

College of Charleston

Project 205 New Construction – Public Comment #2 Responses

SHPO Project Number 25-JS0212

SCDES-BCM Reference No. HQE-MAZM-OBJ2E

Please see below for the College of Charleston's responses addressing themes from public comment received December 2, 2025. The College has submitted repackaged project Work Plans on January 1st, 2026, that include: (1) Professional Examination Plan of 106 Coming Street (YWCA Building), (2) Archaeology Work Plan, (3) Cemetery Work Plan, and (4) Commemoration Work Plan. These revised and resubmitted plans incorporate public comments and SC-SHPO review comments dated November 7, 2025.

Harm Avoidance

The College has included a harm avoidance review throughout the newly formatted individual work plans requested. This includes additional information demonstrating the College's documentation of the YWCA structure and a thorough historic report along with proposed salvaged building materials as a method of and methods of harm avoidance. In summary, this now includes the following: a summary of feasibility studies into alternative locations for residence halls performed over the last decade; building and zoning requirements dictating ground disturbance impact; engagement events held to-date with the Community and the establishment of the Community Engagement Council (CEC) to aid in the path forward for commemoration.

Work Plan Development

The College, along with professional consultants at Terracon, have reviewed and implemented comments from SHPO as well as the public to further define framework guidelines, means and methods details, and regulation requirements of the Work Plans that have been divided into four distinct topics: (1) Professional Examination Plan of 106 Coming Street (YWCA Building), (2) Archaeology Work Plan, (3) Cemetery Work Plan, and (4) Commemoration Work Plan.

The Work Plans include check points within the plans frameworks to include submissions weekly or bi-annually as appropriate for defined tasks to SHPO. For example, once archaeology begins, weekly reports of findings are to be submitted for review and comment. Upon the

procurement and selection of a licensed Funeral Director(s), procedural methodology for storage, chain-of-custody, and other field professional guidelines will be submitted for review to SHPO. Additional updates include excerpts of regulatory requirements, policies, and precedent projects for ease of reference. Ground Penetrating Radar (GPR), Archaeology, and documentation protocol have been further defined awaiting review and comment from SHPO's staff and Archaeologists as the review Agency.

Auger testing was conducted for geotechnical and water table confirmations. An archaeology monitoring plan was submitted to and approved by SHPO for the work scope. A completed monitoring report for the work has been submitted for review and is awaiting comment. If any additional monitoring plans are required for the YWCA building or other tasks necessary to support archaeology prior to excavation, the College will submit them for review and approval to SHPO prior to work commencing. Report results will be submitted for review and comment to SHPO.

Community project updates and engagement with the Community Engagement Council (CEC) will continue to promote open dialogue throughout the life of the project. The City, pursuant to SC Code 27-43-10/20, is aware of the project and the future request necessary to begin archaeology. The Work Plans note all reviews and responses between regulatory agencies, and policies are to be shared for compliance and confirmation.

Community and Descendant Engagement

The College of Charleston established a Community Engagement Council (CEC) in fall 2025 to support the College's stewardship of the property and to help guide thoughtful, inclusive approaches to commemoration. The Council brings together representatives from the community, archaeologists, historians, and College stakeholders to ensure that multiple perspectives inform how the site is understood, interpreted and remembered. Through dialogue, collaboration and shared expertise, the Council will help the College honor the property's layered history, recommend appropriate forms of commemoration and foster transparency and trust as the College moves forward as a responsible steward of this important place.

CEC meeting minutes and recommendations will be shared with SHPO/DES throughout the life of the project. All community updates and information will continue to be shared through the College's project website at <https://coming-street-commons.charleston.edu/>.

NAGPRA

As there is no federal funding, federal permitting or licenses, or federal land involved, Section 106 does not apply. The College has utilized informational resources available at SC SHPO,



SCIAA, NPS, and NCHP concerning NAGPRA. The College is working currently to draft an introduction and informational background letter to the Federal and Local Tribes known to have interests in South Carolina and the Charleston area to create open lines of communication throughout the life cycle of the project whether NAGPRA is initiated or not. Additionally, Vice Chief of the Wassamasaw Tribe of Varnertown Indians, Joshua Shumak, is a member of the CEC.

Discovery and Access

The consultant teams will use the College of Charleston Libraries (which includes the Avery Research Center for African American History and Culture) as its primary repository for all findings and documentations related to the project. The CofC Libraires will also hold all future produced internal scholarship (both from Faculty and students); these research documents will be shared with SHPO for their records. No remain locations, including redaction of locations apparent on GPR results, will be provided publicly until the completion of the scoped work due to security and safety. Additionally, project updates, including published reports, will be provided on the College's project website at <https://coming-street-commons.charleston.edu/>

As an institution of higher education, the College will engage its faculty as subject matter experts and consult with them, as appropriate. Any opportunities for student learning will be assessed and submitted for review of compliance among the College, consultants and regulatory agencies.