



CHICORA FOUNDATION, INC.

PRESERVING THE PAST FOR THE FUTURE

P.O. Box 8664
861 ARBUTUS DRIVE
COLUMBIA, S.C. 29202
803-787-6910

May 18, 2016

Ms. Ashley R. Kellahan
Town Administrator
Town of James Island
PO Box 12240
James Island, SC 29422

Dear Ashley,

It was a pleasure speaking with you and I appreciate the information you provided (consisting of two letters from the SC SHPO, dated March 11 and June 15, 2015). What I do not have is any real background on the proposed undertaking, although that may not be important as you will see.

Although the letters are long and the issues involved may seem complex, I do not believe they are. In fact, both letters can have their salient points easily summarized:

March 11, 2015 letter

- MUSC knew of the importance of the buildings by at least 1995.
- The SHPO requested "additional information to address the National Register status of the storage building and garage as part of consultation on the proposed disposition, **but none was provided.**"
- The structures and cistern were present by at least 1932 and "are consistent with the type and period of construction for the . . . quarantine station."
- The SHPO, based on a field inspection, has found all of the structures "contribute to the historical significance of the Fort Johnson/Powder Magazine National Register property."
- Demolition "would constitute an Adverse Effect, in accordance with 60-12-10(1) of the State Owned or Leased Historic Properties law" [in addition, I think it would constitute an Adverse Effect in terms of Section 106 of the National Historic Preservation Act].
- The state law requires that the property owner "describe alternatives that were considered to avoid or minimize adverse effects and the reasons why any rejected alternatives were considered not to be feasible or prudent." This has apparently not been accomplished and the SHPO clearly explains why, providing an entire paragraph of cogent and well-reasoned questions that apparently MUSC has chosen to ignore.
- The letter then mentions federal permitting. I should add that Section 106 involves any federal funding, permitting, or licensing. It is difficult for me to imagine that there are no federal funds involved in a project of this magnitude.



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June 15, 2015 letter

- This letter explains – very clearly – that the structures proposed for demolition are considered contributing resources to the National Register.

Consequently, the SC SHPO has clearly and unequivocally stated in these two letters that the structures proposed for demolition are contributing resources to a National Register nomination. As such they must be treated as National Register listed properties in terms of state law – and also in terms of any federal funding, licensing, or permitting.

I think it is also worth mentioning that the SC SHPO has expressed their disappointment in the proposal, not to mention the irony of these real, legitimately historic structures being replaced by a parking lot and new building to “echo the history.”

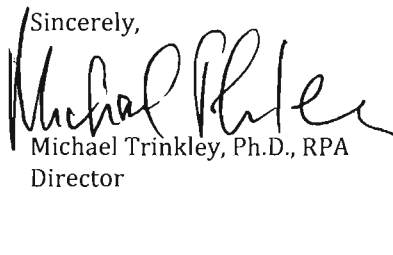
I honestly see no need, or reason, to second guess the professionalism of the State Historic Preservation Office and their findings. It seems abundantly clear to me – based on these two letters – that MUSC has failed to meet the requirements of state law and has not considered the likelihood of federal funding or permitting. Of course, there may be more recent plans or letters – my comments to you are based only on what you have provided to me for review.

I think it would be useful for the Town of James Island to review Chicora’s report on Fort Johnson, conducted in 1994 (*The Property Nobody Wanted: Archaeological and Historical Investigations at Fort Johnson*). This report provides extensive historic background, including a great number of maps, plans, and historic photographs. It also identifies archaeological and historical resources on the property. It documents the condition of historic structures at that time and even includes a lengthy section on “Safeguarding Historic Sites” (pages 112- 115). This report is readily – and freely – available on our web site at <http://www.chicora.org/pdfs/RS43%20-%20Fort%20Johnson.pdf>.

Finally, while I realize the issue on your desk is demolition, I believe it my professional responsibility to also emphasize that the property likely has archaeological significance and requires archaeological investigation prior to any construction. In fact, our report identifies (page 122) a map of the property showing levels of cultural significance. In fact, this map shows many areas of low cultural significance that might well be better locations for parking and construction. Minimally, however, the Town should encourage MUSC to conduct an intensive archaeological survey prior to any further planning activities.

Based on the information you provided I can see no reason for the Town of James Island to permit the demolition of these structures, singly or wholly. Perhaps more to the point, I can see no reason to even consider such a request since MUSC has seemingly failed to comply with state law and has failed to adequately investigate its involvement with federal historic preservation laws.

I trust this overview will be of assistance and help your Town ensure the preservation of these important historic resources.

Sincerely,

Michael Trinkley, Ph.D., RPA
Director