



Cemetery and Commemoration Work Plan of 106 Coming Street

Project 205 New Construction

Charleston, Charleston County, South Carolina

January 8, 2026

DES-BCM Reference No. HQE-MAZM-OBJ2E

SCDAH SHPO Project No. 25-JS0212

Prepared for:

South Carolina

Department of Archives and History

8301 Parklane Road
Columbia, SC 29223



January 8, 2026

SCDAH
8301 Parklane Road
Columbia SC, 29223

Attn: Mr. John D. Sylvest
P: (803)-896-6129
E: jsylvest@scdah.sc.gov
Mr. Robert Larson
P: (803)-896-6181
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Re: Cemetery and Commemoration Work Plan
Project 205 New Construction
Charleston, SC 29401

Dear Mr. Sylvest & Mr. Larsen:

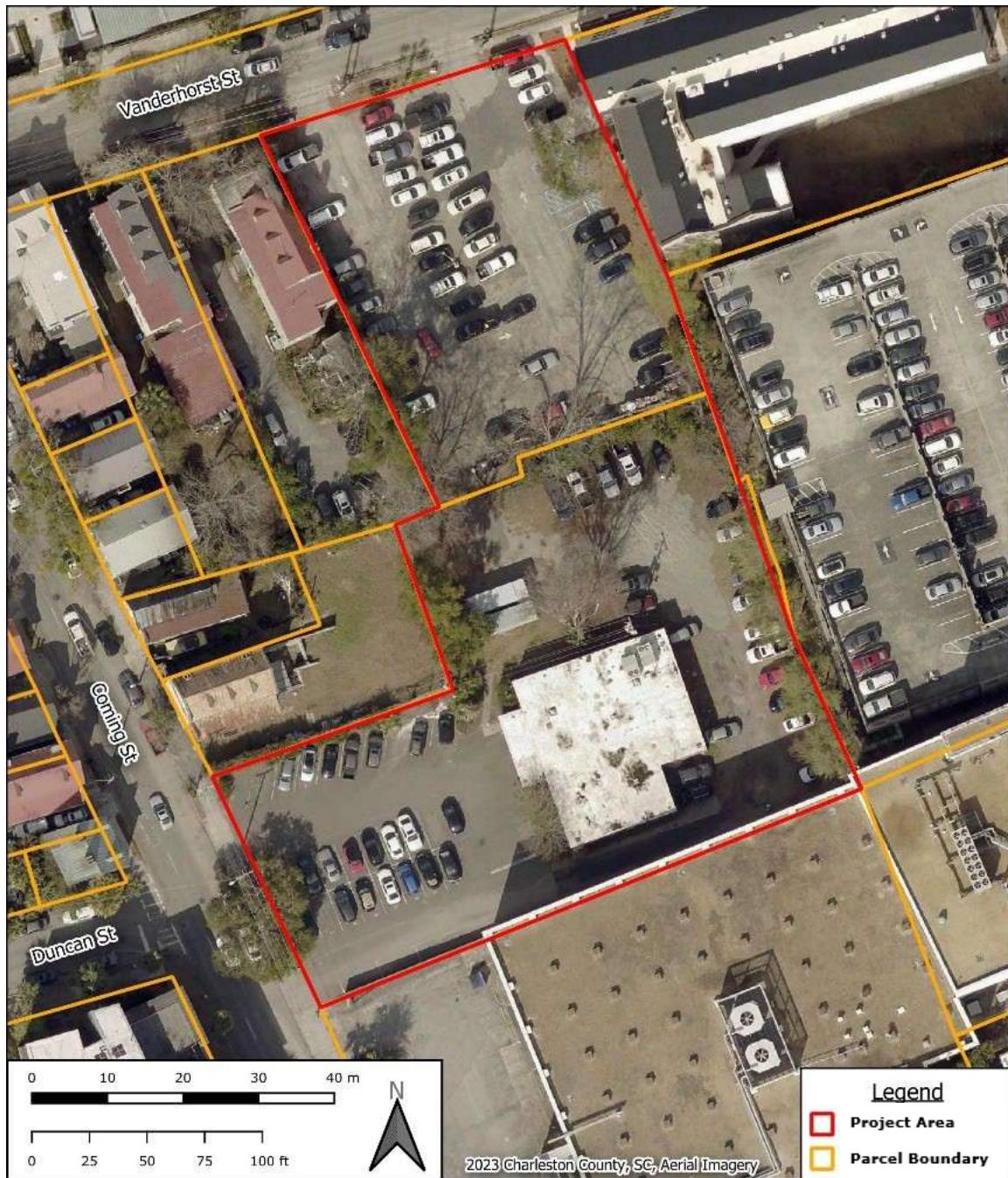
The College of Charleston is pleased to submit this Cemetery and Commemoration Work Plan to the South Carolina Department of Archives and History for "Project 205 New Construction."

The work plan below is submitted following a request by Mr. John D. Sylvest via an email dated November 7, 2025, to Sara Barbagallo, the DES permit manager for this project, addressing recommendations from SCDAH therein. The email requested a stand along Cemetery and Commemoration treatment plan be provided for review and approval by SCDAH and DES-BCM related to the irretrievable loss caused by the proposed development at 106 Coming Street, Charleston, SC (the former Coming Street YWCA building and Charleston Potter's Field), a Significant Site under the Coastal Management Program.

Sincerely,
College of Charleston

Laura Lee Worrell
Senior Project Manager
Qualified Preservation Professional

January 8, 2026



January 8, 2026

Contents

CEMETERY AND COMMEMORATION WORK PLAN	
PROJECT INFORMATION.....	1
Task 1: Community Engagement	3
Task 2: Commemoration	5
Task 3: Reburial/Reinternment.....	6
Conclusion.....	7
APPENDIX	
A: BVL Historic Preservation Research.....	
B: Terracon's Architectural Evaluation and Site History.....	
C: S&ME's Historic Research and Geophysical Assessment.....	
D: Avoidance Assessment	
E: Public Engagement.....	
F: Community Engagement Council (CEC).....	
G: College of Charleston Commitement Declaration.....	
H: Site Commemoration Requirements.....	

CEMETERY AND COMMEMORATION WORK PLAN

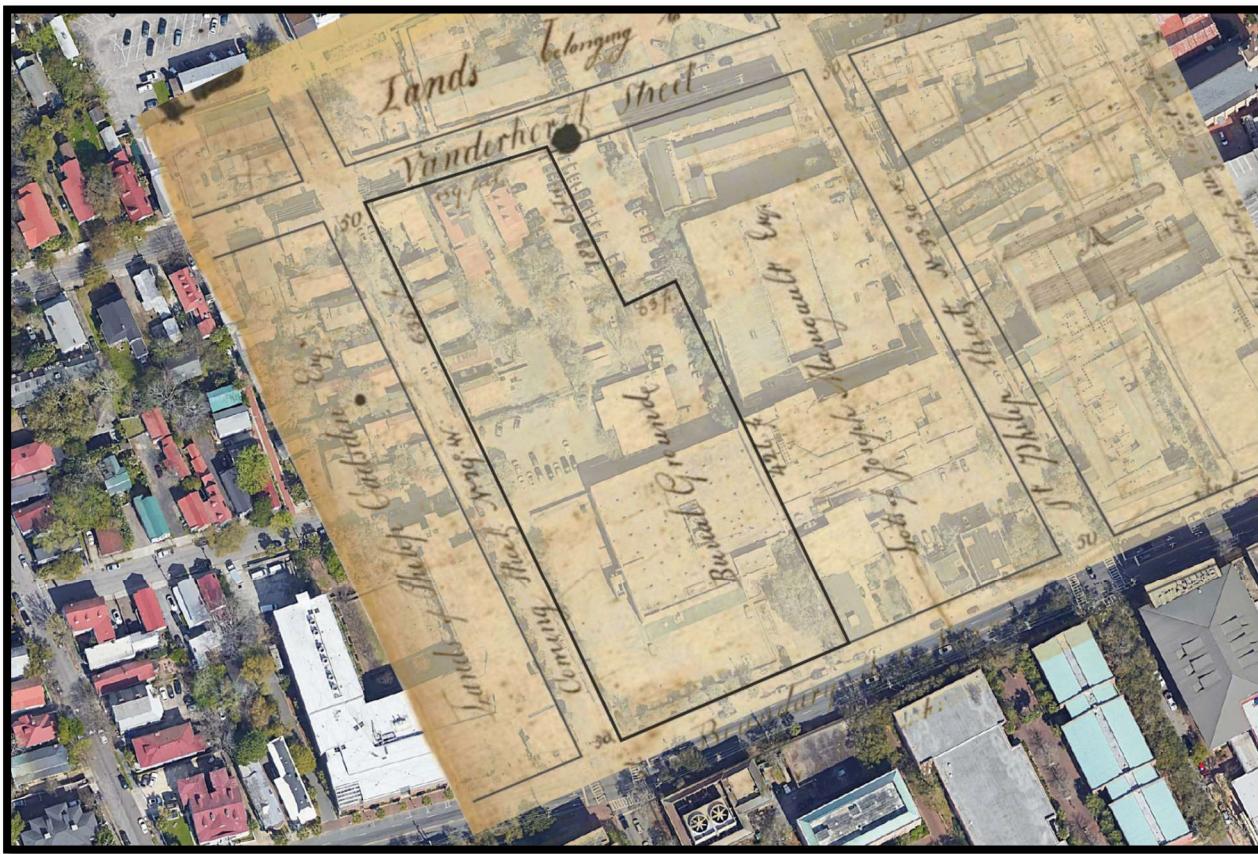


Figure 1: Detail of 1799 plat overlaid on a current aerial (City Engineering Plat, Charleston County Public Library) BVL Historic Research PUBLIC BURIAL GROUND (1790s-1807) Coming, Vanderhorst & Calhoun Streets, Charleston, SC PG7



Figure 2: 106 Coming St. Charleston, SC. Former YWCA of Greater Charleston headquarters. Photo provided by Terracon.

PROJECT INFORMATION

The following Cemetery and Commemoration Work Plan is submitted by the College of Charleston to the South Carolina Department of Archives and History (SCDAH) 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.

Founded in 1770, the College of Charleston sits in the heart of the Historic Charleston peninsula. As a longtime community member and steward of historic preservation, the College of Charleston is committed to the engagement of the community and descendant communities for the commemoration and reinternment for the site's historic Potter's Field and YWCA, located at 106 Coming Street.

Through centuries of development, the site's known history has been vastly limited. The 1794–1807 City of Charleston's cemetery/potter's field and the YWCA building were recognized as culturally significant and have the potential to be listed on the National Register of Historic Places through research of three reports: (1) BVL Historic Preservation Research, (2) Terracon's *Architectural Evaluation and Site History*, and (3) S&ME's *Historic Research and Geophysical Assessment*. Completed additional comments and recommendations from the November 7, 2025, email from SCDAH's John Sylvest, will have coordination between Terracon and BVL to "revise and repackaging" the previously submitted *Architectural Evaluation* and BVL report, in order to meet SCDAH requirements for a written history and local historic context. Original reference reports are submitted as part of additional Project Work Plans and included to this work plan as reference in Appendix A, B, and C.

Considerations for avoidance and the College's efforts to find alternatives to disturbance can be found in the attached Assessment in Appendix D. In-lieu of alternatives, this plan intends to outline community engagement, commemoration of both significant historical features as identified, and the protection and holistic treatment of human remains. In addition, this document was produced in conjunction with the (1) Professional Examination Plan and the (2) overall Archaeology Work Plan including Cemetery Plan, submitted as a separate document for South Carolina State Historic Preservation Office (SHPO) review and approval prior to the initiation of any field investigations.

