



ANDERSON COUNTY
ECONOMIC DEVELOPMENT

USACE, Asbury Park Lease Request By Anderson County, SC For the Development of a Multifaceted Recreational Venue

Revised April 2020



Asbury Park Lease Request by Anderson
County, SC

For Development of a Multifaceted
Recreational Venue

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For Development of a Multifaceted Recreational Venue

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Management Plan

Revised April 2020

For Asbury Park Recreation Venue

Anderson County USACE Management Plan

Asbury Park, Lake Hartwell Project

Revised April 2020

Anderson County (County) is seeking to partner and collaborate with a third-party developer/investor or a developer/investor group to best utilize United States Army Corps of Engineers' Hartwell Lake shoreline properties in Anderson County. The County is willing to lease United States Army Corps of Engineers ("USACE") properties and then sublease to the third party for the purpose of quality development with nexus to the resource.

USACE has authority as well as multiple operational regulations for the use of the properties that have been entrusted to them by the United States Congress. USACE by virtue of their authority may lease properties to political subdivisions who may then sublease to third parties for development as desired by the political subdivision in this case, the County. The County and the third-party sublessee must comply with all USACE rules and regulations.

As a lessee of USACE property Anderson County is responsible and accountable to USACE in following and complying with all USACE rules and regulations regarding use of USACE controlled properties, therefore the County is obliged to create and administer the following management plan.

The Management Plan:

Anderson County has for many years operated several parks and playgrounds, some on USACE property, for example, Green Pond Landing, for the use of Anderson County citizens and visitors as well. The Anderson County Parks, Recreation and Tourism ("ACPRT") operates, oversees, maintains and manages these venues. ACPRT will manage the new developments on USACE land with the same skill and professionalism as is currently the case. ACPRT will answer to Anderson County Council and the Anderson County Administrator.

The Management Plan will be based on the authority provided by Anderson County Council and carried out the County Administrator. After receiving approval from USACE to lease Anderson County Hartwell lake shoreline properties, Anderson County Council by majority vote of resolution and ordinance will implement lease agreements with USACE and thereby accept the responsibilities and accountabilities of USACE rules and regulations.

The County Council will direct the County Administrator to manage the USACE properties as provided by USACE rules and regulations. The Administrator will also work with the sublessee development partners (partners) to ensure their compliance with the directives provided in USACE rule and regulation. The partners will answer directly to the Administrator as provided in the sublease agreement.

The ACPRT Department will provide inspections and monitoring in association with USACE Hartwell Project Office of the development projects utilizing the assets of the County's Land Use, Storm Water Management and Building & Codes offices during any phase of construction. When development projects are completed and operational the ACPRT will patrol, inspect and monitor the projects, on a minimum of a monthly basis to ensure USACE regulations are being met, reporting violations to the developer for correction and to the County Administrator, who will report to USACE and Anderson County Council. County Council will reserve the right of inspection at any time.

Operational Management

As general operational guidelines of any ACPRT facilities the County has looked at the following guidelines to help ensure safety and enjoyment while in any of our parks. Those who choose not to observe these guidelines can be asked to leave our park without any form of refund.

SPEED LIMIT: 10 mph. Please observe our speed limit to ensure the safety of all our guests. Remember...children are playing!

QUIET TIME: 10 p.m. to 8 a.m.

SITE OCCUPANCY: Only one (1) RV is allowed per campsite.

CHILDREN: Guests are responsible for all behavior of children. All children under the age of 14 years must be accompanied by an adult 18 years or older.

SAFETY AFTER DARK: In order to ensure safety after dark, please carry a flashlight. No bike or scooter riding after dark.

TRASH: Please place all garbage in designated dumpsters located around the park. Recycle containers for paper, plastic, and aluminum are available at each dumpster site.

CAMPFIRES: Campfires are permitted, however, all open flame fire precautions must be followed.

FIREWORKS AND FIREARMS: The following are prohibited on park property: fireworks of any kind and firearms and weapons of any kind, including: slingshots, dart guns, bow/arrow, BB, Airsoft and pellet guns.

PETS: Pets must be kept on leashes (six-foot maximum length) or inside or kenneled or fenced outside and do not leave unattended. No excessive barking allowed. Pets must be walked by a responsible person to pick up after them immediately. Pets are not allowed in or near any buildings, bathrooms, pool, or playground areas. Service dogs receive standard ADA acceptance. Maximum of 3 Pets allowed.

SWIMMING POOLS OR SWIMMING AREAS: No Lifeguard is on Duty. Children under 14 must be supervised by an adult (18 years or older). Anyone behaving in an unsafe or destructive manner will be removed from the area. Only bathing suits permitted in pool, no cotton material permitted like cut offs or t-shirts.

CAMP SITE VISITORS: Visitors to camp sites are always welcome, provided they register at the main office. Registered guests and their visitors are expected to read and adhere to all campground guidelines. Guidelines are presented at time of check-In. All your visitors must leave campground by 10 p.m.

RECREATIONAL VEHICLES: Battery-operated, gas powered vehicles or motor-driven cycles, bikes, scooters or golf carts may be driven in the park. All operators must wear safety equipment and all road rules and speed limits apply.

VEHICLE REPAIRS: Repair of vehicles and RV's is not permitted in the park. You may check with the local listings for businesses that provide these services.

RV WASHING: Please check with our main office for more details and permits.

MESSAGES: If you are expecting messages, please check at central office. Emergency messages will be delivered to your site.

MAIL SERVICE: Mail service is available for guests. Please check with the camp office for more details.

OTHER CAMPSITE GUIDELINES:

- Ground disposal of any drain water (gray or black) is prohibited by State Law. Wastewater from RVs (including sink water) must be disposed of into the dump station tank or sewer drains (where available). Do not put grease down the sewer.
- Sewer connections are required by state law and must have a tight seal by a sewer donut (or sewer ring) or a screw-type connector.
- No permanent, ground foundation roof, awnings, decks, porches or steps may be added at any campsite or camper.
 - Standard, attached to camper, roll-out awnings such as or similar to brand names "Solera" or "Carefree" are permitted.
 - Standard, portable, collapsible temporary steps with landing such as or similar to brand names "C R Brophy Machine Shop" or "RV-Co" or "Lippert" are permitted.

CABIN POLICIES

CHECK IN/CHECK OUT

- Check-In 3 p.m. (EST) | Check-Out 11 a.m. (EST)
- Check-Out: means your Cabin must be vacated by 11 a.m. (EST). We ask that you honor our Check-Out time promptly to minimize hardship on our housekeeping staff and the next arriving guests.

PARK AMENITIES:

It is the hope of the ACPRT that the developers will consider including the following amenities.

The campsites are back-in and pull-through with 30 / 50-amp electric connection, sites come with picnic tables, WiFi and connections for cable channels.

- Clean, Modern Bathhouses
- Camp Store
- Grocery Items
- RV Supplies

- Laundromat (washers / dryers / folding table)
- Wireless Internet
- Clubhouse (available for rent)
- Dog Park
- Playground and Play Equipment
- Horseshoe Pits
- Dog Walk
- PROPANE on site

Development Plan

Revised April 2020

For Asbury Park Recreation Venue

Lake Hartwell Project

Anderson County, SC

Asbury Park Development Plan

Revised April 2020

Anderson County, South Carolina is requesting the United States Army Corps of Engineers to lease Red Zone properties on Lake Hartwell, specifically Asbury Park, to create a park with an atmosphere suitable for superior economic development and sustainable growth. This will generate substantial capital investment, quality job creation, and facilitate the use of the County's resources to their highest and best use. Our method of development is to seek out through a request for proposal (RFP) process as described in the Anderson County Procurement Ordinance, a third party developer/investor/operator or a developer/investor/operator group (operator) with whom we will arrange a sub-lease contract that is in accordance with USACE procedure and regulations. The operator that will be selected will be tasked to prepare, restore and operate the park for camping and other entertainment venues. We anticipate and are encouraging a variety of camping experiences. Anderson County also recognizes that Lake Hartwell is one of its greatest resources and is seeking to help facilitate beneficial and environmentally sound development and redevelopment of Lake Hartwell shoreline properties located in Anderson County that compliment this resource.

In the event USACE authorizes a lease agreement, Anderson County Council will select, under a sub-lease agreement, a knowledgeable and experienced operator that will agree to and have a full understanding that proposals and components of proposals must be approved by USACE. They will understand the County cannot enter into any binding agreement for use of the Asbury Park Area or any other area under any proposal without prior USACE approval. The County in no way controls the decisions of USACE regarding approval of the proposed projects, nor does the County control the timing of USACE's review or approval of the proposals. Any proposed agreements between the Operator and the County are subject to revisions by USACE and must be approved in writing by USACE before execution by the County. All USACE rules and regulations shall be adhered to.

Anderson County will require a detailed business plan for the use of and improvements to the Asbury Park Area and the operation(s) of the Project. As part of the selection process Anderson County will verify the financial stability and reputation of the investors.

Anderson County, through the office of the County Administrator, Park-Recreation-Tourism Office and County staff, will work closely with the successful recipient of the sub-lease in the re-development of Asbury Park. The RFQ requires a phased approach. Breaking the development into 2, 3, or 4 phases will give all parties an opportunity to assess not only progress but viability as well. This will also allow all parties to test the information gathered in the market analysis/feasibility study and the company's business plan and feasibility study. Anderson County will provide a "Management Plan" that will describe the lessee's responsibilities and obligations

to the County based on the County's responsibilities and obligations to USACE. However, the responsibilities and obligations for the County and for the lessee are the rules and regulations that are provided by USACE..

Development will also include promotion through all of the outlets that are available to the County and to the operator. By using the services of the South Carolina Parks, Recreation and Tourism Department we will be able to gather advertising funds as well as the state wide social media network. The Anderson County operated television station provides coverage of all the things in Anderson and the Asbury Park venue will be center stage. The County also has a robust social media division that will supply a steady stream of information concerning the attributes and amenities of Asbury Park.

Phase I (years 1 and 2). The County anticipates that Phase I (see attached map) will include the re-opening of approximately 75 campsite. This will require road repair and the replacement or repair of water and electrical service to these camp sites. The roads will be constructed to County standards and will be received into the County system for long term maintenance. The camp sites will include opportunities for tent campers as well as small and large recreational vehicles including motorhomes and pulled campers. Phase I will include a convenience store to provide sundry items, ice and propane. The County will work with the operator on the location, restoration and/or construction of SCDHEC and USACE approved bathhouses, septic tanks and camper "dump stations". The County will ensure that all regulations are met. Recreational areas, both playground and swimming, will be developed and equipment will be installed to meet current, applicable safety standards. Descriptions of and locations of the application and use of American with Disabilities Act ("ADA") for the project will be documented. Please see attached Asbury Park, The Shores of Asbury Park as proposed by Lake Hartwell Development Group, LLC (LHDG). LHDG submitted the successful response to the County's RFP. Using the "Legend" on the park layout, Phase 1 will include Items 1, 3, 5, 6, 7, 8, 9, 15, 16, 18, 19, 20, 22, 24, 25.

Phase II: 2, 11, 12, 13, 14, 17, 21

Phase III: 2, 4, 10, 11, 12, 13, 21, 23

Any repeated items in any of the phases listed above indicates more of the same dependent upon demand, available space and USACE prior approval.

Phase II or II & III (Years 3 and following). The development of Phase II will include additional camping sites, "mini cabins", or other sheltered stationary living quarters that may include cabins, tree houses, or a lodge with multiple rooms. Anderson County will work continuously with the operator and USACE to ensure regulations and codes are adhered to.

Lake Hartwell Development Group, LLC

Revised April 2020

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Description and Operation of the Shores of Asbury Waterpark

Based on the results of conducting our internal Lake Hartwell Development Group, LLC feasibility study and reviewing the Noell Consulting Group market analysis we have determined a waterpark would be an excellent and very workable recreational use for Lake Hartwell. Inflatable water parks similar to the venue recommended for the Anderson County lease, Lake Hartwell Development Group, LLC sublease proposal have already been successfully implemented on several United States Army Corp of Engineers controlled and managed waterways and lakes. Our due diligence indicates an inflatable waterpark would enhance the recreation opportunities currently found on Lake Hartwell. The research revealed there were no features to date of this type on Lake Hartwell. We are happy to propose this new, exciting feature and believe it will add to family use and bring visitors to our lake that may not otherwise visit our area. Therefore, the waterpark will increase the use of and activity on Lake Hartwell and bring economic stimulus to Anderson County and the surrounding areas.

The waterpark would be seasonal, beginning with a soft opening the weekend before Memorial Day and operating through Labor Day weekend. There are many variations of waterparks, however we settled on an inflatable waterpark as it allows us to use a detachable anchor system that allows you to rapidly deflate and remove as may be necessary due to storms, or drought/low water season, when it is not feasible to move it out to deeper water. It will also allow us to completely remove it at the end of season and store for the following season. The waterpark will be enclosed in much the same way that a public swimming area is protected/designated with lengths of floating and connected brightly colored polyurethane gas line that has been capped off. There will also be signage and use of buoys to denote no boating/water park area boundaries. The proposed waterpark area is already an established no wake zone (water park layout attached, example #1).

The public waterpark will be accessible through ticket sales at the main booth entrance gate, a booth located near the courtesy dock from the water, and predominately through reservations from our website. Our signage and advertisements will all include and suggest tickets sales be made by phone or website. Each ticket will allow the patron a two hour time slot for use of the venue. Encouraging the public to make reservations this way will significantly help to control traffic inside the park.

We propose installing an approved courtesy dock for the mooring of vessels that want to use not only the waterpark, but also the food service area. The dock will have an ADA lift chair apparatus installed to provide access to our venues to those with disabilities who approach the venue from the water. There will also be an ADA chair lift installed on our waterpark platform deck to lower those with disabilities making the public swimming area accessible/useful to a wider audience.

Each reservation made online will have a liability waiver that must be signed and submitted before anyone is allowed in the waterpark. There will also be a short video that must be watched prior to and every time the waterpark is visited, no exceptions. The park will not provide lifeguards. There will be three to four attendants stationed around the waterpark in full view of the patrons during their two hour blocks of use. On entering the waterpark area, every patron will be fitted with personal flotation device and required to wear the device at all times. There will also be an elevated attendant platform where at least one attendant will be stationed to oversee from above. All attendants will be instructed in lifeguard skills, CPR, and how to use an automated external defibrillator (AED). We will also have life rings or similar “throw-able” flotation devices located on the deck around the waterpark. The waterpark will never be open after dark. When we shut the park down in the evening there will be security guards throughout the park, as well as video and camera surveillance. We will also use motion detection lights to assist in making sure the waterpark feature does not have unwanted visitors after hours. The floating tents and cabanas will only be used during park operations as an added feature for those seeking an additional source of shade. Guests are required to wear the same park colored life jackets when swimming to or from the floating tents (photo attached, example #2 and #3). It will also be necessary to watch the educational video and sign a liability waiver and to wear a colored band for their activity.

We understand inclement weather will take place. The waterpark will be closed anytime weather poses a risk to its attendees. The waterpark can also be completely removed if the forecast calls for excessive winds or hail.

The waterpark day use area will be separated by use of land mass, signage, and fencing where needed. There will be a public road that leads to the designated parking area for the waterpark. We also intend to have an established parking area near to the main park entrance that will allow us to shuttle those parking away from the waterpark activity area. Those parking in this day-use area will be given a colored placard for their mirror or dashboard and be instructed to wait for the next shuttle. No one will be allowed to walk the main road through the park. We will provide a walking path away from the main thoroughfare. The day use and camping use areas will be separated by use of roads with gates and codes, signage, and fencing where needed.

