFR Part 1506.3), narrowing the discussion of these issues in the statement [EA] to a brief presentation of why they would not have a significant effect on the human environment or providing a reference to their coverage elsewhere.”

This Final PEA examined the results of 17 site-specific EAs completed across the United States. Each range examined would affect up to 40 acres of land on a previously disturbed site. Ranges examined included a MRF Range, Zero Range, and LFSH, among other Army-standard training range types. This PEA concluded, based on the findings of these site-specific EAs, that constructing and operating new training ranges on existing or former range sites could only have potential effects to soil erosion, migration of metals, wetlands (during construction), and protected species. The PEA identified minimal effects to energy, socioeconomics, air quality, airspace, cultural resources, facilities and infrastructure, HTMW, land use, natural resources, noise, topography, solid waste, and traffic and transportation (USAEC 2013). During construction, the proposed action would result in local construction jobs and provide minor incidental spending in the local community. This would be expected to provide some additional opportunities and increases in local employment and personal income which could have a temporary positive impact.

Implementation of the best management practices (BMPs) identified in the PEA would minimize the negative potential effects to soil erosion and the migration of metals; adverse effects to wetlands and protected species would be minimized through the appropriate regulatory processes under the purview of the United States Army Corps of Engineers (USACE) and United States Fish and Wildlife Service (USFWS), respectively.

Through this process, the SCARNG determined the only technical resource areas which required in-depth evaluation in this EA would be Biological Resources and HTMW. The remaining technical resource areas were adequately analyzed in the PEA and eliminated from more detailed study in this EA.

Resources with potentially adverse effects (mitigated):

- *Biological Resources* –Based on USFWS guidance and the analysis provided in the Biological Assessment (pending Biological Opinion), the SCARNG has concluded the construction and operation of the MPMG ‘may affect and is likely to adversely affect the Tri-Colored bat, a proposed Federal-listed species and its habitat. The construction and operation of the MPMG ‘may affect but is not likely to adversely affect’ the Red-cockaded Woodpecker, a Federal-listed species and its habitat.

Resources with Less-than-significant effects:

- *Hazardous Materials and Waste (HTMW)* – construction and operational HTMW effects due to presence of unexploded ordnance (UXO) within the proposed MPMG Range MCL, existing areas of concern (AOCs) within the proposed MPMG Range SDZ, potential metals migration from the proposed ranges, and a proposed increase in onsite activity.

Resources with No Anticipated effects:

- *Cultural Resources* - On 13 December 2011 and 12 December 2019, South Carolina SHPO concurred, in writing, with the finding that no historic properties or archaeological resources listed on or eligible for listing on the NRHP would be affected by the proposed action. In addition, 13 federally recognized tribes were consulted in 2011 and again in 2019. Responding tribes did not identify any concerns regarding the proposed action, unless an inadvertent discovery of cultural materials is made during construction. As such, no effects to cultural resources would be anticipated.

Resources Adequately Analyzed in the PE but Eliminated From More Detailed Analysis in this EA:

- *Land Use* – No adverse land use effects or significant changes in land use or land management would occur due to modernizing and operating training ranges on previous or existing range sites. Additionally, no off-post land uses would be directly affected. As such, no direct or indirect adverse land use effects are anticipated.
- *Air Quality* – The proposed action is in a full attainment area. The proposed action is not anticipated to have an appreciable impact on regional MSAT levels. Construction related impacts to air quality would be temporary, localized increased fugitive dust and mobile-source emissions. Although the proposed action would result in a long-term increase in training activity at the MTC, these training activities would be temporary and therefore, individual increases in vehicular emissions during each specific training event. Since emissions would be short-term and localized they would not result in a long-term increase

in criteria pollutants. The proposed action would reduce overall vehicle miles traveled due to eliminating the need to transport Soldiers between the MTC and regionally available small arms training sites.