The proposed tasks for this Cemetery and Commemoration Plan are as follows:

- Task 1: Community Engagement
- Task 2: Commemoration
- Task 3: Reburial/Reinternment

Task 1: Community Engagement

To assist with local community engagement, the College of Charleston engaged Terracon Consultants, Inc., partnered with the Asiko Group, based in Charleston, who specializes in authentic and meaningful community engagement. The Asiko Group utilized creative communication and public outreach to work with stakeholders to help develop strategies and results that can benefit the project and community. Asiko aided the College during three public meetings (June, August and September 2025) to engage stakeholders and learn of their thoughts and anxieties in a manner receiving equitable concern. In addition, Appendix E provides the College's larger community engagement efforts to date, with the assistance of the Asiko Group and internal College of Charleston Communications office.

As a transition to a more direct community and descendant-led engagement, a Community Engagement Council (CEC), comprised of local volunteers, descendant community members, and other interested stakeholders, was created in fall 2025 to provide input on the proposed project. The CEC was created to provide advice on the respectful handling of human remains, selection of certified funeral director(s), selection of reinterment location, memorialization of the people and site, and to advise whether additional analysis, such as DNA testing or Isotope analysis, is warranted. The call to action, invitation notice, roster, and general mission statement prior to committee adoption can be found in Appendix F. Ongoing CEC meeting minutes, requests, and directives will be provided on a monthly basis to SCDAH as part of the ongoing agreement and checkpoints established in compliance with the Cemetery and Commemoration Work Plan. Attached in Appendix G is a Commitment Letter from the College of Charleston's President Andrew T. Hsu outlining the Council's role and reporting benchmarks.

Other cultural projects being referenced, but not limited to, are provided below to help inform models of best practice, good stewardship, and community engagement:

- African Burial Ground National Monument in New York, NY
- Anson Street African Burial Ground in Charleston, SC
- Hill African Burying Ground in Richmond, VA
- Unmarked Burials Consultation Committee provided by Missouri State Historic Preservation Office
- Sacred Ground – The Fight to Protect Burial Sites of Enslaved People in St. James Parish, Louisiana, provided by the Inclusive Louisiana and the Center for Constitutional Rights
- Bethel Burying Ground Project in Philadelphia, PA
- Cemetery Hill Project in Clemson, SC, by Clemson University
- Baldwin Hall at Old Athens Cemetery by University of Georgia
- East Marshall Street Well Project by Virginia Commonwealth University
- Unmarked Cemetery in Sugar Land, Texas
- Taum Graveyard in Taum, Ireland

January 8, 2026

- Graveyard at Gooch Dillard Hall in Charlottesville, Virginia, by University of Virginia
- African American Burial Ground in West Philadelphia, Pennsylvania, by the University of Pennsylvania

Other standards and published works referenced, but not limited to, are provided below to help inform models of best practice, good stewardship, and community engagement:

- Advisory Council on Historic Preservation's Policy Statement on Burial Sites, Human Remains, and Funerary Objects

Although there is not a federal nexus triggering the Section 106 process, because there is no federal agency involvement, funding, or permitting, there is a possibility of encountering historical Native American Burials interred within the boundaries of the potter's field. With the addition to the larger public and descendant community engagement, the College, with aid from Terracon Consultants, is continuing work on outreach and communication to Federal, State, and Local Tribes. Continued correspondence between these sovereign nations and tribes will be shared, along with all monthly engagement updates, with SCDAH as part of the ongoing agreement and checkpoints established in compliance with the Cemetery and Commemoration Work Plan.

In the event the Native American Graves Protection and Repatriation Act (NAGPRA) is triggered due to encountering identifiable Native American human remains, relationships and lines of communication will be established. Consultation with the tribes has not yet occurred, so these protocols are not included in this draft of the work plan, but these protocols will likely be included in the forthcoming research design.

In addition, the College has reached out to the following agencies to inform them of ongoing efforts, seek guidance, and to ensure compliance with all applicable laws and regulations:

- South Carolina Institute for Archaeology and Anthropology
- National NAGPRA Program, National Park Service
- Advisory Council on Historic Preservation

In conjunction with the Community Engagement Council's direction and recommendations, the College of Charleston will continue ongoing updates with the public on findings, commemoration, and reinternment throughout the project through the project website at <https://coming-street-commons.charleston.edu/>, in accordance with SHPO request dated September 5, 2025, along with direct communications with established Tribes. Additional reference communication methods can be found in Appendix

E. 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.

Task 2: Commemoration

The College is committed to honoring the full and complex history of the property by thoughtfully incorporating two permanent commemoration sites into its footprint. These sites will recognize the legacy of the YWCA, whose presence on the property reflects a history of community service, advocacy and support, as well as the Potter's Field, which serves as a solemn reminder of those who were laid to rest there and whose lives deserve remembrance and dignity. By embedding these commemorative spaces into the landscape of the property, the College affirms its responsibility to preserve historical memory, acknowledge past uses of the land and create places for reflection, education and respect for the individuals and communities connected to this site.

The College of Charleston established a Community Engagement Council (CEC) to support the College's stewardship of the property and to help guide thoughtful, inclusive approaches to commemoration. The Council brings together representatives from the community, archaeologists, historians, and College stakeholders to ensure that multiple perspectives inform how the site is understood, interpreted and remembered. Through dialogue, collaboration and shared expertise, the Council will help the College honor the property's layered history, recommend appropriate forms of commemoration for both the YWCA and Potter's Field and foster transparency and trust as the College moves forward as a responsible steward of this important place. For additional information concerning the establishment, members, and actions of the CEC, refer to Appendix F.

A physical commemoration for the YWCA and former director Christine O. Jackson is required as part of any new construction design submission per the parcel Planned Unit Development (PUD) ordinance language. A physical commemoration of the YWCA history on the site was also a requirement of the City of Charleston Board of Architectural Review (BAR) demolition approval from June 11, 2025. Excerpts from BAR and the PUD can be found in Appendix H.

More information on this can be found in the Professional Examination Plan, Task 6 or as summarized from the plan below.

Sequencing for the implementation of a commemoration plan would be as follows:

- *Complete Historic Research and Documentation outlined in Professional Examination Tasks*

January 8, 2026

- *Engagement with stakeholders, YWCA of Greater Charleston, SCDAH, College of Charleston, Liollio Architecture, and CEC with historic research and documentation to help guide commemoration planning and design.*
- *Development of a site masterplan for new construction.*
- *Ongoing engagement with stakeholders through design, coordination for construction, and eventual ribbon cutting.*

While time durations cannot be provided at this time, the College of Charleston intends to allow the appropriate space and time for the development of the commemorations through the direction of the Community Engagement Council (CEC). Detailed timeframes and commemoration design programs will be provided to SCDAH as they are developed, and will be included in the six (6) month update reports for the Professional Examination provided to SCDAH as well as monthly updates as appropriate and noted in Task 1 of this plan. For additional information concerning the establishment, members, and actions of the CEC, refer to Appendix F.

Task 3: Reburial/Reinternment

To ensure the protection and holistic treatment of human remains as part of the removal and reinternment of the site, two parallel paths must occur: (1) Compliance with Laws and Regulations and (2) Community/Descendent Engagement. Since the state does not have codified protocols for the excavation and documentation of historical human burials, the project will follow standards set forth in *South Carolina Standards and Guidelines for Archaeological Investigations*¹. In addition to SHPO Project Number 25-JS0212 Work Plans, the project will comply with the noted below guidelines and legal requirements as listed:

- South Carolina Standards and Guidelines for Archaeological Investigations
- The Advisory Council on Historic Preservation's Policy Statement on Burial Sites, Human Remains, and Funerary Objects, located at <https://www.achp.gov/digital-library-section-106-landing/achp-policy-statement-burial-sites-human-remains-and-funerary>.
- SC Code 27-43-10, *Removal of Abandoned Cemeteries*, requiring publishing of legal notice for four consecutive weeks in a newspaper of general circulation in the county to inform the public of the intent to

¹ 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)

January 8, 2026

relocate any human remains and then another four-week period is given for public comment.

- Native American Graves Protection and Repatriation Act (NAGPRA)
- Technical Review Board (TRC), City of Charleston,
- Department of Environmental Services, DES-BCM (CZC) Permit
- South Carolina State Historic Preservation Office, Work Plan approvals

As the College seeks approval from the City of Charleston, local jurisdiction, in compliance of SC Code 27-43-10, and reinternment approval by the City of Charleston Council, no work will commence out of sequence without proper permits and approvals required being provided as dispensed to SCDAH for proof of compliance.

In tandem, the Community Engagement Council (CEC), which consists of community and self-nominated individuals representing interested general community at large and descendant community will provide ongoing feedback, guidance, and cultural insight for reinternment. Other stakeholder groups include Tribes, public and descendant communities, and interested agencies. Additional comments and input are always welcome directly through the College's project website at <https://coming-street-commons.charleston.edu/> or through email to coming-commons@charleston.edu. All comments, works, and recommendations will be compiled and submitted to SCDAH in compliance with prior outlined submission deadlines that occur monthly and bi-annually.

While time durations cannot be provided at this time, the College of Charleston intends to allow the appropriate space and time for the development of the reinternment plan to occur through the direction of the Community Engagement Council (CEC). Detailed timeframes and reinternment plans will be provided to SCDAH as they are developed and will be included in the six (6) month update reports for the Professional Examination provided to SCDAH as well as monthly updates as appropriate and noted in Task 1 of this plan. For additional information concerning the establishment, members, and actions of the CEC, refer to Appendix F.

Conclusion

The College of Charleston is pleased to submit this Cemetery and Commemoration Plan for the Potter's Field and YWCA of Greater Charleston located at 106 Coming Street, to the South Carolina Department of Archives and History. The College of Charleston is already initiating current Work Plan outlines and will continue upon the signed approval of the Cemetery and Commemoration Work Plan by SCDAH.

APPENDIX A

BVL HISTORIC PRESERVATION RESEARCH



BVL HISTORIC
PRESERVATION RESEARCH

PUBLIC BURIAL GROUND (1790S-1807)

COMING, VANDERHORST & CALHOUN STREETS

CHARLESTON, SC

Prepared for:

The College of Charleston

Prepared by:

BVL Historic Preservation Research

Brittany Lavelle Tulla, Emilie Crossan and Amanda Metze

July 2025

BVL HISTORIC PRESERVATION RESEARCH

PUBLIC BURIAL GROUND (1790S-1807)

COMING, VANDERHORST & CALHOUN STREETS
CHARLESTON, SC

In the decade following the American Revolution, the City of Charleston established a 3.4-acre public burial ground on the north side of today's Calhoun Street. Active between the 1790s and 1807, the property was referred to as the "Strangers and Negroes Burying Ground" and became the final resting place for many of Charleston's most vulnerable and destitute residents, including the city's poor, orphaned, enslaved, and newly arrived immigrants. Today, the land has been redeveloped and the burial ground remains unmarked.