Lake Hartwell Development Group is proud and excited to offer this amenity to Lake Hartwell and Anderson County. We wish we could say we were the first anywhere to do so, however this sadly isn't the case. There are inflatable and permanent water parks found throughout many of the USACE controlled and managed waterways. Nashville Shores on Percy Priest has a rather large waterpark and Prizer Point on Lake Barkley, although still a little bigger than what we are proposing, is the same brand with many of the same components as we want at The Shores of Asbury. Greg Batts is the owner of Prizer Point and has extended his personal cell number to answer any concerns not covered in this explanation.

Lake Hartwell Development Group hopes to acquire the approval of the United States Army Corp of Engineers and Anderson County in an effort to offer some new ADA accessible amenities to the recreational use of Lake Hartwell. With your approval and guidance we will work diligently to provide a fun and safe environment to all of those visiting beautiful Lake Hartwell.

Proposed Shores of Asbury Water Park

“Yellow” dotted lines indicate approximate location of “no boat” access/safety area of the waterpark. Floating sections of capped and connected polyurethane HP natural gas line will form the no-boat boundaries. We will seek assistance from USACE in using USACE “No Boats Allowed” buoys and moorings along the outer perimeter of the water park boundaries in accordance with USACE regulations. Small clusters of “yellow” dots represent possible locations for floating 8’x8’ cabanas/tents (actual number will be less). Cabanas will provide shade for caregivers watching their children in the waterpark area. Kayak and paddle board rental (pictured) will be relocated to another suitable area. (Revised April 2020)



Sample photo #2 Inflatable version. Lower photo shows view of anchor points.

Lake Hartwell Development Group has proposed adding floating cabanas around the perimeter of the floating waterpark. Parents or adults that have children in the waterpark play area will have the option to “rent” the 8’x8’ floating cabanas. Cabanas will rent on the same block of time allowed for waterpark attendees (2 hours). The cabanas will provide a shaded area near the play area. Please see anchor detail in bottom photo.



Sample photo #3

A sample of an 8'x 8' floating cabana (non-inflated) showing anchor points.



Shores at Asbury Campground-Phase 3 Development-Tree House

Sample drawing of approximately 600 sqft tree house. Structure will be prefabricated and lifted onto pilings; to be designed to meet all USACE prior approvals and construction standards. (not to scale) All deck areas will include safety railings meeting ADA and current building and code standards (not pictured).



Shores at Asbury Campground-Phase 3 Development- Tree House-Floor Plan

Sample drawing of approximately 600 sqft tree house floor plan. Structure will be designed to meet all USACE prior approvals and construction standards. (not to scale)



1st Floor



LIVING AREA
14'-0" x 14'-0"

Asbury Park Feasibility and Market Study

Includes Executive Summary

For Asbury Park Recreation Venue

ANDERSON COUNTY ECONOMIC DEVELOPMENT
ASBURY CAMPGROUND MARKET ANALYSIS

Executive Summary

Background

Anderson County Economic Development retained Noell Consulting Group (NCG) to conduct a market analysis for the feasibility of a campground and future lodging on the Asbury Campground site on Lake Hartwell.








The following summarizes our key conclusions relative to this opportunity, with more detailed research, conclusions, and recommendations being provided in the larger accompanying package.

Location

- Asbury Campground sits across the lake from Green Pond Landing, a recently built event center which has become a successful host to fishing tournaments in Anderson County.
- Currently, there are approximately 1,600 campsites and 66 cabins on Lake Hartwell operated by private (48%) and public (52%) entities.
- The site is accessible from Interstate 85 but lacks visibility on high trafficked roads. The site is a 20-minute drive from the interstate with multiple grocers along the route.

Target Market Audience

- Lake Hartwell experiences seasonality in campground stays with variation in users
- Tent / Cabins user's peak season occurs in the summer months while RV users show variability with greater year-round potential.
- Based on NCG experience, this mix of renters creates demand for the following unit mix as shown on the table to the right:

U SER	AUDIENCE	% Asbury	J	F	M	A	M	J	J	A	S	O	N	D	Peak Occ.	Off-Peak Occ.	Annual
Tent / Cabin	 Family Campers	20%													66%	19%	38%
	 Glampers	10%													66%	19%	38%
	 Travel Campers	0%													66%	19%	38%
RV	 Families	15%													66%	19%	38%
	 Retirees	25%													66%	36%	48%
	 Workers / Transient	5%													90%	90%	90%
	 Special Events	25%													22%	29%	26%
Overall Weighted Occupancy			17%	17%	29%	48%	62%	60%	47%	33%	31%	14%		56%	29%	40%	



Demand & Pricing

- Based on a survey of competitive private and publicly operated campgrounds, the average price/night for Lake Hartwell is **\$38** with variability dependent on campground location, site conditions, and amenities.
- Utilizing the relationship between hotel stays and camping nights NCG identified the potential for 80 – 100 sites prior to 2022. Given the current hotel market conditions and development activity in the near future, we do not recommend a hotel lodging component until after 2025.
- Specifically, we recommend:
 - 20% of all sites as dedicated tent sites appealing to family campers and Glampers seeking lake front camping in the summer months;
 - 70% of sites as dedicated RV sites to appeal to families, retirees, workers, and event led stays such as Green Pond Landing fishing tournaments and Clemson football;
 - 10% of sites for future lodging component (2025+)

Product Type	Unit Mix	Overnight Rates		Long-Term Peak Rates		Long-Term Off-Peak Rates		Est. Ann. ADR	Est. Peak Occupancy	Est. Off-Peak Occupancy	Est. Ann. Occupancy
		Peak	Off-Peak	Week	Month	Week	Month				
RV Site (Water, 30/50 AMP)	70%	\$54	\$44	\$325	\$715	\$275	\$604	\$39	52%	34%	40%
Tent Site (Water, 20 AMP)	20%	\$40	\$33	\$240	-	\$200	-	\$30	70%	20%	38%
Lodge Room	10%	\$162	\$130	-	-	-	-	\$146	70%	60%	65%
100%								\$48			42%

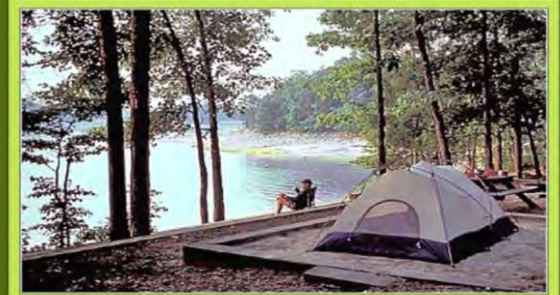
*Above pricing assumes full hook-ups are not available to the RV sites. If full hook-ups can be provided pricing increases \$5/night.

Project Amenities

With over 1 million visitors to Lake Hartwell annually there is potential to attract campers/ RV users by creating an elevated experience currently not offered in the area:

- According the 2019 North American Camping report campground atmosphere is the highest factor campers consider when choosing a campground. Given Asbury's lake orientation the campground has a strong opportunity to provide top of market atmosphere by including unique features such as a cafe or snack bar, programmed spaces, and elevated water amenities such as water sport rentals and a courtesy dock.
- NCG suggests differentiating RV and tent sites to improve campground atmosphere and properly segment the market. Important factors for all sites include level sites, water & electric, shade, and picnic tables. Differentiating sites by amenities can help segment sites by audience. Deluxe sites should include elevated features such as patios/porches and larger sites for boat storage.



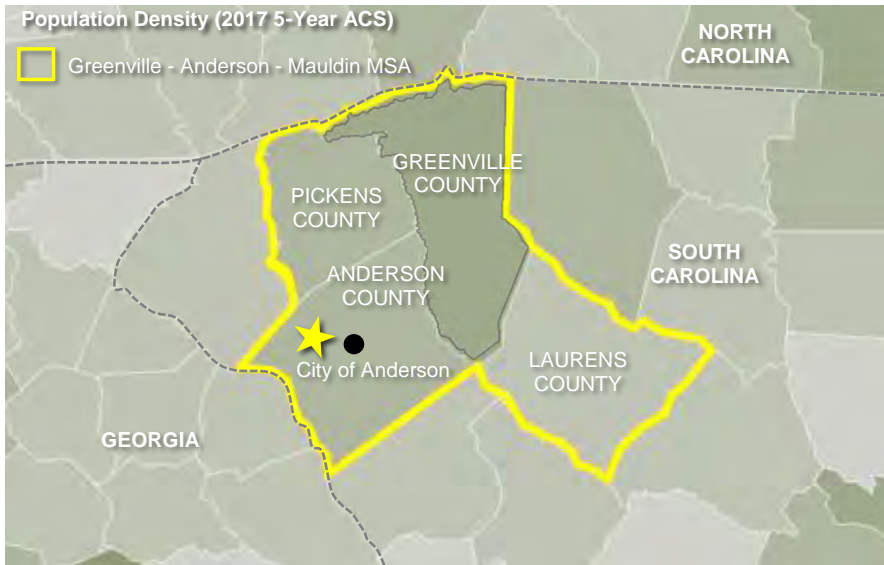


ASBURY CAMPGROUND, ANDERSON COUNTY, SC CAMPGROUND MARKET ANALYSIS

ANDERSON COUNTY ECONOMIC DEVELOPMENT
OCTOBER 2019

ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 1
Overview of Greenville Metro Area Population Trends



The Greenville-Spartanburg-Anderson MSA includes the four counties of Greenville, Pickens, Anderson, and Laurens. In recent years, Anderson County has seen significant growth.

From 2000 to 2010 the MSA saw an annual growth of 10,008 people, with a significant portion of that growth being captured by Anderson County at a 21.5% capture. This capture decreased slightly to 16.3% from 2010 to 2017, during which the City of Anderson saw an increase in MSA capture of 1.0%.

In addition to MSA growth, Lake Hartwell has regional draw which attracts over 10 million visitors a year.

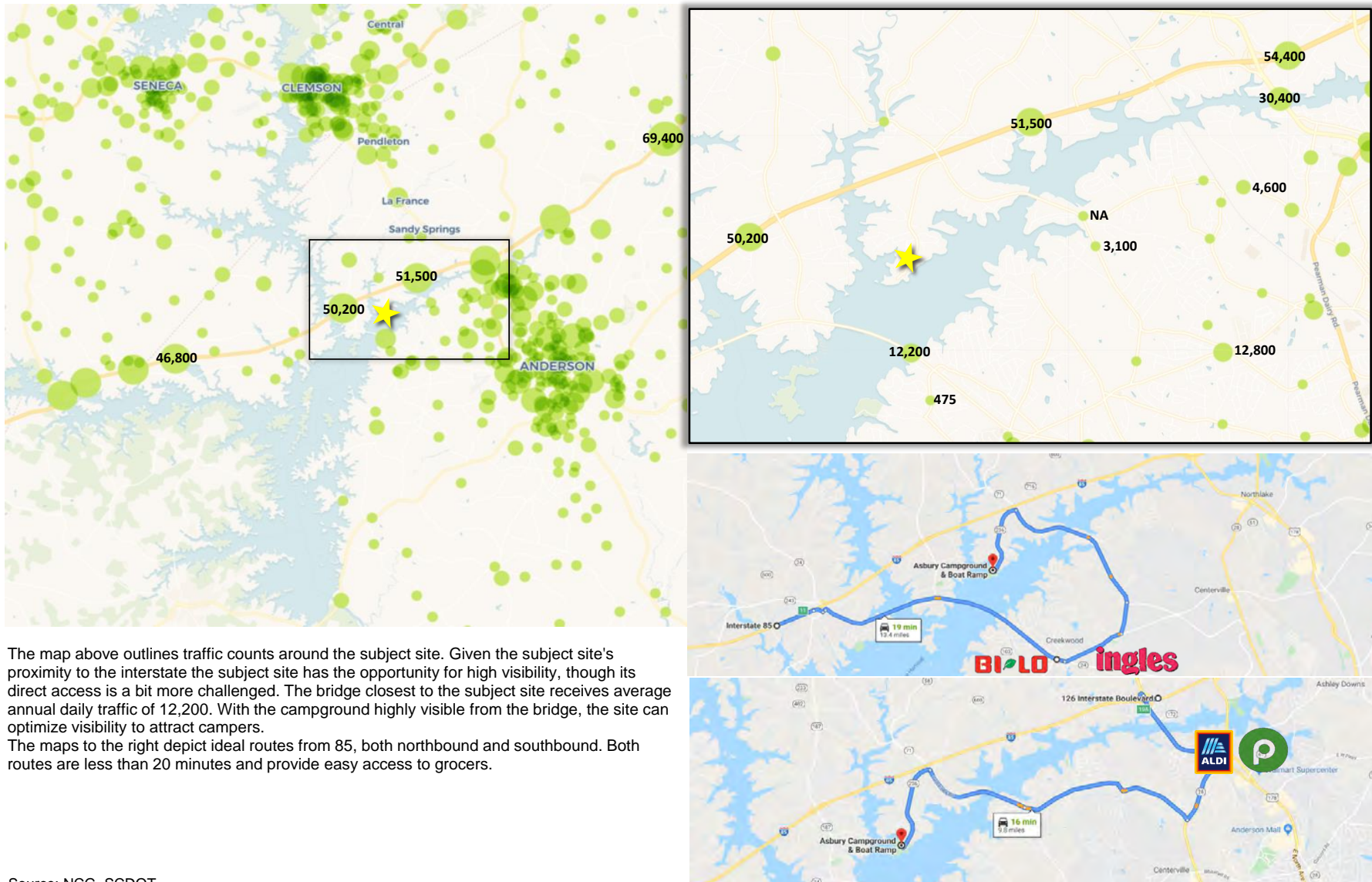
GEOGRAPHY	LAND AREA		POPULATION		ANNUAL GROWTH		ANNUAL % GROWTH		CAPTURE OF REGION		
	SQ MILES	% of MSA	2017	% of MSA	2000-10	2010-17	2000-10	2010-17	2000-10	2010-17	LAND CAPTURE RATIO (2010-17)
Anderson County	715	26.4%	198,759	22.2%	2,155	1,639	1.2%	0.9%	21.5%	16.3%	0.62
Greenville County	785	29.0%	506,837	56.6%	7,314	7,726	1.8%	1.6%	73.1%	77.1%	2.66
Laurens County	714	26.3%	66,848	7.5%	-304	46	-0.4%	0.1%	-3.0%	0.5%	0.02
Pickens County	496	18.3%	123,479	13.8%	844	612	0.7%	0.5%	8.4%	6.1%	0.33
MSA Total	2,711	100.0%	895,923	100.0%	10,008	10,023	1.3%	1.2%	100.0%	100.0%	1.00
City of Anderson	15	0.5%	27,293	3.0%	79	103	0.3%	0.4%	0.8%	1.0%	1.90

SOURCE: Noell Consulting Group, United States Census Bureau



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 2
Lake Hartwell Traffic Counts and Site Access



