

Archaeological Work Plan

106 Coming Street

Project 205 New Construction

Charleston, Charleston County, South Carolina

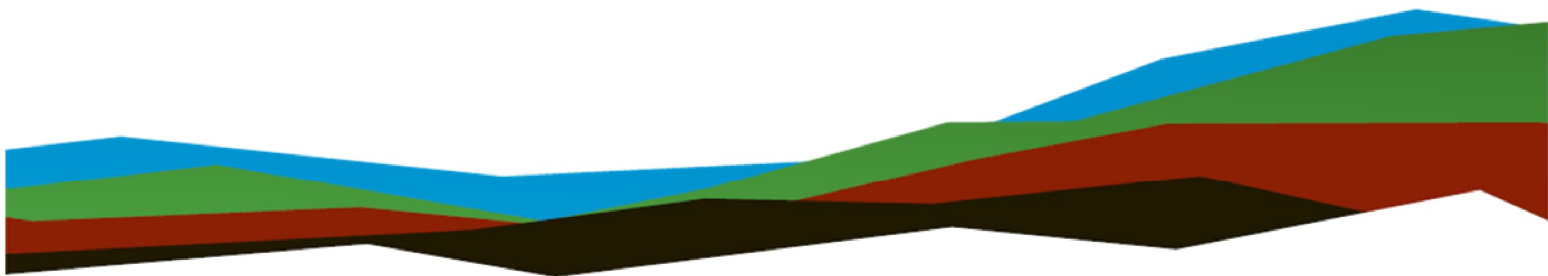
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SCDAH SHPO Project No. 25-JS0212

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Nationwide
Terracon.com

■ Facilities
■ Environmental
■ Geotechnical
■ Materials



Approximate Project Area Outlined in Red

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ARCHAEOLOGY WORK PLAN

The following Archaeology Work Plan prepared by Terracon will be submitted to the South Carolina Department of Archives and History (SCDAH) on behalf of the College of Charleston to satisfy requirements of the Coastal Zone Consistency (CZC) permit application. The Department of Environmental Services (DES) Bureau of Coastal Management (BCM) permit reference number for this project is HQE-MAZM-OBJ2E and SHPO Project Number 25-JS0212. The project requires a National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit and a CZC Certification. The Clean Water Act (CWA) created the NPDES program, and the U.S. Environmental Protection Agency (EPA) has delegated the authority of issuing NPDES permits to the states. As such, the states are empowered to administer their own permitting program, as long as it complies with the requirements of the NPDES permit. Thus, State-issued NPDES permits are not considered a federal Undertaking. In South Carolina, DES issues and manages NPDES permits. The BCM issues the CZC certificates as part of the permitting process for ground disturbance in the coastal zone areas of South Carolina.

The College is an institution of higher education of the State, authorized by the Higher Education Act to issue higher education facilities revenue bonds for the purpose of financing or refinancing in whole or in part the cost of acquisition, construction, reconstruction, renovation and improvement of land, buildings, and other improvements to real property constituting Higher Education Facilities under the General Bond Resolution and the Higher Education Act. No federal funding is anticipated as part of this project and the College's land holdings are state-controlled.

Terracon understands that the College of Charleston has reviewed alternatives to construction at 106 Coming Street and has drafted a Harm Avoidance Assessment and Alternatives Analysis (Appendix A). In the event that the current project development proceeds as planned, the following archaeological work plan provides overarching procedures for 1) Documenting Archaeological Features, 2) Procedures for the Discovery of Human Remains, 3) Protocol for Unanticipated Discoveries, and 4) Analyses, Significance Evaluation, Curation, and Reporting. A discussion of these overarching protocols is followed by an outline of the stages of archaeological work, as currently proposed. At the request of the South Carolina State Historic Preservation Office (SHPO) a separate document (Cemetery Work Plan) outlining the excavation plan for the relocation of the cemetery will be submitted for review and approval prior to any subsurface archaeological investigations.

This archaeology work plan outlines the methods and processes for the general archaeological investigation of the proposed project site. Terracon will submit a research design to the SHPO for review and approval prior to the initiation of subsurface archaeological excavations. This research design will include approved methodological approaches summarized in this work plan, present explicit research questions, and include a review of relevant gray literature and academic literature. This research design will help establish the context of the site, as well as define the criteria for National Register of Historic Places (NRHP) eligibility for the site within that context.

Although the site has not been previously documented within the proposed project area and the level of disturbance there is currently unknown, it is possible that intact portions of the cemetery, if they exist, could be considered eligible for the NRHP under Criterion D for exhibiting the potential to yield important information associated with the largely undocumented enslaved and disenfranchised population of Charleston at the turn of the nineteenth century. Furthermore, if intact structural remains are encountered in situ or cultural features associated with the historical occupations of the site are documented, it is possible they could be considered eligible for the NRHP under Criterion D for exhibiting the potential to yield important historical information regarding the growth and development of Charleston.

Documenting Archaeological Features

Following the closure of the cemetery, the area experienced the construction and demolition of multiple structures within the proposed project boundaries. As such, it is anticipated that historical architectural remains and features may be encountered during the investigations. These remains may be evident as foundations, piers, privy pits, and/or other non-structural features, such as middens or refuse pits. If cultural features or in situ architectural or structural remains that are not associated with historical dumping episodes are encountered during fieldwork, the remains will be assigned a feature number, exposed, and documented with standardized field notes, measurements, mapping, and photography. Following initial documentation, SHPO would be contacted and provided with a detailed description of the feature(s) and sufficient supporting written and photographic documentation to aid them in consulting with Terracon on the appropriate excavation or sampling strategies, as warranted. Procedures for the documentation and excavation of potential burial features are presented in the stand-alone Cemetery Work Plan document.

Terracon plans to begin excavations at the locations of documented former structures, areas exhibiting the presence of potential structural remains, and other obvious non-mortuary cultural features. Cultural features would be excavated by methods appropriate to their size and type and in consultation with SHPO, if warranted. In general, feature locations will be referenced to the general site plan and written descriptions of features will include dimensions, shape, soil matrix color and texture, depth below surface, stratigraphy, and recovered materials. Cultural features will initially be exposed in plan view, then drawn to scale, photographed, and recorded on standardized unit and block forms. Once documented in plan view, the feature will be bisected to record the profile in cross-section then drawn to scale, photographed, and recorded on standardized unit forms.

The depth and type of fill material used, as well as the stability of the fill, would dictate the extent/depth of the feature excavation. For example, smaller features such as post holes would be bisected, half of the fill removed, and one profile recorded. Pit features (refuse pits) may be similarly bisected and excavated, if warranted. Large or deep features (e.g., wells, privies) will be sampled or bisected, dependent upon the stability and depth of the fill. Once

the cross-section profile is completely exposed, it would then be drawn to scale, photographed, and recorded on standardized unit forms. Once the profile documentation is complete, the remaining feature fill will be screened for cultural material. Builder's trenches may be investigated with smaller test unit excavations or similar methods, as appropriate. For example, a 1-x-1-m test unit may be excavated along one side of intact structural remains to document the builder's trench and determine if there are diagnostic artifacts located within the historical backfill. Architectural features (e.g., piers, foundation remnants) may be fully exposed and documented with measured drawings and photographs.

If potential burial features or human remains are encountered within a non-burial feature or structural remains that appear to have intruded upon a burial, the documentation and excavation of the burial will be given preference over the documentation of the historic period features. Specific methodology for burial or grave excavations are presented in a standalone Cemetery Excavation Plan document (Cemetery Work Plan).

Procedures for the Discovery of Human Remains

While it is possible that intact human burials associated with the former cemetery may be encountered during the investigations, within a few years of the cemetery's closure, development began, and over the next two centuries, the site was impacted by the construction and demolition of multiple structures within the proposed project boundaries. As a result of these impacts, there is likely significant subsurface disturbance to the former cemetery. As such, there is a higher potential for encountering displaced or disarticulated human skeletal remains potentially at or just below the ground surface that may be disturbed or exposed during preliminary ground disturbing activities. Given the potential for human remains, archaeological monitors will be onsite during all proposed subsurface disturbances associated with the current project. This includes, but is not limited to, installation of silt fencing, utility removal, and installation of a groundwater/dewatering station.

In 2023, the Advisory Council on Historic Preservation (ACHP) developed a policy statement to establish a minimum set of rules and principles to be implemented to provide consideration and protection to burial sites, human remains, and funerary objects¹. The policy statement stresses the need for coordination and consultation with communities that will be affected by development projects, particularly historically marginalized groups such as the descendants of Africans and Indigenous people. Consultation should seek consensus with potential descendant communities regarding decision making (including what constitutes respectful treatment of human remains and burial sites), deferring to their preferences when feasible. Although the ACHP and SHPO prefer that burial sites be avoided and protected, if no suitable alternatives are selected/available, consultation with the descendant community is urged prior to ground disturbance, and extreme care and respect is expected when handling human remains and/or funerary objects. The protection and treatment of human remains is outlined

¹ ACHP. 2023. *Policy Statement on Burial Sites, Human Remains, and Funerary Objects*. <https://www.achp.gov/sites/default/files/policies/2023-07/PolicyStatementonBurialSitesHumanRemainsandFuneraryObjects30June2023.pdf>

in a standalone Cemetery Work Plan document; however, the following general procedures for encountering unanticipated human remains are outlined below.

If human remains (or likely human remains) are encountered by contractors prior to or during construction on the proposed project site, ground disturbing work will be stopped within 25 meters of the remains, and the Charleston County Coroner's Office will be contacted at the number provided below to confirm the remains are not modern. Although the Charleston County Coroner is aware of the proposed project, they will be informed of the nature of our work, given a description of the remains, and the project location address. Terracon will then inform the SHPO at the email address below within 24 hours of the unexpected discovery and will provide them with a brief update. If the remains are determined to be historic aged, they will be mapped in place, and then removed, documented, and stored per the protocols outlined in the Cemetery Work Plan document.

Contacts for notification of unanticipated human remains discoveries are:

- Charleston County Coroner: (843) 476-4030
- Primary SHPO Contact: Robert Larsen at (803) 896-6181 or rlarsen@scdah.sc.gov
- Secondary SHPO Contact: John Sylvest at (803) 896-6129 or jsylvest@scdah.sc.gov

In the event that construction proceeds without an archaeological monitor on site and any damage or subsurface impacts should occur to the site as a result of proposed construction activities, the damage must be documented in accordance with the SHPO document, *Guidance for Assessing Damage to Archaeological Sites*². Failure to do so can result in felony for the destruction or desecration of human remains, which is punishable with at least one year and not more than 10 years in prison and a maximum fine of \$2,000 (SC Code 16-17-600). If damage occurs during the proposed archaeological investigation, Terracon archaeologists must be informed so the site damage can be appropriately documented and included in the final report provided to SHPO.

In the event of encountering human remains, either as articulated/intact burials or disarticulated remains, the location of the remains or burial will be plotted using a total station; the remains recorded in field notes, mapping, and other documentation; and the remains would be respectfully collected, wrapped in muslin, transferred to a fully covered box, and transported to the field office/lab for documentation and temporary storage. For security reasons, no human remains will be left in the field office/lab overnight. Instead, with the consent of the project funeral director, human remains would be transported to the Terracon Charleston office for overnight storage in a locked, climate-controlled room serving as a dedicated laboratory for this project. It is expected that human remains would be turned over to a certified funeral director within 24 hours of being recorded.

² State Historic Preservation Office, South Carolina Department of Archives and History. 2023. *Guidance for Assessing Damage to Archaeological Sites*. [https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20\(SHPO\)/Programs/Programs/Review%20and%20Compliance/Guidance-Assesing-Damage-Archaeological-Sites.pdf](https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20(SHPO)/Programs/Programs/Review%20and%20Compliance/Guidance-Assesing-Damage-Archaeological-Sites.pdf)

Protocol for Unanticipated Discoveries

Although archaeological monitors will be present onsite during subsurface disturbance related to the project, the following procedures were developed to provide contractors and other on-site personnel with general referenced information for protocols to be followed in the event that cultural remains are noted. Prior to the initiation of project work, the lead monitoring archaeologist would advise on-site project contractors to be on the alert for evidence of the presence of archaeological resources and cultural materials, of how to identify these expected resources, and of the appropriate protocol in the event of apparent discovery of an archaeological resource or possible human remains.

If potential intact archaeological features or subsurface artifact concentrations related to the historic period occupation of the site are encountered, soil disturbing activities in the immediate vicinity would be temporarily halted and construction crews and heavy equipment would be redirected to another portion of the site until the resource is documented and evaluated. The archaeologist would assess the identity, integrity, and significance of the encountered archaeological resource in consultation with SHPO, detailed above (Documenting Archaeological Features). If potentially significant cultural features (such as intact structure foundations, privies, or other larger features) are uncovered during the construction efforts, temporary avoidance of these areas by ground-disturbing activities may be necessary pending additional SHPO coordination and/or a site visit. The area immediately surrounding the cultural feature would be secured and marked as an avoidance area with surveyor's flagging tape and ground stakes. It is expected that construction work would progress elsewhere on the site and that such avoidance would not cause significant project delays.