In 2025, the College of Charleston acquired approximately 1.14 acres of this public burial ground site. The College's parcel, hereafter referred to as the "Project Area," consists primarily of surface parking and includes a one-story c. 1966 building identified as No. 106 Coming Street (Figure 1).¹

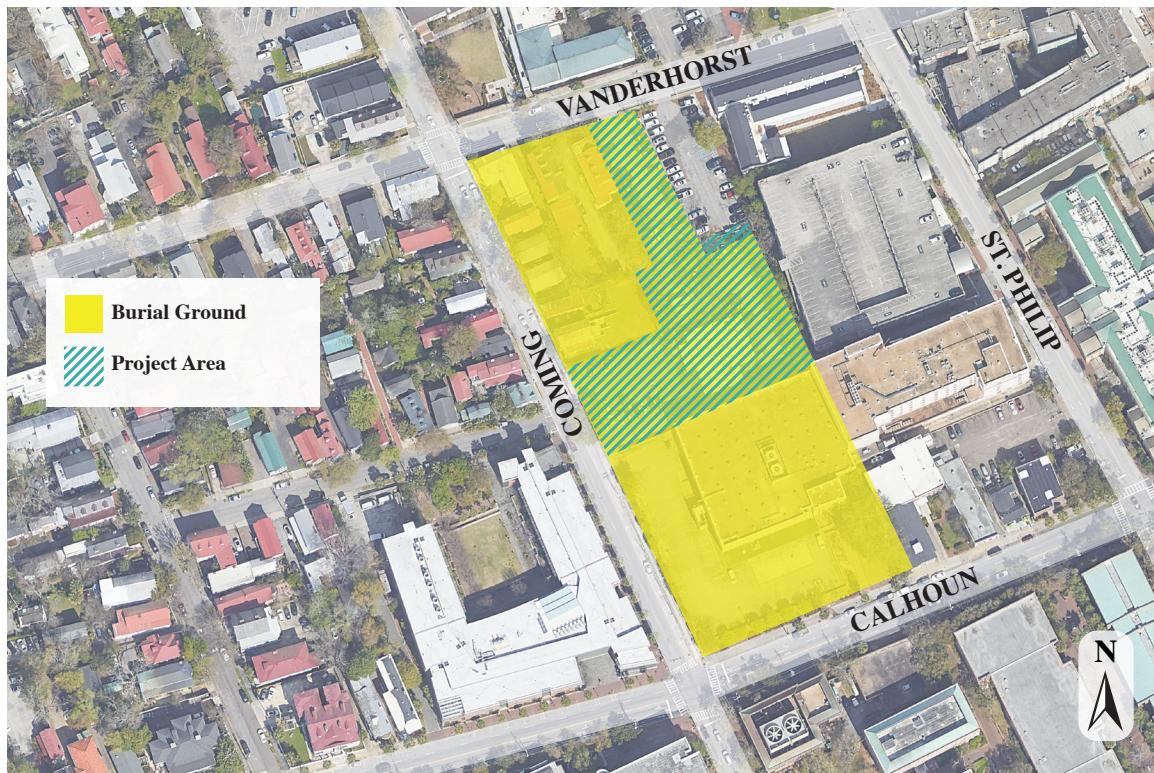


Figure 1: A 2025 aerial showing the current Project Area within the boundaries of the "Strangers and Negroes Burying Ground."

¹ See BVL HPR historic building report of No. 106 Coming Street (Charleston County tax parcel #4601603017)

ESTABLISHMENT OF THE BURIAL GROUND

Between the 1670s and 1840s, Charleston established three successive public burial grounds in response to population growth, recurring epidemics, waves of immigration, and intensified participation in the Transatlantic Slave Trade. The Project Area is situated within the boundaries of the second of these municipal cemeteries and is denoted as “Public Burial Ground B” in Figure 3.

In February of 1793, Charleston’s City Council formally purchased a 3.4-acre parcel on the “Charleston Neck” from John Poaug (1769-1796) to establish a new public burial ground.² The property was described as bounding “Manigault Street or Boundary” (known today as Calhoun Street) to the south, Coming Street to the west, Vanderhorst Street to the north, and private property to the east. Approximately 1.14 acres of this 1793 purchase was conveyed to the College of Charleston in 2025 (see Figure 1).³

Situated outside Charleston’s original city limits, the Project Area was historically part of a larger 23.4-acre tract owned by London merchant and colonial politician Samuel Wragg (1690-1750) by 1715.⁴ Located in a landscape defined by scattered farms and marshland along the Ashley River, the parcel was likely used by the Wragg family as rental land, supported by general or tenant farming.⁵ By 1786, Wragg’s descendants, including Poaug, subdivided the property into 69

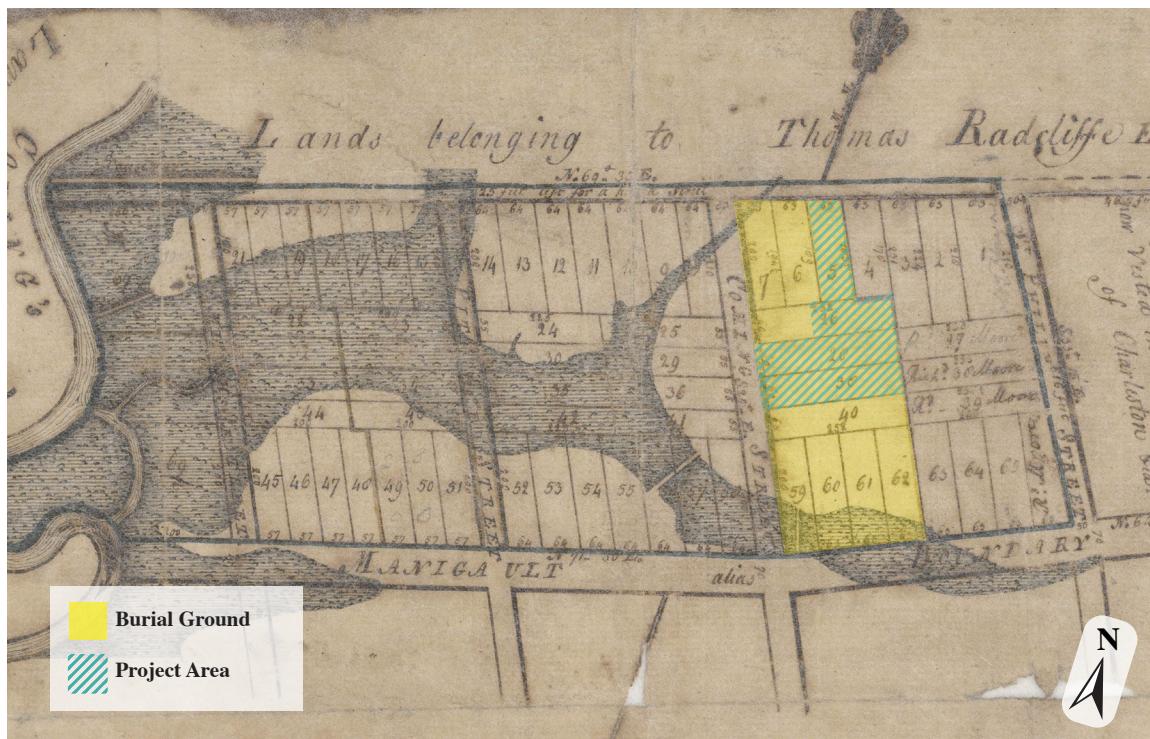


Figure 2: 1786 plat of the subdivision of Wragg’s estate; the lots purchased by the City of Charleston in 1793 are highlighted (McCrady Plat 0538, Charleston County Register of Deeds)

2 Charleston County Deed Office, Deed Book F6, Page 519, Charleston, SC.

3 Charleston County Deed Office, Deed Book 1291, Page 721, 724, Charleston, SC.

4 Billings, Warren M. “Sir William Berkeley and the Carolina Proprietary.” *The North Carolina Historical Review*, Vol. 72, No.

3. Raleigh: North Carolina Department of Natural and Cultural Resources, 1995. 329–42.

5 “For the City,” 1800 March 21, *City Gazette*, Charleston, SC.

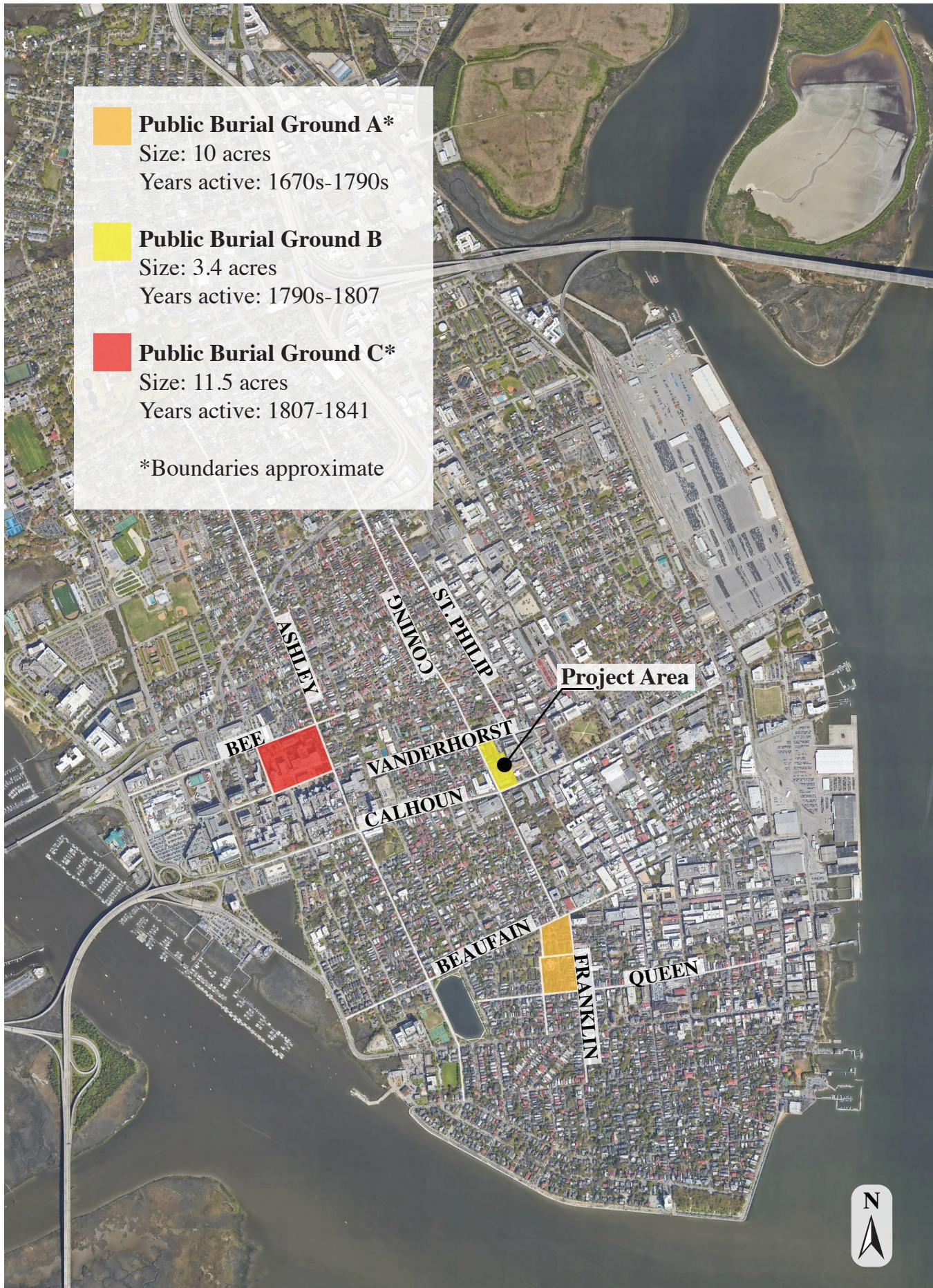


Figure 3: Current aerial of the Charleston peninsula with the city's early public burial grounds denoted.

separate building lots. A late-eighteenth-century plat confirms that the future public burial ground was divided into eleven of these lots, with the southwest corner still partially occupied by the marshes of Coming's Creek, a former tributary of the Ashley River that once bisected most of the peninsula's western edge (Figure 2).