- *Wetlands & Water Resources* – It has been determined no wetlands are present within the proposed MPMG construction footprint. Therefore, no impacts to wetlands are anticipated. According to the PEA, the most common risk to the quality of water resources was sedimentation caused by erosion of exposed and disturbed soils during range construction. During construction, compliance with NPDES construction permit, including implementation of a project-specific SWPPP would ensure sedimentation effects are minimized. Range operations would not affect groundwater. No groundwater pumping is required for constructing or operating the proposed MPMG range. The proposed action would result in minimal or no effects to surface waters, groundwater, or wetlands.
- *Climate Change/Greenhouse Gas Emissions* - There would be short-term increases to Greenhouse Gas (GHG) emissions during the proposed construction of the MPMG range, and minimal increases during the operation. Therefore, only a small amount of net GHG emissions are anticipated for the proposed action. The proposed action would reduce overall GHG emissions due to a decrease in vehicle miles traveled between the MTC and regionally available small arms training sites. The potential impact of the construction of the proposed MPMG range on climate change is expected to be negligible.
- *Noise* –The proposed .50 caliber activity of the MPMG Range would result in little or no increase of noise sources from existing operations because an existing range using the same munitions overlaps the proposed MPMG Range. Furthermore, the proposed MPMG range is located within an existing impact area on an existing range complex. Figure 2 highlights all existing active SDZs firing into the small arms impact area including the proposed MPMG range footprint. The map clearly shows active ranges are all firing upon the proposed MPMG SDZ. The map also shows the field artillery box is located within the middle of the MPMG SDZ. An artillery round is a weapon system which requires a crew or more than one individual to function due to its high operational complexity and includes big guns, howitzers, or mortars having a caliber greater than that of small arms, or infantry weapons. Therefore, operational noise levels would not change significantly and effects are anticipated to be minimal. Any anticipated noise impacts would be minimized due to the site's distance from housing or other noise-sensitive areas. Negligible noise effects are anticipated from temporary construction activities.
- *Socioeconomics* - No adverse effects to socioeconomic resources, including Environmental Justice, would occur due to the proposed action. The proposed action would not cause disproportionately high and adverse impacts on any minority or low-income populations in accordance with the provisions of E.O. 12898. According to the Environmental Protection Agency (EPA) Environmental Justice Screening and Mapping Tool, the closest socially vulnerable population is over two (2) miles from the proposed firing points of the MPMG range. No additional demands on local emergency services would be anticipated. As previously noted, the proposed action would result in additional local construction jobs and provide minor incidental spending in the local community. This would be expected to provide some additional opportunities and increases in local employment and personal income which could have a temporary positive impact on the local economy.
- *Infrastructure* – Existing infrastructure is available to support the proposed action. All utility services will connect to the existing Fort Jackson primary lines and will run onto the

ROCA portion of the range. Two driveways will connect to the existing Guadalcanal Road. Existing road networks are sufficient to support construction and range access.

- *Traffic & Transportation* - No adverse traffic or transportation effects are anticipated for the proposed action. There would be a short-term increase in construction related traffic which can be readily absorbed by existing on-post and off-post road networks. The SCARNG would implement the BMP to limit construction traffic to non-peak periods to further reduce effects. Operations would reduce overall vehicle miles traveled due to eliminating the need to transport Soldiers between the MTC and regionally available small arms training sites. Existing transportation infrastructure is sufficient to support the proposed action.
- *Geology, Topography, and Soils*- During operation, no additional disturbance to geology, topography, or soils would be anticipated. The SCARNG would continue to implement appropriate operational soil erosion control methods and adhere to the BMP guidelines set forth in the *Army Prevention of Lead Migration and Erosion from Small Arms Ranges Manual* (USAEC 1998) and the *Army Small Arms Training Range Environmental Best Management Practices Manual* (USAEC 2005). Minimal effects to geology, topography or soils would be anticipated. Construction impacts are outlined below:
 - *Prime Farmland Soils*. No prime farmland soils exist within the proposed construction footprint. As such, no effects to prime or unique farmlands are anticipated.
 - *Geology*. No effects to the local geology are anticipated, as no deep excavation is proposed.
 - *Topography*. Only minimal topographic changes would occur within each proposed construction footprint, as the proposed construction areas are generally flat and have been previously used as training ranges and areas. No major topographic changes are proposed. As such, only minimal effects to local topography are anticipated.

