
RE: Project 205 New Construction Work Plan Submittal

From Sylvest, John <JSylvest@scdah.sc.gov>

Date Wed 2/18/2026 5:16 PM

To Schwebler, Justin <justin.schwebler@terracon.com>; RLarsen <RLarsen@scdah.sc.gov>; ejohnson@scdah.sc.gov <ejohnson@scdah.sc.gov>

Cc Worrell, Laura Lee <worrelll@cofc.edu>; Russ, Terri A <Terri.Russ@terracon.com>; Dorn, Mills <Mills.Dorn@terracon.com>; Sara W. Barbagallo <sara.barbagallo@des.sc.gov>; Benjamin F. Thepaut <Benjamin.Thepaut@des.sc.gov>

 1 attachment (174 KB)

Charleston Co. Strangers and Negroes Burying Ground Charleston 1-30-26.pdf;

Justin, Sara,

Thank you for your below January 9, 2026 email regarding the submittal of four work plans (*Professional Examination Plan, Archaeological Work Plan, Cemetery Work Plan, and Cemetery and Commemoration Work Plan*) associated with our review of “Project 205 New Construction” (SCDES-BCM Reference No. HQE-MAZM-OBJ2E and SHPO Project Number 25-JS0212). The four work plans were provided in response to our September 5, 2025 and November 7, 2025 comments to SCDES-BCM on the referenced Project.

The State Historic Preservation Office (SHPO) is providing additional comments to Terracon Consultants, Inc. and the College of Charleston through the South Carolina Department of Environmental Services, Bureau of Coastal Management (SCDES-BCM) in accordance with the South Carolina Coastal Zone Management Act of 1976, as amended (South Carolina Code Title 48, Chapter 39), the “Policies and Procedures of the South Carolina Coastal Zone Management Program” and the 1996 Memorandum of Agreement between our Offices concerning implementation of the South Carolina Coastal Management Program.

Please visit our website at <https://scdah.sc.gov/historic-preservation/programs/review-compliance/sc-des-bcm-review-process> for more information regarding our review role pursuant to the Coastal Management Program. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes including those with state recognition, local governments, or the public.

Our office is providing comments on the numbered documents below that have been received by our office since providing our comments of November 7, 2025. We appreciate your patience as we have reviewed these documents.

Our comments on these documents do not denote acceptance or approval of the removal of human remains or of a potential mass burial ground. It is the responsibility of the Owner/Applicant, the College of Charleston, to comply with all applicable

cemetery laws and regulations as well as implementation of ethical approaches to the treatment of human remains. Our office recommends consulting the Advisory Council on Historic Preservation's Policy Statement on Burial Sites, Human Remains, and Funerary Objects, see <https://www.achp.gov/digital-library-section-106-landing/achp-policy-statement-burial-sites-human-remains-and-funerary>.

- 1) SCDES-BCM public meeting and hearing of November 18, 2025 and the College's response to the public comments
- 2) Community Engagement Council (CEC) meeting minutes received to date: November 12, 2025, December 4, 2025, and January 8, 2026
- 3) *Archaeological Monitoring Report, College of Charleston, Coming Street Commons, Charleston, South Carolina* (dated and received January 6, 2025)
- 4) *Historic Research and Geophysical Assessment, 106 Coming Street and 99 St Philip Street, Charleston, South Carolina* (S&ME, Inc., dated November 12, 2024), received November 25, 2025
- 5) *Professional Examination Plan of 106 Coming Street, Project 205 New Construction, Charleston, Charleston County, South Carolina* (Terracon, dated January 8, 2026)
- 6) *Archaeological Work Plan, 106 Coming Street, Project 205 New Construction, Charleston, Charleston County, South Carolina* (Terracon, dated January 2026)
- 7) *Cemetery Work Plan, 106 Coming Street, Project 205 New Construction, Charleston, Charleston County, South Carolina* (Terracon, dated January 2026)
- 8) *Cemetery and Commemoration Work Plan of 106 Coming Street, Project 205 New Construction, Charleston, Charleston County, South Carolina* (Terracon, dated January 2026)
- 9) SHPO Preliminary Information Form (PIF) for the Strangers and Negroes Burying Ground/Potter's Field, received from the Preservation Society of Charleston on December 16, 2025