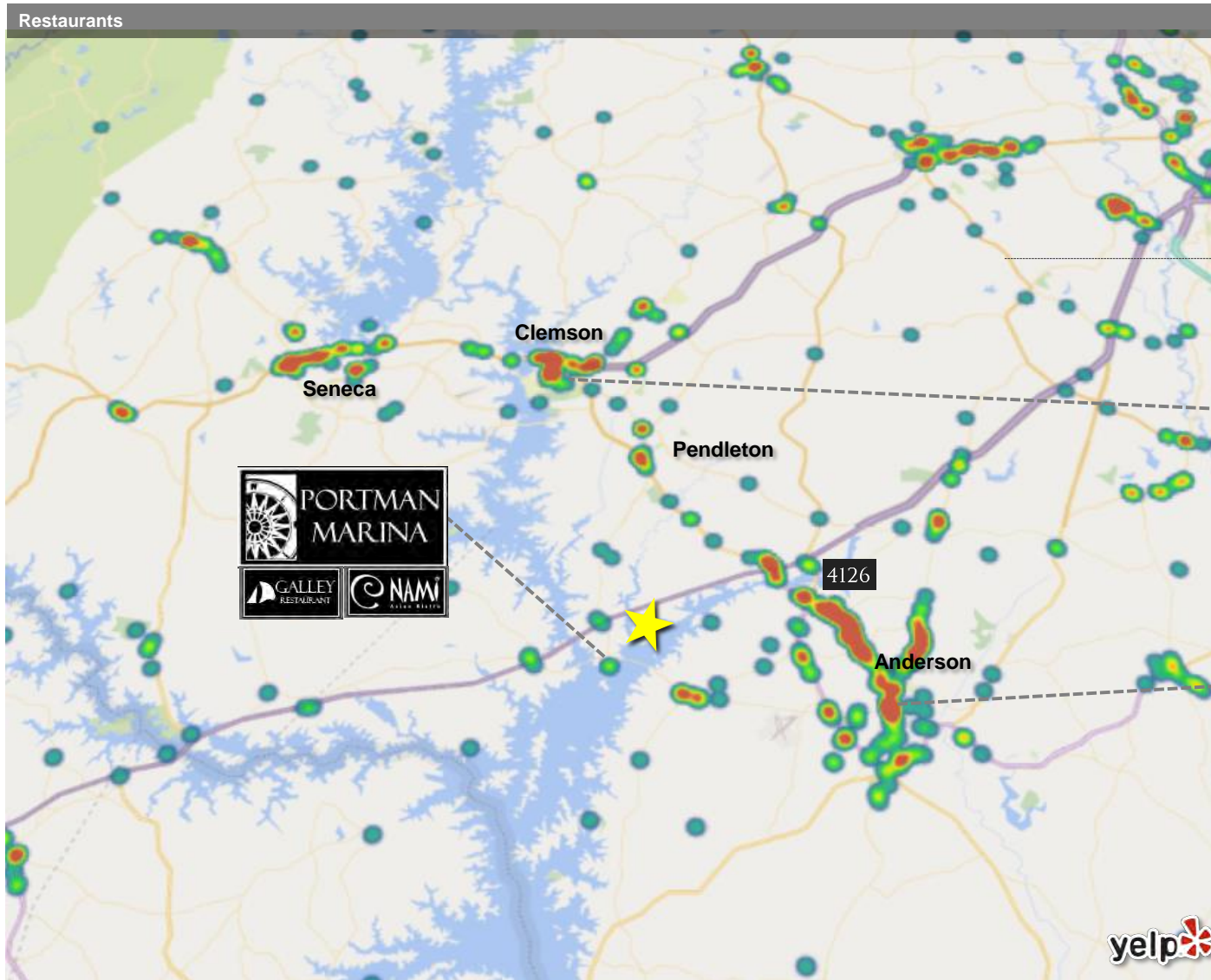
The map above outlines traffic counts around the subject site. Given the subject site's proximity to the interstate the subject site has the opportunity for high visibility, though its direct access is a bit more challenged. The bridge closest to the subject site receives average annual daily traffic of 12,200. With the campground highly visible from the bridge, the site can optimize visibility to attract campers. The maps to the right depict ideal routes from 85, both northbound and southbound. Both routes are less than 20 minutes and provide easy access to grocers.

Source: NCG, SCDOT



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 3
Proximity to Restaurants



The subject site is within a short drive of a diverse offering of restaurants. Clemson and Anderson's Downtowns offer a wide selection of dining choices. Hwy 28 also offers many fast-casual options for campers. Future campers will have access to a variety of convenient and higher-end dining options.

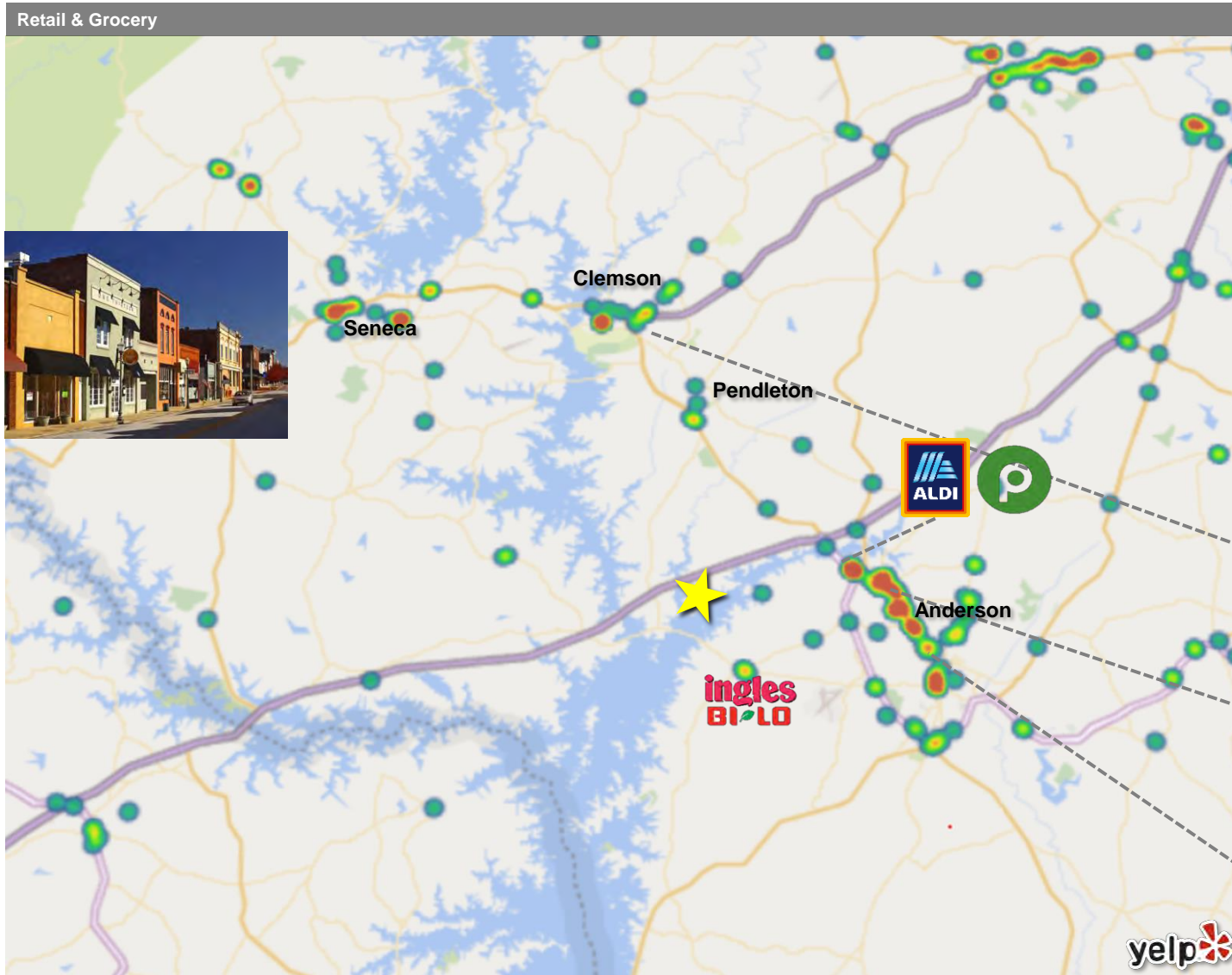


Source: NCG, Yelp



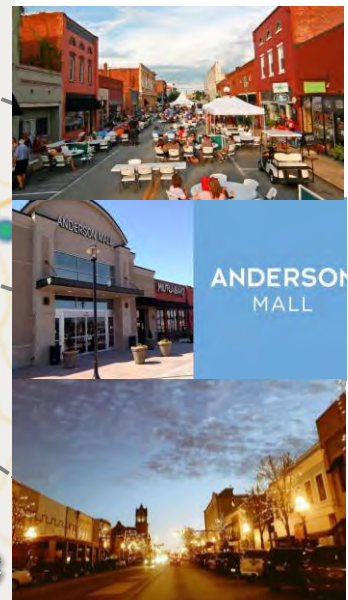
ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 4
Proximity to Retail



The subject site is easily accessible to Anderson and Clemson giving campers a diverse retail offering. Multiple grocers are within a short drive from the future campground adding to the appeal of the location. While day-to-day convenience retail is an important amenity to campers, the area is also accessible to the Anderson Mall offering conventional retailers as well as unique, boutique retailers in Downtown Anderson and Clemson.

Source: NCG, Yelp



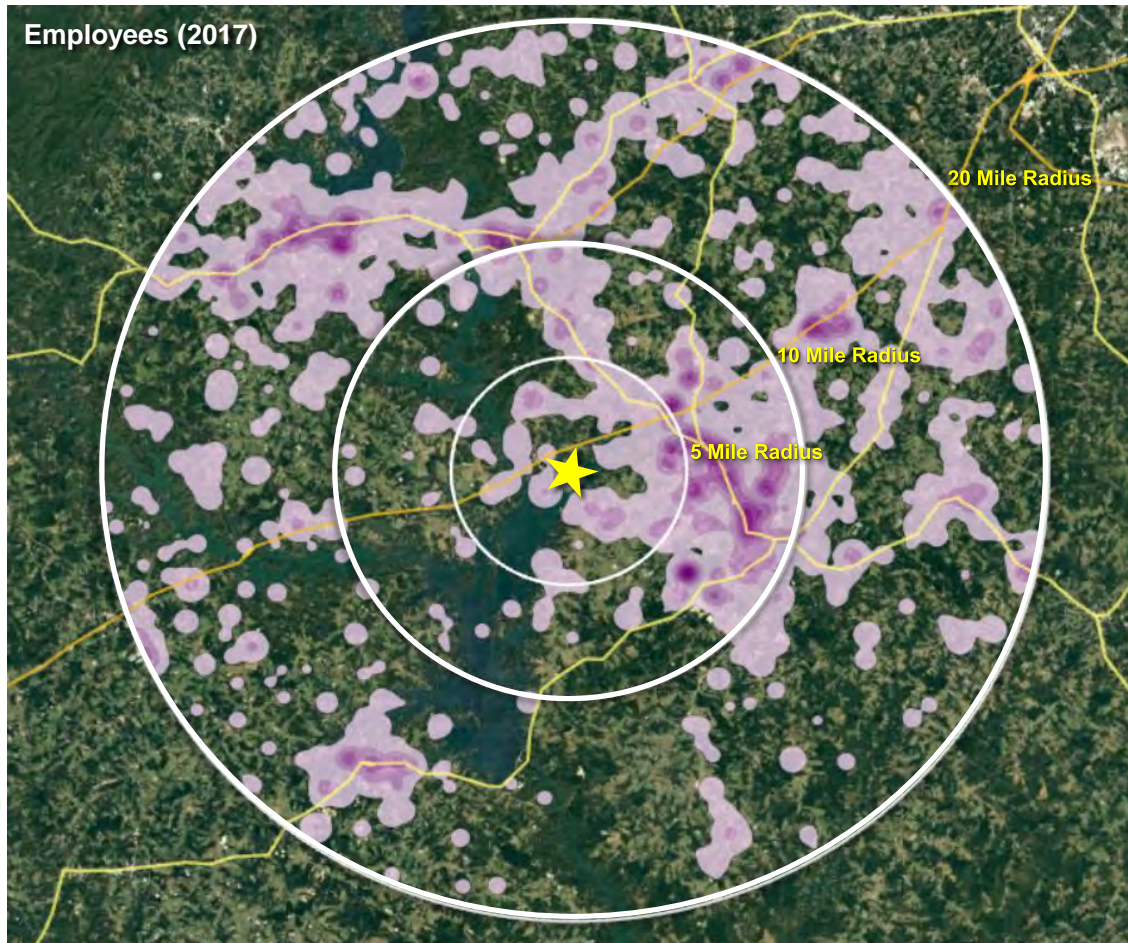
ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 5 Proximity and Connection of the Subject Site to Jobs

Total Jobs, Above \$40k in Salary, By Distance	
Distance	Employment
20 Miles	74,875
15 Miles	53,143
10 Miles	35,170
5 Mile	6,408

Top 10 Industry Sectors Within 5 Miles	
Industry Sector	
Manufacturing	30%
Retail Trade	16%
Accommodation and Food Services	13%
Health Care and Social Assistance	10%
Administration & Support, Waste Management and Remec	5%
Construction	5%
Professional, Scientific, and Technical Services	4%
Wholesale Trade	3%
Other Services (excluding Public Administration)	3%
Utilities	3%

Major Employers



Within 20-miles of the subject site there are over 74,000 jobs. The employment industries in Anderson County and surrounding areas are heavily manufacturing, with the majority being located in cores along I-85 and surrounding the City of Anderson and Clemson. These industries are drivers for the transient camping population discussed later in this report, but the general business environment is also a large driver for hotel/lodging room nights in the area.

SOURCE: Noell Consulting Group, Google Maps, US Census, OntheMap



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 6 Strengths, Challenges, and Opportunities for the Subject Site



SOURCE: Noell Consulting Group

Strengths

The subject site benefits from its proximity to the heavily traveled interstate 85. Further, the site is a 10 minute drive to grocery, convenience stores, and gas. Green Pond Landing, a popular event center and boat ramp, is less than 10 miles away. Compared to other campgrounds, Asbury benefits from scenic waterfront views and deep water. These are important and attractive features for campers.

Challenges

Currently the site does not have infrastructure for full hookup sites. Market interviews have indicated this is a major factor in attracting RV campers. While the site is close to the interstate, there is not a direct exit which can affect visibility and occupancy.

Opportunities

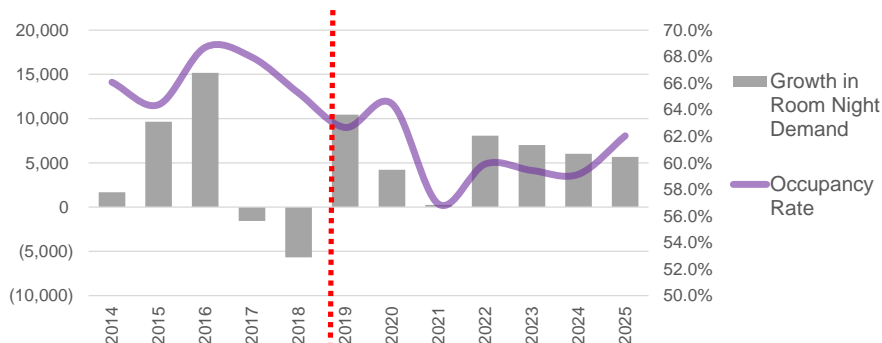
Lake Hartwell has regional draw with over 10 million visitors per year. The site is attractive to campers given its access to the interstate and conveniences. Waterfront sites should be optimized as well as differentiating amenities to allow the campground to appeal to a wider audience of campers.