The intent of archaeological monitoring is to identify and assess intact, subsurface cultural features and artifact concentrations as well as potential burials or human remains. With the exception of a representative sample of temporally or culturally diagnostic artifacts (which may be collected, as warranted, from disturbed fill or exposed ground surface), no systematic collection of unprovenienced artifacts or cultural materials from previously disturbed deposits or construction fill would occur. Similarly, analysis would be limited to artifacts and cultural materials recovered from intact feature contexts, discussed below.

Archaeological Analyses, NRHP Evaluation, Curation, and Reporting

Archaeological Analyses

With the exception of potential human remains and associated burial artifacts (including coffin hardware, nails, or other associated mortuary furniture), cultural material will be stored with chain of custody forms at Terracon's Charleston office in a dedicated, secure, temperature-controlled room until they are turned over to SCIAA. This Terracon office space will serve as the archaeology laboratory and storage space throughout the duration of the proposed project. Artifacts will be processed in compliance with 36 CFR 79 and SCIAA's curation

guidelines³. Procedures for the recovery and handling of human remains and associated cultural materials are presented in the Cemetery Work Plan document.

Incoming materials to the archaeology laboratory will be checked against the field specimen log to confirm that each bag is correctly labeled with pertinent information including site number, block number, provenience, stratum, depth, crew initials, and field date. Following initial cataloging, artifacts will be:

- Washed or brushed free of soil.
- Sorted by block number, unit number, raw material class.
- Labeled by provenience.
- Dried, counted, weighed, analyzed, and placed in 4-mil polyethylene, zipper-seal archive-quality bags.

Artifact analysis seeks to determine the function (if unknown) and temporal range of archaeological sites. During artifact analysis, comparative literature will be consulted using Terracon's in-house library and additional resources and reference materials as warranted.

In accordance with the *South Carolina Standards and Guidelines for Archaeological Investigations*, updated 2024, analysis will follow established classifications and accepted regional typologies. Basic artifact analysis will include the following tasks:

- Assign an accession, or artifact identification, number.
- Document material type.
- Document class (e.g., projectile point, lithic flake, bead, etc.).
- Record weight and count.
- Record dimensions, if appropriate.
- Document diagnostic type, if known (e.g., Creamware, Clovis, etc.).
- Record other noteworthy attributes.

No specialized analyses (e.g., faunal analysis, ethnobotanical analysis, radiocarbon dating, DNA-testing, etc.) or artifact conservation are anticipated as part of this project; however, if such materials are recovered, recommendations for future analyses would be provided in the report.

With the exception of a representative sample of temporally or culturally diagnostic artifacts (which may be collected, as warranted, from the disturbed fill or exposed ground surface), artifact analysis and curation would be limited to artifacts and cultural materials recovered from intact subsurface feature contexts. SHPO has requested that Terracon retain a minimum 5 percent representative sample of any loose bricks or brick fragments associated with intact architectural features (not associated with dumping or filling episodes) for potential future X-ray fluorescence (XRF) analysis. This sample will be curated with SCIAA following the completion of the project. All potential grave-related personal artifacts and other associated

³ South Carolina Institute of Archaeology and Anthropology. 2005. *Curation, Loan, and Access Policy*. https://sc.edu/study/colleges_schools/artsandsciences/sc_institute_archeology_and_anthropology/documents/curation_loan_access_policy.pdf

materials (coffin hardware, nails, etc.) will be collected, stored, and reinterred with the associated human remains by the certified funeral director.

Public feedback indicates that some individuals have expressed interest in conducting DNA testing on recovered human remains. This process is inherently destructive, as it requires the removal of samples of bone or teeth to extract genetic material. While some community members may value the scientific and cultural insights such testing could provide, others may regard it as desecration and strongly oppose such analysis. The Community Engagement Council (CEC) should determine whether DNA testing is warranted; however, this specialized analysis is not included as part of the current work plan. The College's commitment with the CEC will help direct the extent of this sensitive analysis with agreed upon review and updates to SHPO. Appendix B contains information about the CEC.

NRHP Evaluation

The National Register of Historic Places (NRHP) is an official register listing historically significant sites and properties across the United States. The NRHP is maintained by the National Park Service; at the state level the NRHP is administered by the SHPO. As a consultant, Terracon does not determine whether a resource is eligible for the NRHP. Terracon consults with SHPO and offers NRHP recommendations for resources, but it is the SHPO who issues the determination on whether a resource is eligible for the NRHP. Due to the complexity of the proposed project, Terracon will maintain weekly communication with SHPO to discuss findings and consult on next steps and expectations. Outlined below are the general criteria evaluating a resource's eligibility for listing in the NRHP.

Archaeological significance of sites is determined using criteria defined in 36 CFR 60.4⁴, in coordination with the SHPO. Guidance for applying the NRHP criteria is found in National Park Service (NPS) Bulletin 15: *How to Apply the NRHP Criteria for Evaluation*⁵. Site significance, as established by 36 CFR 60.4, may be in history, architecture, archaeology, engineering, or culture. Historic properties include buildings, structures, objects, sites, and districts. To be considered eligible for listing in the NRHP a historic property must exhibit integrity and meet one of the following criteria (36 CFR 60.4):

- A. Be associated with events that have made a significant contribution to the broad patterns of our history, or
- B. Be associated with the lives of persons significant in our past, or
- C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values or that represent a significant and distinguishable entity whose components may lack individual distinction, or

⁴ Code of Federal Regulations Part 60–National Register of Historic Places. § 60.4 Criteria for Evaluation. <https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol1/pdf/CFR-2012-title36-vol1-sec60-4.pdf>

⁵ National Park Service, U.S. Department of the Interior. 1997. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf

- D. Have yielded or may be likely to yield, information important in prehistory or history.

While most archaeological sites are recommended as eligible for the NRHP under *Criterion D*, this criterion is somewhat vague. In order to clarify the issue of site importance, the following attribute evaluations add a measure of specificity that can be used in assessing site significance and NRHP eligibility:

- *Site Integrity* – Does the site contain intact cultural deposits or is it disturbed?;
- *Preservation* – Does the site contain material suited to in-depth analysis and/or absolute dating such as preserved features, botanical and/or faunal remains, or human skeletal remains?;
- *Uniqueness* – Is the information contained in the site redundant in comparison to that available from similar sites, or do the remains provide a unique or insightful perspective on research concerns of regional importance?;
- *Relevance to Current and Future Research* – Would additional work at this site contribute to our knowledge of the past? Would preservation of the site protect valuable information for future studies? While this category is partly a summary of the above considerations, it also recognizes that a site may provide valuable information regardless of its integrity, preservation, or unique qualities.

It should be noted that cemeteries are not typically considered eligible for inclusion in the NRHP unless they also meet certain criteria considerations⁶. While a cemetery may qualify for listing under Criterion A (association with significant events), Criterion B (association with significant persons), or Criterion C (design), the cemetery must also meet one of the special Criteria Considerations, including deriving its primary significance from architectural/artistic distinction or historical importance (or representing the only surviving structure associated with a person or event).

Reporting

Following completion of archaeological excavation and analyses, a technical report will be prepared detailing the results of the archaeological investigation. The technical report will adhere to the requirements of the *South Carolina Standards and Guidelines for Archaeological Investigations*⁷ and will contain the following components, summarized in Table 1.

⁶ Potter, Elizabeth Walton, and Beth M. Boland. 1992. *Guidelines for Evaluating and Registering Cemeteries and Burial Places*. National Register Bulletin 41.

⁷ South Carolina Department of Archives and History, State Historic Preservation Office, South Carolina Institute of Archaeology and Anthropology, and the Council of South Carolina Professional Archaeologists. 2000 (Updated 2024). *South Carolina Standards and Guidelines for Archaeological Investigations*.

[https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20\(SHPO\)/Programs/Programs/Review%20and%20Compliance/Standards_Guidelines_2024.pdf](https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20(SHPO)/Programs/Programs/Review%20and%20Compliance/Standards_Guidelines_2024.pdf)

Table 1. Report Format and Minimum Content requested by SHPO (2024).

Chapter	Content
Title Page	Lists the report title with investigation type and project location. Additionally, the client's information, Authors, Principal Investigator's data and signature, report status (draft/revised draft/final), and report date.
Abstract	Describes the project, project purpose, summarizes the report findings, summarizes resource NRHP evaluations, and summarizes management recommendations.
Table of Contents	Outlines the report chapters including page numbers.
List of Figures/Tables	Detailed lists outlining the figures and tables used in the report.
Project Introduction	Summarizes the purpose of the report/fieldwork, the client, the reason the undertaking is being conducted, summarizes legislation that governs the work, lists project personnel, lists the range of work dates, and includes locational maps.
Environmental Setting	Summarizes the general environmental characteristics including physiographic information, proximal water sources, soil characteristics and current land use.
Cultural Context	Provides an overview of the local cultural history associated with the site and the events that may have shaped the community.
Summary of Previous Archaeological Investigations	Summarizes available and known data regarding previous archaeological work that may have been conducted onsite.
Research Design	Provides explicit statements and poses questions that may be answered with archaeological work.
Methodology	Outlines the field and lab methodology.
Results	The results will summarize the work conducted and include feature descriptions, cultural associations, background research, brief narrative, site map, representative site photos, soil descriptions, and site significance recommendations or whether additional work is required to determine a site significance recommendation. No pictures of human remains will be included in the technical report, rather, they will be referenced and included as an appendix to avoid dissemination of sensitive media.
Summary and Recommendations	Summarize the project, list and review cultural resource data, and make recommendations for NRHP eligibility and whether additional work is recommended.
References Cited	Detailed list of references used during investigation.
Appendices and Attachments	Appendices will include the SHPO concurrence letter (once obtained), artifact catalog, specialist reports or lab results, and photographic documentation of human remains. Photos of human remains are treated as classified and not intended for public consumption.

Terracon will provide hard copies and a digital PDF of the technical report to SHPO and SCIAA. The entire project site will be recorded under a single site trinomial (to be determined). The Terracon Project Manager and SHPO will be evaluating the eligibility of this site against NRHP criteria throughout the lifecycle of the archaeological investigation and as features are encountered. SHPO reserves the right to present any reported findings for peer review. Peer

review is generally conducted by people who have demonstrated expertise pertaining to the reporting subject matter.

Following acceptance of the final report by SHPO, and in consultation and collaboration with stakeholders, the results of the investigations may be presented in a public information component, such as an online ArcGIS StoryMap, public presentation, or other published documentation, as appropriate. Copies of the final documentation will be housed at the College of Charleston Libraries Avery Research Center for African American History and Culture (See Appendix A for the College of Charleston Commitment Letter).

Curation

Cultural material (excluding human remains or associated grave items) recovered during the archaeological investigation will be curated in accordance with SCIAA's Curation, Loan, and Access Policy⁸ document published in 2005 and with the standards established in 36 CFR Part 79. Prior to curation, recovered cultural material will be assigned accession numbers, re-bagged in clean 4-mil bags, labeled, sorted by provenience and placed in larger nesting bags, and nesting bags will be sorted by block, unit, and level and stored in archival banker boxes in Terracon's secure, climate-controlled laboratory in Charleston.

Once Terracon receives concurrence from SHPO indicating the technical report and project recommendations are approved, all recovered cultural material (excluding human remains or associated grave items) will be packaged and delivered with chain of custody forms, a final copy of the technical report, and completed site form to SCIAA for curation in perpetuity.

STAGES OF WORK

Archaeological investigations would be conducted in four proposed stages, described below:

Stage 1 – Establish site datums to which all subsequent survey will be tied into with RTK GNSS. Conduct geophysical survey prior to any ground disturbance, using ground penetrating radar (GPR), to provide context for anticipated ground disturbance and to help determine number and locations of possible burials and/or concentrations of cultural features including structural footprints and/or remains.

Stage 2 - Archaeological monitoring of the demolition and removal of hardscape (i.e., structure and concrete). Additional geophysical survey, using ground penetrating radar (GPR), following asphalt removal to help determine possible number and locations of possible burials and/or concentrations of cultural features including structural footprints and/or remains.

Stage 3 - Establish the excavation grid for the purposes of excavation, mapping and documentation, and determining the placement of project infrastructure.

Stage 4 - Site excavation and on-site lab documentation.