1) SCDES-BCM public meeting and hearing of November 18, 2025 and the College's response to the public comments, and 2) Community Engagement Council (CEC) meeting minutes received to date: November 12, 2025, December 4, 2025, and January 8, 2026

Our office appreciates the SCDES-BCM holding a public meeting and hearing regarding their review of "Project 205" and for their acceptance of public comments on the Project for an extended time period. Our office was in attendance at the public meeting and hearing, and all public comments have been shared with and read by our office. We also appreciate the College's response to the public comments and the College's efforts to incorporate the public's comments and our prior comments into the repackaged work plans that we received on January 9, 2026. The College has also shared with our office and SCDES-BCM the meeting minutes of CEC meetings conducted to date, which we believe aids in transparency and continued understanding of stakeholder concerns.

There still appears to be some misunderstanding of our office's review authority in the documentation included under items 1) and 2) though. Our office has an official review role over the proposed Project due to the applicant's/College's need for a SCDES stormwater permit and Coastal Zone Consistency Certification, which triggers consultation with our office under state law and the Coastal Zone Management Program. The SHPO advises SCDES-BCM on the National Register eligibility status of historic and archaeological sites and the presence of Geographic Areas of Potential Concern (GAPC) or Significant Sites within a project area. The SHPO also advises SCDES-BCM on potential impacts that the project may have on the historical or cultural values of the GAPC or Significant Site and treatment options necessary as a result of proposed development impacts, as appropriate. The SHPO's role in project review is advisory and consultative, rather than regulatory. The SHPO is not a permitting agency, nor do we have authority under federal or state law to "say no" or deny a project moving forward. The SHPO may provide guidance comments and/or recommended permitting conditions regarding the presence or treatment of the GAPC or Significant Site, which SCDES-BCM considers in making and including in its permitting and certification decisions.

The recommended conditioned review and approval of applicable work plans or work plan stages by the SHPO does not denote SHPO approval of the removal of a cemetery or burial ground. The SHPO has no specified role or authority under state cemetery laws. Our review only denotes that we have been afforded the opportunity to review, comment, and concur on the proposed work plan methodologies, in accordance with applicable state, federal, and cultural resource management standards and guidelines.

State cemetery law (SC Code of Laws 27-43-10 through 27-43-40) stipulates the removal authority and conditions for the removal of a cemetery or burying ground.

If this project did not need a SCDES permitting or Coastal Zone Consistency Certification then the SHPO would have no official review role over the project and the College could have elected to move forward with the project on their own initiative (provided that no federal funding, licensing, or permitting was involved that would trigger SHPO review under Section 106 of the National Historic Preservation Act).

There also appears to be reasonable and pertinent questions in the documentation included under items 1) and 2) regarding the order of procedural steps for implementation of Project 205's work plans, who is involved in decision making, and whose comments have bearing on the overall project, pursuant to the review under federal, state, and local laws. The SHPO notes that procedurally when it comes to the proposed removal of a mass burial ground we are not aware of an existing flow chart or decision tree. We recommend that the College continue to seek to include within or appended to the applicable work plans, and on the College's Project 205/Coming Street Commons website, a summary document of the needed and anticipated procedural review steps, including roles and responsibilities, engagement protocols, and anticipated timeframes, in order to assist in providing clarity to all project stakeholders and the public. We also recommend continuing to seek ways to concurrently provide Project-related updates and documentation to all review agencies and Project stakeholders to streamline the desired open and transparent engagement and sharing of information.

The College's response under 2) also included the notion of a "harm avoidance" review and a summary of requested alternatives analysis, i.e. alternative locations for the provision of student housing that the College considered over the last six years or decade. A "Harm Avoidance Assessment" is now appended to the work plans we received on January 9, 2026. We appreciate the requested alternatives analysis identifying other properties that the College has looked at over the past several years to provide student housing. The analysis does raise the question of at what point the Project may become financially infeasible. Has the College accounted for the financial costs of a potential multi-year or multi-decade cemetery removal project, as well as potential

commemoration project costs? Could these financial costs and costs to the community potentially outweigh the benefits of the housing project? We are concerned that the proposed work plans may not encompass the potential professional archaeological staffing levels, length of time, and costs that it could take to properly steward such a resource and project to completion.