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 7 Lodging Demand Analysis for Lake Hartwell Area, 2013 - 2025

Demand	2013	2014	2015	2016	2017	2018	Avg., '13-'18	2019	2020	2021	2022	2023	2024	2025	Avg. '19-'25
Employment Growth in the Metro	10,920	9,250	12,850	7,980	5,880	7,300	9,030	5,220	2,220	-120	4,040	3,510	3,010	2,840	2,960
% Employment Growth	2.9%	2.4%	3.2%	1.9%	1.4%	1.7%	2.3%	1.2%	0.5%	0.0%	0.9%	0.8%	0.7%	0.6%	0.7%
Tourism Growth in SC Leisure Trips	-	200,000	200,000	200,000	200,000	900,000	340,000	476,000	509,320	544,972	583,120	623,939	667,615	714,348	588,473
% Tourism Growth	-	3.8%	3.6%	3.5%	3.4%	13.2%	6.7%	7.0%	7.0%	7.0%	7.0%	7.0%	7.0%	7.0%	7.0%
Total Room Nights Demanded - Comp. Set	117,952	119,626	129,274	144,445	142,878	137,198	131,896	147,638	151,856	152,096	160,176	158,876	158,116	165,856	156,373
Growth in Room Night Demand	-	1,674	9,648	15,171	-1,567	-5,680	3,849	10,440	4,218	240	8,080	7,020	6,020	5,680	5,957
% Change in Room Nights Demanded	-	1.4%	8.1%	11.7%	-1.1%	-4.0%	3.3%	7.6%	2.9%	0.2%	5.3%	4.6%	4.0%	3.5%	4.0%
New Room Nights Per New Job	-	0.18	0.75	1.90	-0.27	-0.78	0.36	2.00	1.90	-2.00	2.00	2.00	2.00	2.00	1.41
Total Room Nights Supplied (Existing)	181,040	181,040	200,793	210,240	210,240	210,240	198,932	235,598	235,598	267,353	267,353	267,353	267,353	267,353	258,280
Growth in Room Night Supply	-	0.0%	10.9%	4.7%	0.0%	0.0%	3.1%	12.1%	0.0%	13.5%	0.0%	0.0%	0.0%	0.0%	3.6%
Additional Room Nights from Planned Deliveries															
Home 2 Suites	87	rooms						-	-	31,755	31,755	31,755	31,755	31,755	
*Note this is only pipeline within our competitive set.															
Total Room Nights Supplied		181,040	200,793	210,240	210,240	210,240		235,598	235,598	299,108	299,108	299,108	299,108	299,108	299,108
Occupancy Rate		66.1%	64.4%	68.7%	68.0%	65.3%		62.7%	64.5%	50.8%	53.6%	53.1%	52.9%	55.5%	
Excess Room Night Supply Over 70% Occupancy								-24,687	-18,661	-81,828	-70,285	-72,142	-73,228	-62,171	
Supportable Rooms @ 70% Occupancy								-68	-51	-224	-193	-198	-201	-170	



While local hotel demand witnessed strong growth in 2015-2017, a slow down in regional employment gains brought decreasing occupancy through 2018. Thankfully a surge in tourism helped to limit further occupancy declines in 2019 despite the delivery of a new 98 room Tru Hotel along the interstate. That said, we forecast occupancy to remain in the lower 60% through 2020. The delivery of the new Home 2 Suites in late 2020/early 2021, combined with a forecasted regional economic slowdown will result in occupancy levels dipping into the 50% with limited likelihood of returning to the 60% by 2025, let alone nearing the 70% - the point at which additional new hotels would be warranted.

SOURCE: Noell Consulting Group, Economy.com/Moody's, SCPRT, STR



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 8
Campground Demand Analysis for Lake Hartwell Area, 2014 - 2025

Demand	2014	2015	2016	2017	2018	Avg., '13-'18								Avg. '19-'25
National Hotel Room Night Demand	1,157,230,900	1,189,614,896	1,205,133,146	1,230,000,000	1,300,000,000	1,216,395,788								
National Hotel Room Night Demand Growth	57,230,900	32,383,996	15,518,250	24,866,854	70,000,000	40,000,000								
% Nat. Hotel Room Night Demand Growth	4.9%	2.7%	1.3%	2.0%	5.4%	3.6%								
National Camping Night Demand	572,400,000	587,200,000	587,200,000	598,944,000	610,922,880	591,333,376								
National Camping Night Demand Growth	12,400,000	14,800,000	0	11,744,000	11,978,880	10,184,576								
% Nat. Camping Night Demand Growth	2.2%	2.5%	0.0%	2.0%	2.0%	1.8%								
National Ratio of Camping Nights/Hotel Nights	0.49	0.49	0.49	0.49	0.47	0.49								
							2019	2020	2021	2022	2023	2024	2025	Avg. '19-'25
Total Lake Hartwell Area Hotel Room Night Supply	905,930	905,930	905,930	937,320	937,320	918,486	973,090	973,090	1,004,845	1,004,845	1,004,845	1,004,845	1,004,845	995,772
Lake Hartwell Area Hotel Room Night Demand	598,612	583,253	622,418	636,998	611,674	610,591	609,789	627,211	510,962	538,107	533,739	531,186	557,189	558,312
Est. Lake Hartwell Camping Nights Demanded	296,091	287,897	303,272	310,184	287,451	296,979	298,945	307,486	250,496	263,803	261,662	260,411	273,158	273,709
Total Hartwell Area Campground Inventory	1,426	1,426	1,426	1,426	1,726	20,897	1,726	1,726	1,726	1,726	1,726	1,726	1,726	1,726
Hartwell Area Campground Night Inventory	520,490	520,490	520,490	520,490	629,990	542,390	629,990	629,990	629,990	629,990	629,990	629,990	629,990	629,990
SC & CoE Avg. Campground Annual Occupancy	36.0%	36.0%	37.0%	37.0%	37.0%	36.6%	37.0%	37.0%	37.0%	37.0%	37.0%	37.0%	37.0%	37.0%
Lake Hartwell Area Camping Nights Occupied	187,376	187,376	192,581	192,581	233,096	198,602	233,096	233,096	233,096	233,096	233,096	233,096	233,096	233,096
Potential Unmet Campground Night Demand	108,715	100,520	110,691	117,602	54,354	98,377	65,849	74,390	17,400	30,707	28,566	27,314	40,062	40,612
Number of Potential Additional Campground Sites	298	275	303	322	149	270	180	204	48	84	78	75	110	111



Based on national hotel and camping reports, the US has averaged a ratio of 0.49 camping nights per hotel room nights from 2014-2018, with little variation. We utilized this ratio applied to the local Lake Hartwell area hotel room night demand to quantify potential campground nights demanded and then compared the demand to inventory/supply of existing campground sites.

As seen above, the market was running approximately 300 sites under-supplied until the delivery of the Clemson RV Park in 2018. While that RV park absorbed most of the unmet demand, additional positive demand remains, however the delivery of additional hotel supply (Home 2 Suites in Anderson) will soften the overall market through 2021. In 2022+ positive unmet demand exists for approximately 80-100 new campground sites. Additional demand is likely available if "stolen" from existing supply that is not keeping up with market amenity desires.



It should be noted that while the State and CoE report occupancies in the 30-50% range, we do not feel this is indicative of a general over supply in the market, and more a reflection of seasonality, operational procedures, target audiences, and amenities provided versus what a private operator may be capable of.

SOURCE: Noell Consulting Group, STR, North America Camping Report, SCPRT, and CoE



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 9
Camper Audience- Lake Hartwell

USER	AUDIENCE	SEEKING	LENGTH OF STAY	% Market	Asbury Opportunity	% Asbury	
Tent / Cabin		Family Campers	Seeking recreation for family vacations. Will value site and campground amenities.	Weekends and occasionally week long vacations- Spring, Fall, Summer breaks	15%	Strong opportunity given amenity rich environment and lake orientation. Highly seasonal audience.	20%
		Glampers	Often young couples from nearby cities seeking experiential camping experience. Willing to pay more for elevated services and unique amenities. (Yurts, Restaurant, Lodging)	Weekends	5%	Growing opportunity to attract affluent couples from major feeder markets (Atlanta, Greenville). Most demanding of luxury offering but have means to pay. Highly seasonal.	10%
		Travel Campers	Using campgrounds as an alternative to hotel lodging. Value driven and seek locations near interstate.	Overnight stays	10%	Not a target to focus on given value orientation and challenged access from interstate.	0%
RV		Families	Easy & accessible sites for overnight stays. Seeking amenity rich campgrounds when staying longer as camping as the main destination.	Overnight when traveling, Longer Weekend/Week long Stay	15%	Good opportunity to capture fair share of market. Will be highly attracted to amenity base but not all willing to pay top of market rates.	15%
		Retirees	Mature couples seeking amenitized sites. Seek full hookup sites.	Weeks to Months	20%	Strongest opportunity to attract given lake orientation and amenity offerings. Good audience to balance off-season occupancy.	25%
		Workers / Transient	Value oriented campers seeking necessities for longer term stays. Seek full hookup sites.	Months	15%	Low opportunity given value orientation, however will get a portion as they have strong concentration in market.	5%
		Special Events	Seeking accommodations for Clemson football, fishing tournaments, etc. Large sites with boat parking are a priority.	Longer weekends/ Week long stays	20%	Strong opportunity given location to both Clemson and Green Pond.	25%

SOURCE: Noell Consulting Group



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 10

Forecasted Occupancy at the Subject Site by Audience

USER	AUDIENCE	% Asbury	Occupancy												Peak Occ.	Off-Peak Occ.	Annual
			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec			
Tent / Cabin	 Family Campers	20%	10%	10%	20%	30%	60%	90%	90%	60%	30%	30%	20%	10%	66%	19%	38%
	 Glampers	10%	10%	10%	20%	30%	60%	90%	90%	60%	30%	30%	20%	10%	66%	19%	38%
	 Travel Campers	0%	10%	10%	20%	30%	60%	90%	90%	60%	30%	30%	20%	10%	66%	19%	38%
RV	 Families	15%	10%	10%	20%	30%	60%	90%	90%	60%	30%	30%	20%	10%	66%	19%	38%
	 Retirees	25%	10%	10%	20%	90%	90%	50%	50%	50%	90%	90%	20%	10%	66%	36%	48%
	 Workers / Transient	5%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%
	 Special Events	25%	20%	20%	25%	30%	30%	10%	10%	10%	50%	50%	50%	10%	22%	29%	26%
Overall Weighted Occupancy			17%	17%	25%	48%	62%	60%	60%	47%	53%	53%	31%	14%	56%	29%	40%

SOURCE: Noell Consulting Group



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

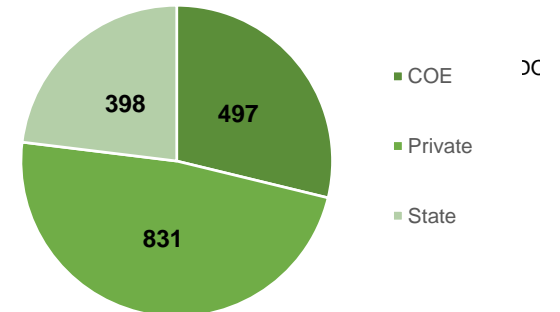
Exhibit 11 Lake Hartwell Campground Overview



The map to the left displays current campgrounds within the Lake Hartwell area. There are 1,660 campsites and 66 cabins within 21 parks or campgrounds. The majority of campgrounds are operated privately (48%). The Army Corps of Engineers operates 29% of campsites with the State of Georgia and South Carolina operating the remaining 23%.



Total Sites by Ownership

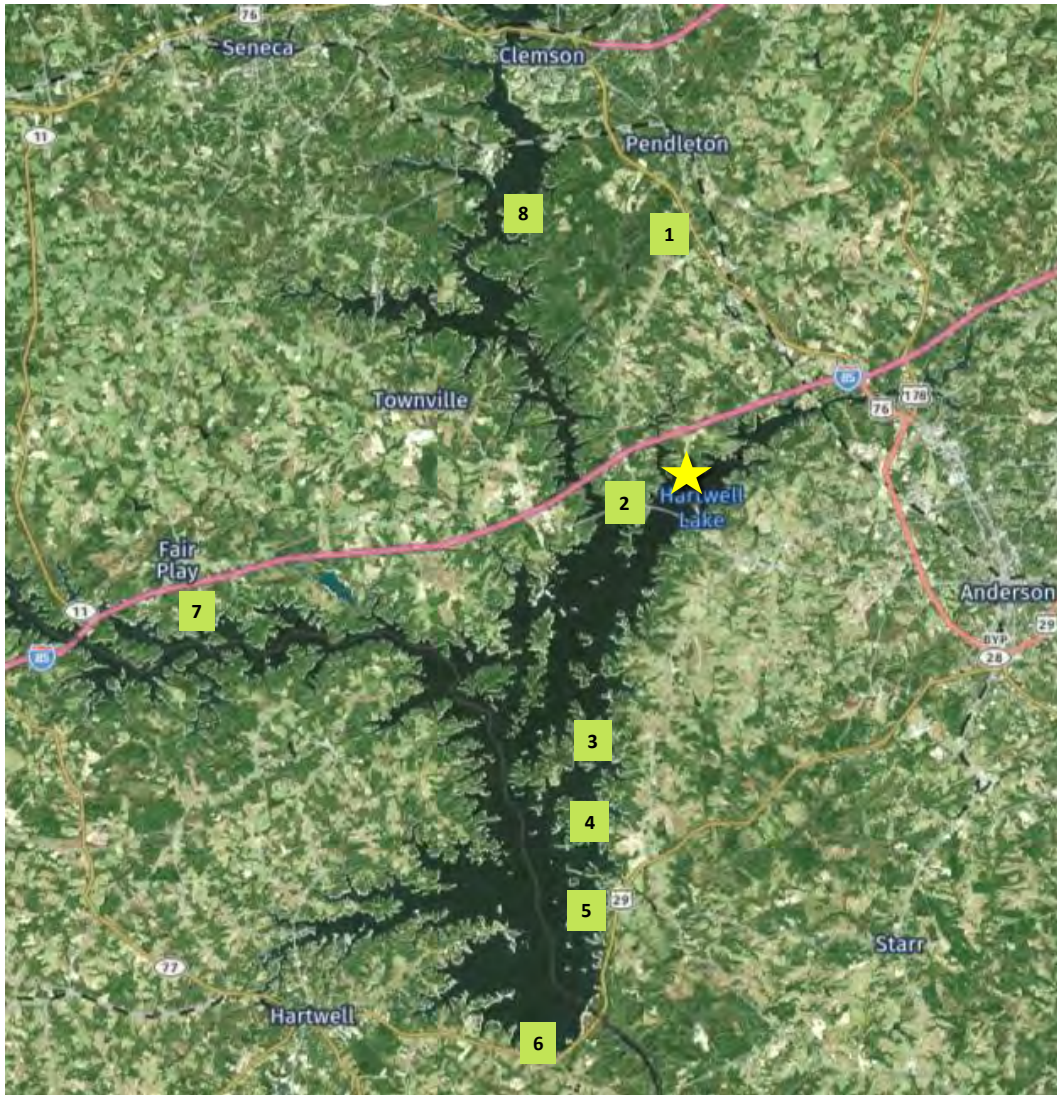


SOURCE: Noell Consulting Group, SCPRT, CoE



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 12
RV Park and Campground Community Map