⁸ South Carolina Institute of Archaeology and Anthropology. 2005. *Curation, Loan, and Access Policy*. https://sc.edu/study/colleges_schools/artsandsciences/sc_institute_archeology_and_anthropology/documents/curation_loan_access_policy.pdf

Stage 1

Stage 1 will consist of a geophysical survey of the site prior to asphalt removal or other ground significant ground disturbance. A previous geophysical survey in 2024 by SM&E, subcontracting with Hardy Services Group, utilized GPR across the parking surface. This survey identified possible building foundations at approximately 4 feet below the ground surface and other “anomalous findings” but the survey did not indicate the presence of possible unmarked graves. Terracon proposes to conduct a multi-channel radar survey prior to removal of the asphalt. The results of this survey will be processed and shared with SHPO for review and consultation. Terracon also recommends an updated archaeological geophysical survey once the existing asphalt paving has been removed across the entire proposed project area (see Stage 2).

The geophysical survey in Stage 1 will be conducted in an attempt to map subsurface features consistent with burials and/or historical structural remains prior to ground disturbing activities. The geophysical scope of work consists of field exploration, data processing, and reporting. The overall goal of this part of the investigation is to help determine possible number and locations of possible burials and/or concentrations of cultural features including structural footprints and/or remains.

It is expected that the results of the GPR surveys will help inform the subsequent archaeological excavations, determine the expected number of burials and/or cultural features, and the placement of Terracon’s field infrastructure, including the placement of screening stations, a portable field office/lab trailer, a ground water-dewatering station for contingency purposes, and a construction laydown/staging area.

Once the initial Stage 1 GPR survey is completed and the data has been processed, Terracon will provide the SHPO with GPR amplitude depth slices, for independent review. Terracon will not proceed with exhumation of burials until the SHPO is given the opportunity to review geophysical data and potential anomalies/potential burials. The College will update the public on findings throughout the work performed through the project website at <https://coming-street-commons.charleston.edu/>, in accordance with SHPO request dated September 5, 2025. It should be noted that information concerning locational data of human remains will remain redacted until the completion of the project and sensitive information (such as photographs of skeletal remains) will not be made publicly available.

Geophysical work will be undertaken by Alex Corkum, PhD, RPA, a geophysicist with over 17 years of experience conducting geophysical surveys on unmarked cemeteries throughout the United States and internationally (see Figures 1–4 for examples of recent work). Dr. Corkum will be assisted by Joseph Snider, a geophysicist and archaeologist with over 14 years of experience across the United States. Mr. Snider has extensive experience with both geophysical and archaeological fieldwork on cemetery sites and is skilled in managing large datasets.

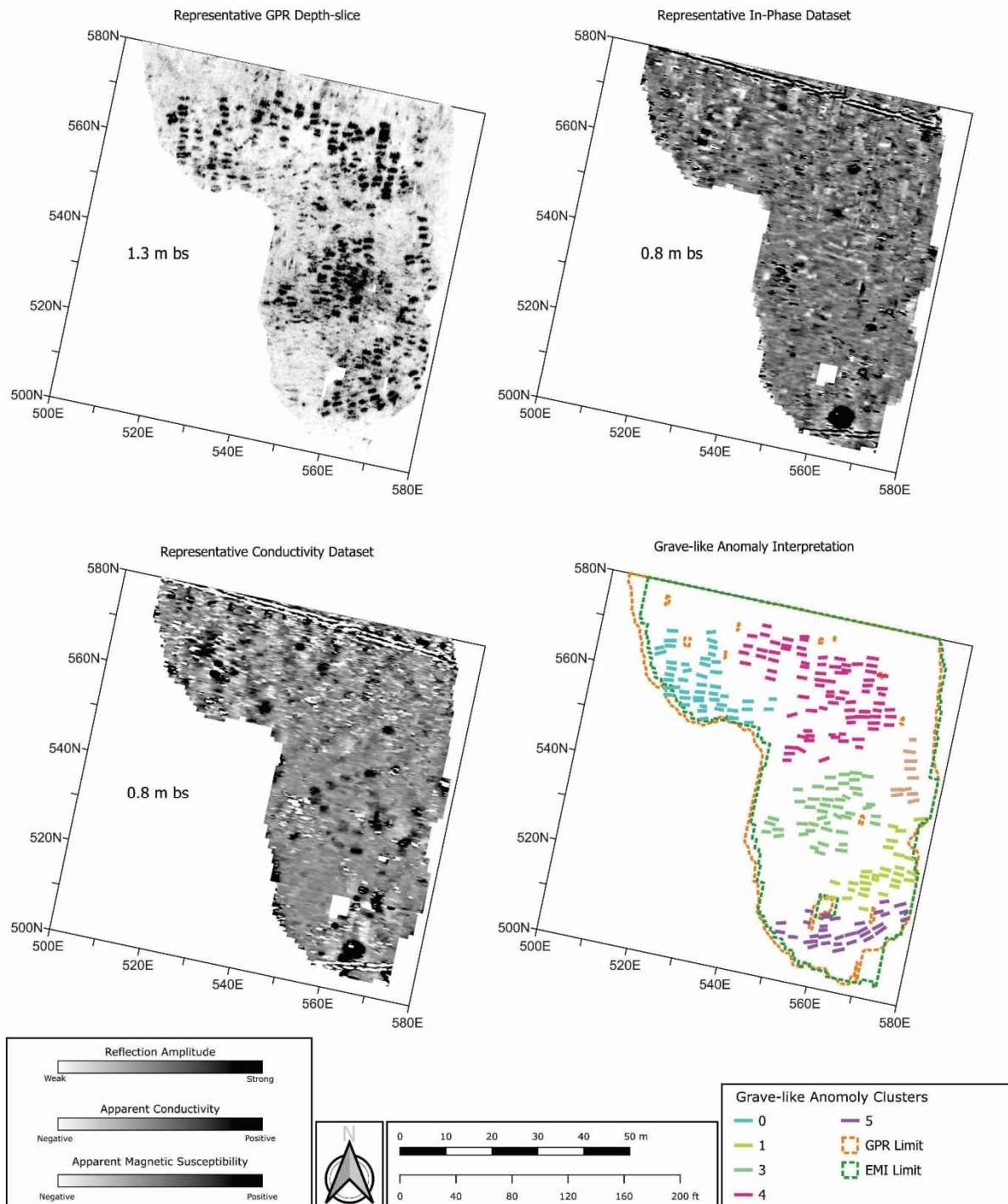


Figure 1 Example Unmarked Cemetery Dataset, showing 250 MHz GPR and EMI data with Interpretation.

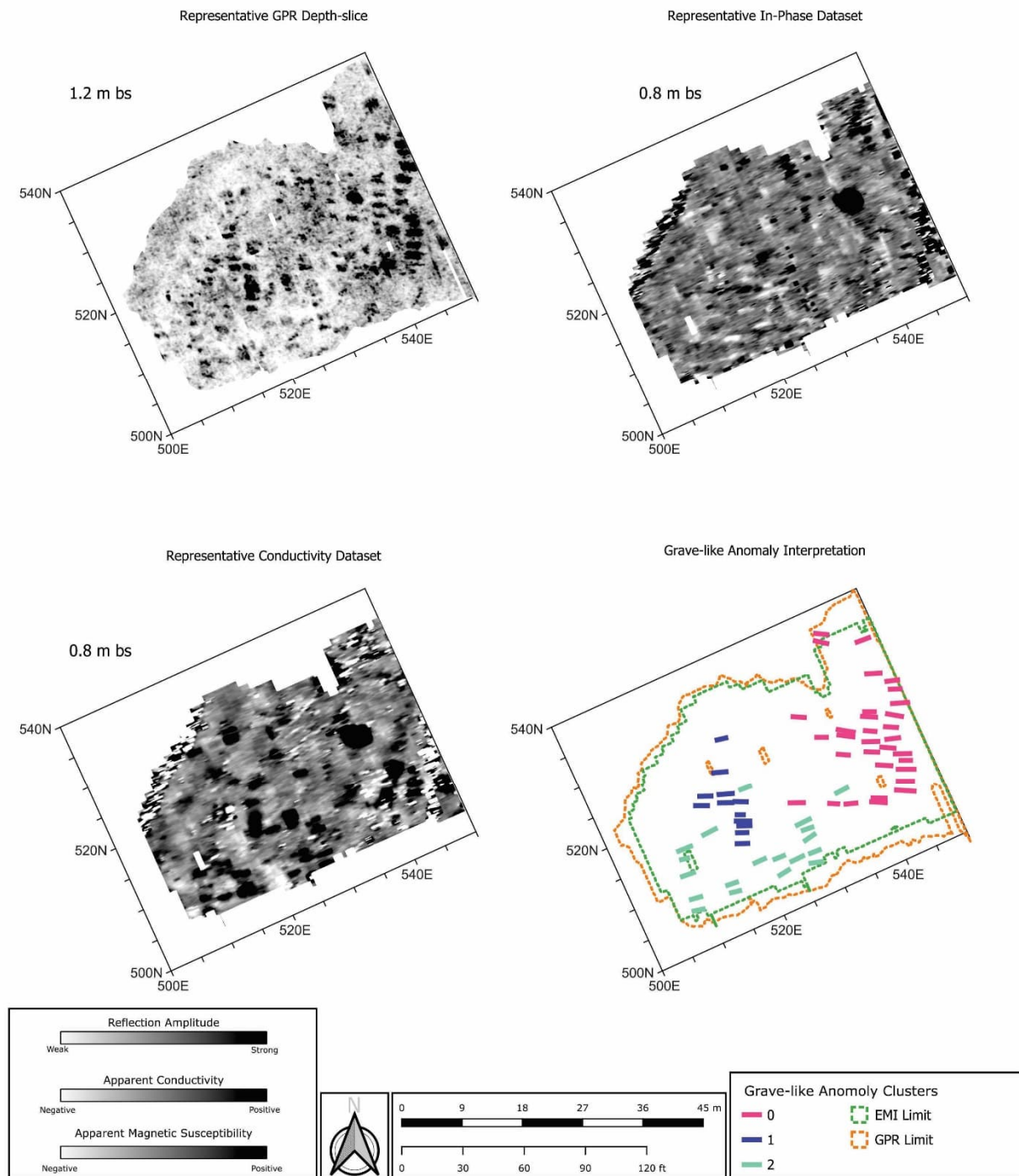


Figure 2 Example Unmarked Cemetery Dataset Showing 250 MHz GPR and EMI data with Interpretation

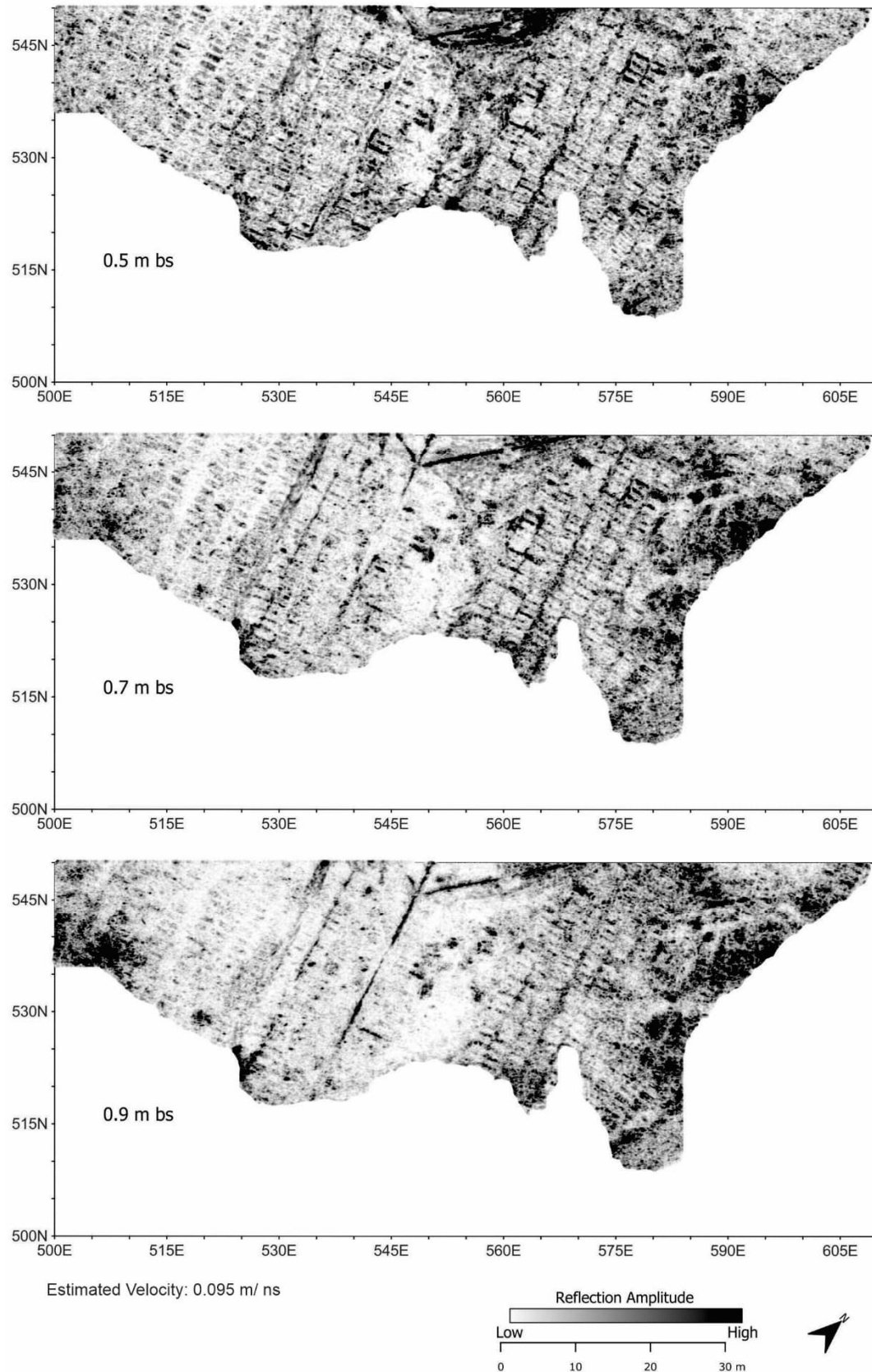


Figure 3 Example of 250 MHz dataset depth-slices from unmarked cemetery.