Charleston's City Council purchased the eleven lots from Poaug to replace an earlier public burial ground, which was approximately 10 acres in size and located within the city limits. The original cemetery, which served the city for over a century, is now the area of the Robert Mills Manor housing complex, bounded by Logan, Beaufain, and Magazine streets, and denoted as "Public Burial Ground A" in Figure 3.⁶ It was established as a final resting place for individuals excluded from formal church burials, such as those too poor to afford private interment, those unaffiliated with a religious institution, or those explicitly barred from church graveyards. In a major port city like Charleston, this often included "strangers," such as seamen, transient workers, or traveling families who died within the city limits, as well as orphans, enslaved individuals, and free people of color, many of whom perished as a result of unsanitary living conditions or a public health crisis.⁷

Many of those interred in this first city-owned cemetery died while housed in municipal institutions that were located directly across the street within a large complex of public facilities (Figure 4). This particular complex included the City Hospital and Poor House, which offered limited medical

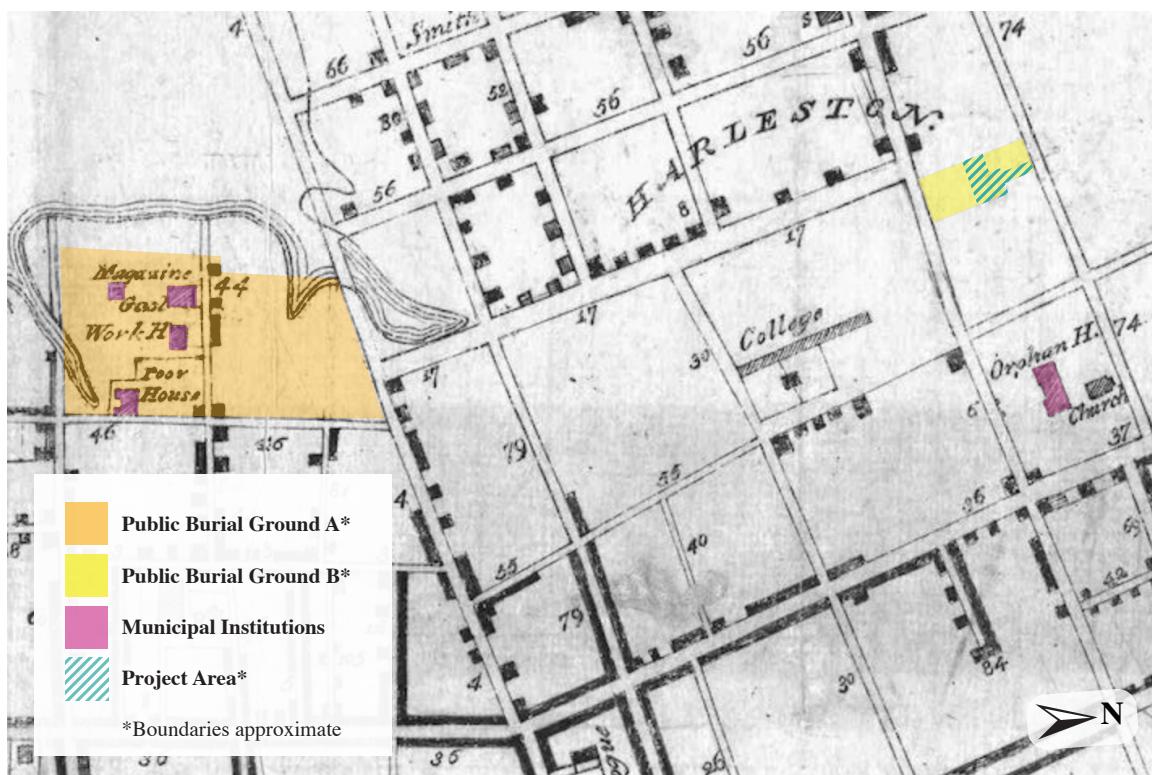


Figure 4: Detail of c. 1802 map of Charleston by J.J. Negrin; "Public Burial Ground A" and the associated the municipal complex as well as the Project Area are denoted (Charleston County Public Library)

⁶ Butler, Nic. "The Forgotten Dead: Charleston's Public Cemeteries, 1794-2021." *Charleston Time Machine*, podcast. Episode 201, 7 May 2021. Transcript available at: <https://www.ccpl.org/charleston-time-machine/forgotten-dead-charlestons-public-cemeteries-1794-2021>.

⁷ "Charleston, April 15," 1768 April 15, *The South Carolina and American General Gazette*, Charleston, SC.

care, shelter, and basic necessities for Charleston's impoverished residents. Others interred there had been confined in the City Jail or the Work House, the latter specifically used to punish or detain enslaved individuals for offenses defined either by their enslavers or city ordinances.⁸ By 1790, this earlier cemetery also began to serve the Charleston Orphan House, the first municipal orphanage in the United States. Located adjacent to Poaug's estate along Boundary Street, the institution provided care for children without families or estranged from relatives who needed financial support and supervision. As the original burial ground approached capacity, the City Council's 1793 acquisition of the Project Area and surrounding parcels from Poaug was intended to sustain burial services for these same marginalized populations.

City Council, 20th of Aug. 1794.
WHEREAS it becomes at this time necessary that a place be appropriated for the burial of strangers, those who may die in the poor house, hospitals, and negroes: therefore resolved, That the lot of land lately bought from John Pouag, on the north side of Boundary Street, be applied to the above purpose, and that the commissioners of the poor-house have the same under their direction.
Extract from the journals,
P. Bounetheau, C. C.
August 23.

Figure 5: *City Gazette*, August 25, 1794 (Charleston, SC)

intended function.¹⁰ Petitions for the establishment of such a space continued well into the decade, further suggesting that the Project Area was not put into immediate use as a public burial ground and may have been active for a significantly shorter period than commonly believed.

In November of 1798, for example, a committee representing several of Charleston's churches called for the designation of a burial site "for the internment of Strangers" outside the city's limits with a separate section "for the burial of negroes, other people of color, and slaves."¹¹ As the Project Area was both located beyond the city boundaries and intended for the burial of those specific populations, it is possible that it was not yet formally established or put to regular use as a burial ground by this time. Supporting this, newspaper reports from late 1798 confirm that the City Hospital continued to bury the deceased in the "City Hospital Burying Ground," likely referring to the first public cemetery located directly across from the hospital complex near today's Robert Mills Manor on Logan Street (Public Burial Ground A in Figure 3).¹²

In response to the churches' 1798 appeal, the City Council appointed a committee to "enquire [sic] into and report whether any and what land near the city [could] be procured for the internment of dead bodies."¹³ By April of 1799, the committee issued a report recommending that "some

In August of 1794, City Council declared it "necessary" to designate an additional place for the burial of "strangers, those who may die in the poor house, hospitals, and negroes" and specified that "the lot of lands lately bought from John Pouag [sic]" on the north side of Boundary Street would serve this purpose (Figure 5).⁹ Yet in May of 1795, the Medical Society of South Carolina (MUSC) urged citizens to advocate for the procurement of a "sufficient piece of ground...without the city" for a public burial ground and cited concerns related to the prevention of disease, an appeal that implies the Project Area was either underutilized, poorly managed, or not widely recognized as serving its

8 "The Ichnography of Charles-town at High Water," 1739. Library of Congress, Washington, D.C.

9 "Proclamation," 1794 August 25, *City Gazette*, Charleston, SC

10 "In the Medical Society," 1795 May 15, *City Gazette*, Charleston, SC.

11 "For the Information of the Citizens," 1799 May 3, *City Gazette and Charleston Daily Advertiser*, Charleston, SC.

12 "City Hospital Report," 1798 October 26, *Evening Courier*, Charleston, SC.

13 "For the Information of the Citizens," 1799 May 3, *City Gazette and Charleston Daily Advertiser*, Charleston, SC.

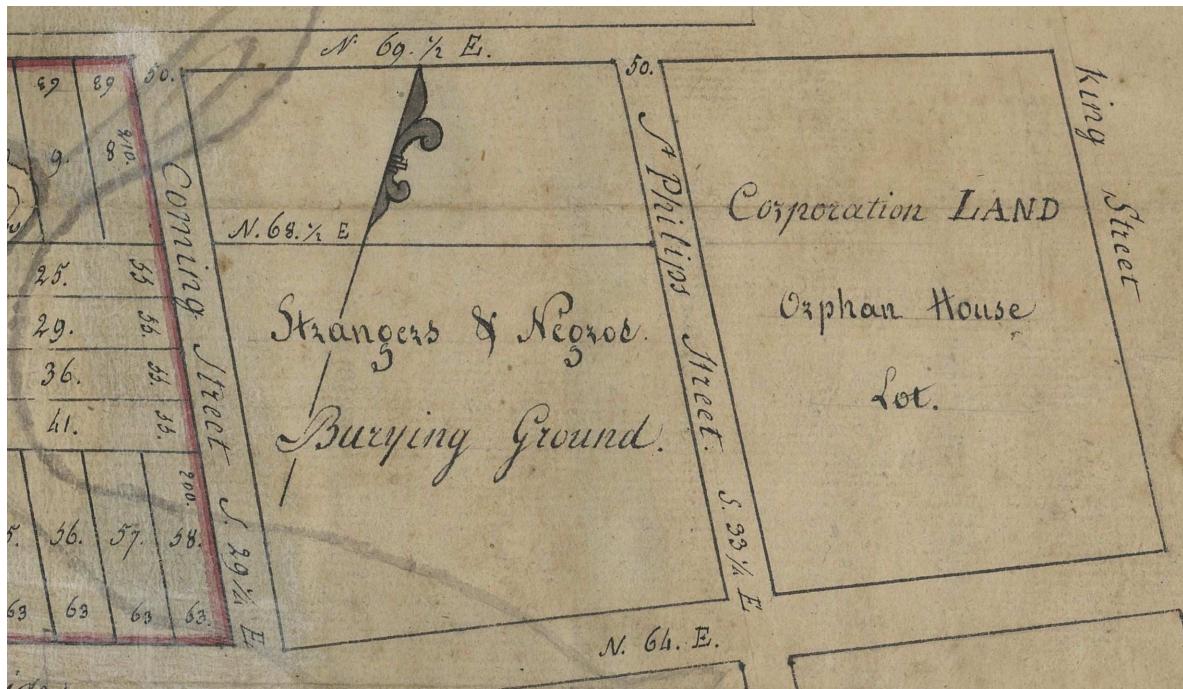


Figure 6: Detail of 1798 plat of the site as a burial ground; the dimensions; however, are not accurate (McCrady Plat 0490, Charleston County Register of Deeds)

place without the limits of the city of Charleston be purchased at the expense of the city for the interment of deceased strangers" and of citizens unaffiliated with a church in Charleston. The report further emphasized that "no such place" had yet to be "set apart for the burial of negroes, other people of color and slaves," and urged the city to act swiftly to establish both.¹⁴

These appeals and recommendations, however, stand in direct contradiction to both the city's 1793 purchase of the site, intended specifically for the burial of strangers, the poor, and people of color, and two contemporaneous plats produced in 1798 and 1799 that clearly depict the site as a burial ground. A 1798 plat, for example, labels the parcel as a "Strangers and Negroes Burying Ground," while a February 1799 plat includes a notation that it was "now used for the strangers' burial ground or cemetery," indicating that the site had already begun to fulfill its designated public function by that time (Figures 6-7).

It is possible that the Project Area saw little to no use as part of a public burial ground between its purchase in 1793 and the end of the decade. While unlikely, the site may have been viewed as undesirable due to ongoing legal disputes tied to Wragg's former estate following John Poaug's death in 1796.¹⁵ Another possibility is that the land had not yet been sufficiently filled, making portions of it unsuitable for burials initially. The 1798 plat supports this theory, showing portions of Coming's Creek still extending into the southwest corner of the site. At that time, sections of Boundary Street (now Calhoun Street) remained submerged by the creek and would not be formally improved west of St. Philip Street until after the site closed as a public burial ground in 1807.¹⁶

By August of 1799, however, the City of Charleston again identified the site as city-owned land,

14 "For the Information of the Citizens," 1799 May 3, *City Gazette and Charleston Daily Advertiser*, Charleston, SC.

15 "Harriet Beresford Poaug v. Christopher Gadsden," 1801 May. *Reports of Cases Argued and Determined in the Superior Courts of Law in the State of South Carolina Since the Revolution*. Vol. 11. New York: Isaac Riley, 1811. 294.

16 "To the Editors of the Courier," 1807 April 11, *Daily Courier*, Charleston, SC.