SHPO also questions the term “harm avoidance” when the cultural resources in question, the Coming Street YWCA building and the Potter’s Field/Second Official Municipal Cemetery are proposed for removal. In our opinion, “harm avoidance” does not mean mitigation, which is what has been proposed to date through the documentation, interpretation and commemoration of the historic significance of these two resources. To avoid harming the Coming Street YWCA building and the Potter’s Field/Second Official Municipal Cemetery these resources would be preserved, and the proposed new construction would take place elsewhere.

3) *Archaeological Monitoring Report, College of Charleston, Coming Street Commons, Charleston, South Carolina (dated and received January 6, 2025), and 4) *Historic Research and Geophysical Assessment, 106 Coming Street and 99 St Philip Street, Charleston, South Carolina (S&ME, Inc., dated November 12, 2024)**

Our office emailed Terracon and the College of Charleston on November 24, 2025 asking that they:

“Please clarify and confirm comments we heard at the Public Meeting/Hearing for Project 205 regarding the geotechnical installations in your attached Archaeological Monitoring Plan that appeared to state these installations being completed already, versus our attached comments on that Monitoring Plan for the geotechnical installations that stated, “Please inform our office of when the archaeological monitoring will begin and when the monitor is in the field. Due to the nature of the undertaking, please provide our office weekly updates on the status of the archaeological monitoring.” We were also to receive archaeological analysis and reporting per the Monitoring Plan.

We also heard at the Public Meeting/Hearing that some level of GPR investigation has already occurred on the project site. Can you confirm please.”

Our office notes that, one, the Archeological Monitoring Plan proposed two piezometer monitoring well geotechnical installations; the Archaeological Monitoring Report cites six total locations of ground disturbance that Terracon provided monitoring for; and two, Terracon did not notify us regarding the four additional disturbances conducted during the August and October monitoring episodes cited in their November 25, 2025 response and in the Archaeological Monitoring Report, nor did we receive the weekly updates that we requested in our July 3, 2025 comments. SHPO received multiple consultations from individuals in Charleston stating human remains were being dug up during these monitoring episodes, with additional photographic documentation of work being performed on site. We ask for this notification so that we are aware of the work which is occurring and can adequately provide professional analysis to any inquiries/concerns. SHPO respectfully asks Terracon provide more active communication to our office concerning this project in the future.

The Archaeological Monitoring Report states the monitoring work revealed no cultural features or subsurface artifacts. SHPO accepts the Archaeological Monitoring Report as final. The monitoring report should be submitted as an appendix of the final report upon conclusion of the Project. Please state this within the Reporting Section (pgs. 8-9) of the Archaeological Work Plan.

Additionally, SHPO notes the soil stratigraphical profiles and assessment were recommended to provide anticipatory soil profiles for future excavations, at a minimum, this information should be cited within the Cemetery Work Plan to provide demonstrable

evidence of expected soil profiles in areas surrounding the southwest portion of the tract (surrounding soil probe B-13), central portion of the tract (surrounding soil probe B-14) and the northeast portion of the project tract (surrounding soil probe B-15).

The College provided a copy of S&ME's Historic Research and Geophysical Assessment to us on November 25, 2025. The report, prepared for Burr & Foreman LLP, provides historic research and documentation of the project tract, including a recommendation that the Coming Street YWCA (cited as SHPO Site Number 8360) is eligible for listing in the National Register of Historic Places. Our office did assign SHPO Site Number 8360 for this report, but we never received a copy of the report or any SHPO Survey Form. If we assign a site number then we should receive the resulting survey documentation.

A limited geophysical (GPR) assessment was also conducted. Our office questions the veracity of any subsurface features identified by the contracted GPR survey in 2024. As the aforementioned report lacks demonstrable evidence of amplitude depth slices indicating the anomalies and their subsequent depth, there is no current independently verifiable data demonstrating anomalies were accurately interpreted. While Terracon should factor the potential for these subsurface features to be present, S&ME's GPR survey should have no bearing upon any GPR or EMI work proposed to be conducted within this workplan. Furthermore, as vehicles were present in the parking lot during the time of the GPR survey, it is unclear if the presence of these vehicles corrupted any anomaly readings noted in the report.