SOURCE: Noell Consulting Group, Google Earth, Google Maps

RV Parks and Campgrounds	Sites	Avg. Rate
1 Clemson RV at the Grove	300	\$54.00
2 KOA Lake Hartwell	35	\$43.00
3 Springfield Campground	79	\$26.00
4 Sadler's Creek State Park	71	\$40.00
5 Big Water Marina	19	\$42.50
6 Watsadler Campground	51	\$26.00
7 Carolina Landing	79	\$47.50
8 Twin Lakes	102	\$30.00
RV Parks and Campgrounds Avg.	92	\$38.63



 Subject Site

ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS









Exhibit 13 Summary of the Competitive Market by Area

ID	Community Name	Location	Year Built	Acre	# Sites	Types of Sites Available	Overnight Rates	Long Term Rates	Occupancy	General Performance	Amenities/Comments
1	Clemson RV at the Grove	Pendleton, no lake access	2018	45	300	RV (Full hook up, 30/50 AMP) RV Tailgate Includes 2 meals, shuttle to game, live band	\$54 \$235/wkend	\$700/mo \$2,600/season	Open for a year, still under construction; Busy during football season; Would not comment on overall occupancy	Football season main revenue; Off season attracts longer term retirees and local workers; Looking to host events/festivals	WiFi, Pavilion w/ TVs, Lawn, Restrooms, Bath house, Full hook up For-sale lots under construction w/ pool & Clubhouse (100); Future expansion to include tent sites and trails to host festivals
2	KOA Lake Hartwell	Anderson - I-85 access	-	-	35	RV (Full hook up, 30/50 AMP) 49 sites RV (Full hook up, patio) 6 sites Tent- 9 sites Cabin- 10	Summer- \$45-50 \$70 Summer- \$31-45 Winter- \$41-\$45 Winter- \$29-38 \$60-\$130	\$460 + power/mo - -	Summer - avg. stay 3 days; 60% Winter- 100% long term >30 days; 30%	High occupancy; Summer audience mix of families, retirees Winter- 100% long-term occupancy; Security big factor for families	Pool, Game room, Playground, Laundry, Camp store, Pavilion, Jump pad, Mini gold, Dog park, Propane, Fire wood, Dump station Security- Gate w/ guard at night
3	Springfield Campground	Anderson - Lake Access	-	-	79	RV/Tent All sites w/ Water/Electric 20/30/50 AMP	\$26/night		Peak season wkend/holiday- 90% Midweek- 50% Open April to October	Waterfront sites, nice facilities, only open seasonally due to lower occupancy than other COE campgrounds	Restrooms, Bath house, Playground (2), Dump station, Trash dump, Boat ramp, Beach w/ swimming
4	Sadler's Creek State Park	Anderson - Lake Access	-	395	71	RV (Water/Electric 30 AMP)- 52 sites Tent- 14 sites Group- 5 sites	\$32 - \$60 \$17 - \$30		Limit 14 days in 30 day period; only nightly rates Avg SC State Parks= 36%	Popular park for its amenities; Does not have full hook ups and only 30 AMP electric	Playground (2), Ball field, Picnic shelter (2), Lakeside pavilion (150 ppl), Nature trail, Boat ramps (2), Fishing pier- 100 ft. deep water, Dump station, Bath house

SOURCE: Noell Consulting Group

ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 14 Summary of the Competitive Market by Area Continued

ID	Community Name	Location	Year Built	Acre	# Sites	Types of Sites Available	Overnight Rates	Long Term Rates	Occupancy	General Performance	Amenities/Comments	
1	Big Water Marina and Campground	Anderson- Lake Access	1983	-	19	RV (Upper- Full hook up, 30/50 AMP) *8 lower sites only water/electric	Summer- \$45-50/night Winter- \$35-45/night	\$500-600/mo (seasonality)	Upper sites stay full- 90%; Lower sites popular in peak seasons, low occ. In off season	Full hook up and amenities very attractive, 75% of campers are local workers (Purina, Sargent Metal)	WIFI, Ship store, Restaurant, Restroom/Bath house, Marina, Boat storage/service, Mail service, Boat ramps, Beach, Water sport/Boat rental	
		 										
2	Watsadler Campground	Hartwell- US-29 access, Lake Access	-	-	51	RV/Tent (Water & Electric- 30AMP)	\$26/night		Limit 14 days in 30 day period; only nightly rates	Peak season wkend/holiday- 90% Midweek- 50% (Dec.- March 23 sites stay open)	Boat ramp, courtesy dock, Bath house, Restrooms, Dump station, Playgrounds (2)	
		 										
3	Carolina Landing	Townville- I-85 access, Lake Access	-	-	79	RV/Tent- 178 sites (82 Full hook up) Cabins- 13	30 AMP- \$45.90 50 AMP- \$48.90 \$111-\$171/night	\$275-296/wk (30/50AMP) \$570-653/mo (30/50AMP) \$2,000- \$3,000/year \$671- \$1076/wk \$880- \$1155/mo	NA	No lakeside campsites, but heavily amenitized. Many long term campers	Clubhouse, Lodge, Pool, Laundry, Fishing dock, Playground, Volleyball court, Mini golf, Horseshoe pit (s), Basketball Court, Swimming beach, Gated access	
		 										
4	Twin Lakes	Clemson- Lake Access	-	152	102	RV/Tent (Water & Electric 30/50 AMP)	\$26 - \$34		Limit 14 days in 30 day period; only nightly rates	Peak season wkend/holiday- 90% Midweek- 50% (Dec.- March 58 sites stay open)	Highest revenue COE campground, very popular. Clemson football campers book 6 m. advance	Playground (5), Picnic shelter, Boat ramps, Courtesy Dock, Dump station, Bath house, Beach w/ swimming (2), Dump station (5), Picnic area (27),
		 										

SOURCE: Noell Consulting Group

ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 15

Estimated Rate Premiums By Campground and Characteristics for Avg. RV Site

Characteristic	Weight	Clemson RV	Carolina Landing	Sadler's Creek	KOA Lake Hartwell	Big Water Marina	Twin Lakes	Competitive Set Average	Competitive Set Average Desc.
Campground Atmosphere	15.0%	4.0	3.5	4.0	2.0	1.0	3.0	2.9	Limited to moderate programming
Proximity to Interstate	12.5%	3.0	4.0	1.0	4.0	1.0	2.0	2.5	Avg. 7.58 miles
Water Orientation	20.0%	1.0	2.0	4.0	1.0	3.5	3.0	2.4	Short drive to waterfront
Quality/Privacy of Site	10.0%	3.0	3.5	4.0	1.0	3.0	4.0	3.1	Mixed of leveled, treed sites to more primitive
30/50 AMP Full Hookup	15.0%	5.0	4.0	1.0	4.0	5.0	1.0	3.3	Most w/ full hookup on all of some sites
Campground Amenities	5.0%	2.0	3.0	3.0	3.5	5.0	2.5	3.2	Bath house, dock, beach, playground
Access to Full Service Grocery	5.0%	4.0	1.0	2.0	3.5	1.0	2.5	2.3	Avg. 6.83 miles
Access to Convenience Goods	5.0%	4.0	1.0	1.0	4.0	4.0	1.0	2.5	Mix of on-site/ short drive
Prox. To Demand Generators	2.5%	4.0	1.0	3.0	4.0	3.0	3.5	3.1	Drive to Clemson/Green Pond/Anderson
Ownership	10.0%	5.0	4.0	2.0	4.0	3.0	1.0	3.2	Private/COE/State
Weighted Average Score		3.3	3.1	2.7	2.8	2.9	2.3	2.8	Market Avg. Rent \$43
Estimated Premium/Discount:		17.3%	7.6%	-6.5%	-3.0%	2.3%	-17.6%	0.0%	Campgrounds ranked on a 1 - 5 scale, with 1 being poor and 5 being strong, relative to all projects in the market.
Estimated Rate:		\$54	\$48	\$39	\$41	\$44	\$31	\$43	
Actual Average Rate:		\$54	\$48	\$40	\$43	\$43	\$30	\$43	

Characteristic	Comp. Set Average	Subject Site	Subject Site Prm. To Avg.	Description
Campground Atmosphere	2.9	4.0	37%	Programmed spaces w/ ample security
Proximity to Interstate	2.5	3.0	20%	Approx. 5 miles
Water Orientation	2.4	4.0	66%	Waterfront on deep water
Quality/Privacy of Site	3.1	4.0	30%	Heavily wooded and spacious; Room for larger, modern RVs
30/50 AMP Full Hookup	3.3	1.0	-70%	30/50AMP with dump station
Campground Amenities	3.2	4.5	42%	Café/rest., waterpark, boat ramp, store
Access to Full Service Grocery	2.3	3.0	29%	Approx. 7 miles
Access to Convenience Goods	2.5	4.0	60%	On-site store
Prox. To Demand Generators	3.1	4.0	30%	Close to Green Pond; Longer drive to Clemson
Ownership	3.2	4.0	26%	Privately operated
	2.84	3.40		*Equates to a 25.1% premium to the market average
Estimated Rate (2019 \$):	\$43	\$54		Forecasted based on demonstrated rates & scores (+/- 2%)

The results of the best competitor positioning analysis indicates that the subject site can support rates of \$54/night for an average RV site during peak season. This pricing equates to an approximate 25% premium to the market.

NCG believes pricing is supportable given site's on-site cafe/rest., unique amenities, and location/lake orientation.

SOURCE: Noell Consulting Group



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 16 Recommended Subject Site Campground Development Program

Product Type	Unit Mix	Overnight Rates		Long-Term Peak Rates		Long-Term Off-Peak Rates		Est. Ann. ADR	Est. Peak Occupancy	Est. Off-Peak Occupancy	Est. Ann. Occupancy
		Peak	Off-Peak	Week	Month	Week	Month				
RV Site (Water, 30/50 AMP)	70%	\$54	\$44	\$325	\$715	\$275	\$604	\$39	52%	34%	40%
Tent Site (Water, 20 AMP)	20%	\$40	\$33	\$240	-	\$200	-	\$30	70%	20%	38%
Lodge Room	10%	\$162	\$130	-	-	-	-	\$146	70%	60%	65%
100%								\$48	42%		

*Above pricing assumes full hook-ups are not available to the RV sites. If full hook-ups can be provided pricing increases \$5/night.

Phasing:

Based on our demand analysis we recommend no more than 100 total sites be placed into production prior to 2022 on this site. The lodge rooms will compete more directly with a traditional hotel market, a market which we forecast to be over supplied through 2025, and as such we do not recommend delivery of the lodge until 2025+ in a final phase of the development.



SOURCE: Noell Consulting Group

ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

Exhibit 17 Asbury Campground Recommendations

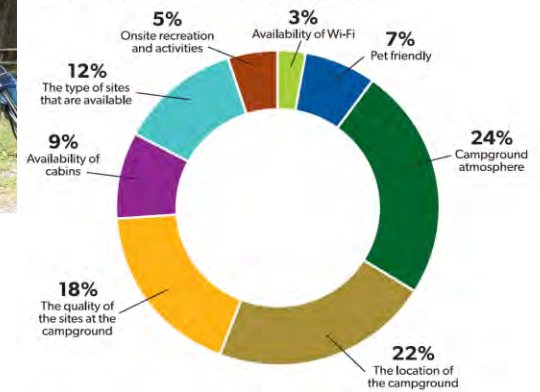
RV Site	Tent Site
Amenities	Amenities
Full Hookup *	Level site w/ Tent Pad
20/30/50 AMP	20AMP w/ USB ports
Water & Electric	Water & Electric
Shade	Shade
Level Site w/ room for larger RVs	Picnic Table
WiFi/Cable Access	Charcoal Grill
Picnic table	Fire Pit
Parking for extra cars/ Boat Storage	
Charcoal Grill	
Fire Pit	
Porch/Patio	

NCG suggests differentiating RV and tent sites to improve campground atmosphere and properly segment the market. Important factors for all sites include level sites, water & electric, shade, and picnic tables. Differentiating sites by amenities can help segment sites by audience. Deluxe sites should include elevated features such as patios/porches and larger sites for boat storage.



* If full hookup sites are not feasible consider utilizing a private contractor to provide pump outs.

THE TOP FACTOR IN SELECTING A CAMPGROUND IN 2018



SOURCE: Noell Consulting Group, 2019 North American Camping Report



ANDERSON COUNTY ECONOMIC DEVELOPMENT ASBURY CAMPGROUND MARKET ANALYSIS

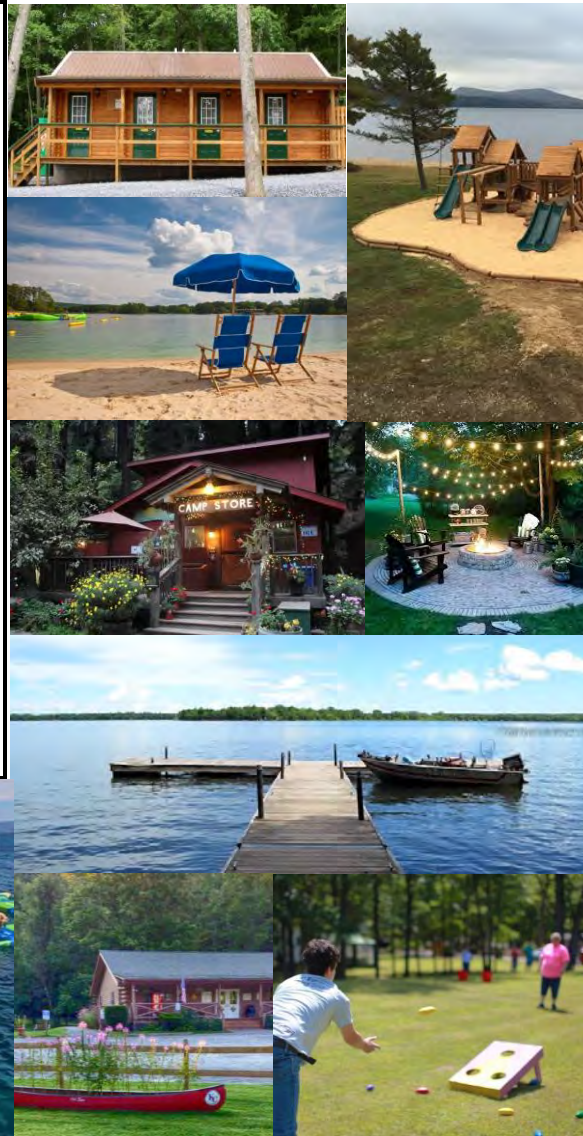
Exhibit 18 Asbury Campground Recommendations

Campground Amenities

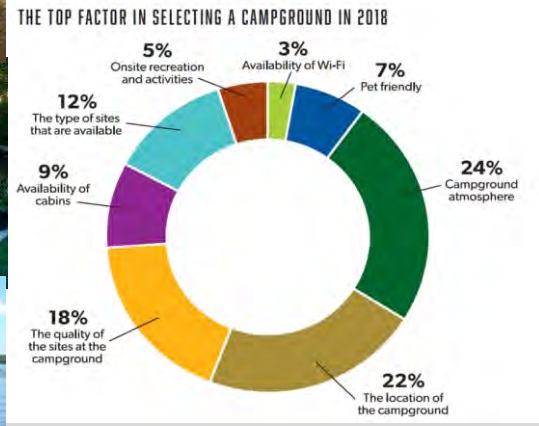
- Restroom and Bath house
- Pavilion
- Boat Ramp(s)
- WiFi
- Swimming Beach
- Playground
- Fire wood for-sale
- Laundry Facilities

Differentiating Amenities

- Café / Snack Bar
- Camp Store (Ice, Propane, RV service, convenience goods)
- Lawn Games
- Game room / Clubhouse
- Onsite Activities (Movie Night, Yoga, etc.)
- Canoe/Kayak/Paddle Board Rental
- Swimming Pool
- Courtesy dock
- Water Park



Asbury Campground has the opportunity to provide an amenity offering currently unavailable in the Lake Hartwell area. Listed to the top left are market standard amenities for the area. The bottom left list identifies amenities which will differentiate the campground and demand premiums over competitive campgrounds.