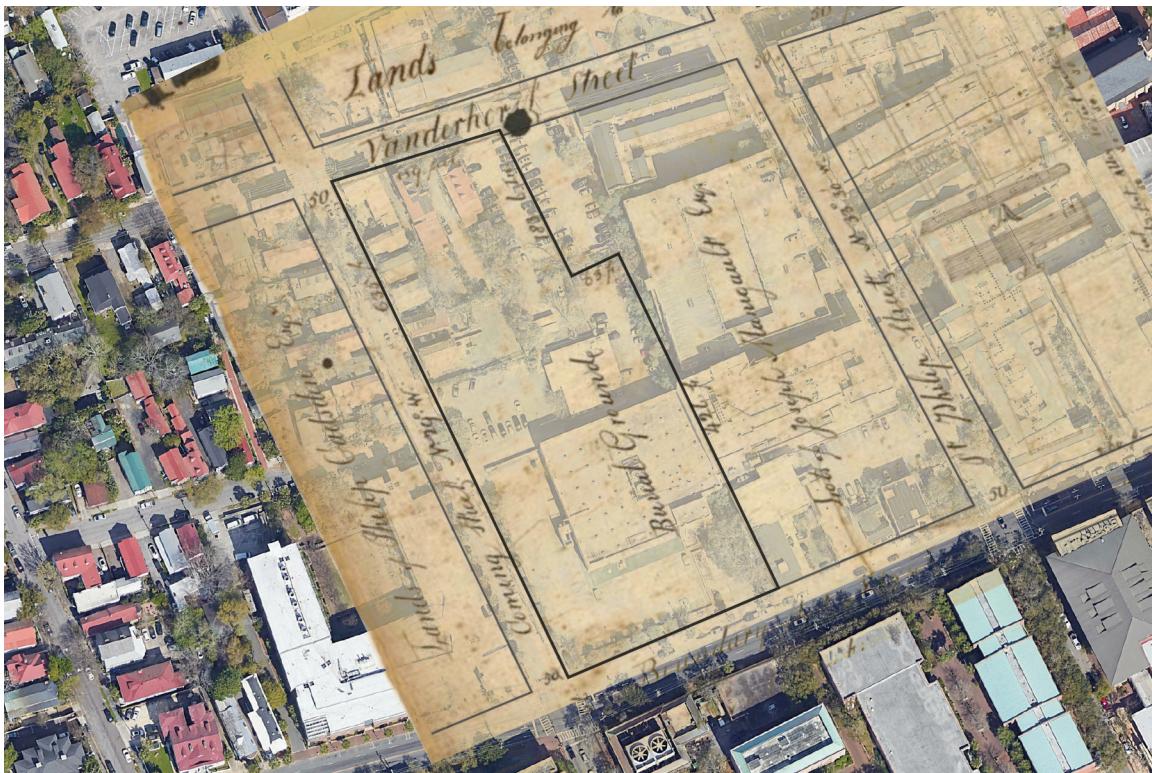


Figure 7: Detail of 1799 plat overlaid on a current aerial (City Engineering Plat, Charleston County Public Library)

describing it as a parcel “beyond the bounds of the city” purchased “for a burying place for strangers and negroes.”¹⁷ The parcel measured 189’ on Vanderhorst Street, 252’ on Boundary Street, 609’ along land owned by the Manigault family, and 635’ on Coming Street (Figure 7). That October, the City Council’s committee responded to the churches’ former request for a public burial ground by stating they did “not think it necessary to make any further observations” about the matter as past councils “have already taken order for the purchase of a burial ground.”¹⁸

From that point forward, the city unequivocally used the Project Area and site as a burial ground for its most vulnerable residents. One year later, in October 1800, the City Council announced plans to erect a pine and cedar fence around the “Strangers Burial Ground,” one of the first formal acknowledgments of the site as an active cemetery.¹⁹ The fence likely served multiple functions, such as deterring vandalism and preventing illegal dumping, and more importantly, establishing a formal boundary around the entire burial ground.

In July of 1801, Charleston passed a city ordinance to standardize interments within the burial ground (Figure 8). The ordinance established guidelines for grave dimensions, burial timing, registration, and appointed a superintendent to oversee its operation, a position held by John Welch for the duration of the site’s active use as a burial ground.²⁰ It also mandated the segregation of burials. A wooden fence, similar to the one enclosing the entire site, was erected to divide the site into two distinct sections. A northern section “not exceeding one acre,” a tract that likely bounded

17 “The Committee on City Lands,” 1799 August 24, *City Gazette and Charleston Daily Advertiser*, Charleston, SC; “The Committee on City Lands,” 1799 August 28, *City Gazette and Charleston Daily Advertiser*, Charleston, SC.

18 “City Council,” 1799 October 31, *City Gazette and Charleston Daily Advertiser*, Charleston, SC.

19 “Contract,” 1800 October 14, *City Gazette*, Charleston, SC.

20 Edwards, Alexander, compiler, *Ordinances of the City Council of Charleston, In the State of South Carolina, Passed since the Incorporation of the City, Collected and Revised Pursuant to A Resolution of the Council. To Which Are Prefixed, the Act of the General Assembly for Incorporating the City, and the Subsequent Acts to Explain and Amend the Same. W. P. Young*, Charleston, 1802. 211; City of Charleston Directory, 1803-1807. Charleston County Public Library, Charleston, SC.

An **Ordinance** for the better regulation of
the Public City Burial Ground.

I. BE it ordained by the Intendant and Wardens in City Council assembled, and it is hereby ordained by the authority of the same, That a discreet

Supervisor of burial ground to be elected, to remain in office during pleasure of council discreet and proper person be elected by council, to the office of superintendent of the city burial ground, to remain in office during the pleasure of the city council, to be paid by the fees and emoluments herein after mentioned and referred to him; whose duty it shall be to keep the keys, and have charge of the said burial ground, and under whose superintendence and privity, the same shall, from time to time, be opened, and interments made as hereinbefore directed, or as may from time to time be directed by the city council.

Partition fence
to be erected to make a division
for interment of
white persons
and foreigners
11. And be it further ordained by the authority aforesaid, That a partition fence (similar to the fence with which the whole is already enclosed) shall be erected through the present burial ground, so as to cut off, on the northern side of the same, an area not exceeding one acre, to be exclusively reserved and appropriated to the interment of free white persons, strangers and foreigners, and subject to be interred in the yards of any of the churches in this city, subject to be interred in the yards of any of the churches in this city.

How graves shall be allotted as aforesaid, be divided by right lines into plots of eight feet in breadth; that the graves be opened across the said areas, so as to be opened in regular succession, so that each area be filled before any ground be broken in the next; that the graves to be dug shall be at the distance of not more than one foot from the broken ground of one grave, to the broken ground of the next; that, regularity, and uniformity be preserved, and the ground, reson-

next; that regularity and uniformity be preserved, and the ground economised as much as possible.

III. And be it further ordained by the authority aforesaid, That the residue of the said burial ground be appropriated for slaves, and people of co-

lour, free negroes, mulattoes, and mestizos. That the uneven places be

... graves, situated and marked, so that the same place be levelled, and when done, that the whole be divided into oblong areas of eight feet in breadth, in the manner as mentioned in the preceding clause of this ordinance, and that the graves in future be dig therein, as nearly conformably to the regulations aforesaid, as the nature and circumstances of the ground will admit.

IV. And be it further ordained by the authority aforesaid, That no grave

No grave to be opened but by application to superintendent be opened in future, in either of the said burial grounds, but by application to the superintendent, who shall have the digging of all graves; and whose duty it shall be to keep a book for each of the burial grounds—the

superintendent, who is to have graves dug. Superintendent to keep a book, one for the strangers burial ground to be ruled into appropriate columns, to express the date of interment, the name of the person interred, his or her age, occupation, place of nativity, time of residence here, and the disease or

causality whereof such person died; and the book for the other burial ground shall be ruled into appropriate columns, to express the date of interment, the name of the slave or person of colour interred, his or her age, place of nativity, time of residence here, and the disease or causality whereof such person died; and no grave shall be opened, or interment made, until the deceased person be registered in the book as aforesaid, in which as many of the aforesaid particulars shall be interred, as can possibly be ascertained.

And

And if any person, or persons whatsoever, shall perfume, of their own accord, to open either of the said burial yards, or to dig a grave, or inter, or depo-
sition any dead body therein, the person so offending, shall suffer a penalty not
exceeding twenty dollars, to be recovered in the court of wardens, as in other
cafes.

Perfors of their
own accord
opening yards, or
digging graves,
subject to a pen-
alty.

V. And be it further ordained by the authority aforesaid, That all graves, to be opened or dug in the said inclosures, shall be dug or caused to be dug by the superintendant, and funk to not less than the depth of six feet; and the better to insure their being dug to that depth, the superintendant shall make a rod of the said length, to be always used as a standard for the depth of the graves.

VI. And be it further ordained by the authority aforesaid, That the fit-
perintendant shall not admit any interments to be made in either of the said to be made after
burial grounds after dark, or before daylight; and that no dead bodies be
dark, or before

burial grounds after dark, or before daylight; and that no dead bodies be allowed to be fene for interment, from any place without the limits or environs of the city, (the marine hospital only excepted); that the superintendent shall always ready, without delay, to receive applications, and make the requisite register thereof, and procure, or cause to be dug, the requisite grave or graves, according to the true intent and meaning of this ordinance, under the penalty of any sum not exceeding twenty dollars, for every default, to be recovered in the court of wards; and the said superintendent shall be always entitled to have and receive the fees and perquisites hereinafter specified, before he shall be obliged to suffer the interment of any body in either of the said burial grounds.

Penalty on superintendent for
failing to receive fees and perquisites, etc.

VII. And be it further ordained by the authority aforesaid, That to compensate the superintendent, he shall have the digging of all graves, in both of the said burial yards, and be paid by the newfog, according for the interment of any dead person.

the laid burial yards, and be paid by the person applying for the interment interulant. (except where such interment be made from out of the orphan or poor-houses, where no charge therefore shall be allowed) the fees hereinafter mentioned and limited, that is to say:—For the digging of the grave of a stranger, a mariner, or seaman, and causing the interment, two dollars; digging the grave of an adult slave, which shall be upwards of four feet fix inches in length, one dollar and twenty-five cents; digging all graves for slaves less than four feet fix inches in length, one dollar; digging all graves for free people of colour, of whatsoever dimensions, one dollar and twenty-five cents; for opening the grave yard for any person deputed of visiting the same, (except city officers) fix and a quarter cents; for opening ditto, and attending to the erection of any form over any grave, if of wood only, twenty-five cents; and where the form erected is of brick, stone, marble, in whole or in part, or of materials other than wood, one dollar and fifty cents; for registering every interment, fix and a quarter cents; for giving every certificate from his book, when required, twenty-five cents; for opening the books for the inspection of any person deputed thereof, (except city officers) fix and one quarter cents.

Ratified in City Council, this 2d day of July, in the year of our Lord, 1801, and in the 25th year of American independence.

Thomas Roper, *Intendant.*



Figure 9: The footprint of the burial ground showing the Project Area boundaries and estimated location of fence that marked the segregated parcels

Vanderhorst and Coming streets and was situated on the highest ground, was designated for White burials. The remaining, larger section was reserved for the interments of enslaved individuals and free people of color, a substantial portion of which falls within the Project Area (Figure 9). By allocating only a small portion for White burials and reserving the majority for Black interments, the ordinance suggests that a disproportionate number of Black residents, both free and enslaved, were to be buried at the site.

Within the northern White section, graves were to be arranged in eight-foot-wide “oblong areas,” with each section filled before beginning the next. Individual graves were to be spaced one foot apart. A similar layout was intended for the remainder of the site, designated for Black burials, “as nature and circumstances of the ground [would] admit.” Because the southern portion of the site sat on lower, less stable land near the waterway along Boundary Street, the ordinance further required that “uneven places...be leveled” to make the land suitable for interment.²¹

The ordinance also established a fee structure for burials: \$2.00 for a “stranger, mariner, or seaman,” \$1.25 for an enslaved adult or free person of color in graves “upwards of four feet six inches,” and \$1.00 for enslaved individuals, to be buried in graves smaller than four feet, six inches.²² Burials for those associated with the Poor House, City Hospital, and Orphan House were exempt from fees. Within the year, however, the City Council deemed these fees “too exorbitant” and reduced them to \$1.00 for strangers and \$0.75 for enslaved or free people of color.²³ Fees for grave markers were also outlined, confirming that not all burials were unmarked. The installation of wooden markers was \$0.25, while stone, brick, or marble markers were \$1.50.²⁴

Although the superintendent’s early records do not survive, other municipal documents and historic accounts of life in Charleston at the turn of the nineteenth century shed light on those potentially interred within the Project Area. The following sections explore the diverse groups of people for whom the Project Area, and the broader site, served as a final resting place.