Overall SHPO comments on 5) through 8) Work Plans:

--We note that the four work plans we received on January 9 are available online on the SCDES-BCM Project webpage at <https://des.sc.gov/community/community-engagement/environmental-sites-projects/college-charleston-project-205>. The Project webpage notes that the comment period closed Nov. 28, 2025. Are comments being accepted by SCDES-BCM or the College of Charleston on the four work plans or future iterations of the work plans? Please clarify.

--None of the work plans appear to incorporate our prior below quoted recommendation or reflect the possibility that the City of Charleston, as the local governing body, may not consent to the removal of the Potter's Field/Second Official Municipal Cemetery pursuant to SC Code 27-43-10 through 27-43-40, or that the College may ultimately decide to not develop the 205 Coming Street site.

"We further recommend that an alternative should be provided for in the work plan staging by the Owner/Applicant to reconsider the entire project based on the results of Stage 1 and Stage 2 work, at minimum. Namely, not proceeding with any further removal, excavation, or investigation, or the proposed removal, excavation, or investigation, allowing for the development of alternative plans for the site, in consultation with our office and all stakeholders. Alternative plans should include consideration of avoidance and preservation of the burial ground, carefully capping and greenspacing the site for use as a commemorative community space."

--We recommend reviewing the appendices across each work plan and ensuring that they are titled and referenced the same across all work plans. The appendices also need to be maintained or updated as the project evolves, as well as ensuring any language pertaining to a work plan item is reflected in the work plans. For example, the Archaeological Work Plan references an appended Commitment Letter but it's not there, it's also referenced and appended in the Commemoration Plan though. This is a letter addressed to us dated 12/17/25 that was not previously received by our office. The letter references monthly and weekly reporting promises to us, but are these reflected consistently in the work plans? Separately in the Commemoration Plan on pg. 3 it is stated the letter outlines the CEC's role?

--Each work plan needs to be consistent with and cross reference the other work plans in terms of language, methodologies, processes, engagement, and deliverables.

5) Professional Examination Plan of 106 Coming Street, Project 205 New Construction, Charleston, Charleston County, South Carolina (Terracon, dated January 8, 2026)

--This plan appears to be the most complete of the four work plans. As the new Commemoration Work Plan cites the role and engagement of the Community Engagement Council in memorializing the Coming Street YWCA building, we recommend revising the Plan to include the Council as a coordinating party on the bottom of page 1.

--The revised plan incorporates and acknowledges the future incorporation of our comments provided on the plan on November 7, 2025. We recommend including our comments to date on the overall project as an appendix to the Plan, as reference.

--p. 5, Conclusion, we do not anticipate providing a "signed approval" of the Professional Examination Plan that starts the clock on work on measured drawings. Please remove. The College may elect to execute measured drawings, or begin work on other tasks outlined in the Plan, whenever it chooses.

--Provided there are no other coordinating party comments on the Plan, then SHPO will accept the plan as revised and resubmitted based on these and the comments provided above and to date, as final. Additional consultation with the SHPO will be needed if the Plan changes based on coordination with other parties or if the proposed building demolition does not move forward.

6) Archaeological Work Plan, 106 Coming Street, Project 205 New Construction, Charleston, Charleston County, South Carolina (Terracon, dated January 2026)

--Our office is only providing comments on the technical merits of the revised draft work plan document. While improved, this plan continues to have the same issues as the prior two drafts in terms of inconsistent references and incompleteness of work, some of which has been caused by efforts to address our comments and public comments received to date.

--Stages of Work: Our office concurs with the new Stage 1 GPR survey of the site prior to asphalt removal or other significant ground disturbance. If an independent third party, which is not Terracon, conducts this initial GPR survey, our office will still require a methodological work plan be submitted for review, as well as a subsequent report, including amplitude depth slices, to be submitted to our office, SCDES-BCM, and project stakeholders.

We believe the prior Stages for archaeological monitoring and for GPR survey following building demolition and asphalt removal should remain as separate stages, to be Stages 2 and 3, respectively. Stoppages of work to include reporting on the results of the monitoring and the GPR survey and consultation with our office, SCDES-BCM, and project stakeholders should occur after each stage in the work plan.