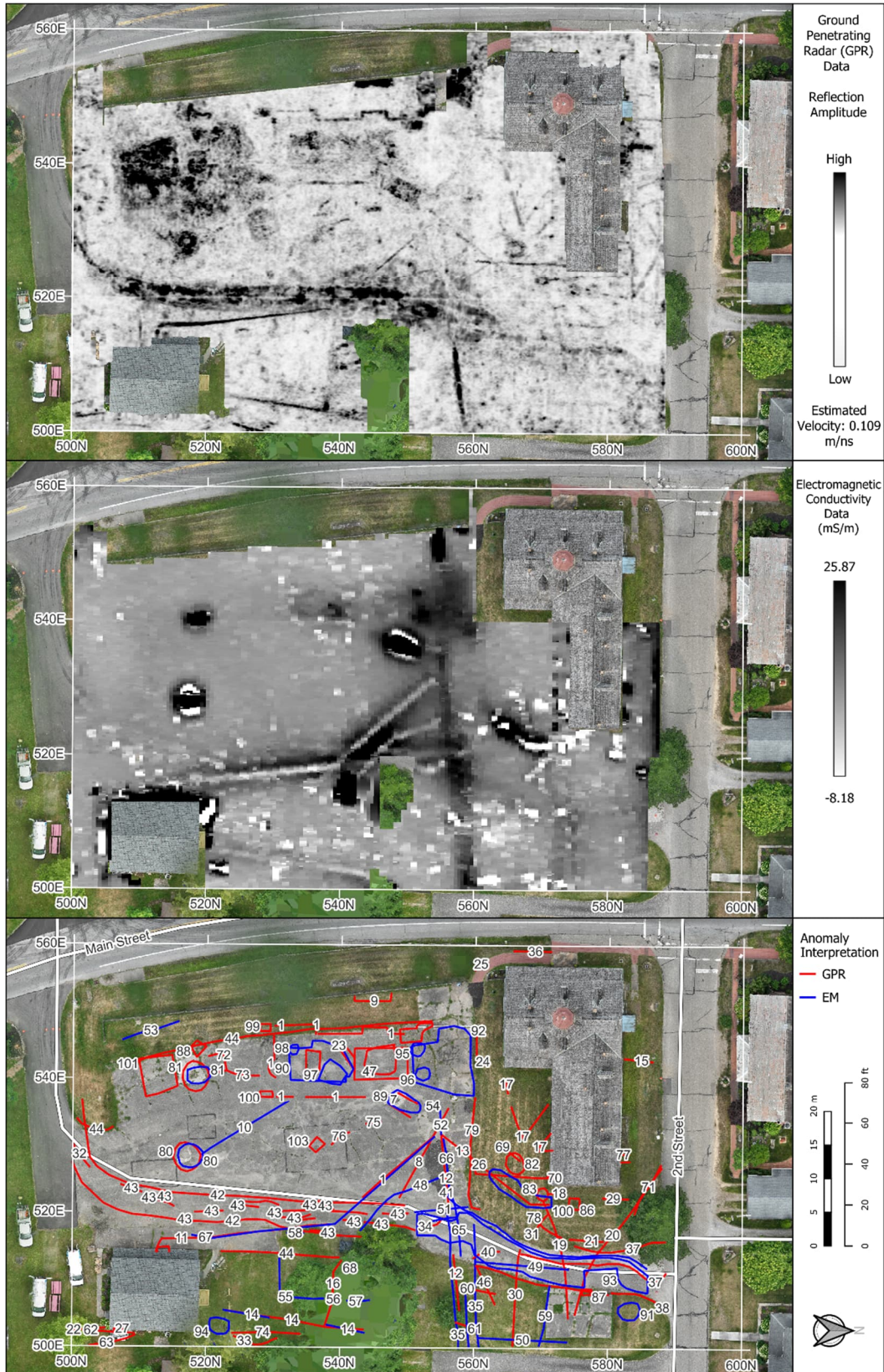


Figure 4 Representative 250 MHz GPR and EMI datasets of Historic Cultural Resources Under a Paved Parking Lot, showing Foundations, drives, garden features, and utilities.

Terracon proposes to conduct a geophysical survey of unobstructed areas within the project area. This preliminary GPR survey will be undertaken prior to removal of pavement and will consist of multi-channel ground penetrating radar (GPR).

A description of specific instrumentation, methods, and anticipated results is presented below.

Field Exploration

Terracon will conduct the first geophysical survey using ground penetrating radar (GPR) to survey the project area. The multi-channel GPR data will be collected semi-gridded utilizing baselines established at each end of the survey area to ensure that transects are collected parallel to one another and to minimize gaps between transects. These survey transects will be conducted approximately north to south to maximize the potential for crossing unmarked graves, which are likely oriented approximately east to west.

An Emlid Reach RS2+ real-time kinematic global navigation satellite system (RTK GNSS system) with a horizontal accuracy of 0.7 cm and a vertical accuracy of 1.4 cm will establish the geophysical survey baselines and permanent datums at each survey location.

Data Analysis and Reporting

GPR field data collection would follow standards referenced in ASTM D6432. The GPR survey will utilize a Kontur GROUND 2124 GPR system towed behind a UTV or pushed on a cart, depending on ground conditions at the time of survey and tied into an Emlid Reach RS2+ RTK GNSS. This multi-channel step-frequency antenna comprises 24 channels operating at 30-4,500MHz spaced 0.075m apart, which produces a swath of data 1.8 m wide. This would be similar to operating twenty-four single channel radar systems with transects spaced 7.5 cm apart with antenna frequencies ranging from 30 MHz to 4,500MHz. Terracon intends to restrict the GPR frequency range to operate between 200 MHz to 2,500MHz in order to characterize the subtle responses anticipated to be associated with cultural deposits. Data would be taken back to the office to be processed utilizing Geolitix, engineered by Geolitix Technologies, Inc. Data from the survey will be combined and interpreted in the GIS program QGIS, engineered by the QGIS Development Team, or similar. Data will be provided in the form of processed geophysical data, ESRI Shapefiles (Point, Line, and Polygon) in the coordinate system UTM Zone 17 North, and an interpretive map with anomaly locations and classification (Rank 1 – Rank 3), which will be accompanied by an anomaly table that includes comments and anomaly centroid positions in the UTM Zone 17 North.

Following completion of the data analysis, the results of the geophysical survey will be incorporated into a geophysical survey report. The report will include a detailed methodology discussion, including a description of how the data were collected, processing software used, and specific processing steps. Relevant field environmental, soil, and weather conditions present during data collection will also be discussed. Reporting will include figures showing the project location, survey grid, and detected anomalies. Anomalies will be described and interpreted, with figures including representative examples of survey results including radargrams, amplitude slice maps, and other gridded data, as appropriate.

Terracon will provide SHPO copies of our GPR amplitude maps of depthslices at systematic depth intervals for independent review. Terracon understands that exhumation of potential burials will not proceed until the SHPO reviews and gives concurrence on identified potential anomalies/potential burials.

It should be noted that geophysical methods may be affected by on-site conditions beyond the control of the operator and may be considered inconclusive. Interpretation is based on a combination of known factors combined with the experience of the operator and the geophysicist evaluating the results. The geophysical results provide a level of confidence but should not be considered absolute.

Stage 2

Archaeological Monitoring

Following written approval from SHPO for the measured drawings of the existing YWCA structure, it is likely the structure and surrounding parking area will be demolished and removed from the project site. As a result of the high probability of encountering cultural features, including human skeletal remains, archaeological monitors will be on site during the YWCA structure's demolition, debris removal, and other proposed subsurface impacts onsite. Additionally, during a public meeting held on November 18, 2025, an audience member, who worked at the YWCA in the 1990s, recalled observing possible headstones along a property boundary. Prior to demolition, the archaeological monitors will conduct a thorough pedestrian survey of the proposed project area to document current site conditions and to assess the area for evidence of possible cultural features on the ground surface.

Archaeological monitors will be present during all demolition work and subsurface disturbances. Terracon proposes that monitors operate in pairs, with two monitors assigned to each mechanical excavator. If multiple excavators are in use, each will have its own team of two monitors throughout the demolition activities.

If intact archaeological deposits are encountered during monitoring, the monitors will instruct the mechanical excavator to stop work and/or relocate no fewer than 25 meters away while the feature is documented. If cultural features are encountered during this work, they will be preliminarily documented (photographed, sketch map, notes, and securing the feature from additional impacts) but not excavated. Further investigation of cultural features would be conducted during the site excavation portion (Stage 4) if required.

Archaeological monitors will be given sufficient time to inspect exposed areas and/or record cultural materials and/or features. "Sufficient time" is variable based on feature type, size, and complexity. An archaeological monitor can generally conduct preliminary documentation activities (photography, sketch plan, notes, and securing the feature from additional impacts) within an hour; however, if additional time is required work can continue in another portion of the site, under the supervision of a monitor, while the feature is documented to SHPO standards. Terracon will provide the SHPO with a detailed description of the features and

sufficient supporting documentation to aid SHPO in rendering an NRHP eligibility determination.

Geophysical Surveys

Following the demolition of the extant YWCA structure and the removal of the asphalt paving, the ground surface should be smoothed using shovels and/or lute rakes to provide a more level ground surface for the operation of the GPR (outlined below). This second geophysical survey should be undertaken immediately following the removal of pavement. It is anticipated that these surveys will inform the planning of all subsequent archaeological investigations. The results of these surveys will provide information vital to the success of the exhumation component of this project. Prior to geophysical scanning, a metal detector survey would be conducted to remove metallic finds, as feasible, from the scanning area.

Terracon proposes to conduct a geophysical survey of unobstructed areas within the project area. The survey will consist of ground penetrating radar (GPR) and electromagnetic induction (EMI) surveys. The use of a second geophysical instrument (EMI) increases our ability to confidently interpret results from any given project; this is especially true concerning historical cemetery sites. Following the completion of the geophysical surveys and archaeological monitoring related to the asphalt removal and YWCA building demolition, a brief technical memo will be provided to SHPO and the South Carolina Department of Environmental Services Bureau of Coastal management (DES-BCM) for review. This memo will outline the results of monitoring, including photographs and brief descriptions of cultural features encountered during Stage as well as potential anomalies recorded as a result of the GPR surveys.

Geophysical Field Exploration Methods

Terracon will conduct the second geophysical survey using GPR and EMI to survey the project area. Prior to the survey a grid will be established in GIS and will consist of 30-x-30-m blocks. The survey transects will be conducted approximately north to south to maximize the potential for crossing unmarked graves, which are typically oriented approximately east to west. The EMI survey will utilize a CMD-MiniExplorer 6L electromagnetic conductivity meter, or similar. Data will also be collected in 30-x-30-m blocks, or similar, along the same axis as the GPR survey. EMI data will be collected in 25 cm transect spacing to ensure the data is sufficiently dense. EMI data will be processed in Terrasurveyor64, or similar.

An Emlid Reach RS2+ real-time kinematic global navigation satellite system (RTK GNSS system) with a horizontal accuracy of 0.7 cm and a vertical accuracy of 1.4 cm will establish the geophysical survey grid and permanent datums at each survey location.

Once the GPR survey is completed and the data has been processed, Terracon will provide the SHPO with GPR amplitude depth slices for independent review. Terracon will not proceed with exhumation of burials until the SHPO is given the opportunity to review geophysical data and potential anomalies/potential burials. The College will update the public on findings

throughout the work performed through the project website at <https://coming-street-commons.charleston.edu/>, in accordance with SHPO request dated September 5, 2025. It should be noted that information concerning locational data of human remains will remain redacted until the completion of the project and sensitive information (such as photographs of skeletal remains) will not be made publicly available.