THE “STRANGER”

From the time the city acquired Poaug’s eleven lots in 1793, the Project Area was explicitly designated for the burial of “strangers,” a purpose clearly documented in 1794 newspaper reports and reinforced by city plats produced in the late 1790s (see Figures 6-7). In the eighteenth and nineteenth centuries, the term “stranger” commonly referred to someone who had newly arrived to or was unfamiliar with a particular place. In a port city like Charleston, this typically included traveling merchants, seafarers, immigrants, and refugees, most of whom arrived by ship.²⁵ The 1801 ordinance that formalized burial regulations on the property affirmed this designation, directing that “strangers and foreigners” unaffiliated with a church be interred in the site’s segregated northern section alongside the poor.²⁶

Death records surrounding the turn of the eighteenth century are incomplete and inconsistently

21 Edwards, 1802, 212.

22 Edwards, 1802, 213.

23 Edwards, 1802, 242-243.

24 Edwards, 1802, 213.

25 “City Council,” 1794 September 22, *City Gazette*, Charleston, SC.

26 Edwards, 1802, 212.

maintained, making it difficult to determine an exact number of “strangers” interred within the site. Contemporary public health statistics, however, offer context. Yellow Fever plagued Charleston throughout the period that the Project Area functioned as a burial ground. While many other factors, such as illnesses, injury, and natural causes, contributed to the deaths of strangers, Yellow Fever remains the most thoroughly documented. As a result, it provides one of the clearest links to those possibly interred in the Project Area.

Yellow Fever, often referred to as “Strangers’ Fever” due to its disproportionate impact on immigrants and travelers unaccustomed to a place’s climate, was one of the most common causes of death among visitors to Charleston.²⁷ Particularly lethal during the summer months, the disease was later discovered to be transmitted by mosquitoes that thrived in crowded port cities with standing water, making Charleston especially vulnerable. A 1795 article in a Hartford, Connecticut newspaper titled “Observations on the Yellow Fever,” for example, warned cities with “low marshy grounds near the waterside” and dense streets of the heightened risk of the disease and used Charleston’s wharves as an example.²⁸ While Yellow Fever also impacted the poor, enslaved, and working-class residents, those already acclimated to the Lowcountry climate were generally less vulnerable than recently arrived northerners or Europeans. “Strangers” who died from Yellow Fever and were interred within the site likely succumbed to the disease’s final toxic phase defined by jaundice, internal bleeding, black vomiting, or organ failure.²⁹

If the Project Area was formally in operation as part of a burial ground in the late 1790s, those interred within its bounds may include a large percentage of the fourteen people who died of Yellow Fever during the summer of 1795, as Charleston’s Committee of Health confirmed that most were “Emigrants lately from Europe, Strangers, and other Transient Persons.”³⁰ During an outbreak in the summer of 1797, two passengers aboard Captain M. Morrison’s vessel died on route to Charleston, likely arriving from New York, a common route for Morrison.³¹ Although the exact cause of death is unknown, the timing during the summer months strongly suggests the disease. Upon arrival, their twin children were admitted into the Orphan House. It is possible that the two adults were interred on the site, given their status as newly arrived “strangers,” as well as their two children, who died shortly thereafter.³²

The summer of 1799 was particularly deadly. Charleston physician David Ramsey (1749-1815), an expert on infectious diseases, noted that Yellow Fever reached epidemic levels by August following a period of heavy rainfall. The outbreak persisted until mid-November.³³ From August 1 to December 1 of that year, 362 individuals were buried within Charleston’s city limits. While the exact number of Yellow Fever deaths remains uncertain, approximately 239 of the deceased were identified as “strangers,” the very population the Project Area was intended to receive.³⁴ Given the site’s intended use and the timing of these deaths, it is highly likely that the majority of these individuals, including sailors from Havana, Cuba, and Spain who died shortly after arriving at

27 Edgar, Walter, “Epidemics,” in *The South Carolina Encyclopedia*. Columbia, SC: University of South Carolina Press, 2006. 306-307.

28 “For the *City Gazette*,” 1795 July 22, *City Gazette*, Charleston, SC.

29 Fraser, 190.

30 “Committee of Health,” 1795 October 1, *City Gazette*, Charleston, SC.

31 Murray, John E. *The Charleston Orphan House: Children’s lives in the first public Orphanage in America*. Chicago, IL: The University of Chicago Press, 2013. 57; “For New York,” 1797 June 21. *City Gazette*, Charleston, SC.

32 Murray, 57.

33 “For the City and Carolina Gazettes,” 1800 March 21, *City Gazette*, Charleston, SC.

34 Ibid.

port, were interred within the site and perhaps the Project Area.³⁵

In 1800, Dr. Ramsey further observed that Yellow Fever primarily affected individuals from “the higher northern latitudes of Europe and America,” noting that “the danger seemed to diminish with the length of time” spent in the city and “greater assimilation” to the Lowcountry environment.³⁶ Death statistics from the early 1800s support his observations. In 1802, Ramsay attributed ninety-six deaths to Yellow Fever, stating that “most of the victims were sailors.”³⁷ By 1804, the number rose to 150 deaths, which he claimed were “exclusively confined to strangers.”³⁸ Among them was 23-year-old Irish “stucco plasterer” John Fallon, a visiting craftsman whose September 1804 death was attributed to the “stranger’s fever” by the *Carolina Gazette*.³⁹ They, too, were likely interred on the site and may be within the Project Area’s northern section.

THE DESTITUTE AND THE ORPHANED

Since the establishment of Charleston’s first city-owned cemetery in the late seventeenth century, public burial grounds had been affiliated with the city’s poor. The association was both practical and administrative: the original burial ground (Public Burial Ground A in Figure 3) was located directly beside the municipal complex that housed the Poor House (also known as the Alms House), and until the passage of the 1801 ordinance creating a superintendent for the city’s cemetery, the public burial grounds were managed by the Commissioners of the Poor House (see Figures 4-5).⁴⁰ Even after the city redirected burials to outside the urban core to what is now the Project Area, this institutional link remained. In the 1794 announcement regarding the purchase of the Project Area and surrounding lots from Poaug, the City Council explicitly named “those who may die in the Poor House” as among those intended to be buried there.⁴¹ Records from the “Commissioner of the Alms House (Poor House),” along with the findings from a 2024 S&ME cultural resource report, further suggest that Poor House residents likely played a role in burial operations, including grave digging, coffin construction, and transporting the deceased.⁴²

Documents from 1802 to 1807 offer insight into the demographics of those admitted into the Poor House, and by extension, those potentially buried within the Project Area. Minutes kept by the commissioners of the Poor House in 1802, for example, reported at least fifty deaths that year, most of whom likely could not afford a formal burial elsewhere.⁴³ The Poor House also maintained a “Register of the Transient Sick and City Poor” and although it does not contain the dates or causes

35 “For the City and Carolina Gazettes,” 1800 March 21, *City Gazette*, Charleston, SC.

36 Ibid.

37 McCandless, Peter. *Slavery, Disease, and Suffering in the Southern Lowcountry*. New York, NY: Cambridge University Press, 2011. 108.

38 David Ramsay. *The Charleston Medical Register for the Year 1802*. Charleston: W.P. Young, 1803. 5.

39 “Died,” 1804 September 28, *Carolina Gazette*, Charleston, SC.

40 Edwards, 1802, 211-214.

41 “Proclamation,” 1794 August 15, *City Gazette*, Charleston, SC; Edgar, Walter, “Charleston Poorhouse and Hospital,” in *The South Carolina Encyclopedia*. Columbia, SC: University of South Carolina Press, 2006. 155.

42 “Rules of the Board of Commissioners of the Charleston Alms House with the Rules for the Government of the House, Together with an Ordinance Relating to the Alms House.” Records: Commissioners of the Alms House (Poor House), 1800-1923. Charleston County Public Library. Charleston, SC.

43 “Minutes for 1802 January 25.” Records: Commissioners of the Alms House (Poor House), 1800-1923. Charleston County Public Library. Charleston, SC; “Minutes for 1802 December 20.” Records: Commissioners of the Alms House (Poor House), 1800-1923. Charleston County Public Library. Charleston, SC; S&ME, Inc.. “Historic Research and Geophysical Assessment of 106 Coming Street and 99 St Philip Street, Charleston, South Carolina, S&ME Project No. 24130280.” Charleston, SC: S&ME, Inc., 2024. 7.

of death, the records from February 1803 through the Project Area's closure as part of the burial ground in August 1807 list a diverse population that resided at the institution. The list included both native Charlestonians and individuals from foreign countries such as Ireland, England, Gibraltar, Bermuda, and Spain. Others came from across the eastern seaboard, from Savannah, Georgia, to Portland, Maine.⁴⁴ Among those who died while residing at the Poor House, and perhaps buried within the Project Area, was 19-year-old Mary Robertson. Robertson was hospitalized in October 1806 after being shot in the head with a musket ball. She died soon after from tetanus, also known as lockjaw.⁴⁵

In 1802, the City Council established the Charleston Dispensary to provide medical care for people who were generally self-sufficient but unable to afford treatment when ill.⁴⁶ Data published in an 1805 edition of the *City Gazette* offers insight into the individuals who died under the Dispensary's care between 1802 and 1805 (Figure 10). During the summer of 1805 alone, the Dispensary recorded 234 deaths from a range of conditions. The most common causes of death were "bilious fever" (likely referring to malaria or Yellow Fever), "bowel complaints," and consumption (also known as tuberculosis).⁴⁷ The Dispensary's role as a medical safety net for the city's working poor strongly suggests that many were interred on the public burial ground site, although their precise burial locations are unknown.

Following the 1801 ordinance that standardized burials within the Project Area and broader site, individuals who died while in the care of the Poor

DISEASES.	1803			1803			1804			1805			Result.		
	June	July	August	June	July	August	June	July	August	June	July	August	Cured	Died	Unknown
Syphilis,	2	1		1	1	3	2	1	3	1	1	1	10	4	5
Dyspepsia,	1												4		
Hypochondria,													1		
Sore Foot,	1												2		
Pleurisy,	1	1	2										2		
Worm Fever,	2												5		
Vaccine,	3	1											4		
Diarrhoea,	1				1	2	4	2	1	1	1	1	8	4	4
Scald Head,													1		
Fever,	1				1	1	1	3	4	2	1	3	16	4	4
Sore Throat,	2												2		
Ophthalmia,					1								1		
Leucorrhœa,					1								1		
Consumption,					2		2	1	1	1	1	1	3	5	2
Abscess,					1								1		
Rheumatism,					1		1						5		
Wound,					1	1	4						3		
Sore Leg,													7		
Intermittent Fever,	3				4		3						21		
Ursentery,													4		
Hooping Cough,													1		
Catarrh,													2		
Parturition,				1	1		2						6		
Luxures from fall,													1		
Sprain,													2		
Cholera,													2		
Stroke of the sun,													1		
Hysteria,													2		
Diseased Spine,													1		
Inflamed breast,													1		
Amenorrhœa,													3		
Cephalagia,													1		
Yellow fever							2	3	13				11	7	
Intemperance,								1	1				1	1	
Infirmitiæ of age,								1	2				2	5	
Bilious fever,													1	4	
Nephritis,													1	1	
Constipation,													1	2	
Dropsy,													1		
Scarlatina,													1		
Scurvy,													1		
Ulcer,								1					1		
Tumour,													1		
Hemiplegia,								1	6	2			1		
Sore finger,									3				1		
Hepatitis,													2		
Itch,													3		
Swelled ankle,													1		
Manorrhagia,													1		
TOTAL,	16	5	9	10	12	22	26	21	36	11	12	20	151	20	19

Figure 10: Public health data in the *City Gazette* for the years 1802 through 1805, October 2, 1805

⁴⁴ "Feb. 1803-Dec. 1807." Register of the Transient Sick and City Poor, 1803-1916. Charleston Archive, Charleston County Public Library, Charleston, SC.