Effects to all resources areas would be further reduced or avoided through the implementation of standard environmental Best Management Practices (BMPs) or management measures, incorporated into the proposed action.

All formal comments received would be considered prior to final design and any mitigation decisions, and be included in the project record. We value your input and welcome your participation in the NEPA process. While we accept comments throughout the project development process, please respond, in writing, on or before **17 November 2023**. If you have any questions or concerns about the proposed action, please contact me at 803-730-2178 or virginia.theriot@scmd.sc.gov.

Please send your written responses via e-mail to:

Ms. Virginia Theriot
NEPA/ECP Manager/Senior Consultant
Acting Cultural Resource Manager
virginia.theriot@scmd.sc.gov

Sincerely,

Virginia Theriot



November 13, 2023

Ms. Virginia Theriot
The State of South Carolina Military Department
NEPA/ECP Manager/Senior Consultant
Acting Cultural Resource Manager
Via email: virginia.theriot@scmd.sc.gov

Re: Army National Guard—Environmental Programs Division and SC Army National Guard (SCARNG) Multi-purpose Machine Gun (MPMG) Range at McCrady Training Center (MTC), Richland County, South Carolina

Dear Ms. Theriot:

I am writing on behalf of the South Carolina Department of Health and Environmental Control (DHEC or the Department) in response to your letter of October 12, 2023 regarding the preparation of an Environmental Assessment (EA) of the Army National Guard—Environmental Programs Division and SC Army National Guard (SCARNG) Multi-purpose Machine Gun (MPMG) Range at McCrady Training Center (MTC), located in Richland County, SC. As SCMD/SCARNG seeks input to be integrated into the proposed Remediation Plan, DHEC offers these comments and considerations from programs and divisions with the DHEC Bureau of Air Quality, Bureau of Land & Waste Management and Bureau of Water.

A. Bureau of Air Quality Air Permitting Division

The proposed range would need to be evaluated to determine if an air quality permit is required. Steps that assist in this type of evaluation would: 1) determine air emissions based on the definition of potential to emit; 2) determine if the source should be considered part of the larger Fort Jackson source; and 3) determine if the emissions or type of source trigger a need for permitting and/or other state or federal regulations. Please contact [Christopher D. Hardee, PE](#), Manager of the Bureau of Air Quality Air Permitting Division to talk through each of the steps. He may be contacted by phone (803-898-0039) or by email (hardeecd@dhec.sc.gov).

During initial review, the range and MTC operation should not be considered as part of the Ft. Jackson source per the 1996 EPA Memo on Military Installations (<https://www.epa.gov/sites/default/files/2015-07/documents/dodguid.pdf>). Therefore, the emissions from the range will be evaluated as a separate source.

Relative to the type of emissions, DOD/Naval Ordnance Safety and Security have emission factor databases for all small arms and ordnances. Ft. Jackson has calculated their potential to emit from their ranges using those factors and can be further discussed as part of this process.

Potential to Emit is defined as “the maximum capacity of a source to emit a regulated pollutant under its physical and operational design.” Certain aspects can be considered (e.g., limitations on capacity due to safety); whereas, other aspects (e.g., the range’s planned training schedule) cannot be considered. A meeting would be the best way to determine an appropriate potential to emit for the new range.