Stage 3

Stage 3 will focus onsite security and site infrastructure. Prior to beginning Stage 3 Terracon will await review and approval of the geophysical survey report and the research design document from SHPO and DES-BCM.

It is anticipated that site infrastructure will be established in areas that do not include cultural features. The GPR results and a site design plan noting the presence of known utilities will be used to determine the best locations for the placement of the dry screening stations, field office/lab trailer, ground water-dewatering station, and construction laydown/staging area. If the GPR data does not indicate open spaces or areas devoid of potential cultural features located within the project area, then the most logical locations for their placement may be excavated first to make space for the infrastructure.

Site Security

Site security and privacy will be incredibly important to establish onsite as soon as possible. A fence should be installed to encompass the project area. Fencing should be 6–8 feet in height, sturdy, including privacy screening, and a gate that can be locked when crews are not onsite. Privacy screening is used to avoid exposing human remains to the public during excavation and removal, offering some dignity to the decedents. Privacy fencing also offers some protection from looters or vandals who may be interested in identifying locations of interest based on observing fieldwork. During excavation of burials and/or mortuary features, shade tents or larger event tents can be used to offer some privacy from observation from above. Security cameras have been installed on site and will be monitored by 24-hour surveillance.

Project Infrastructure

The field office/lab is intended to provide secure on-site storage for sensitive electronic equipment and temporary storage of human remains if recovered. The field office is proposed to be along the Vanderhorst Street entrance to the project area, pending the results of the GPR survey. The field office/lab should include a double lock on all external doors, including a deadlock. A locking cabinet or closet with keyed locks will be kept in the lab to lock up human remains and/or grave goods until they are moved to a larger, secure facility, such as the dedicated archaeology laboratory space at Terracon's Charleston office or certified funeral director's facility. With the permission of the project funeral director, Terracon plans to move any recovered human remains to the Terracon Charleston office daily for further

documentation (e.g., measurements, photography). The human remains would be stored in accordance with 36 CFR 79, including in a locking cabinet or closet with keyed locks located inside a locked office with keyed locks; having a fire detection and fire suppression systems, climate control to ensure appropriate temperature and humidity levels are maintained; and protection against water damage, pests, and other external elements. Terracon would only keep the human remains until they are collected by the project's funeral director. Any transfer of cultural materials, including human remains, from location to another would be documented with chain-of-custody forms, which must be maintained accurately and kept up to date at all times. The original chain of custody form will be retained by Terracon and submitted with curated cultural material.

Terracon plans to establish multiple screening stations across the project area but will be limited to areas that exhibit no evidence of cultural features or burials. Screening stations will include a bank of portable shakers with wire mesh screens. Soil will be transported to the screening stations via 5-gallon buckets. Buckets will use a color-coded system as a visible reminder to the screeners which unit they are screening for, in addition to labeled flagging tape for each bucket indicating the block, unit, level, depth, and other pertinent provenience information. Mesh screen size will depend on what type of soil matrix is being screened. In general, a 1/4-inch wire mesh screen will be used to sift material; however, in the event that human remains are encountered, a 1/8-inch wire mesh screen will be substituted for recovery of remains or associated cultural materials. Unless site conditions dictate otherwise, Terracon plans to dry screen all soil; however, soil samples may be collected, as warranted, from select cultural features such as privies or disposal pits for later off-site water screening or flotation. To establish a construction laydown/staging area, the GPR results will need to be analyzed to determine a suitable location for placement. To avoid construction traffic across or within the site, the laydown/staging area should be placed near the site entrance/exit on Vanderhorst Street or Coming Street.

Groundwater/De-Watering Contingency

In the event of groundwater intrusion or stormwater/flooding occurrences onsite, a water pump and pumping station should be established. Installation of a potential sump and/or sump pump may be necessary to de-water areas of excavation. Prevention of sediments entering stormwater drains should be controlled by implementing natural fiber filter systems at stormwater drain openings. Coordination with the developer will be necessary for staging and proper preparation.

Excavation Block Grid

Prior to excavation, an arbitrary 5-x-5-meter grid will be established across the project area using 12-inch spike nails and braided fluorescent nylon mason line string. This grid will be tied to the geophysical site survey grid established during Stage 1 of the investigations. The location of the block corners would be recorded with a total station. In addition to labeling the northing and easting for all four corners of each excavation block, to make documentation

more efficient in the field each block will also be given a distinct name comprising of a letter and a number (A-1, B-3, J-10, etc.). A letter will be assigned to each row ascending from A–Z, south to north; and numbers will be assigned to columns and will ascend from west to east. Cultural features will be hand drawn on associated Block Maps, assigned a sequential number based on the order they were recorded, and recorded with a total station.

Stage 4

Stage 4 would focus on site excavation and site documentation. During this stage, Terracon would send weekly updates to SHPO and the DES-BCM. SHPO staff may come to the site for monitoring purposes or for regular updates at any time. The results of the GPR survey, if sufficient to determine the presence of subsurface features, would be used to determine which blocks should be prioritized. No construction is expected to take place onsite while archaeological excavation is being conducted.

Block Excavation

Due to the potential for encountering displaced human remains, each 5-x-5-meter grid block will be excavated from the ground surface down. Each block will be comprised of twenty-five 1-x-1-meter units which would be identified by the northing and easting of the southwest unit corner. Units would be excavated at arbitrary 10-cm levels within natural strata (clearly redeposited fill would be excavated as a single stratum rather than by arbitrary 10-cm levels). Excavation will continue until the soil profile indicates a reasonable depth below disturbed subsoil and two culturally sterile, natural soil levels are encountered. Soil would be screened through a 1/4-inch mesh screen for standardized recovery of cultural material. Field notes will be recorded on standardized test unit and block unit forms and will include unit/block designators, depth, general conditions, amount of cultural material recovered and brief descriptions of the material, and other pertinent information such as presence of and relationships between features. A Munsell chart will be used to record soil colors, and US Department of Agriculture (USDA) soil texture classifications will be used to characterize soil textures. If cultural material is encountered it will be placed into 4-mil plastic bags that will be labeled, written in black permanent marker, with pertinent project information including: field specimen (F.S.) number, project number, project name, block number, unit number, level, stratum, depth, crew initials, date, and number of bags associated with that F.S. number. Once a unit is completed, all associated field forms would be reviewed for consistency, readability, and errors, and then turned into the field office/lab with all cultural material recovered from that unit. Unit paperwork and artifact bags will be reviewed by the onsite field director for accuracy and consistency, and any errors or issues will be addressed immediately to ensure quality data recording.

Features

If in situ architectural or structural remains that are not associated with historical dumping episodes are encountered during fieldwork, the remains will be assigned a feature number,

fully exposed, brushed clean, documented in standardized field notes, measured, mapped, and photographed in accordance with the procedures outlined in Documenting Archaeological Features, outlined above. Other cultural features would be excavated by methods appropriate to their size and type and in consultation with SHPO, if warranted. As outlined above and in the Cemetery Work Plan, if potential burial features are encountered under or within a feature, structural remains, or within the footprint of a historical building, the documentation and excavation of the burial will be given preference over the documentation of any other features.

Archaeological Analyses

Following procedures outlined above, with the exception of potential human remains, cultural materials and artifacts will be processed in compliance with SCIAA's curation guidelines. Artifacts will be washed or brushed free of soil and dried; counted, weighed, and classified; and rebagged in labeled zipper-seal archive-quality bags. Artifacts will be stored at Terracon's archaeology laboratory temporarily until the materials are transferred to SCIAA for permanent curation.

Reporting

Following completion of archaeological excavation and once analyses are completed, a technical report will be prepared detailing the results of the archaeological investigation. The technical report will adhere to the requirements of the *South Carolina Standards and Guidelines for Archaeological Investigations*, updated 2024. Following review and acceptance of the final report, Terracon will provide hard copies and a digital PDF of the technical report to the SC SHPO and SCIAA. The results of the investigations may also be presented in a public information component, to be determined in consultation and collaboration with stakeholders.

Additional Monitoring

Following completion of archaeological excavations, analyses, and reporting, it is recommended that archaeological monitors remain on site until all subsurface disturbance related to construction on site is completed. In the event possible human skeletal remains or cultural materials related to the historic cemetery are uncovered, procedures for unanticipated discoveries (outlined above) should be followed. The onsite archaeological monitor will be responsible for initiating the "unanticipated discoveries" process. If possible human skeletal remains are encountered later during construction when archaeological monitors are not onsite the project site manager will be responsible for initiating the "unanticipated discoveries" process.

APPENDIX A: HARM AVOIDANCE ASSESSMENT AND COMMITMENT LETTER



College of Charleston Harm Avoidance Assessment

Founded in 1770, the College of Charleston sits in the heart of the Historic Charleston peninsula. The College currently owns and operates over 190 buildings, spanning three campus locations with more than 120 of those structures classified as historic. As a longtime community member and steward of historic preservation, the College of Charleston is committed to the delicate balance urban universities face when managing the relationship between the institution and the surrounding community. A critical component of that town-gown interplay is on-campus student housing. To that end, the College of Charleston for the last 30 years has continuously worked to provide as much affordable, on-campus student housing as possible. However, the College is only able to house approximately 3,400 students, which puts it far below the national average of universities that house more than 40% of their undergraduate populations.

Creating more affordable student housing on campus will provide benefits to both the College and the greater community. Research consistently demonstrates that university students who reside on campus tend to achieve higher academic performance and exhibit greater retention rates compared to their off-campus peers. Additionally, providing more on-campus housing eases pressures on surrounding neighborhoods.

Being situated in a dense urban historic city, the College has found opportunities for development are limited:

- Scarcity of raw land
- Options of demolition and rebuild are limited due to the historic nature and existing lot size limitations
- Acquisition of historic structures to renovate or add to for large-scale needs is often difficult to incorporate modern building code or system requirements without reduction of usable living space

The College of Charleston understands the obligation, duty, and commitment to the community to investigate alternative options that would avoid harm to the cultural resources located at 106 Coming Street and 99 St. Philip Street. The properties and ventures outlined below demonstrate the College's efforts over the last six years to seek and find alternative viable options for large-scale residential housing that meet the campus needs and balance the economy of scale for construction.

1. 363-369 King Street

- a. Assemblage of 3 parcels on King between retail outlets Urban Outfitters and Williams Sonoma.
- b. Beztak Properties designed and took through BAR a residence hall project.
- c. New 7-story
- d. Beztak could not make the project work financially.
 - i. As part of an easement process, the College was able to secure a ROFR, and when Beztak decided to not move forward with their project, the College exercised that option.
- e. After several months of due diligence, the College also could not make the project work financially.



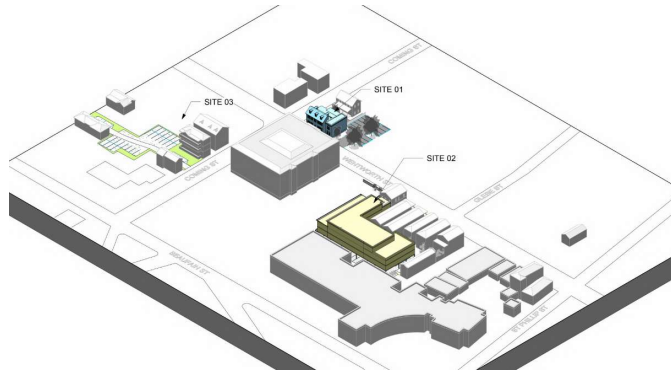
2. New Residence Hall LX (Lightsey Annex)

- a. A new residence hall built on land currently owned by CofC on the small footprint behind Berry/Lightsey/McAlister residence hall structures.
 - i. Site of the old Sears tire center
- b. New 6-story building (currently zoned for 5)
- c. Only provided 180 beds



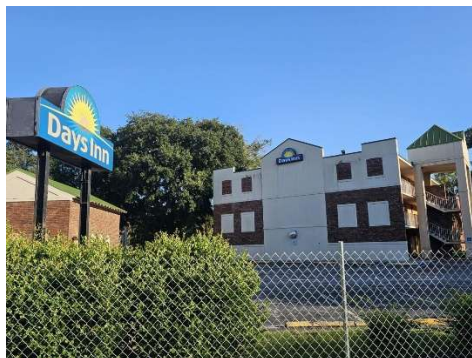
3. Various Alternatives on Foundation Property along Wentworth/Coming

- a. New construction behind the old Greek houses on Wentworth Street (97–107 Wentworth)
 - i. Very small project, less than 10,000 square feet; did not meet the need and took current parking offline.
 - ii. Between 100 and 111 beds
- b. Renovation of the houses at 112 and 114 Wentworth
 - i. VERY small project, with only a few dozen beds
- c. 13 Coming/8 Kirkland
 - i. Slightly larger than the 112/114 Wentworth project, but not by much



4. Mt. Pleasant Days Inn

- a. Explored acquisition of the old Days Inn at 261 Johnnie Dodds Blvd in Mt. Pleasant.
- b. The facility was owned by VTT Management and had 130 rooms.
- c. The site was about 2.5 acres
- d. The seller was not willing to work through the state process, and the College could not act quickly enough.
- e. There were questions about how well student housing off the peninsula would be received by students.