We also believe the Work Plans should include and account for an Exploratory Stage, Stage 4, that will likely be needed or recommended by our office to investigate the results of the monitoring efforts and/or GPR survey results and review, accounting for potential test unit excavations, soil coring, auguring, probing, soil penetrometer testing, or trench excavation in certain areas, to better define the presence of burials or features, before beginning the currently proposed Stage 3. This Stage 4 should be directly consulted with our office prior to the initiation of any fieldwork associated with this stage. Upon completion of the

aforementioned Stage 4, our office recommends a complete stoppage of work and a meeting between the College, SHPO, SCDES-BCM, and Terracon to discuss all subsequent findings from the preceding stages of work and what methodological changes will be required for the Archaeological Work Plan and Cemetery Work Plan and excavation of the entire archaeological site and Potter's Field/Second Official Municipal Cemetery.

--Our office concurs with submittal of a research design. The research design submittal needs to be cited in the work plan stages. We recommend including it within the reporting for and after what we suggest being Stage 3 (post the second GPR survey).

--The Procedures for the Discovery of Human Remains, in particular the proposed removal of collection of human remains, is not consistent with the Protocol for Unanticipated Discoveries or with the Stage 2 Archaeological Monitoring protocols, which both call for cultural features / artifacts / archaeological deposits to not be collected or excavated (at least until the currently proposed Stage 4). If anything, the procedures and protocols should be in reverse, with human remains being the materials not being collected.

Work plans need to better define "cultural features", "archaeological materials", and "human remains", or "artifacts" for the reference of all parties.

Our office recommends treating the project site as a burial ground / cemetery until the excavation stage (Stage 6, per SHPO's recommendations, cited below in Conditions), by not collecting, removing, or excavating any human skeletal remains, disarticulated human remains, and any associated grave goods until the City of Charleston, as the local governing body under SC Code 27-43-10 through 27-43-40, approves the removal of the cemetery or burial ground, and until SHPO has had the opportunity to review and approve the forthcoming research design and final Archaeological Work Plan and Cemetery Work Plan.

--Pgs.1-2, Correct. If the archaeological site is determined eligible for the NRHP under Criterion D and/or subsequently listed in the NRHP, non-burial features could contribute to the site's eligibility, either as an individual historic property or as a contributing resource to the Charleston Historic District. Non-burial features would also then contribute to the site's overall values as a Significant Site or Geographic Area of Particular Concern (GAPC) under the Coastal Zone Consistency Act.

--Pg. 2, Documenting Archaeological Features, it appears this section is more fully repeated under Stage 4's language.

--Pg. 4, middle, If damage occurs to the archaeological site or cemetery during the proposed archaeological investigation, appropriate local law enforcement, SCDES-BCM, and SHPO should be contacted immediately, not just having Terracon archaeologists be informed so they can appropriately document the damage in accordance with SHPO [Guidance for Assessing Damage to Archaeological Sites](#) (which calls for an abbreviated letter report for SHPO and SCIAA, not just including the site damage in the final report).

--Pg. 6, At a minimum, standard osteometric data should still be gathered during excavations of any human remains which may be present and prior to curation; additionally, this information should be presented within the final report within an osteometric data chart. This should be conducted within Stage 4, Archaeological Analysis; while stated in the Cemetery Plan, this should likewise be stated in the Archaeological Work Plan, so both documents are methodologically consistent.

--Pg. 6, In addition to gathering standardized osteometric data, should any disarticulated human remains be noted, i.e. not clearly present in a singular burial context, at a minimum, an initial Minimum Number of Individuals (MNI) analysis, should be calculated.

This should be conducted within Stage 4, Archaeological Analysis; while stated in the Cemetery Work Plan, this should likewise be stated in the Archaeological Work Plan, so both documents are methodologically consistent.

--Pg. 6, Should any non-burial subsurface features be present, which may contain preserved organic material, representative samples of these should still be gathered in-field, which allow for radio-carbon dating, ethnobotanical analysis. Furthermore, should any subsurface features contain preserved wood, of any sort, again, a representative sample should be taken which could allow for dendrochronological dating in the future.

--Pg. 10, Prior to establishing site datums, the entirety of the site should be recorded as a singular archaeological site with the South Carolina Institute for Archaeology and Anthropology (SCIAA); the subsequent archaeological form and site number should be shared with SHPO.