B. Bureau of Land and Waste Management

DHEC regulates hazardous waste activities at permitted facilities in South Carolina. The permitting process gives DHEC and other government agencies the chance to evaluate the ability of a facility to comply with state and federal regulations. Review with our RCRA Federal Facilities Manager would guide permitting needs to comply with the South Carolina Hazardous Waste Management Regulations and the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments. For additional guidance, please contact Stacey French, P.E., Director, Division of Waste Management at (803) 898-0290 or frenchsl@dhec.sc.gov or Kent Krieg, Manager, RCRA Federal Facilities at (803)898-0255 or (kriegkm@dhec.sc.gov).

It was also noted that the location of the proposed MPMG range is near some of the Solid Waste Manage Units (SWMUs) on site. Additional discussions about this consideration is encouraged.

C. Bureau of Water

As noted in the proposal, “(d)uring construction, compliance with NPDES construction permit, including implementation of a project-specific SWPPP would ensure sedimentation effects are minimized.” The Bureau of Water Dam Safety and Stormwater Management

Division is available for additional guidance or assistance. Please contact Stormwater Permitting Manager John A. Poole, MEng, PE, PMP, at (803)898-3678 or pooleja@dhec.sc.gov as needed.

As SCMD prepares its final design and mitigation decisions in the NEPA process, I can continue to provide support with coordination and communications with our bureaus and divisions at SC DHEC. Please let me know any way that DHEC staff can help address any questions, clarify permitting needs, update permit application status, or share additional information. Likewise, I can assist in coordinating agency-focused meetings that your team feels could be beneficial to these efforts. I can be contacted via email ellenbke@dhec.sc.gov or via phone (803) 898-8161.

Thank you for this opportunity to comment on these efforts and please let me know any way I can be of further assistance.

Respectfully,



Kristy T. Ellenberg
Director, Collaborative Partnerships and Strategic Initiatives
DHEC Environmental Affairs

cc: Ms. Myra Reece, Director, DHEC Environmental Affairs, via email: reecemc@dhec.sc.gov



State of South Carolina
Department of Natural Resources

P.O. Box 167
Columbia, S.C. 29202
803-528-4199

Robert H. Boyles, Jr., Director
Lorianne Riggins, Director, Office of Environmental Programs

November 17, 2023

Ms. Virginia Theriot
NEPA/ECP Manager/Senior Consultant
Acting Cultural Resource Manager
South Carolina Office of The Adjutant General
1 National Guard Road
Columbia, SC 29201-4752

Electronic submission

RE: McCrady Training Center Multi-purpose Machine Gun Range, Richland County, SC

Dear Ms. Theriot,

Personnel with the South Carolina Department of Natural Resources (SCDNR) have reviewed the proposed project, evaluated its impact on natural resources and offer the following comments.

The proposed project involves the construction and operation of a Multi-purpose Machine Gun (MPMG) Range at the McCrady Training Center (MTC), in Richland County, South Carolina. The project site is located within the MTC's licensed area of Fort Jackson. The MTC is the primary training facility for the South Carolina Army National Guard (SCARNG). Based on the 30% design, the proposed footprint for the range is approximately 208 acres including the Range Operations and Control Area (ROCA). The range would be secured by two main access gates that would open to two separate driveways that would lead to a gravel or asphalt parking area, depending on funding. Range signs and flagpoles would also be installed along the gated entrance. The SCARNG proposes to construct several buildings within the ROCA including a Covered Mess Hall, a Classroom, an Operations Storage Building, a Range Control Tower, and an Ammo Breakdown Building. An enclosed bleacher area would also be installed. According to the information provided, the proposed action would result in minimal or no effects to surface waters, groundwater, or wetlands. Furthermore, the SCARNG has concluded the construction and operation of the MPMG 'may affect and is likely to adversely affect' the tricolored bat and red-cockaded woodpecker.