5. Master Lease Existing Student Housing in Charleston

- a. Issued an RFP in September 2021
 - i. Only two responses – 99 St. Philip, 61 Vandy
 - ii. CofC moved forward with 99 St. Philip as 61 Vandy became unresponsive due to lease timeline
- b. Issued an RFP in April 2022
 - i. Warren Place lease was ending August 2023
 - ii. Only two responses – Warren Place, 930 NoMo
 - iii. CofC moved forward with Warren Place as 930 NoMo was cost prohibitive and the College had existing infrastructure at Warren Place so remaining in place saved College resources
- c. Issued an RFP in June 2023
 - i. Only a few responses – 61 Vandy, 930 NoMo, 595 King-Hoffler Place, 363-369 King
 - ii. CofC moved forward with 61 Vandy as the others were far too expensive.
 - 1. The lease rates were well above our existing housing fee structure.
- d. Issued an RFP in April 2024
 - i. Only one response – 930 NoMo
 - ii. CofC didn't move forward with accepting proposal as it was higher than their previous proposal and well beyond our student housing rate.

6. 200 Meeting

- a. Looked at acquisition of the building and parking deck at 200 Meeting Street
- b. 4-story, 145K heated square foot building offered by Avison Young
- c. Needed extensive renovation to make residential.
- d. The seller was not willing to work through the state process, and the College could not act quickly enough.



4-STORY MIXED-USE TROPHY PROPERTY
IN HISTORIC CHARLESTON, SOUTH CAROLINA

AVISON
YOUNG

7. *Wentworth/St. Philip Street Parking Deck*

- a. The College does not own the land.
- b. City of Charleston is going to require at least the current number of parking spaces (503) return in the new development, which leaves very little space for other uses.

8. *220 King Street*

- a. Acquisition of the former nunnery and Christian bookstore at the corner of Beaufain and King streets
- b. Had limited housing units already built out, but needed significant work
- c. Did not offer much in the way of density
- d. Seller moved to another buyer that could work faster than a State agency

9. *Redevelopment of College Lodge site*

- a. Initial plan was to replace facility with new residence hall
- b. After a feasibility study, it was determined that the footprint is not large enough to provide necessary density

10. *Residence Inn on Ripley Point*

- a. Temporary solution to housing needs
- b. Cons: too expensive, requires transportation support to main campus

As an additional analysis of harm avoidance, the College along with its consultants have analyzed construction methods, design considerations, engineering and building code, and local ordinance requirements when considering new construction for the site. Two main requirements below outline unavoidable ground disturbance impacts for any new construction activity:

- Soils and bedrock, Cooper marl, located in the Charleston peninsula require significant structural foundations to meet engineering and seismic zone requirements. The impact to a site's footprint for building foundations can range from 50'-80' below grade for piles with caps being multiple feet deep and 10'-20' square pile caps impacting on average 5' below grade and above the water table.
- The City of Charleston's Stormwater Design Standards will require any new construction to provide stormwater retainage vaults to offset new construction and impervious area runoff. In-ground vaults require extensive ground disturbance sitting below finished floor and above the site's water table, likely 5'0" below site grade.

APPENDIX B: COMMUNITY ENGAGEMENT COUNCIL

Community Engagement Council

Mission

The Community Engagement Council was established by the College of Charleston to strengthen the relationship between the College, City of Charleston and the broader community. The College of Charleston is committed to working with descendant representatives, neighborhood leaders and preservation partners to develop an on-site memorial and interpretation plan. The establishment of this council is based on a “Call to Action” for transparency regarding the 106 Coming St. Project. The mayor of the city and president of the university shared the importance that a “Path Forward for the Coming Street Project” must be carried out with care, respect, transparency and public input.

Objectives

The advisory group will serve as both a facilitator for public discussion and as a guiding light on the details for next steps on the 106 Coming St. Project. Its primary objectives are centered on supporting meaningful dialogue, fostering active involvement and advancing initiatives that respect the past, place and people. Council members will work collaboratively to ensure these objectives are met through ongoing participation, dedication to the council’s mission and alignment with its goals.

- **Support Meaningful Dialogue:** Create opportunities for open and constructive discussions that address community needs and priorities.
- **Promote Active Community Involvement:** Encourage and facilitate the participation of community members in council activities, ensuring diverse voices are heard and valued.
- **Advance Council Mission:** Align all activities and initiatives with the overarching mission of the council, ensuring that the work undertaken contributes to the respect of the past, place and people.

By focusing on these objectives, the Community Engagement Council aims to create a positive impact and foster a sense of shared purpose among its members and the community at large.

Goals

- To collaborate with College leadership and city officials to ensure all procedures uphold the utmost respect for those interred and thoughtfully address community concerns.
- To utilize archaeological findings and community input to shape the path forward for the 106 Coming St. Project.
- To honor and memorialize both the potter’s field and the former site of the YWCA with dignity.

COMMUNITY ENGAGEMENT COUNCIL

Liaison: Dr. Courtney Howard
Vice President of Community Engagement

Facilitators

- Joanna Gilmore - Anson Street African Burial Ground
- LaSheia Oubre - Anson Street African Burial Ground

City of Charleston	College of Charleston	Community		Religious	Consultants	Advisors
Harlan Greene City of Charleston Historic Commission	Jim Newhard Faculty	Norm Dickerson	Chair, Social Action & Civic Engagement, NAACP	Eric Manning Pastor, Mother Emanuel	Dr. Tonya Matthews IAAM	Arthur McFarland Retired municipal judge
Lisa Jones Historic Charleston Foundation	Jalen Evans Student, BSU	Walter B. Brown	Former Chair, Monck's Corner Planning Commission	Luqman Rasheed Imam	Michael Allen National Parks Service	Demetria Noisette Clemons Trustee Emerita
Jerome Harris Human Affairs & Racial Conciliation Commission	Zoe Barber Student, HPCP	Stephen Vale Cofer-Shabica	Circular Congregational Church - the Meeting House			Omar Muhammad Protect & Respect the Bodies
Madison Lee Preservation Society of Charleston	Sharon Ramirez Grad. Student, HPCP	Patricia Ploehn	Historic Preservationist			
Dr. Shawn Gathers City of Charleston MWBE		Dr. Millicent Brown	Protect & Respect the Bodies			
		James Njonjo	Protect & Respect the Bodies			
		Daniel Schmidt	Radcliffeborough Neighborhood			
		Julie Ann Bowling	Friends of the Tower Hill Cemetery			

APPENDIX C: SHPO CORRESPONDENCE

From: Sylvest, John <JSylvest@scdah.sc.gov>
Sent: Friday, September 5, 2025 3:19 PM
To: Schwebler, Justin; Larsen, Robert; Johnson, Elizabeth; Sara W. Barbagallo
Cc: Benjamin.Thepaut@des.sc.gov; Gary Jensen; Chris Cook; Worrell, Laura Lee; Schultz, Cristi; JenniferP@adcengineering.com; Dorn, Mills; Russ, Terri A; Boschi, Dave; Jill.Rothenberg@des.sc.gov
Subject: RE: Project 205 New Construction - CZC_DES_BCM Project Review Form and Archaeology Plan
Attachments: CHAR_College of Charleston-Coming Street Commons-106 Coming Street-Archaeological Monitoring Plan-Revised Draft_25RL0214.pdf; CHAR_College of Charleston-Coming Street Commons-106 Coming Street-Archaeological Monitoring Plan-Draft_25RL0214.pdf

Sara,

Our office received electronically on July 11, 2025 the following documentation from Justin Schwebler with Terracon Consultants, Inc. for a project named "Project 205 New Construction":

- a completed SHPO Project Review Form for SC Department of Environmental Services-Bureau of Coastal Management (DES-BCM) projects
- a copy of a Subscriber-View SC ArchSite map
- topographic survey plan sheets (dated April 21, 2025)
- a draft report, *Architectural Evaluation, St. Philips Housing Innovation District, 106 Coming Street, Charleston, Charleston County, South Carolina* (dated June 9, 2025)
- a draft, *Archaeological Work Plan, College of Charleston, Project 205 New Construction, Charleston, Charleston County, South Carolina* (dated July 2025)

The documentation was submitted in anticipation of an application to the South Carolina Department of Environmental Services-Bureau of Coastal Management (DES-BCM). We understand that public notice of an application identified as DES-BCM reference number HQE-MAZM-0BJ2E has now occurred.

Our office has been in consultation with and provided prior "pre-coordination" anticipatory due diligence review comments to Terracon Consultants, Inc. and the College of Charleston since March 2025 for a project identified as "Coming Street Commons" and/or "St. Philip Housing District". We accepted on July 3, 2025 (see our attached letters) a revised draft plan as final for the *Plan for Archaeological Monitoring, Coming Street Commons, College of Charleston, Charleston, Charleston County, South Carolina*, which we reviewed for proposed geotechnical instrumentation installations at the project site.

Per the project permit application, the project is described as early site work to enable demolition of an existing structure and associated paving, archeological site investigation and recovery, and installation of test piles for a proposed student housing project. The total disturbed area is 1.6 acres for a Stormwater permit. There are no wetland impacts. The project address comprises 91 & 99 St. Philip St., Vanderhorst St., and 106 Coming St. in Charleston.

The State Historic Preservation Office (SHPO) is providing comments to Terracon Consultants, Inc. and the College of Charleston through the DES-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. 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.

The project area has not been previously surveyed for cultural resources/historic properties. The project area is located within the boundary of the National Register-eligible proposed expansion area of the Charleston Historic District, a Significant Site. The project area is also located adjacent to the National Register-listed and National Historic Landmark (NHL)-designated Charleston Historic District, a Geographic Area of Particular Concern (GAPC).

Architectural Evaluation, St. Philips Housing Innovation District, 106 Coming Street, Charleston, Charleston County, South Carolina

The *Architectural Evaluation* report includes a brief history of 106 Coming Street, including both the current building constructed in 1964 for the Young Women's Christian Association (YWCA) chapter of Charleston, as well as the parcel itself, which was laid out as the second official municipal cemetery for the City of Charleston beginning in 1794. 106 Coming Street bisects the middle of what was once the municipal cemetery. The report also appends a separate BVL Historic Preservation Research report, *Coming Street YWCA (1964), 106 Coming Street, Charleston, SC* (dated May 2025).

Based on our review of the draft *Architectural Evaluation* report, our office finds that the Coming Street YWCA building at 106 Coming Street is individually eligible for listing in the National Register of Historic Places at the local level of significance under Criterion A, with applicable areas of significance including Social History, Ethnic Heritage: Black, Social History: Civil Rights, and Other: Women's History. The recommended period of significance would be from 1964 to 1975 (incorporating the National Register program's fifty-year rule). The property is also eligible at the local level of significance under Criterion B in all the same areas of significance for its associations with Christine O. Jackson from 1966 to 1975. The building would not be eligible under Criterion B for associations with Coretta Scott King or Septima Clark, as there are almost certainly other properties with which they are more strongly associated and which would better represent their significant accomplishments.

As the Coming Street YWCA building meets the National Register eligibility criteria it is considered a "Significant Site" for the purposes of the Coastal Management Program. The proposed demolition of Coming Street YWCA building would constitute an irretrievable loss of the Significant Site.

Coastal policies related to Significant Sites are located in Chapter 3 of the Program Document section titled "Guidelines for Evaluation of All Projects": "in review and certification of permit applications in the coastal zone, the [DES-BCM] will be guided by the following general considerations:...9) the extent and significance of impact on the following aspects of quality or quantity of these valuable coastal resources...iii) historic or archaeological resources—irretrievable loss of sites identified as significant by the S.C. Institute of Archaeology and Anthropology or the S.C. Department of Archives and History without reasonable opportunity for professional examination and/or excavation, or preservation."

Our office recommends that professional examination or preservation of the Significant Site occur. Our office recommends as a permit condition that a professional examination or preservation treatment plan be provided for review and approval by our office and DES-BCM.

The professional examination or preservation treatment plan should be conducted by individuals that meet the Secretary of the Interior's Professional Qualifications Standards in archeology, history, architectural history, or historic architecture, as appropriate.

The professional examination or preservation treatment plan should include a copy of the application for, and approval of, the proposed demolition by the Charleston Board of Architectural Review.

If the irretrievable loss cannot be avoided, allowing for preservation of the Significant Site, then proposed professional examination treatment plan measures may include but are not limited to:

digital photographic documentation of the building submitted for approval prior to demolition; identification of and/or preparation of measured drawings of the building submitted for approval prior to demolition; completion of a SHPO Statewide Survey Form for the building; a written history of the YWCA Building placing the building within its local historic context; an oral history project; an "history harvest" event related to the history and memorialization of the Coming Street YWCA building; interpretive panels or exhibits; online exhibits; presentations to the public; dissemination of the written history to accepting local repositories, or other creative measures.