⁴⁵ "An Inquest," 1806 October 21, *Charleston Courier*, Charleston, SC.

⁴⁶ "Public Information," 1802 May 4, *South Carolina State Gazette*, Charleston, SC.

⁴⁷ "Comparative View," 1805 October 2, *City Gazette*, Charleston, SC.

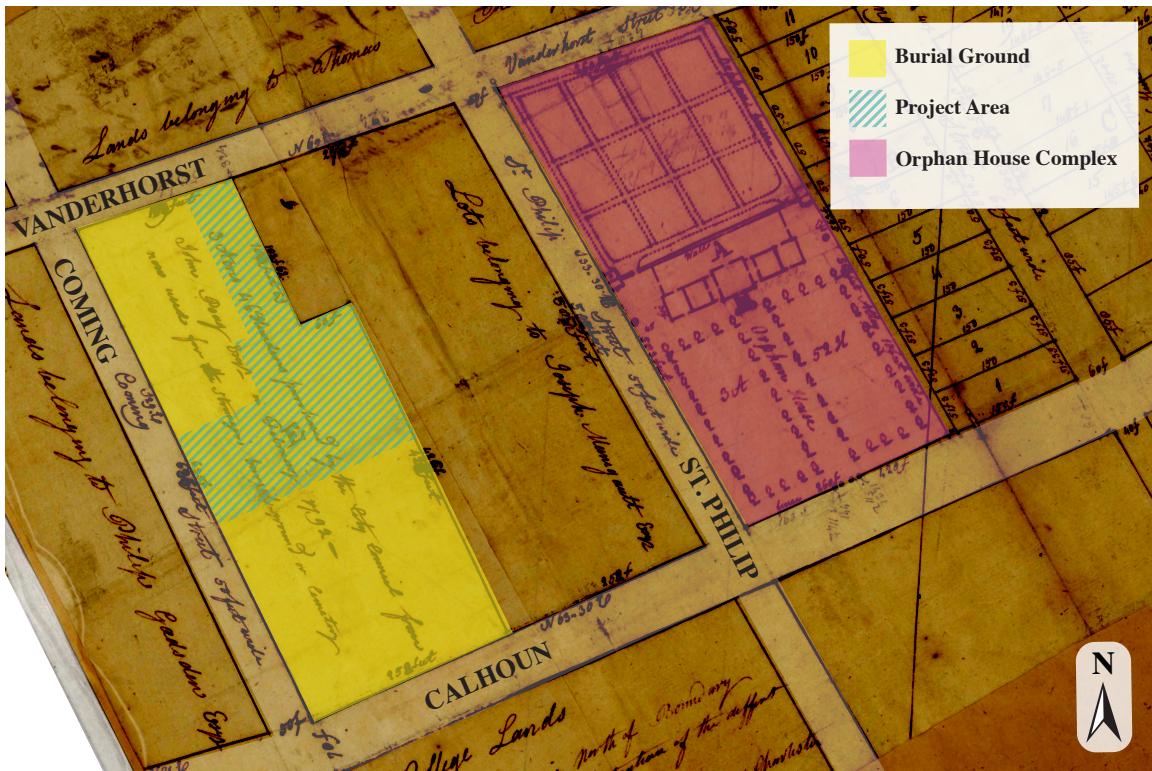


Figure 11: Detail of 1799 plat showing the close proximity of the burial ground to the Orphan House complex (McCrady Plat 0538, Charleston County Register of Deeds)

House were exempt from burial fees. The same provision applied to residents of the Charleston Orphan House, the city-run institution established to care for orphaned and abandoned children one block east of the Project Area.⁴⁸ Many adults admitted into the Poor House or treated at the Charleston Dispensary had dependent children, who were often transferred to the Orphan House for continued care. By 1796, city regulations required that any child residing in the Poor House be moved to the Orphan House upon reaching “a proper age.”⁴⁹

Very few of the children who passed through the Charleston Orphan House in the late eighteenth and early nineteenth centuries had parents who were deceased. Many were placed there by families facing financial hardship, as it served as a refuge for the children of the city’s working poor who turned to the Orphan House for temporary care while trying to regain stability.⁵⁰ As a result, some children buried within the Project Area and surrounding site may have passed through both the Poor House and Orphan House, depending on their age and family circumstances.

The Orphan House was often overcrowded, creating conditions ripe for the spread of disease. Smallpox and measles were particularly contagious. The first-recorded measles case appeared in 1795 and resulted in one child’s death; four more children died of measles during an outbreak in the summer of 1802.⁵¹ Given the Orphan House’s close proximity to the site, its role as a city-sponsored institution, and the economic vulnerability of the children it served, it is highly probable that those children were interred within the public burial ground and potentially in the northern, White-designated section of the Project Areas (Figure 11).⁵²

48 Edwards, 1802, 242-243.

49 “Poor-House of Charleston,” 1796 August 17, City Gazette, Charleston, SC.

50 Edgar, “Charleston Orphan House,” 155; Fraser, 238.

51 Murray, 118.

52 “Minutes for 1795 October 22.” Records: Commissioners of the Charleston Orphan House, 1790-1959. Charleston County Public Library, Charleston, SC.

The Orphan House's Register of Children, which tracked admissions, discharges, and deaths, documents several other children who died while under the institution's care. This includes Maria Finley, described as "one of the older girls" and who died in 1803 after a five-day illness, possibly Yellow Fever. That same year, 14-year-old Sarah Hutton died of a fever, and infants Ann Reynolds (of a lung infection) and Clementina Brunston (cause not noted) also passed away. Archibald McNeil, the son of Irish immigrant and hatter Archibald McNeil (or McNeal), likely entered the Orphan House after his father's death in December 1802.⁵³ He died there in the summer of 1803 at the age of three.⁵⁴ In 1804, 11-year-old Thomas Arnold and two-year-old John Brown died while at the Orphan House. The following year, four-year-old Margaret Scott, three-year-old Ruth McCrackin, and five-year-old Alexander Bozeman also died. In 1806, two-year-old Samuel Guy died, as well as Samuel Shilling, described by the Orphan House physician as "little boy Shilling," who died of a lingering illness.⁵⁵ He was likely the son of nearby Coming Street tailor Samuel Shilling.⁵⁶ Archival records from both the Orphan House and the Poor House, however, are fragmentary, and it is highly probable that many more burials associated with the Orphan House occurred within the Project Area and its surrounding site.

Another significant demographic interred at the site was Charleston's population of free people of color. At the turn of the nineteenth century, free Black residents comprised roughly 3% of the city's population.⁵⁷ Among them was a distinct and relatively affluent class often referred to as the "Brown Elite," who, while adopting many of the cultural values of the White upper class, also cultivated independent social and economic networks in the city's northern neighborhoods, not far from the Project Area. In response to discriminatory burial practices, including exclusion from White churchyards such as St. Philip's Episcopal Church, members of the Brown Elite formed mutual aid organizations. This included the Brown Fellowship Society in the 1790s, which established a cemetery of their own near the Project Area, on the site now occupied by the College of Charleston's Addlestone Library.⁵⁸

However, the majority of Charleston's free Black population belonged to the working class and were unlikely to be members of burial societies, which required membership fees. Therefore, many of Charleston's free Black residents during the late 1790s and early 1800s were likely buried in the segregated southern section of the site and Project Area. At the turn of the nineteenth century, most free women of color served as cooks, bakers, seamstresses, and shopkeepers, while men found employment as dock workers, general laborers, and tenant farmers.⁵⁹ Because many free Black residents labored along the port and resided in overcrowded housing, their vulnerability to infectious diseases was also significantly heightened. In 1800, Dr. Ramsay recorded that by August of 1799, Yellow Fever took the lives of 544 people. Of those, 123 were "negroes."⁶⁰

53 "Archibald McNeal," 1802 December. *South Carolina, U.S., Wills and Probate Records, 1670-1980*. Charleston County Public Library. Charleston, SC.

54 "Register 1791-1834." Records: Commissioners of the Charleston Orphan House, 1790-1959. Charleston County Public Library. Charleston, SC; S&ME, 8.

55 Ibid.

56 City of Charleston Directory, 1802. Charleston County Public Library, Charleston, SC; "Register 1791-1834." Records: Commissioners of the Charleston Orphan House, 1790-1959. Charleston County Public Library. Charleston, SC; S&ME, 8.

57 1800 U.S. Federal Census.

58 Koger, Larry. *Black Slaveowners: Free Black Slave Masters in South Carolina, 1790-1860*. North Carolina: McFarland & Company, Inc. 2012. 167.

59 City of Charleston Directory, 1801. Charleston County Public Library. Charleston, SC; Edgar, Walter, "Free persons of color," in *The South Carolina Encyclopedia*. Columbia, SC: University of South Carolina Press, 2006. 341-342.

60 "For the City and Carolina Gazettes," 1800 March 21, *City Gazette*, Charleston, SC.

THE ENSLAVED

The southern section of the property and Project Area served as the final resting place for a substantial number of enslaved individuals. This included those who died while at the Work House, a city-run prison where enslavers paid wardens to have enslaved people disciplined, and those enslaved by municipal institutions, such as Sarah, the Orphan House's enslaved washwoman, who died in May of 1805.⁶¹ The site also received the remains of numerous African captives who died shortly after enduring the transatlantic voyage in bondage and transported in overcrowded cargo ship into the port of Charleston.⁶² Additionally, the 1801 ordinance identified the site as a burial ground for "mestizos," a term used at the time to refer to individuals of mixed Indigenous ancestry, many of whom were also enslaved.⁶³

A significant factor contributing to the rapid filling of the site with burials was the 1803 repeal of the federal ban on the Transatlantic Slave Trade, which had been in place for nearly two decades. This legislative shift led to a dramatic increase in the arrival of enslaved Africans in Charleston during the years the Project Area was active as a public burial ground. In 1788, the South Carolina General Assembly passed a law prohibiting the importation of enslaved people to stabilize the state's economy following the American Revolution. The act barred the import of any "negro or other slave...either by land or water" until January 1, 1793, and was subsequently renewed for the next sixteen years.⁶⁴ However, on December 17, 1803, the law was repealed, and South Carolina resumed the transatlantic importation of Africans.⁶⁵ This continued until the federal ban on the international slave trade took effect on January 1, 1808.⁶⁶

For five years beginning in late 1803, Charleston experienced an unprecedented surge of slave ship arrivals, described by historian Nic Butler as "a mad scramble to import as many Africans as possible" during "the most horrific episode in the history of the trans-Atlantic slave trade to North America."⁶⁷ Between December 1803 and December 1807, approximately 40,000 enslaved Africans arrived at the port of Charleston.⁶⁸ At the time, local regulations mandated that sea captains quarantine arriving ships at designated points near the entrance of the Charleston Harbor, primarily on present-day Sullivan's Island and James Island. There, individuals who were ill or had died during the voyage were removed to "pestilence houses," or quarantine stations, to prevent the spread of disease. Given the constant threat posed by epidemics, health officials were then tasked with inspecting every vessel before granting permission to dock.⁶⁹ Yet even after clearance and docking at the Charleston port, the surviving Africans remained confined, either aboard the ships or in dockside holding facilities along the wharves, while awaiting their sale at auction. Those

61 Felice F. Knight. "Slavery and the Charleston Orphan House, 1790-1860." unpublished dissertation, 2013. Graduate Program in History. Ohio University. 79. accessed 2025 June 14. https://etd.ohiolink.edu/acprod/odb_etd/ws/send_file/send?accession=usu1374152542&disposition=inline .

62 Edwards, 1802, 212.

63 Ibid.

64 "An Act," 1788 November 7, *City Gazette*, Charleston, SC.

65 Fraser, Walter J.. *Charleston! Charleston!*. Columbia, SC: University of South Carolina Press, 1989. 185, 188; "State of South Carolina," 1804 January 19, *Carolina Gazette*, Charleston, SC.