--p. 10, Stage 1, please spell out and define acronyms such as "RTK GNSS".

--p. 11, top, delete "ground" prior to "significant".

--Pg. 11, fourth paragraph, and pg. 18, second and final paragraph, SHPO concurs with receiving the amplitude depth slices for the GPR survey stages, however, based upon the results of the GPR surveys, the monitoring plan methodologies and subsequent stage methodologies could or should change to focus on potential features identified. As such, for reporting SHPO would request receiving a technical memo similar to a management summary. Please remove the adjective "brief". The memo should be as long or as short as it needs to be to adequately discuss the results of both episodes of geophysical survey and monitoring, and how the Archaeological Work Plan and Cemetery Work Plan will be altered to reflect the findings.

--Pg. 11, fourth paragraph, and pg. 18, bottom paragraph, recommend revise second sentence to: "Terracon will not proceed with exhumation or removal of burials, human remains, or grave goods until one, the SHPO is given the opportunity to review geophysical data and potential anomalies/potential burials resulting from the proposed Stage 1 and 2 geophysical surveys, two, until a research design and Cemetery Work Plan is reviewed and approved by SHPO incorporating the data from the aforementioned geophysical work, monitoring, and exploratory work to alter proposed excavation methodologies in the Cemetery Work Plan, as necessary, and three, until the City of Charleston approves the removal of the cemetery or burial ground and provides the College, SHPO, and SCDES-BCM a copy of the approval documentation. This statement should also apply to the second sentence under Stage 3 on pg. 19, and in the Cemetery Work Plan on pg. 4.

--Pg. 16, Terracon is proposing to conduct a multi-channel GPR survey, containing variable megahertz between 200-2,500. Our office sought peer review of the proposed-to-date GPR survey methodologies by Dr. Jon Leader, former South Carolina State Archaeologist, who has extensive experience conducting GPR surveys in cemetery contexts. Dr. Leader offered the following observations and recommendations:

- Multi-channel GPR systems are useful for large area analysis at a reduced sensitivity rate. They are great for foundations and utilities, not for forensic level recovery of bodies.
- Multi-channel GPR systems are also more susceptible to surface interference than single-channel systems. The area in question is likely to be heavily contaminated.

- Multi-channel GPR systems are susceptible to high signal interference. Multi-channel systems use several antennas operating at the same time, which can result in overlapping signals, crosstalk, and interference between channels. This can muddy the data, leading to reduced clarity and more difficulty in accurately interpreting the subsurface conditions. As noted, we are dealing with a cemetery with an expectation of high impact and disarticulation or disruption.
- Multi-channel GPR system's overall signal strength is often diluted as each antenna collects data independently. If one antenna encounters significant interference, it can affect the entire dataset. The larger surface area covered by the multiple antennas increases the chances of interference from heterogeneous surfaces. This makes the data harder to interpret accurately. We aren't tracking utilities but bodies.
- GPRs are broadband units. The central frequency is the one that is named (e.g., 450 MHz, 500 MHz etc.). This is as much a forensic undertaking as it is an archaeological one. The appropriate unit is a 450 or 500 MHz unit with very close spacing of lanes (10cm-no more than 20cm). This takes more time but ensures the best results.

Ultimately, our office believes that a meeting may be needed to discuss and finalize the GPR survey methodologies.

--Pg. 17, Archaeological Monitoring, Terracon will notify our agency of when any archaeological monitors are present in the field and projected overall time they will be monitoring.

--Pg. 17, Should any archaeological features or deposits be noted during the aforementioned monitoring, Terracon will consult our office prior to the removal of any features noted.

--p. 18, second paragraph, revise to "encountered during Stage 2".

--Pg. 19, Site Security, "decedents", spelling.

-- Pg.22, Stage 4, During composition of the draft report, the archaeological site form should be updated within the requisite archaeological findings.

-- Pg.22, Stage 4, Terracon will notify our agency when the proposed archaeological monitor is present during all subsurface construction related construction activities.