The *Architectural Evaluation* report (including the BVL Historic Preservation Research report) provided may suffice upon revision and repackaging as a written history report of the Coming Street YWCA building. Our office can provide additional comments on the report content as part of the review of the proposed professional examination treatment measures. The *Architectural Evaluation* report's appended digital photographic survey and photo site plan and floor plan documentation should suffice as meeting the standard SHPO stipulated parameters for photographic documentation of a historic building. Original measured drawings of the Coming Street YWCA building should be identified or measured drawings must be prepared and approved by our office prior to any demolition activities. We would also recommend recording the Coming Street YWCA building on a SHPO Survey Form.

The SHPO will have thirty (30) days to review and comment on the draft professional examination or preservation treatment plan upon receipt. If revisions are requested back to the Owner's/Applicant's consulting preservation professional the Owner/Applicant and their consulting preservation professional will address the requested revisions within thirty (30) days upon receipt, until the final plan is approved by SHPO.

Archaeological Work Plan, College of Charleston, Project 205 New Construction, Charleston, Charleston County, South Carolina

The *Archaeological Work Plan* (also titled within the document as *Archaeological Monitoring and Investigation Plan*) builds upon and describes how Terracon, Inc. and the College of Charleston proposes to implement the previously SHPO recommended and reviewed *Plan for Archaeological Monitoring, Coming Street Commons, College of Charleston, Charleston, Charleston County, South Carolina*, as well as an initial plan for the documentation and recovery of human remains associated with the City's second official municipal cemetery that is located in the project area.

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 only providing comments on the technical merits of the draft *Archaeological Work Plan*. We note that the presence or absence of any human remains has not been established to date by any known survey, construction, or excavation project or activity. Our comments on the *Archaeological Work Plan* 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>.

Our office recommends that the *Archaeological Work Plan* incorporate and/or another planning document be developed and provided for review regarding the protection and holistic treatment of human remains. We recommend stating more clearly that all historic burials are protected under at minimum South Carolina burial laws, citing these laws accordingly:

Preservation and Protection of Abandoned and Unmaintained Cemeteries
[6-1-35, SC Code of Laws](#)

Destruction or Desecration of Human Remains or Repositories Thereof; Penalties
[16-17-600, SC Code of Laws](#)

Removal of Abandoned Cemeteries
[27-43-10 thru 27-43-40, SC Code of Laws](#)

Access to Cemeteries on Private Property
[27-43-310, SC Code of Laws](#)

The *Archaeological Work Plan* and/or planning documents would benefit from documentation by the Owner/Applicant, the College of Charleston, regarding 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.

Our office recommends as a permit condition that a revised *Archaeological Work Plan* be provided to this office and DES-BCM for review and approval prior to any ground disturbing activities and beginning any work. Our office's technical comments on the *Archaeological Work Plan* are listed below and should be incorporated into the revised draft provided for review:

--The division of project work into four work stages or phases, while helpful to understanding the timing and progression of work phases for the overall project, would be technically improved by clearer protocols within each stage. For example, we recommend providing clearer protocols for both the identification and recovery of structural remains, human remains, and/or artifacts; for consultation protocols with SHPO, the County Coroner, DES-BCM, the City of Charleston, and Charleston County; and, for treatment of architectural features or other various non-human subsurface features, taking into account National Register eligibility evaluations.

Additionally, there are some overlap and discrepancies in the work plan staging. For example, p. 9, third paragraph states that excavation of burials is intended to be undertaken during Stage 4, noting in the preceding sentences that no further excavation at that location will occur during Stages 1, 2, 3, instead the location will be recorded on field forms, maps, and on a GIS platform, but the following paragraph states that prior to initiation of Stage 4 of the work plan.....remains will be collected and transported to the field office for temporary secure storage. The protocols need to be clearer regarding when discovered remains will be marked, buffered, and covered back up in the field vs collected and/or removed or excavated.

--Following our *Guidance for Archaeological Site Monitoring*, the archaeological monitoring plan needs to specify the exact amount of time during which construction excavations during all work stages are to be made available for archaeological work and/or inspection.

--During the initial stage one of demolition, should any non-human architectural features and/or other various non-human subsurface features be noted by the archaeological monitor, work in this area will need to cease immediately and be buffered. Terracon will contact our office within 24-48 business hours, providing a detailed description of the aforementioned archaeological feature. Terracon should provide sufficient supporting documentation to our office to enable a National Register eligibility determination to be made, or provide a National Register eligibility recommendation with supporting documentation to our office for our concurrence. Protocols should be provided for SHPO consultation and additional excavation steps and treatment measures as deemed necessary.

--Terracon will provide our office a separate GPR methodological plan, detailing the proposed transects, transect spacing and specifications on the exact GPR model utilized. Upon completion of the GPR survey, Terracon will provide our office GPR amplitude maps of all specific timeslices at all various depths, for independent review and will not proceed with exhumation of burials until the SHPO gives concurrence on all potential anomalies/potential burials.

--p. 5, Delete "see Compensation, below" or provide the compensation figures. Page 12 also cites a "compensation table below".

--Please provide an incorporated plan for securing the project site and the temporary field office from potential looting. Please provide clarification of what archaeological resources or human remains will be stored in the temporary field office vs at off-site offices or storage areas.

--Please revise the plan to state that our office will be provided documentation of the hand auguring or soil penetrometer probing in Stage 3, before continuing with the remaining portions of the exhumation.

--Our office requests that all information concerning locational data of human remains remain redacted information to the public. Locational data of human remains can be released to the public once the project is complete (i.e., all excavations are complete, all burials have been fully removed, and the draft report has been finalized by our office).

--p. 6, Our office concurs that a separate work plan for the inclusion of College of Charleston students and faculty should be developed and provided to our office for review. Due to potential infractions of South Carolina burial laws ([16-17-600, SC Code of Laws](#)), should College of Charleston professionals or students be included for potential excavations, they should only be included on excavations of non-human archaeological feature. The location of human remains should remain redacted information to both parties as well.

--p. 9, fourth paragraph, fifth sentence, revise to "transferred to a fully covered plywood box,".

--p. 9 and 10, check references to a "licensed/certified funeral home director" for consistency.

--p. 11, second paragraph, "labeled" is repeated in same sentence.

--p. 11, third paragraph, a timeframe for the submittal of the draft report needs to be stated, as well as who the report will be provided to for review. Delete "monitoring" prior to report in the third sentence and the second bullet. Provide more bulleted details as to the content of the reporting.

--The entire document and the reporting on p. 11 needs to state more clearly that the entire site should be recorded with a SCIAA site number, and that the entire site should be evaluated as the project unfolds for National Register eligibility, taking into account the work plan stages and features as they are discovered.

--p. 12, last sentence, do not include assumptions. See our prior comments concerning the development of a planning document for the holistic treatment of human remains.

--Please clarify how all uncovered archaeological resources and human remains, as well as the temporary secure storage facility, will be curated consistent with federal standards like 36 CFR 79.

--The SHPO requests the reinternment location be finalized as soon as possible, before the conclusion of the project. Please provide the aforementioned location to our office.

--Revise plan to state that if any brick remnants of architectural features are identified, the SHPO requests Terracon retain, at a minimum, a 5% representative example for future XRF analysis, and that any brick remnants must be curated with SCIAA.

--Revise plan to state that should any damage occur to an archaeological site from proposed construction when the archaeological monitor is not present, the recordation of this damage should follow our office's *Guidance for Assessing Damage to Archaeological Sites* ([https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20\(SHPO\)/Programs/Programs/Review%20and%20Compliance/Guidance-Assesing-Damage-Archaeological-Sites.pdf](https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20(SHPO)/Programs/Programs/Review%20and%20Compliance/Guidance-Assesing-Damage-Archaeological-Sites.pdf)).

--At a minimum, Terracon will provide weekly updates to our office and DES-BCM and with advanced notice, allow our office to oversee all monitoring and excavations.

--Our office reserves the right to present any findings for peer review, and any additional timeframes this review may entail.

Regarding any proposed new construction within the project area, our office recommends as a permit 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.

Our standard late/unanticipated discoveries clause should also be included as a permit condition:

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.

Sincerely,



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
803.896.6129
<https://scdah.sc.gov/historic-preservation>

From: Sylvest, John <JSylvest@scdah.sc.gov>
Sent: Friday, November 7, 2025 2:13 PM
To: Schwebler, Justin
Cc: Larsen, Robert; Johnson, Elizabeth; Sara W. Barbagallo; Benjamin F. Thepaut; Gary Jensen; Chris Cook; Worrell, Laura Lee; Schultz, Cristi; Jennifer Papa; Dorn, Mills; Russ, Terri A; Nelson, Blue; Boschi, Dave; Rothenberg Jill P.
Subject: RE: Project 205 New Construction: Professional Examination, Geophysics, and Archaeology Work Plan

Justin, Sara,

Thank you your below email and for the submittal of the revised draft document, *Professional Examination, Geophysical Work Plan, and Archaeological Work Plan, Project 205 New Construction, Charleston, Charleston County, South Carolina* (dated October 1, 2025), provided in response to our September 5, 2025 comments to SCDES-BCM on a project named “Project 205 New Construction” (SCDES-BCM Reference No. HQE-MAZM-OBJ2E and SHPO Project Number 25-JS0212).

The State Historic Preservation Office (SHPO) is providing additional comments to Terracon Consultants, Inc. and the College of Charleston through the 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 only providing comments on the technical merits of the revised draft document, *Professional Examination, Geophysical Work Plan, and Archaeological Work Plan, Project 205 New Construction, Charleston, Charleston County, South Carolina*.

Our comments on the revised draft document 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>.

Professional Examination Plan:

Our office recommended as a permit condition that a professional examination or preservation treatment plan be provided for review and approval by our office and DES-BCM, related to the

irretrievable loss caused by the proposed demolition of the Coming Street YWCA building, a Significant Site under the Coastal Management Program.

Based on our review of the revised draft Professional Examination Plan portion of the document, **our office recommends as a revised permit condition that a Professional Examination Plan be developed and implemented in consultation with our office, the YWCA of Greater Charleston Chapter, and the City of Charleston, 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 that the conditioned Professional Examination Plan be developed and provided as a standalone document, not as a part of the Archeological Work Plan. Please provide a revised standalone Professional Examination Plan taking into account our comments below.

The Professional Examination Plan (Plan) should continue to reference the approval of the proposed YWCA building demolition by the Charleston Board of Architectural Review, as well as reflect the City's condition that the YWCA building's socio-cultural significance be commemorated in a physical manifestation with a highly visible presence in the new construction project, which appears to be incorporated as Task 6 in the Plan provided.

The Plan may also reflect the applicant's efforts to engage the community regarding commemoration of the Coming Street YWCA. However, our office believes the Plan tasks and commemoration of the Coming Street YWCA should be separate from any proposed commemoration of the Potters Field/Second Official Municipal Cemetery, which is separate and farther removed in time in our opinion. We recommend that the Owner/Applicant develop a separate commemoration plan for the Potters Field/Second Official Municipal Cemetery, reflecting engagement with the community and with all interested parties and stakeholders, including our office.

Our office concurs with the overall proposed tasks for the Plan. We are providing our comments on each task:

Task 1 – Written History and Local Historic Context Statement: Our office previously stated that a revised and repackaged version of the previously submitted *Architectural Evaluation, St. Philips Housing Innovation District, 106 Coming Street, Charleston, Charleston County, South Carolina*, which appends a separate BVL Historic Preservation Research report, *Coming Street YWCA (1964), 106 Coming Street, Charleston, SC* (dated May 2025) may suffice as a written history report. Our additional comments on the report's content are as follows:

- Revise the report title, date, and project description to reflect its submittal as a repackaged written history and documentation report submitted as mitigation for the demolition of the National Register-eligible Coming Street YWCA building, pursuant to the CZC review.
- Delete the June 9, 2025 cover letter and any extraneous information such as SHPO Review Forms, project site plans.
- The project description section (and the project website at <https://coming-street-commons.charleston.edu/cultural-preservation/>) contains language that is not accurate and should be deleted. We do not have a Memorandum of Agreement with the College for Project 205 or any other project. We do have a Programmatic Agreement with the College regarding the management of state owned or leased National Register listed properties, but this

Programmatic Agreement is not applicable to Project 205 or any federally assisted project or state SCDES-BCM permitted project. Our advisory role to SCDES-BCM could be potentially incorporated, see <https://scdah.sc.gov/historic-preservation/programs/review-compliance/sc-des-bcm-review-process> for more information.