As described in the provided materials, tricolored bat (*Perimyotis subflavus*) and red-cockaded woodpecker (*Dryobates borealis*) are known to occur within the boundary of Fort Jackson and may be affected by the proposed activity. According to SCDNR data, the state endangered Rafinesque's big-eared bat (*Corynorhinus rafinesquii*), the state threatened southern hognose snake (*Heterodon simus*), and federally at-risk Chamberlain's dwarf salamander (*Eurycea chamberlaini*) are also known to occur on Fort Jackson near the project area. The SCDNR recommends consideration be given to these species in the Environmental Assessment (EA), particularly the southern hognose snake which utilizes the upland habitats likely to be impacted by the proposed project.

The southern hognose snake is a state threatened species that is often associated with open pine habitats. Southern hognose snakes are most active and vulnerable above ground during the spring (March-April)

and fall (September-early November). The SCDNR recommends activities during these times are minimized, especially the use of heavy equipment, to reduce impacts to highly fossorial species underground from soil compaction and crushing. If the southern hognose snake is found within the project footprint, efforts must be made to avoid any negative impacts or take of the species. Please note that take of this state listed species is prohibited under S.C. Code of Laws §50-15-20(C); therefore, southern hognose snake may not be removed from the project site without first obtaining a permit from SCDNR.

Specific movement distances are unknown for Southern hognose but an accepted movement distance for colubrid snakes is 10 km with suitable habitat and 1 km with unsuitable habit (NatureServe 2018). Additionally, based on best available science, 77% of all occurrence records for the southern hognose snake occur either on or within a kilometer of protected lands (USFWS, 2019). Given the proximity of the species occurrence within the range of potential movement distances, the SCDNR recommends the following silt fencing exclusion methods if the aforementioned avoidance windows cannot be accommodated:

- Erect silt fencing around the project area in the winter when snakes are dormant. If the timing of this would impact project timelines, the SCDNR asks that the silt fencing be erected now and that a monitoring plan be in place to walk the perimeter of the silt fence daily the week prior to construction beginning to ensure that any herpetofauna within the project footprint along the fencing be moved to outside of the project area prior to any work taking place.
- Monitor the silt fencing to ensure it is effectively working properly on a monthly basis prior to construction activities occurring. This should effectively exclude any herpetofauna and other small wildlife species from the project area prior to excavation. Once construction activities begin, it should be monitored weekly.

According to SCDNR data, there are currently no additional records of threatened and endangered species in or around the project area. Please keep in mind that information regarding the presence of species is derived from existing databases, and SCDNR does not assume that it is complete. Areas not yet inventoried by SCDNR biologists may contain significant species or communities.

The SCDNR recommends the following comments and best management practices (BMPs) be considered and incorporated into the Proposed Project's Plans.

- Prior to beginning any land disturbing activity, appropriate erosion control measures, such as silt fences, silt barriers or other devices, must be placed between the disturbed area and any nearby waterways and maintained in a functioning capacity until the area is permanently stabilized.
- 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.
- Construction activities should avoid and minimize, to the greatest extent practicable, disturbance of riparian vegetation within the project area. Removal of vegetation should be limited to only what is necessary for construction of the proposed structures.
- Grassy areas, including any potential rights-of-way to be maintained, should be vegetated to the greatest extent practicable with native warm-season grasses that are beneficial to wildlife and pollinator species. SCDNR prefers and recommends the use of native warm season grasses and/or other native forbs such as: Indiangrass (*Sorghastrum nutans*), big bluestem (*Andropogon gerardii*) and little bluestem (*Schizachyrium scoparium*). A list of beneficial pollinator plant species for the southeast may be found at www.xerces.org/pollinators-southeast-region/ or by visiting <http://www.pollinator.org/guides>. Additional South Carolina native pollinator plant species that may be applicable for use at the site can be found in Appendix A of the Technical

Guidance for the Development of Wildlife and Pollinator Habitat at Solar Farms at
<https://www.dnr.sc.gov/solar/assets/pdf/solarHabitatGuide.pdf>.