7) Cemetery Work Plan, 106 Coming Street, Project 205 New Construction, Charleston, Charleston County, South Carolina (Terracon, dated January 2026)

--The intent of our comment regarding this potential separate plan was for it to focus on the protection and holistic treatment of human remains, including requirements of how state burial laws have been and will be complied with, in terms of required approvals, notification, and removal and/or reburial plans, as well as parties legally required to be consulted in addition to descendant community parties that will be consulted and involved in decision making. As such, the Legislative Framework regarding cemeteries in the second draft plan should be retained in the Cemetery Work Plan, citing these laws in full and detailing the procedural steps for compliance with these laws against the proposed work plan stages.

Related, again, has the governing body with jurisdiction over the burying ground provided an opinion regarding the removal of graves or relocation of the burying ground, especially for a public municipal cemetery that they were responsible for establishing? Namely, we understand that the local governing body is aware of the Project, but have they provided a list of requirements to the

College for how the College is to petition for the removal of the Potter's Field/Second Official Municipal Cemetery that could be included in the Cemetery Work Plan?

Lastly, while the creation of the Community Engagement Council is cited in the planning documents and is a needed and positive step, the plan appears to need further development regarding how engagement with, or notice of removal of a burial ground to, descendent communities will occur and take into account their objections or comments.

--Please ensure that the archaeological work components are cross referenced and spelled out in both the Archaeological and the Cemetery Work Plans and that our comments to date on both plans are reconciled in each plan. For example, include the proposed Stages of Work in both plans (as a reference list in the Cemetery Plan at minimum), ensure that the reporting on burial features and non-burial features are spelled out clearly, and include NAGPRA and tribal consultation protocols. If the reconciling of our comments is proving to be an issue then we are open to a single plan incorporating all work plan components, stages of work, and our comments to date.

--Pg. 3-4, In addition to the redaction of any locational data concerning human remains until completion of the project, our office recommends, to ensure the proper protection of all human remains, prior to completion of the undertaking, that there is no photography or videography of human remains for public distribution.

--Pg. 4, Site Security, Our office recommends setting up an area outside of the secure site fencing and not in view of existing excavations, to allow for press inquiries or public comments to be answered, without compromising site security.

--Pg. 6, General Grave Excavation and Documentation, Our office recommends quantifying how many individuals will be excavating at each 5-by-5 meter excavation block, i.e. roughly how many field staff will Terracon have on site on-average per day? Factoring the potential high density of human remains, which may be located at the site, will a singular bioarchaeologist and osteoarchaeologist be sufficient for an excavation of this potential scale?

--Pg. 6, General Grave Excavation and Documentation, Our office concurs with the generalized excavation methodologies of excavating 5-by-5 meter excavation blocks, vertically in 10cm natural strata levels, However, our office concurs the potential scope of these excavations will likely be unique in scope and could require multiple methodological changes as the undertaking unfolds due to the potential uncertainty of comingled / disarticulated remains. For future reference on potential methodological changes, our agency cites the *Pheasant Wood Fromelles: Report on Evaluation of WWI Mass Graves & Digging Hallowed Ground: As demonstrated within the archaeological excavations at Fromelles*, conducted by the University of Glasgow in 2008 & Tony Pollard, demonstrating successful methodological utilizations of trenching units to identify and excavate mass burials containing high quantities of comingled / disarticulated human remains. Depending on the results of the initial first two or three 5-by-5 meter grid blocks and if any standardizing findings can be calculated, trenching 5-by-1 meter units could be useful.

8) Cemetery and Commemoration Work Plan of 106 Coming Street, Project 205 New Construction, Charleston, Charleston County, South Carolina (Terracon, dated January 2026)

--Documentation previously provided to our office, SCDES-BCM, and the public noted the College's intent to memorialize and commemorate the Potter's Field/Second Official Municipal Cemetery, as well as the Coming Street YWCA building at 106 Coming Street. As such, our office recommended a separate commemoration planning document be developed for the Potter's

Field/Second Official Municipal Cemetery, reflecting engagement with the community and with all interested parties and stakeholders, including our office.

Our office believes and anticipates the commemoration plan to be a living, breathing document that will be subject to revision and review as commemoration and memorialization plans are developed in engagement with the community, descendent communities, the Community Engagement Council, our office, and the stakeholders that the College has identified to date. Additionally, as the commemoration plan for 106 Coming Street includes the Coming Street YWCA building, we recommend appending the *Professional Examination Plan of 106 Coming Street* to the document.