- The project description section should also include a brief introduction and description of the appended BVL report, i.e. how it differs from the Terracon report. Otherwise, there does not really appear to be a way to merge the two reports unless the authors agree to repacking the contents into one overarching report in such a manner.
- The key sections of the report can be retained as-is.
- The items in Appendix A should be separated into their own appendices labeled A, B, C, etc. Please insert labeled introductory pages prior to each appendix, i.e. “Appendix -- Photographic Survey and Reference Maps – Surrounding Context,” “Appendix – Historic Aerial Photographs.” The BVL report should be appended first, followed by the photographs appendices, then eventually by the drawings, then the maps and SHPO comments.
- Append copies of our comments provided to date on the proposed project to the report as an Appendix.
- Append the SHPO Statewide Survey Form and accompanying survey photographs to the report as an Appendix.
- Revise the report to include the statement of National Register eligibility by our office, in introduction and on page 32. Delete or completely revise the bottom two paragraphs on page 32, having the focus of the written history on the YWCA building.
- Page 3, delete the bottom paragraph regarding archaeological investigation plans associated with the overall project.
- Page 10, second paragraph, either add a period after “J” or spell out Julius; bottom, reference that the BVL “recent history” is appended as Appendix --.
- Include more historic documentation from the Avery Research Center’s collection in the report.
- Include more biographical information about the architect/builder.
- Include more biographical information about Christine O. Jackson.
- Include and reference photographs of the removed items cite on page 24 including the bronze memorial plaque, two iron window grates, and parking permit.
- Include photographs of window and door details to the appended exterior photodocumentation.

Task 2 – Digital Photo Documentation: Our office accepts the *Architectural Evaluation* report’s appended digital photographic survey and reference maps/photo site plan and floor plan documentation, as well as the historic aerials, Sanborn maps, and historic images contained within the BVL and Terracon report as meeting the standard SHPO stipulated parameters for photographic documentation of a historic building prior to demolition. Our recommendations for repackaging the documentation, including the addition of a few additional photographs, are spelled out above in our comments on Task 1.

Task 3 – Measured Drawings: It appears that original measured drawings of the Coming Street YWCA building have not been identified. As such, new measured drawings are proposed and must be prepared and approved by our office prior to any demolition activities. Our office does not object to the proposed measured drawings being conducted in accordance with HABS Guidelines, however, the task should be clear where HABS Guidelines will and will not be met, citing in particular that the goal is to not submit the measured drawings for review and acceptance by the National Park Service and incorporation into the

HABS Collection of the Library of Congress, but to record the building in a “HABS-like” manner. Our office can accept the measured drawings and field notes electronically; no hard copy will be required. We will accession the written history report, photographs, and drawings electronically into the State Archives. We recommend that the cited archival bond copies be provided to and retained by the College of Charleston Libraries.

Task 4 - Material Salvage/Preservation: Architectural elements and/or signage that are salvaged should be photo documented and described in writing and provided to our office via email.

Task 5 - SHPO Statewide Survey Form: Please contact us for a SHPO survey number assignment for use in recording the Coming Street YWCA building on a SHPO Survey Form. We recommend appending the SHPO Survey Form and its accompanying survey photographs to the Task 1 report, as well as providing us with individual electronic copies of the Survey Form and photographs in accordance with our naming conventions cited in our Survey Manual and our [Electronic Submission Requirements for Planning Surveys and Review & Compliance Surveys](#).

Task 6 – Interpretation/Physical Commemoration Plan: This Plan is a key public education component of the overall mitigation of the irretrievable loss. Any draft plan provided should include designs as well as text and/or graphics or objects under consideration. Timeframes for development and implementation should also be included.

Task 7 – Dissemination of Professional Examination Findings/Education Opportunities: Our office concurs with the College of Charleston Libraries as an additional repository of the Professional Examination deliverables. Do these libraries include the Avery Research Center, or is Avery separate? If separate, then Avery should receive copies as well. The internships should be a welcomed opportunity for College of Charleston students, however, our office does not need to receive reports of their experiences. The exception would be if any College of Charleston interns write reports documenting excavations associated with the overall project, we would respectfully ask that these are shared with us, to add to the state site file record.

Professional Examination Task Submittal Timeframes: The measured drawings must be prepared and approved by our office prior to any demolition activities. The measured drawings should be submitted electronically to our office for review. Our office will have fifteen (15) days to approve or provide comments on the drawings.

The remaining tasks can be submitted after the demolition of the Coming Street YWCA building. Again, we recommend providing emailed updates regarding the tasked components outlined under the Plan every six (6) months until completion is documented in writing by the SHPO.

Geophysical Work Plan, and Archaeological Work Plan:

The revised *Geophysical Work Plan, and Archaeological Work Plan* (also titled within the document as Cemetery Relocation Work Plan) appears to reflect revisions in response to our prior September 5, 2025 comments and recommendations, but the overall work plan components would benefit from additional organization, detail, thoroughness, and clarity in keeping with our prior comments. The work plan components feel as they deserve more depth, consideration, and careful study, accounting for the

sensitive nature of the proposed work affecting the acknowledged Potters Field/Second Official Municipal Cemetery, whose proposed removal has received much public interest and concern.

Our office recommended as a permit condition that a revised *Archaeological Work Plan* be provided to this office and DES-BCM for review and approval prior to any ground disturbing activities and beginning any work. This condition still applies. Our office's technical comments on the *revised Plan* components are listed below and should be incorporated into another revised draft provided for review:

It appears that, in keeping with our prior review comments and recommendations, that the Owner/Applicant has two options for the development of applicable work planning documents associated with the overall proposed project -- one, develop and provide three separate planning documents:

- one plan for the Professional Examination Plan related to the demolition of the Coming Street YWCA/a Significant Site as discussed above,
- a second plan for the Archaeology Work Plan (including Geophysical work),
- and a third plan for a Cemetery Relocation Work Plan (we would suggest a different title though).

There naturally would be some overlap and repetition between the planning documents, but the one document as currently provided blends the three tenets of the overall project, which reads unclearly. The organization of the Archaeology Work Plan, which only appears as a title in the Submission, has suffered as a result. If one overarching plan is to be retained for the archaeology and cemetery work, i.e. the second option, then it needs much clearer organization, detailed overarching protocols and procedures, and references to such protocols and procedures throughout. We are not promoting a lengthier document for the sake of length, but a planning document (or documents) that reads to either a cultural resource professional or to a member of the public as a plan that has been well thought out, consistent, has realistic and definable metrics, and that reflects the significance and sensitivity of the cultural resources.

A Cemetery Plan should focus 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. The appended Community Engagement Efforts, which reflect the applicant's community engagement efforts to date, as well as the community's strongly expressed concerns and objections to date largely encompass the applicant's proposal to disturb, excavate, and/or relocate a suspected large amount of human remains. As such, the engagement efforts appear to appropriately belong in a Cemetery Plan type document. As an example, the current work plan document provides a Legislative Framework for cemetery laws, then proceeds into what are archaeological work plan stages, with pages 9-10 under Stage 1 mostly addressing cemetery law requirements and public engagement. Are these requirements and engagement statements here solely for providing a sense of timeframes related to the overall proposed cemetery removal? Likewise, a Reburial/Reinternment section is included at the end of the Stage 5 items of page 20, almost as an afterthought.

Related, has the governing body with jurisdiction over the burying ground provided an opinion regarding the removal of graves? Include if and when in the Cemetery Plan.

The community engagement efforts do not list any Native American tribal consultation efforts. For one, the applicant should address the concerns raised by the Muscogee (Creek) Nation in their October 28, 2025 letter.

If grave goods were to hypothetically indicate Native American burials, how will the Owner/Applicant, the College of Charleston, follow the Native American Graves Protection and Repatriation Act (NAGPRA) if necessary?

The overall plan should also plan, or at the very least acknowledge, Native American burials could be present, or how what methods will unfold if any pre-contact artifacts are identified within burial contexts.

We recommend stopping work and providing reporting to us at the end of Stage 1 (monitoring report) and Stage 2 (GPR report), allowing for consultation with all project stakeholders as well as presenting the findings (absent sensitive locational data) to date to the public prior to proceeding further with additional work stages. 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.

Page 16+: Documenting Historical Features, Procedures for the Discovery of Human Remains, Late/Unanticipated Discoveries, and Archaeological Analyses, if not Curation, Reporting, and consultation and National Register determination protocols with our office as well as consultation with any other parties/stakeholders – are these not applicable to all stages of work? We recommend the archaeological work plan begin with these overarching protocols that are applicable to the stages of work, stating the applicable stages as a matter of fact, after which they can be again cited or referenced in each stage for consistency, clarity, and thoroughness. Any differences as applicable to a stage should be noted. Otherwise, it does not appear that our previous recommendation to provide these protocols within each stage was clearly met.

The protocols still need to be clearer regarding when discovered remains will be marked (and how), buffered, and covered back up in the field vs collected and/or removed or excavated, during all stages. Likewise, how, and where will human remains be curated during each stage?

If human remains are identified during monitoring, how will the mechanical stripping be altered to address this?

Stage 3-Mechanical Excavation:

-Soil coring/auguring should be conducted prior to the initiation of mechanical stripping, in select locations, to confirm potential anomalies identified by the GPR and to ensure mechanical stripping will not disturb any human remains/artifacts/features prior to reaching a grave shaft. As such, this subsection should start with soil coring/auguring and should be the introductory paragraphs of this section.

-As a standardized burial depth has not been established, and as historical documentation appears to provide a dearth of any contextual information demonstrating an answer to this, factoring potential disturbances to the burials from later occupational periods, the plan must acknowledge that the potential exists for non-standardized burial depths to be present and that burials may be non-congruent containing disperse disarticulated remains. As such, our office views that the plan must acknowledge mechanical stripping may not be plausible, in any standardized format. The plan should acknowledge that hand excavations may be the only method to accurately and respectfully document and recover all human remains present. The plan should additionally acknowledge that the mechanical stripping portion may need to be removed; a stop work should additionally be called after judgmental soil coring/auguring to assess the findings and if mechanical stripping is feasible.

Stage 5-Burial Removal & Documentation:

-This stage should also acknowledge that mechanical stripping may not be possible and that hand excavations may be the only plausible method, therefore moving the plan directly to this step.

-This stage should include additional elaboration on the methodologies to document disarticulated human remains if present.

-This stage should also include an expanded discussion on how burial goods will be related to the correct re-internment, if non-congruent disarticulated remains are present. For example, if an enslaved tag is identified roughly equidistant between two burials, which re-internment will this burial be within?

Additionally, if burials are incongruently arranged and human remains are disarticulated, how will any potential identified grave goods be documented and re-buried, if a burial is not in clear association to the aforementioned grave good?

If burials are incongruently arranged and human remains are disarticulated, how will a burial plan be formulated when the number of actual graves is unclear? Will MNI (Minimum Number of Individuals) be utilized to scientifically hypothesize how many re-burials would be appropriate?

Weekly progress updates should be provided to our office throughout all stages of work, not beginning at stage 5. The field staff should be compiling this documentation as part of their work anyway.

Page 14, why 5 business days advanced notice for us to come to the site for monitoring? And why is this in Stage 5? SHPO may provide 24-hour advanced notice prior to visiting the site during any stage of work. We do not even have such an advance notice in our agreements with federal agencies and applicants pursuant to Section 106 of the National Historic Preservation Act. Please revise accordingly.

The Geophysical Work Plan starts on page 21, why is it not imbedded in the text of Stage 2 where the geophysical survey is discussed?

Are there any consultation protocols needing to be defined with anyone besides SHPO? (i.e., the County Coroner, DES-BCM, the City of Charleston, Charleston County, Community Engagement Council, internal College of Charleston, Native American Tribes, etc.). A roles and responsibilities section could be helpful to aid in this understanding.

Page 8 contacts, list Robert Larsen, Staff Archaeologist as the primary SHPO contact; John Sylvest can be a backup.

If the removal of human remains is approved and decided upon by the governing body and the Owner/Applicant, what historical information and interpretation will the archaeological investigations seek to reveal about the history of the site and the individuals buried within? Otherwise, current plans read solely as an exercise in archaeological excavation and future reburial as a means to achieve the proposed new housing construction. What and where is the context and justification for removal of human remains in the plans? Where is the alternatives analysis? We recommend looking nationally at prior federal and state projects of a similar nature for lessons learned.

No approved plan, regardless of the amount and detail of review, can account for all outcomes or concerns that may arise over the course of a project involving the proposed excavation and removal of potentially hundreds or thousands of graves, associated grave goods, artifacts, and/or cultural features. Our office would anticipate post-plan approval consultation and additional measures, whether these are expressed through unanticipated discoveries, or through consultation with the public and stakeholders, reflecting desires or outcomes for additional reporting and/or analysis (destructive or nondestructive), conservation, or historical study or commemoration.

We recommend reviewing the project website FAQ's at <https://coming-street-commons.charleston.edu/faqs/> and incorporating applicable elements into the applicable work plans.

We recommend appending copies of our comments provided to date on the proposed project to the work plans as an Appendix.

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.

Sincerely,



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