According to the 2019 North American Camping report, campground atmosphere is the highest factor campers consider when choosing a campground. Given Asbury's lake orientation, the campground has a strong opportunity to provide top-of-market atmosphere by including unique features such as a cafe or snack bar, programmed spaces, and elevated water amenities.

SOURCE: Noell Consulting Group, 2019 North American Camping Report



Threatened and Endangered Species Survey

Includes US Fish and Wildlife Service Clearance Letter

For Asbury Park Recreation Venue



July 12, 2019

Mr. Burriss Nelson
Anderson County
101 South Main Street
Anderson, South Carolina 29624

Transmitted via Electronic Mail (bnelson@andersoncountysc.org)

Reference: **Federally-Protected Species Assessment
Asbury Recreation Park**
Anderson, Anderson County, South Carolina
S&ME Project No. 4226-17-041, Phase 007

Dear Mr. Nelson:

S&ME, Inc. (S&ME) herewith submits this Report on the assessment of the plausible presence of Federally-Protected species for the referenced location (Site). This Report defines the area evaluated, describes the methodologies used, and presents the ensuing results and conclusions. The work was performed in accordance with our existing Master Service Agreement, Task Order 007, and associated Proposal No. 42-1701273, dated October 27, 2017. This work was performed at the request of Anderson County.

◆ Site Description

The assessment reported herein was performed on the Site located at the southern terminus of Asbury Park Road in Anderson, Anderson County, South Carolina (Attachment I, Exhibit 1 – Site Location). The Site includes approximately 35 acres located along the shoreline of Lake Hartwell. The Site is currently owned and managed by the US Army Corps of Engineers (USACE), and as such does not have a defining Anderson County tax parcel number. Figures depicting the topographic surface features and aerial imagery are included in Attachment I (Exhibit 2 – Topographic Surface Features and Exhibit 3 Aerial Imagery).

The Site has been the location of an existing USACE recreation facility (Asbury Recreation Park). The facility served as a primitive campground until 1982 and currently serves as a boat launch ramp. The previous buildings associated with the campground have been demolished and were not observed. There is one main road running from the entrance gate to its terminus at the boat launch ramp. There are a few small areas that appear to be older asphalt roads that are now overgrown with vegetation. The remainder of the site is mixed pine overstory with pine and hardwood regeneration in the understory. Exhibit 2 shows the Site topography at approximately 720 feet above mean sea level (ft. msl). The highest point on the Site is located near the entry gate in the north eastern portion of the Site, sloping to the east, west, and south to Lake Hartwell.

The global positioning system (GPS) coordinates of the center area of the Site are -82.782636 and 34.537684 Decimal Degrees.



◆ Regulatory Basis

Federally-Protected Species

Endangered Species Act of 1973

The 1973 Endangered Species Act (ESA) provides for the conservation of ecosystems upon which threatened and endangered species of fish, wildlife and plants depend.

Relative to administration of this Federal statute, endangered indicates that the species is in danger of extinction; threatened indicates that the species is likely to become endangered within the foreseeable future. Candidate indicates that the United States Fish and Wildlife Service (USFWS) has sufficient information to support listing of the species, although a formal listing as threatened or endangered has not been promulgated. Species of Concern includes species being considered for listing under Section 4 of the ESA, but there is insufficient information to support listing at this time.

Bald and Golden Eagle Protection Act of 1940

The Bald and Golden Eagle Protection Act (BGEPA) was enacted in 1940 and has been amended several times. This Act prohibits the taking of bald and golden eagles without a permit issued by the Secretary of the Interior. Taking includes their parts, nests, or eggs by pursuing, shooting/shooting at, poisoning, wounding, killing, capturing, trapping, collecting, molesting, or disturbing. Further, disturb means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available: 1) injury to an eagle; 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior; or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.

The Act also covers impacts that result from anthropogenic alterations initiated near a previously-used nesting site, during a time when eagles are not present. Such alterations are prohibited if, upon an eagle's return to the nest, such alterations agitate or bother the eagle to a degree that normal breeding, feeding or sheltering habits are interrupted or interfered; thereby, resulting in injury, death, or nest abandonment.

Migratory Bird Treaty Act of 1918

The Migratory Bird Treaty Act (MBTA) implements the United States' commitment to international conventions with Canada, Japan, Mexico, and Russia that protect birds that migrate across international borders. This Act prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests (i.e., taking) except as authorized under a valid permit. The MBTA also authorizes and directs the Secretary of the Interior to determine if, and by what means, the taking of migratory birds should be allowed and to adopt suitable regulations permitting and governing such taking (e.g., hunting seasons for ducks and geese). The MBTA and its implementing regulations also provide authority for the conservation of bald eagles and protect against their taking if the ESA protections are removed.



Nongame and Endangered Species Conservation Act of 1973 (State)

Relative to administration of this State statute, endangered is defined as any species or subspecies of wildlife whose prospects of survival or recruitment within the State are in jeopardy or are likely within the foreseeable future to become so; threatened is defined as a species that is likely to become endangered and in need of management. Species and communities on the State Listing that are neither Federally-Protected nor State-Protected are considered either rare or in need of further study. These species and communities have no legal protection under the Federal or State statutes and are tracked by the Heritage Trust Program at the request of the South Carolina Department of Natural Resources (SCDNR). Legal protection under this statute is prescribed in the South Carolina Nongame and Endangered Species Conservation Act, Section 50.15-40(c) and addresses the taking, transporting and selling of species designated as endangered or threatened for remunerative purposes.

◆ Methodology

Review of Protected Species Databases

The most-current postings in the public domain published on-line by the USFWS [i.e., the Federally-Protected Species Database] (USFWS 2019b) were obtained for Anderson County (Attachment II).

The Federal list (USFWS 2019b) contained one floral and two faunal species. The one floral species was listed as Federally Endangered (E) under the ESA. One faunal species was listed as Federally-Protected under the BGEPA, and one was listed as Federally-Protected under the ESA. At-Risk Species (ARS), Candidate species (C), and Bird of Conservation Concern (BCC) classifications do not have designation as Federally-protected species. Additionally, the USFWS Information for Planning and Consultation (IPaC) project specific species list was obtained (Attachment II). This list contained one additional faunal species that was not listed on the USFWS county specific list. The additional species was listed as a BCC.

The SCDNR Heritage Trust Program (HTP) current on-line posting of Rare, Threatened, and Endangered Species of South Carolina for Anderson County (SCDNR 2019) was also consulted prior to the assessment (Attachment II). The HTP list contained one Federally-protected endangered floral species, the Smooth Coneflower (*Enchinacea laevigata*). The Bald Eagle (*Haliaeetus leucocephalus*) was listed as State Threatened, but not Federally-Protected due to the list not including BGEPA listings. Additionally, the Black Rail (*Laterallus jamaicensis*) was listed as Federally Threatened (Proposed). As the Black Rail is listed by the USFWS and SCDNR as Threatened (Proposed), it has been included in this report.

It should be noted that the USFWS county list is based on what the USFWS reasonably expects to find in a county. The HTP list is based on known occurrences.

The acquired information for the three Federally-protected species was summarized, compiled with photographs of each species, and consolidated for field reference purposes. Portions of the Site that appeared to match the description of optimal/preferred habitats were considered to be potential habitats for those species and were noted during the habitat assessment.



Field Reconnaissance

The field reconnaissance was conducted on June 14, 2019. The reconnaissance was conducted generally from the south to north across the Site. The reconnaissance was performed by S&ME Project Scientist Jacob Foose, R.F. who is experienced in conducting protected species assessments.

The assessment included observations across the Site for the habitat of the target species, as discussed below, as well as the general habitat observed on the Site.

◆ Results

Pre-Field Review of Property Soil Associations

The Anderson County Web Soil Survey (Attachment I – Exhibit 4) indicates the Site is underlain by the following soil associations:

- Madison Sandy Loam, 6 to 10 percent slopes (MaC)
- Madison Sandy Loam, 10 to 15 percent slopes (MaD)

Pre-Field Review of Protected and Listed Species Databases

Three species (two vertebrate animals and one vascular plant) in Anderson County are listed by the USFWS as Federally-Protected (Attachment II).

Vertebrate Fauna

- Bald eagle (*H. leucocephalus*) – Federally-Protected (BGEPA)
- Black Rail (*L. jamaicensis*) – Federally-Threatened (Proposed) (ESA)

Vascular Flora

- Smooth Coneflower (*E. laevigata*) – Federally-Endangered (ESA)

Brief descriptions of the three Federally-Protected species and their preferred habitats have been abstracted from USFWS (2015, 2017, 2019a), and are provided below:

Bald eagle

Distinguished by a white head and white tail feathers, Bald eagles are powerful, brown birds that may weigh 14 pounds and have a wingspan of eight feet. Male eagles are smaller, weighing as much as ten pounds and have a wingspan of six feet. Sometimes confused with Golden eagles, Bald eagles are mostly dark brown until they are four to five years old and acquire their characteristic coloring.

Bald eagles live near rivers, lakes, and marshes where they can find fish, their staple food. Bald eagles will also feed on waterfowl, turtles, rabbits, snakes, and other small animals and carrion. Bald eagles require a good food base,



perching areas, and nesting sites. Their habitat includes estuaries, large lakes, reservoirs, rivers, and some seacoasts. In winter, the birds congregate near open water in tall trees for spotting prey and night roosts for sheltering.

Eagles mate for life, choosing the tops of large trees to build nests, which they typically use and enlarge each year. Nests may reach ten feet across and weigh a half ton. They may also have one or more alternate nests within their breeding territory. In treeless regions, they may also nest in cliffs or on the ground. Bald eagles travel great distances but usually return to breeding grounds within 100 miles of the place where they were raised. Bald Eagles may live 15 to 25 years in the wild, longer in captivity. Breeding eagles will typically lay one to three eggs once a year, and they hatch after about 35 days. The young eagles are flying within three months and are on their own one month later.

Black Rail

The Eastern Black Rail is a small marsh bird ranging from 10-15 centimeters (cm) [3.9 – 5.9 inches (in)] in total length. The Black Rail has a wingspan of 22-28 cm [8.7 – 11.0 in] and weighs approximately 35 grams [1.2 ounces (oz)] on average. As their name implies, they are generally pale to blackish-gray, with bright red eyes and a small blackish bill.

Black Rail habitat is tidally or non-tidally influenced marshes ranging in salinity from salt to brackish to fresh. They can typically be found in marshes containing dense cover but have also been located in upland areas adjacent to these marshes. In the interior US, black rails use wet sedge meadows and shallow wetlands, generally dominated by cattails. Not much is known about their diet, but they are likely opportunistic foragers. Examination of specimens collected indicates a diet of small aquatic and terrestrial invertebrates as well as small seeds. Foraging likely occurs within edges of stands of emerging vegetation both above and below the water line.

Smooth Coneflower

Smooth coneflower is a perennial herb that grows up to five feet tall from a vertical rootstock. The stems are smooth with few leaves. The largest leaves are the basal leaves (eight inches long, three inches wide), which are elliptical to broadly lanceolate and are smooth to slightly rough. Mid-stem leaves are smaller than the basal leaves. The rays (two-to-three inches long) of the flowers are light pink to purplish, usually drooping. Flower heads are usually solitary. Flowering occurs from May through late July. Fruiting occurs through October. The USFWS lists the optimal survey window for this species late May through October. The habitat consists of prairie remnants, open woods, cedar barrens, roadsides, clearcuts, dry limestone bluffs, and power line rights-of-way. This species is usually found in magnesium and calcium rich, basic or circumneutral soils over mafic or calcareous rocks. In South Carolina, soils over diabase and marble are ideal. Abundant sunlight and little competition in the herbaceous layer characterize optimal sites.

HTP Inquiry

The response to an inquiry requesting information on HTP records for the Federally-Protected species at the Site is included in Attachment III. The essential findings of this response were:



- Per the HTP response: "According to SCDNR data, there are currently no records of threatened and endangered species or species of conservation concern within 3-miles of the project footprint. 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."

Field Reconnaissance

The field reconnaissance was performed on June 14, 2019. The weather conditions were sunny and dry with a mean temperature of 75° Fahrenheit. The Anderson County area had received no rainfall within 48 hours prior to the start of the field reconnaissance with no precipitation occurring during the reconnaissance.

Site Habitat Descriptions

Two different habitats were observed on the Site as depicted on Attachment I - Exhibit 5 and described below:

- Habitat 1 is Mixed Pine / Hardwood areas consisting of an overstory dominated by Loblolly Pine (*Pinus taeda*), and an understory of mixed pine and hardwoods. Other observed overstory species included Black Cherry (*Prunus serotina*), Southern Red Oak (*Quercus falcata*), and Red Maple (*Acer rubrum*). Understory species observed included young Loblolly Pine, Southern Red Oak, Willow Oak (*Quercus phellos*), Red Maple, and Sweet Gum (*Liquidambar styraciflua*). There was a dense population of Poison ivy (*Toxicodendron radicans*), Black Berries (*Rubus spp.*), and Chinese Privet (*Ligustrum sinense*) observed in several areas across the site. This habitat occupied approximately 33 acres.
- Habitat 2 consisted of Open and asphalt areas. These areas included the current boat launch ramp, the main road, and additional secondary asphalt road areas. Generally, the adjacent habitat was maintained Fescue grasses within the road side areas. This habitat occupied approximately 2 acres.

Photographs (typicals) of the Site are presented in Attachment IV and are indexed on Exhibit 6 in Attachment 1.

Site Impacts Evaluation – Federally-Protected Species

Bald eagle (*H. leucocephalus*) – Federally-Protected (BGEPA)

Although the Site is located on Lake Hartwell, no nests or individual Bald eagles were observed during the Site reconnaissance. According to the SCDNR records for Federally-Protected species, no known nesting sites occur within three miles of the Site.

Biological Opinion: No Effect.

Black Rail (*L. jamaicensis*) – Federally Threatened (Proposed)

Black Rail habitat consists of non-tidal marshes and shallow wetlands. No habitat or individual specimens of Black Rail were observed at the Site.

Biological Opinion: No Effect.



Smooth Coneflower (*E. laevigata*) – Federally Endangered

The Smooth Coneflower is usually found in open woods, glades, cedar barrens, roadsides, clearcuts, dry limestone bluffs, and power line rights-of-way. No habitat that would support Smooth Coneflower was observed at the Site. Additionally, this species most likely would be present in areas underlain by high-pH substrates. Considering the existing soil profiles on the site the likelihood the Smooth Coneflower exists on the site is low. It should be noted that the survey was performed in the flowering season, and no individuals of this species or other members of the genus *Echinacea* were located during our field survey.

Biological Opinion: No Effect.