The SCDNR offers no objections to this project provided that the above concerns are addressed and these recommendations and BMPs are incorporated into project plans. Thank you for the opportunity to review this project and provide comments. Should you have any questions or need more information, please do not hesitate to contact me by email at DanielT@dnr.sc.gov or by phone at 803.734.3766.

Sincerely,



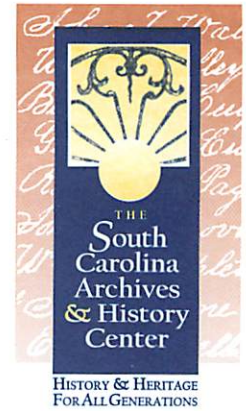
Tom Daniel
Office of Environmental Programs

References

NatureServe. 2018. NatureServe Explorer. Available at <http://explorer.natureserve.org>.

U.S. Fish and Wildlife Service. 2019. Species status assessment report for the southern hognose snake (*Heterodon simus*), Version 1.1. April 2019. Atlanta, GA.

December 13, 2011



Mr. Bryan Hall
Cultural Resources Manager
SCARNG Environmental Office
5401 Leesburg Rd., Bldg #3924
Eastover, SC 29044

Re: Four New Small Arms Training Ranges
McCrady Training Center
Eastover, Richland County, South Carolina
SHPO Project No. 11-RD0242

Dear Mr. Hall:

Thank you for your letter of November 18, which we received on November 28, regarding the above-referenced project. The State Historic Preservation Office is providing comments to the Army National Guard pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR 800. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public.

Based on the description of the Area of Potential Effect (APE) and the identification of historic properties within the APE, our office concurs with the assessment that no properties listed in or eligible for listing in the National Register of Historic Places will be affected by this project.

If archaeological materials are encountered during construction activities, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include, but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal and glass objects, and human skeletal materials. The federal agency or the applicant receiving federal assistance should contact our office immediately.

If you have any questions, please contact me at (803) 896-6183 or dobrasko@scdah.state.sc.us.

Sincerely,

Rebekah Dobrasko

Rebekah Dobrasko
Supervisor of Compliance, Tax Incentives, and Survey
State Historic Preservation Office



December 12, 2019

Rachel Morgan, MA, RPA
Cultural Resource Manager
South Carolina Army National Guard
1 National Guard Road
Columbia, SC 29201

Re: McCrady Training Center Machine Gun Range Construction
Richland County, South Carolina
SHPO Project No. 19-KL0396

Dear Rachel Morgan:

Thank you for your letter of November 13, 2019 regarding the above-referenced proposed undertaking. We also received the Section 106 Project Review Form as supporting documentation for this undertaking as well as the requested additional information provided in your email of December 9, 2019. The State Historic Preservation Office (SHPO) is providing comments to the South Carolina Army National Guard (SCARNG) pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR 800. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public.

The proposed undertaking is defined as the construction of a multi-purpose machine gun range (MPMG) at the McCrady Training Center. In detail, the entirety of the range will be secured via a fence and two main access gates. Additionally, several buildings, an enclosed bleacher area, and six firing lanes are proposed for construction within the range. Security light poles will be installed around the perimeter and existing lines will be extended to provide power to the new range. The Area of Potential Effect (APE) for the undertaking is defined as approximately 4,910 acres.

SCARNG states that the majority of the APE is located within an unexploded ordinance (dud) producing impact area which was determined to be exempt from review in the 2015 *Programmatic Agreement between the United States Army Garrison Fort Jackson and the South Carolina State Historic Preservation Officer for the Management of Historic Properties on Fort Jackson, South Carolina*.

Portions of the APE have previously been surveyed for cultural resources/historic properties (SAS 1991, SAS 1992, OAR 1992; Brockington and Associates 1993, and SCIAA 2012). SCARNG notes that four active military ranges (Inchon, Argentan, Main Tank, and Wanat) are located within the APE and were previously determined to be not eligible for listing in the National Register of Historic Places (NRHP). In our email of December 6, 2019, our office noted that we previously determined that the Inchon range is

eligible for listing in the NRHP. If possible, we request that a map of the location of the active military ranges (Inchiron, Argentan, Main Tank, and Wanat) be provided for our files.