--the January 8, 2026 cover letter is misleading regarding the review to date of the Potter's Field/Second Official Municipal Cemetery as a Significant Site and that an irretrievable loss of the Potter's Field is a foregone conclusion. As such, we recommend removing it and not including a similar cover letter for future iterations of the Plan document.

--pg. 3-4, other projects to be listed could include the Cemetery for Contrabands and Freedmen in Alexandria, VA; the Asylum Hill Project in Jackson, MS; and the Miami Circle and Brickell Avenue Site's in Miami, FL.

--p. 7, Conclusion, the last sentence does not read clearly; also, we do not anticipate providing a "signed approval" of the Commemoration Work Plan.

9) SHPO Preliminary Information Form (PIF) for the Strangers and Negroes Burying Ground / Potter's Field, received from the Preservation Society of Charleston on December 16, 2025

--We have attached our January 29, 2026 letter regarding the National Register eligibility of the Strangers and Negroes Burying Ground / Potter's Field PIF for your information.

SHPO recommended conditions:

Our office recommends as a condition that a *Professional Examination Plan* be developed and implemented in consultation with our office, the YWCA of Greater Charleston Chapter, the City of Charleston, and the College's Community Engagement Council (CEC) until approval and completion of said Plan's tasked components is documented in writing by the SHPO. We also recommend providing emailed updates regarding the tasked components outlined under the Professional Examination Plan every six (6) months until completion is documented in writing by the SHPO.

Our office recommends as a condition that a revised *Archaeological Work Plan* and *Cemetery Work Plan* incorporating our comments be provided to SHPO and DES-BCM prior to any ground disturbing activities and beginning any work.

Recommended conditions should include and account for:

Stoppages of work after each Archaeological Work Plan and Cemetery Work Plan work stages cited below to include reporting on the results and consultation with our office, SCDES-BCM, and project stakeholders.

Stage 1 – Conduct GPR survey prior to any ground disturbance

Stage 2 – Archaeological monitoring of the YWCA building demolition and removal of hardscape

Stage 3 – Conduct GPR survey following the demolition of the YWCA building and removal of hardscape

Stage 4 – Exploratory stage

Stage 5 – Establish excavation grid, site security, and site infrastructure

Stage 6 – Site excavation

Not collecting, removing, or excavating any human skeletal remains, disarticulated human remains, and any associated grave goods until the City of Charleston, as the local governing body under SC Code 27-43-10 through 27-43-40, approves the removal of the cemetery or burial ground, and until SHPO has had the opportunity to review and approve the research design and final Archaeological Work Plan and Cemetery Work Plan.

Providing a copy of the City of Charleston's approval documentation, as the local governing body under SC Code 27-43-10 through 27-43-40, for the removal of the cemetery or burial ground.

Regarding any proposed new construction within the project area, which we understand may occur later under a separate CZC review, our office recommends as a condition that professional examination occur under the Program Document stipulations. For projects located within a Certified Local Government (CLG) review authority, the CLG board of architectural review may be considered as professionals, as long as at least one board member meets the Professional Qualification Standards for the specific subtype necessary.

The Owner/Applicant will provide a copy of the review and approval of the proposed new construction by the Charleston Board of Architectural Review (BAR) to the SHPO, along with a copy of the approved elevations and site plans. Our office will retain review authority and oversight over all potential archaeological impacts or considerations, in keeping with all archaeological work plans and construction plans provided to this office for review.

We do request, however, that our Office be notified immediately if archaeological materials or human skeletal remains are encountered prior to or during construction on the project site. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include, but are not limited to, stone projectile points (arrowheads), ceramic sherds, brick scatters, worked wood, bone and stone, along with metal and glass objects.

Thank you for the opportunity to comment on this project. Please refer to SHPO Project Number 25-JS0212 in any future correspondence regarding this project. If you have any questions, please contact me at (803) 896-6129 or jsylvest@scdah.sc.gov; for archaeological questions contact Robert Larsen at (803) 896-6181 or rlarsen@scdah.sc.gov. We are happy to meet and discuss further our comments and recommendations.

Regards,



John D. Sylvest
Supervisor of Survey and Review & Compliance
State Historic Preservation Office (SHPO)
SC Department of Archives & History
8301 Parklane Road
Columbia, SC 29223