◆ Summary

Based on review of species-specific data in the public domain for Federally-Protected Species and observations made during the field reconnaissance performed on June 14, 2019, the planned Site work is expected to have No Effect on:

Federally-Protected Species:

- Bald eagle (*H. leucocephalus*) – Federally-Protected
- Black Rail (*L. jamaicensis*) – Federally-Threatened (Proposed)
- Smooth Coneflower (*E. laevigata*) – Federally-Endangered

References Cited

South Carolina Department of Natural Resources. 2019. SC Rare, Threatened and Endangered Species of South Carolina – by County. Current On-Lined Edition, Accessed June 13, 2019. <http://dnr.sc.gov/species/anderson.html>

United States Fish and Wildlife Service. 2015. Bald and Golden Eagle Information. Current On-Line Edition. Accessed on June 13, 2019. <http://www.fws.gov/birds/management/managed-species/bald-and-golden-eagle-information.php>

United States Fish and Wildlife Service. 2019a. Eastern Black Rail, *Laterallus jamaicensis jamaicensis*. On-Line Edition. Accessed on June 13, 2019. <https://www.fws.gov/southeast/wildlife/birds/eastern-black-rail/>

United States Fish and Wildlife Service. 2017. Smooth Coneflower (*Echinacea laevigata*). Current On-Line Edition. Accessed on June 13, 2019, http://www.fws.gov/raleigh/species/es_smooth_coneflower.html

United States Fish and Wildlife Service. 2019b. South Carolina List of At-Risk, Candidate, Endangered and Threatened Species - Anderson County. Current On-Line Edition. Accessed June 13, 2019. http://www.fws.gov/charleston/pdf/Endangered/species_by_county/anderson_county.pdf



Federally-Protected Species Assessment
Asbury Recreation Park
Anderson, Anderson County, South Carolina
S&ME Project No. 4226-17-041, Phase 007

We appreciate the opportunity to assist you with this project. If you have any questions regarding the information contained in this report, please contact Mr. Foose at (864) 297-9944.

Sincerely,

S&ME, Inc.

A handwritten signature in blue ink, appearing to read 'Jacob Foose'.

Jacob Foose, R.F.
Project Manager/Environmental Group Leader
jfoose@smeinc.com

A handwritten signature in black ink, appearing to read 'Mark Augspurger'.

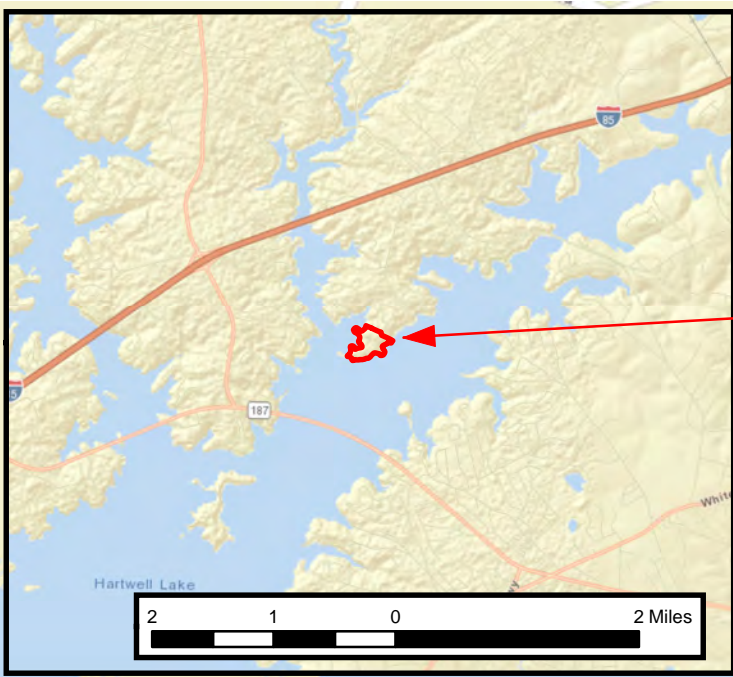
Mark Augspurger
Senior Reviewer
maugspurger@smeinc.com

Attachments: Attachment I – Exhibits 1- 6
Attachment II – USFWS Species List for Anderson County, SC (4-29-2019), IPaC Species List, SCDNR HTP List
Attachment III – SCDNR Heritage Trust Program Inquiry Response
Attachment IV – Property Photographs (Typicals)

JF-MM t:\projects\2017\env\4226-17-041_anderson county_master services agreement\deliverables\task order 007 asbury park\federally-protected species\asbury park protected species - (jf mka).docx

Attachments

Attachment I – Figures 1 - 6

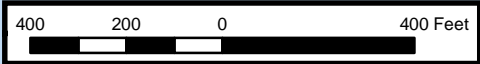


Site Location

REFERENCE:
 This exhibit was developed using information and data from the following sources:

- Anderson County GIS Tax Mapping Office
- ESRI World Street Map

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Legend

Approximate Site Boundary



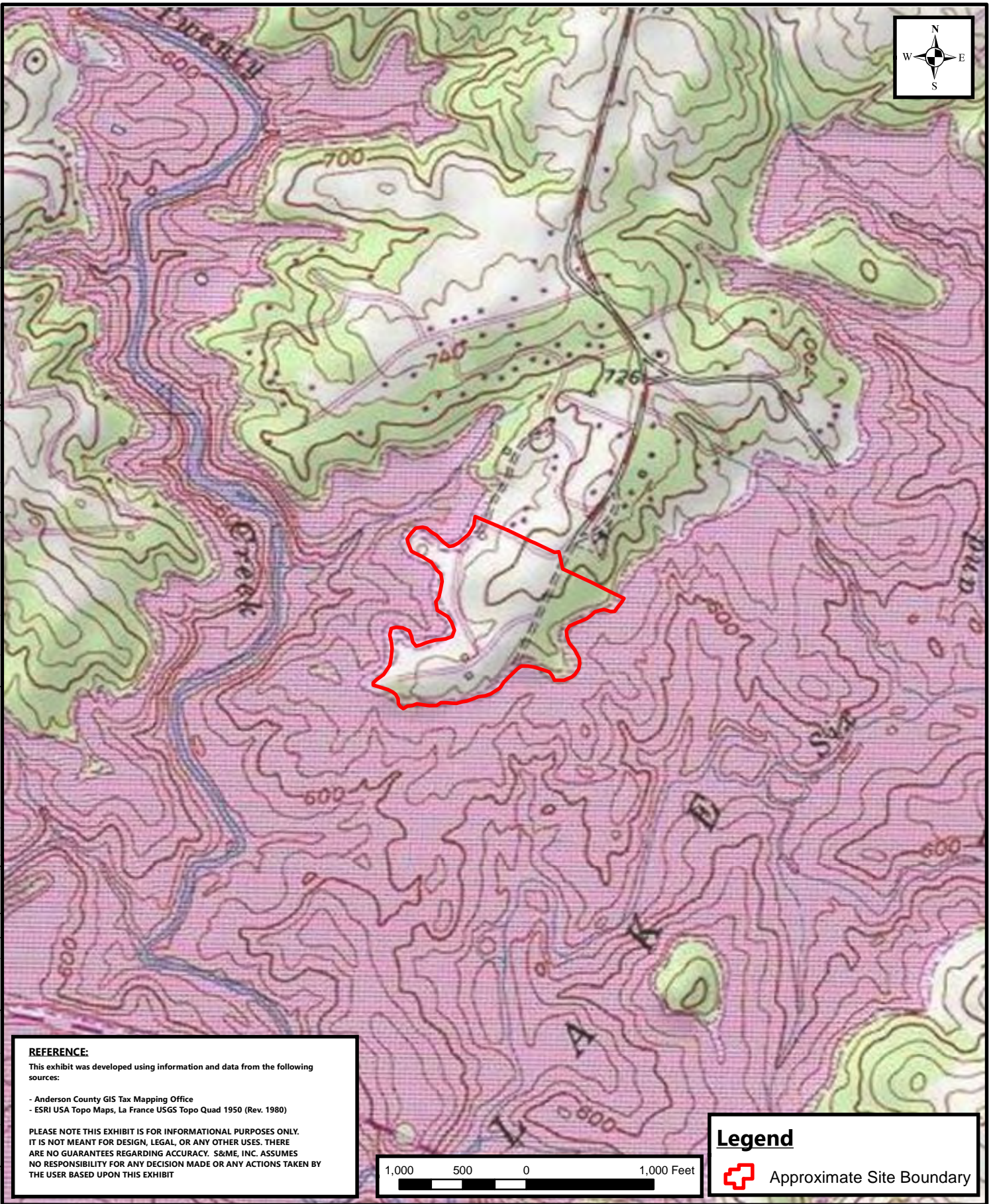
Site Location

Asbury Recreation Park
 Asbury Park Road
 Anderson, Anderson County, South Carolina

Scale:
 As Shown
 Date:
 6-24-2019
 Project Number
 4226-17-041

Exhibit No.
1

Drawing Path: F:\GIS Data Drive\GIS - Project Folder\Temp Project Storage\2014\4226-17-041 Anderson County MSA\Exhibits\Task Order 007 Asbury Park\Exhibit 2 - Topographic Surface Features.mxd plotted by jfosse 06-24-2019

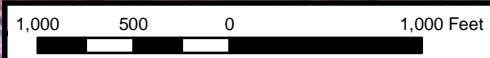


REFERENCE:

This exhibit was developed using information and data from the following sources:

- Anderson County GIS Tax Mapping Office
- ESRI USA Topo Maps, La France USGS Topo Quad 1950 (Rev. 1980)

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Legend



Approximate Site Boundary



Topographic Surface Features

Asbury Recreation Park
Asbury Park Road
Anderson, Anderson County, South Carolina

Scale:
As Shown
Date:
6-24-2019
Project Number
4226-17-041

Exhibit No.

2

Drawing Path: F:\GIS Data Drive\GIS - Project Folder\Temp Project Storage\2014\4226-17-041 Anderson County MSA\Exhibits\Task Order 007 Asbury Park\Exhibit 3 - Aerial Imagery.mxd plotted by jfoose 06-24-2019

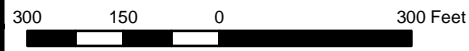


REFERENCE:


This exhibit was developed using information and data from the following sources:

- Anderson County GIS Tax Mapping Office
- ESRI World Imagery via ESRI Online - 2015

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Legend

 Approximate Site Boundary



Aerial Imagery

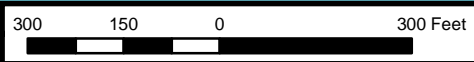
Asbury Recreation Park
Asbury Park Road
Anderson, Anderson County, South Carolina

Scale: As Shown
Date: 6-24-2019
Project Number 4226-17-041

Exhibit No.

3

Drawing Path: F:\GIS Data Drive\GIS - Project Folder\Temp Project Storage\2014\4226-17-041 Anderson County MSA\Exhibits\Task Order 007 Asbury Park\Exhibit 4 - NRCS Soil Associations.mxd Plotted by jfoose 06-24-2019







REFERENCE:

This exhibit was developed using information and data from the following sources:

- Anderson County GIS Tax Mapping Office
- ESRI World Imagery via ESRI Online - 2015
- NRCS Soil Associations via Web Soil Survey - 2019

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Legend

-  Approximate Site Boundary
-  MaC - Madison sandy loam, 6 to 10 percent slopes
-  MaD - Madison sandy loam, 10 to 15 percent slopes
-  W - Water



NRCS Soil Associations

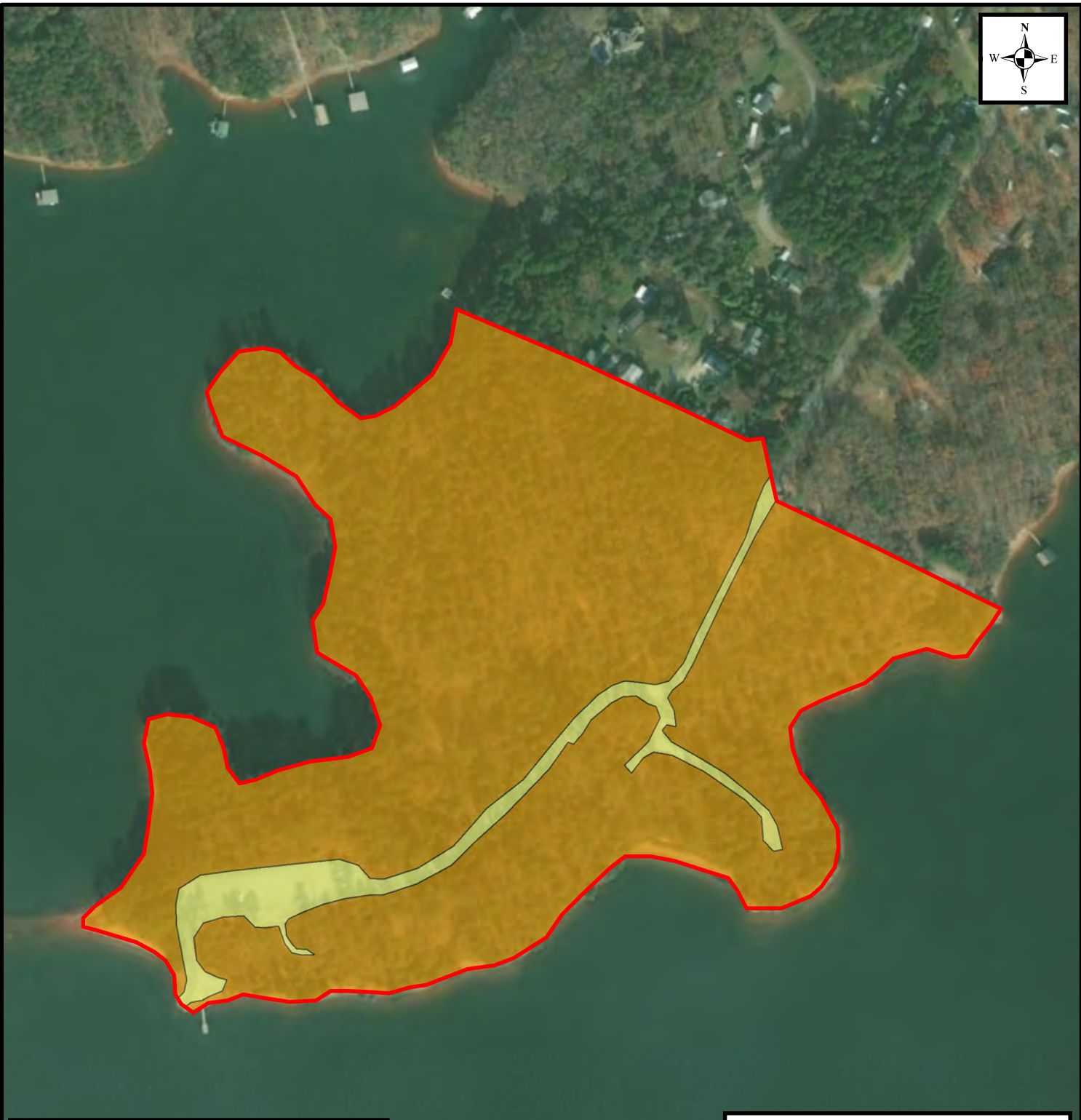
Asbury Recreation Park
 Asbury Park Road
 Anderson, Anderson County, South Carolina

Scale:
 As Shown
 Date:
 6-24-2019
 Project Number
 4226-17-041

Exhibit No.

4

Drawing Path: F:\GIS Data Drive\GIS - Project Folder\Temp Project Storage\2014\4226-17-041 Anderson County MSA\Exhibits\Task Order 007 Asbury Park\Exhibit 5 - Habitat Types.mxd plotted by jfoose 06-24-2019



REFERENCE:

This exhibit was developed using information and data from the following sources:

- Anderson County GIS Tax Mapping Office
- ESRI World Imagery via ESRI Online - 2015
- S&ME Field Collected GPS Data

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Legend

- Approximate Site Boundary
- Mixed Pine / Hardwood - 33 Acres
- Open - Asphalt - 2 Acres



Site Habitat Types

Asbury Recreation Park
 Asbury Park Road
 Anderson, Anderson County, South Carolina

Scale:
 As Shown
 Date:
 6-24-2019
 Project Number
 4226-17-041

Exhibit No.