Nine archaeological sites have previously been recorded within the APE (38RD0370, 38RD0513, 38RD0515, 38RD0971, 38RD0991, 38RD0992, 38RD1023, 38RD1040, 38RD1430). Site 38RD0971 was previously determined to be eligible for listing in the NRHP. The remainder of the sites were recommended as not eligible for listing in the NRHP. SCARNG notes that site 38RD0971 is located within the area proposed for the Surface Danger Zone (SDZ) where projectiles fired from the range will travel and not within the proposed MPMG. SCARNG proposes to continue monitoring the site on a biannual basis to ensure that no damage occurs. Our office concurs with the need for biannual monitoring of the site.

SCARNG states that, due to the dangerous nature of the impact area, it is not possible to conduct additional archaeological survey with the APE. Based on the nature of the undertaking as proposed and the cultural resources previously recorded within the APE, SCARNG believes that the undertaking will have no adverse effect on historic properties.

Our office requested additional information regarding the undertaking in an email of December 6, 2019. SCARNG clarified that all ground-disturbing activities associated with the undertaking are associated with the MPMG range footprint which is within a duded area. The SDZ, as depicted in the figures provided, reflects the area where projectiles are projected to travel and no ground disturbance is proposed within the SDZ footprint. Additionally, SCARNG states that the project will have no impact on the functionality of any of the existing military ranges and the proposed undertaking will not prevent future survey or data recovery at any of the sites within the SDZ, including 38RD0971 or late discoveries.

Based on the description of the APE, and the identification of historic properties within the APE, our office concurs with the assessment that no properties listed in or eligible for listing in the NRHP will be adversely affected by this project.

If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include, but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal and glass objects, and human skeletal materials. The federal agency or the applicant receiving federal assistance should contact our office immediately.

Please refer to SHPO Project Number 19-KL0396 in any future correspondence regarding this project. If you have any questions, please contact me at (803) 896-6181 or KSchroer@scdah.sc.gov.

Sincerely,

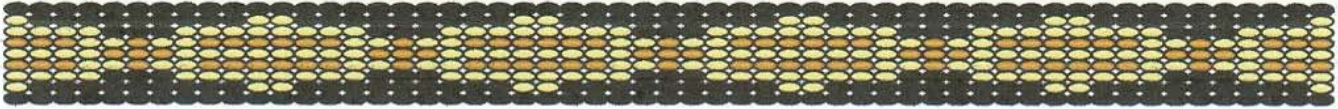


Keely Lewis-Schroer
Archaeologist
State Historic Preservation Office

cc: Connie Barnett, National Guard Bureau
John Sylvest, SHPO

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427
Fax 803-328-5791



December 12, 2011

Attention: Bryan Hall
Cultural Resources Manager
SCARNG Environmental Office
5401 Leesburg Road, Bldg # 3924
Eastover, SC 29044

Re. THPO #	TCNS#	Project Description
2012-320-3		IICEP in support of an EA of the SCARNG's Proposed Construction and Operation of Four (4) New Small Arms Training Ranges at the MTC Eastover, Richland Co., SC

Dear Mr. Hall,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Totherow at 803-328-2427 ext. 226, or e-mail caitlinh@ccppcrafts.com.

Sincerely,

Wenonah G. Haire
Tribal Historic Preservation Officer

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427
Fax 803-328-5791



December 10, 2019

Attention: Rachel Morgan
The State of SC Military Department

Re. THPO #	TCNS #	Project Description
2020-4-4		McCrary Training Center Multi-purpose Machine Gun Range Construction, Richland Co.

Dear Ms. Morgan,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail caitlinh@ccppcrafts.com.

Sincerely,

Wenonah G. Haire
Tribal Historic Preservation Officer