5

Drawing Path: F:\GIS Data Drive\GIS - Project Folder\Temp Project Storage\2014\Savetta Topo Template\Exhibits\Exhibit 6 - Photo Locations.mxd plotted by jfoose 06-25-2019

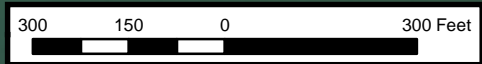


REFERENCE:

This exhibit was developed using information and data from the following sources:

- Anderson County GIS Tax Mapping Office
- ESRI World Imagery via ESRI Online - 2015
- S&ME Field Collected GPS Data

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Legend

- Approximate Site Boundary
- Photo Location and Direction



Photo Locations

Asbury Recreation Park
 Asbury Park Road
 Anderson, Anderson County, South Carolina

Scale:
 As Shown
 Date:
 6-24-2019
 Project Number
 4226-17-041

Exhibit No.
6

**Attachment II – USFWS Species List of Anderson County, SC,
IPaC Species List**

South Carolina List of At-Risk, Candidate, Endangered, and Threatened Species - Anderson County

CATEGORY	COMMON NAME/STATUS	SCIENTIFIC NAME	SURVEY WINDOW/ TIME PERIOD	COMMENTS
Amphibian	None Found			
Bird	Bald eagle (BGEPA)	<i>Haliaeetus leucocephalus</i>	October 1-May 15	Nesting season
	Eastern black rail (T)	<i>Laterallus jamaicensis jamaicensis</i>	April-June	Minimum of five surveys/survey point
Crustacean	Mimic crayfish (ARS)	<i>Distocambarus carlsoni</i>	November-April	
Fish	Blueback herring* (ARS)	<i>Alosa aestivalis*</i>	Mid-January-mid May	Peak: March-April
Insect	Monarch butterfly (ARS)	<i>Danaus plexippus</i>	August-December	Overwinter population departs: March-
Mammal	Little brown bat (ARS)	<i>Myotis lucifugus</i>	Year round	Found in trees, rock creaves, and under bridges
	Tri-colored bat (ARS)	<i>Perimyotis subflavus</i>	Year round	Found in mines and caves in the winter
Mollusk	None Found			
Plant	Georgia aster (ARS*)	<i>Symphotrichum georgianum</i>	Early October-mid November	
	Smooth coneflower (E)	<i>Echinacea laevigata</i>	Late May-October	
Reptile	None Found			

* Contact National Marine Fisheries Service (NMFS) for more information on this species

** The U.S. Fish and Wildlife Service (FWS) and NMFS share jurisdiction of this species

ARS Species that the FWS has been petitioned to list and for which a positive 90-day finding has been issued (listing may be warranted); information is provided only for conservation actions as no Federal protections currently exist.

ARS* Species that are either former Candidate Species or are emerging conservation priority species

BGEPA Federally protected under the Bald and Golden Eagle Protection Act

C FWS or NMFS has on file sufficient information on biological vulnerability and threat(s) to support proposals to list these species

CH Critical Habitat

E Federally Endangered

P or P - CH Proposed for listing or critical habitat in the Federal Register

S/A Federally protected due to similarity of appearance to a listed species

T Federally Threatened

These lists should be used only as a guideline, not as the final authority. The lists include known occurrences and areas where the species has a high possibility of occurring. Records are updated as deemed necessary and may differ from earlier lists.

For a list of State endangered, threatened, and species of concern, please visit <https://www.dnr.sc.gov/species/index.html>.



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
<http://www.fws.gov/charleston/>

In Reply Refer To:

June 13, 2019

Consultation Code: 04ES1000-2019-SLI-0569

Event Code: 04ES1000-2019-E-01135

Project Name: Asbury Park

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
-

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

South Carolina Ecological Services
176 Croghan Spur Road, Suite 200
Charleston, SC 29407-7558
(843) 727-4707

Project Summary

Consultation Code: 04ES1000-2019-SLI-0569

Event Code: 04ES1000-2019-E-01135

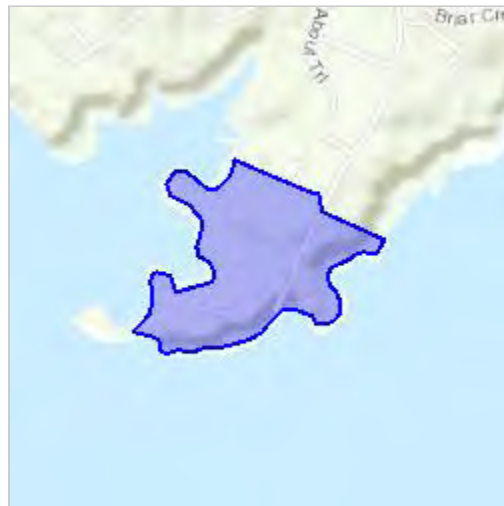
Project Name: Asbury Park

Project Type: DEVELOPMENT

Project Description: Proposed campground

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/34.537552956184854N82.78240456053939W>



Counties: Anderson, SC

Endangered Species Act Species

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Birds

NAME	STATUS
Eastern Black Rail <i>Laterallus jamaicensis</i> ssp. <i>jamaicensis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10477	Proposed Threatened

Flowering Plants

NAME	STATUS
Smooth Coneflower <i>Echinacea laevigata</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/3473	Endangered

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

USFWS National Wildlife Refuge Lands And Fish Hatcheries

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 OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

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, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> 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
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10

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 and understand the FAQ “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.

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 (|)

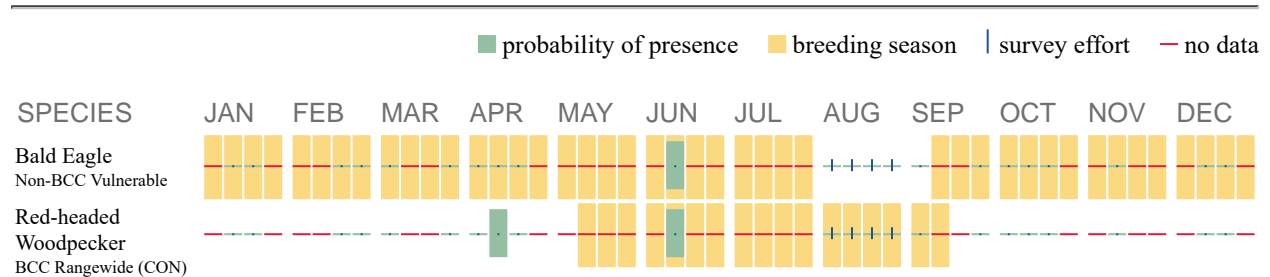
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

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.



Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

Migratory Birds FAQ

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](#) and/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 migratory birds potentially occurring 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 [AKN Phenology 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 to 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, migrating or present year-round in my project 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 refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). 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 specified. 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 Pacific 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 offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts 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 affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers 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 files 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 specified 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 effort (indicated by the black vertical bar) and for the existence of the “no data” indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort 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 confirm 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 confirmed. 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.

Attachment III – SCDNR Heritage Trust Program Inquiry Response

South Carolina Department of Natural Resources



PO Box 167
Columbia, SC 29202
(803) 734-1396
Lemerisj@dnr.sc.gov

Robert H. Boyles, Jr.
Interim Director
Emily C. Cope
Deputy Director for
Wildlife and Freshwater Fisheries

July 10, 2019

Jacob Foose, R.F.
Project Manager/Project Scientist
S&ME
48 Brookfield Oaks Drive, Suite F
Greenville, SC 29607

Electronic submission

Re: Request for Environmental Review/Consultation
Clemson University Snow Recreation Facility Expansion Study
Anderson County, SC

Dear Mr. Foose:

The South Carolina Department of Natural Resources (SCDNR) has received your request for threatened and endangered species consultation of the Asbury Recreation Park project located on Asbury Park Road in Anderson County, South Carolina. No additional project information was provided. The proposed project area is comprised of wooded land and is surrounded by open water and residential development.

According to SCDNR data, there are currently no records of threatened and endangered species or species of conservation concern within 3-miles of the project footprint. 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.

Additional species of concern are also found within 3-miles of the project site – these include whorled horse-balm (*Collinsonia verticillata*), Bartram's bass (*Micropterus sp. cf. cataractae*), Flat bullhead (*Ameiurus platycephalus*), Carolina darter (*Etheostoma collis*), Christmas darter (*Etheostoma hopkinsi*), red burrowing crayfish (*Cambarus carolinus*), Chauga crayfish (*Cambarus chaugaensis*), and white tubercled crayfish (*Procambarus spiculifer*). The aforementioned species are designated as having conservation priority as designated through the South Carolina State Wildlife Action Plan¹ (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.

¹ www.dnr.sc.gov/swap

Review of National Wetland Inventory (NWI) maps and aerial photography indicate that wetlands and/or hydric soils are present in or near to your immediate project area. SCDNR advises that you consult with the U.S. Army Corps of Engineers (www.sac.usace.army.mil/Missions/Regulatory) to determine if jurisdictional wetlands are present and if a permit and mitigation is required for activities impacting these areas. If jurisdictional areas are present, SCDNR recommends that developed project plans avoid or minimize impacts where practicable. SCDNR reserves the right to review any required federal or state permits and mitigation proposals at the time of public notice.

SCDNR offers the following comments and Best Management Practices (BMPs) regarding this project's potential impacts to natural resources:

- 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/wetlands 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.
- Once the project is initiated, it must be carried to completion in an expeditious manner in order to minimize the period of disturbance to the environment. Upon project completion, all disturbed areas must be permanently stabilized with vegetative cover (preferred) or other erosion control methods as appropriate.
- Any disturbed grassy areas 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: indiagrass (*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>.
- SCDNR encourages the use of native plants for landscape plantings, when available, and strongly discourages planting invasive/pest plant species in landscapes. For more information, please visit <https://www.se-eppc.org/southcarolina/> or http://www.clemson.edu/extension/hgic/water/resources_stormwater/intro_native_plants.html.
- The project must be in compliance with any applicable local floodplain, erosion and sediment control and/or storm water ordinances.

These technical comments 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 me by email at lemerisj@dnr.sc.gov or by phone at 803-734-1396.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JL', with a stylized flourish at the end.

Joseph Lemeris, Jr.
Heritage Trust Program
SC Department of Natural Resources

Attachment IV– Property Photographs (Typicals)



1 Edge of boat ramp parking looking east.



2 Looking into mixed pine hardwood, facing west.



3 Edge of main access road looking north.



4 Vegetation growth along abandoned campsite road, looking north west.



**Asbury Recreation Park
Anderson, Anderson County, South Carolina**

S&ME Project # 4226-17-041, Phase 007

Taken by: Jacob Foose

Date Taken: 6/14/2019



United States Department of the Interior



FISH AND WILDLIFE SERVICE

176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407

U.S. Fish and Wildlife Service Clearance Letter for Species and Habitat Assessments

The U.S. Fish and Wildlife Service (Service) is one of two lead Federal Agencies mandated with the protection and conservation of Federal trust resources, including threatened and endangered (T&E) species and designated critical habitat as listed under the Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.*) (ESA). Development of lands in South Carolina have the potential to impact federally protected species. Accordingly, obligations under the ESA, National Environmental Policy Act (NEPA), Clean Water Act (CWA), Federal Power Act (FPA), and other laws, require project proponents to perform an environmental impact review prior to performing work on the site. These projects may include a wide variety of activities including, but not limited to, residential or commercial developments, energy production, power transmission, transportation, infrastructure repair, maintenance, or reconstruction of existing facilities on previously developed land.

Project applicants, or their designated representatives, may perform initial species assessments in advance of specific development proposals to determine the presence of T&E species and designated critical habitat that are protected under the ESA. These reviews are purposely speculative and do not include specific project or site development plans. Many of these speculative proposals are for previously developed or disturbed lands such as pasture lands, agricultural fields, or abandoned industrial facilities. Due to historical uses and existing conditions, these sites often do not contain suitable habitat to support T&E species. Therefore, an assessment may conclude that any future development of the site would have no effect to T&E species or adversely modify designated critical habitat. If the applicant, or their designee, determines there is no effect or impact to federally protected species or designated critical habitat, no further action is required under the ESA.

Clearance to Proceed

For all sites with potential projects that have no effect or impact upon federally protected species or designated critical habitat, no further coordination with the Service is necessary at this time. This letter may be downloaded and serve as the Service's concurrence or agreement to the conclusions of the species assessment. Due to obligations under the ESA potential impacts 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.

Please note this Clearance Letter applies only to assessments in South Carolina but may not be used to satisfy section 7 requirements for projects that have already been completed or currently under construction.

If suitable habitat for T&E species or designated critical habitat occurs on, or nearby, the project site, a determination of no effect/impact may not be appropriate. In these cases, direct consultation requests with the Service should be initiated. Additional coordination with the Service may also be required if the potential project requires an evaluation under another resource law such as, but not limited to, NEPA, CWA, FPA, and the Coastal Zone Management Act.

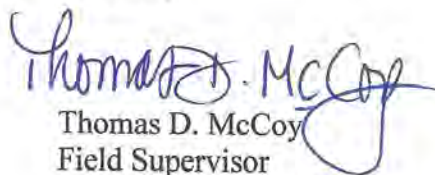
Northern Long-eared Bat Consideration

The Service issued a nationwide programmatic biological opinion (PBO) for the northern long-eared bat (*Myotis septentrionalis*, NLEB) on January 5, 2016. The PBO was issued pursuant to section 7(a)(2) of the ESA to address impacts that Federal actions may have on this species. In addition, the Service published a final 4(d) rule on January 14, 2016, which details special consultation provisions for Federal actions that may affect the NLEB. Briefly, the PBO and the 4(d) rule allow for "incidental" take of the NLEB throughout its range under certain conditions. Take is defined in section 3 of the ESA as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct. Further, incidental take is defined as take that results from, but is not the purpose of, carrying out an otherwise lawful activity. Under the PBO and 4(d) rule, all incidental take of the NLEB is exempted from the ESA's take prohibitions under certain conditions. However, incidental take is prohibited within one quarter mile from known hibernacula and winter roost, or within 150 feet from a known maternity roost tree during the months of June and July.

In consideration of known hibernacula, winter roosts, and maternity roost tree locations in South Carolina, this letter hereby offers blanket concurrence for a may affect, but is not likely to adversely affect determination for the NLEB if the proposed work occurs more than one quarter mile from known hibernacula, winter roosts, or is further than 150 feet from a known maternity roost trees. If an activity falls within one-quarter mile of hibernacula or winter roost or within 150 feet of a maternity roost tree additional consultation with the Service will be required. As a conservation measure for all projects it is recommended that all tree clearing activities be conducted during the NLEB inactive season of November 15th to March 31st of any given year.

The Service appreciates your cooperation in the protection of federally listed species and their habitats in South Carolina.

Sincerely,


Thomas D. McCoy
Field Supervisor

Cultural Survey

For Asbury Park Recreation Venue

Cultural Survey

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Based on information received from the Shoreline Management Office of the Lake Hartwell Dam Project, USACE has a recent Cultural Survey on file. Anderson County is requesting that the on file document be accepted for use in our lease request of Asbury Park Camp Ground.