66 Fraser, 188.

67 Butler, Nic. "The End of the Trans-Atlantic Slave Trade." *Charleston Time Machine*, podcast. Episode 50, 26 January 2018. Transcript available at: <https://www.ccpl.org/charleston-time-machine/end-trans-atlantic-slave-trade>; Butler, Nic. "The Story of Gadsden's Wharf." *Charleston Time Machine*, podcast. Episode 51, 2 February 2018. Transcript available at: <https://www.ccpl.org/charleston-time-machine/story-gadsdens-wharf>.

68 Fraser, 188.

69 "For the City Gazette," 1804 July 24, *City Gazette*, Charleston, SC.

who died during this period of confinement were likely among those interred within the site and potentially the southern portion of the Project Area.

This included at least two enslaved individuals from Mozambique, who arrived aboard the *Horizon* on July 12, 1804, along with hundreds of others, and died shortly after arrival.⁷⁰ Of the estimated 543 captives who embarked from Africa on the large cargo ship, only 55% survived the Middle Passage and arrived in Charleston. Approximately 300 people died from what the *City Gazette* described as “malignant fever,” dysentery, tuberculosis, and “neglect and ill-treatment.”⁷¹ While it is likely that the bodies of those who died en route were removed from the ships before reaching Charleston’s wharves, at least two individuals died of contagious illnesses after docking and were likely buried within the site.⁷² The remaining captives were sold at a series of auctions between July 18th and August 17th, some held on the dock for up to a month.⁷³

Another example is the British slave trading ship *Perseverance*, which arrived in Charleston Harbor on January 15, 1805, after a 90-day voyage from the Congo River region in Africa.⁷⁴ Carrying 367 enslaved people, the ship lost five crew members and 42 enslaved people, and it remains unclear how many deaths occurred after docking.⁷⁵ On January 31, however, the ship’s surgeon and officers signed a sworn statement, published in the *City Gazette*, affirming “no negro whatsoever that has died on board said ship, since her arrival, has been thrown overboard” but “that all who died since...have been decently interred in the Public Burying Ground, in the Suburbs of this City” (Figure 12).⁷⁶ This public declaration suggests that such burials within the site and Project Area were not uncommon but an expected practice, making it highly probable that the southern section of the Project Area contains the remains of individuals who were among the final victims of the Transatlantic Slave Trade in the United States.

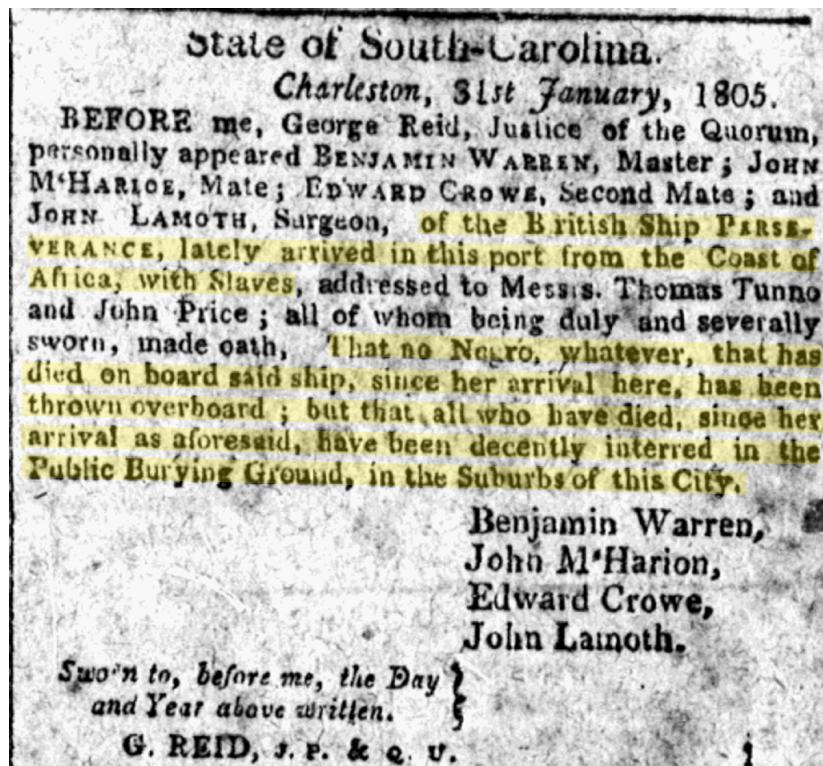


Figure 12: Announcement in the *City Gazette* confirming that enslaved Africans from *Perseverance* have been buried in the public burial ground (February 2, 1805)

70 “For the City Gazette,” 1804 July 24, *City Gazette*, Charleston, SC; “Sale of Negroes and Wines,” 1804 August 4, *Daily Courier*, Charleston, SC.

71 Ibid.

72 Ibid.

73 “Sale of Negroes and Wines,” 1804 August 4, *Daily Courier*, Charleston, SC.

74 *The Trans-Atlantic Slave Trade Database, 1793-1807*, v 2.0. 2019. Distributed by The Slave Voyages Consortium. Accessed June 9, 2025. <https://www.slavevoyages.org/voyages/HkWzZyGY>.

75 Ibid.

76 “State of South Carolina,” 1805 February 2, *City Gazette*, Charleston, SC.

Later that year, in October of 1805, the body of an African girl was discovered along the shoreline of what is now East Battery. She was found wrapped in a “Guinea matt,” or cloth, with her feet bound in yarn. According to the *City Gazette*, she had likely been aboard a recently arrived slave ship, died shortly after arrival, and was discarded overboard. The paper condemned what it called “the shameful practice” of ships throwing the dead into the harbor and urged police and port authorities to take action.⁷⁷ While her name and origin remain unknown, the city’s public condemnation of such mistreatment suggests that she was likely formally interred within the site.

Shortly thereafter, the City Council passed an ordinance prohibiting the disposal of “bodies into any of the rivers, creeks, or marshes within the harbor of the city,” explicitly identifying slave ships arriving from Africa as primary offenders.⁷⁸ Contemporary newspaper reports reveal that health officials and the City Council enforced the new law, publicly naming ships and individuals who violated it.⁷⁹ Given that the Project Area was part of the only active public burial ground at the time, it likely served as the designated site for the interment of those who died under such circumstances, and if so, this ordinance played a significant role in its rapid and substantial filling during the next two years. Between this 1805 ordinance and the site’s closure as a burial ground in 1807, over 30,000 enslaved individuals arrived in the city (Figure 13).⁸⁰

The importation of Slaves from Africa, ceases this day, according to act of Congress. There have been imported, since our ports have been opened, the following number :—	
In the year 1804,	5,386
1805,	6,790
1806,	11,458
1807,	15,676
Total,	39,310

Figure 13: *Charleston Courier*, January 1, 1808

In February of 1806, the City of Charleston enacted regulations mandating that all vessels importing enslaved Africans dock exclusively at Gadsden’s Wharf, which was located just blocks away from the Project Area at the base of Boundary (now Calhoun) Street (Figure 14).⁸¹ That year, over 200 advertisements were published in local Charleston newspapers for the sale of enslaved people at the wharf, further confirming that Africans arriving in Charleston disembarked and were housed in close proximity to the Project Area. At this time, author John Lambert visited Gadsden’s Wharf and published a first-hand account of its conditions:

The planters who were pretty well stocked, were not very eager to purchase; and the merchants, knowing that a market would ultimately be found for them, were determined not to lower their demands; in consequence of which hundreds of these poor beings were obliged to be kept on board the ships, or in large buildings at Gadsden’s Wharf together.⁸²

On the rampant mortality of Gadsden’s Wharf, Lambert wrote:

Close confinement and improper food also created a variety of disorders; which together with the dysentery and some cutaneous diseases to which the negroes are subject, considerably increased the mortality. Upwards of seven hundred died in less than three months, and carpenters were daily employed at the wharf in making shells for the dead bodies.⁸³

77 “Communication,” 1805 October 29, *City Gazette*, Charleston, SC.

78 “Communication,” 1805 October 29, *City Gazette*, Charleston, SC, S&ME, 8.

79 “Proclamation,” 1807 April 28, *Charleston Courier*, Charleston, SC.

80 “Announcement,” 1808 January 1, *Charleston Courier*, Charleston, SC.

81 “State of South Carolina, City of Charleston,” 1806 February 20. *Charleston Courier*, Charleston, SC.

82 John Lambert. *Travels through Canada, and the United States of North America, in the years 1806, 1807, & 1808*. Vol. II. London, UK: C. Cradock and W. Joy, 1814. 166.

83 Lambert, *Travels through Canada, and the United States of North America*, 166..



Figure 14: Locations of the burial ground and Gadsden's Wharf overlaid on a current aerial

Given the strict 1805 ordinance prohibiting the disposal of bodies into the city's waterways, it is highly probable that the estimated 700 individuals who died during this period were interred within the site and Project Area.

On a single day, May 4, 1807, at least six slave ships were docked at the wharf to unload hundreds of enslaved Africans for sale: the *Alice*, the *Anne*, the *Neptune*, the *Morning Star*, and the *Aspinall*. The ship *Alice* departed the African coast with 405 captives and arrived at Gadsden's Wharf with 364.⁸⁴ The *Anne* disembarked at Gadsden's Wharf with 368 of the 409 individuals it had taken from Africa.⁸⁵ The *Neptune* arrived with 140 out of 156.⁸⁶ The *Morning Star* began its transatlantic journey with 509 enslaved people and reached the port with 383, reflecting a loss of 126 lives.⁸⁷ The *Aspinall* advertised 300 “prime Congo slaves” for sale upon arrival, and another unnamed ship began its journey with 334 captives, arriving with 300.⁸⁸ In total, 2,047 enslaved individuals were either brought into Charleston or advertised for sale that day.

It is not possible to determine precisely how many enslaved Africans arrived at the Charleston port deceased or died while housed along the wharves, but historical records confirm that the site reached capacity as a burial ground and was officially closed in the late summer of 1807. This closure coincided with the final months of the Transatlantic Slave Trade and is a powerful indicator of how the trade's brief reopening and the unbridled rush to import as many enslaved individuals as possible before the federal ban impacted the burial ground's use and hastened its end. Although the precise number of those who perished during the Middle Passage versus those who died

84 “The Sales of the Ship Alice’s,” 1807 May 4, *Daily Courier*, Charleston, SC.

85 Ibid.

86 “Prime Gold Coast Negroes,” 1807 May 4, *Daily Courier*, Charleston, SC.

87 “Prime Windward Coast Negroes,” 1807 May 4, *Daily Courier*, Charleston, SC.

88 “Prime Congo Slaves,” 1807 May 4, *Daily Courier*, Charleston, SC.

shortly after disembarkation remains unknown, several factors point to the Project Area as the most probable site of interment for the final wave of Africans forcibly brought to the United States: its designation as Charleston's only active public cemetery for the enslaved and impoverished, its immediate proximity to Gadsden's Wharf, and the 1805 municipal ordinance prohibiting the disposal of bodies into city waterways.

THE CLOSURE

In June 1807, the *City Gazette* reported that the “burying ground in Boundary Street” was “so filled with graves as to be no longer fit for interments.”⁸⁹ The site officially closed on August 1st, 1807 (Figure 15).⁹⁰ Unlike the city’s first burial ground (Public Burial Ground A in Figure 3), which remained in use for nearly a century, the Project Area and surrounding site reached capacity in less than 15 years, a strong representation of the death toll exacted by poverty, illness, and the final years of the Transatlantic Slave Trade. Based on vital records, death statistics, average grave dimensions, and varying interpretations of the site’s period of use, historians and cultural resource specialists estimate that between 4,600 and 12,000 individuals may be buried on the site.⁹¹

In the summer of 1807, burials were directed to a new public cemetery farther west on the Charleston peninsula and denoted as “Public Burial Ground C” on Figure 3. The graveyard was bounded by Thomas (now Ashley Avenue), Bee, President, and Doughty streets on a property occupied today by the Medical University of South Carolina (MUSC) and recently subject to

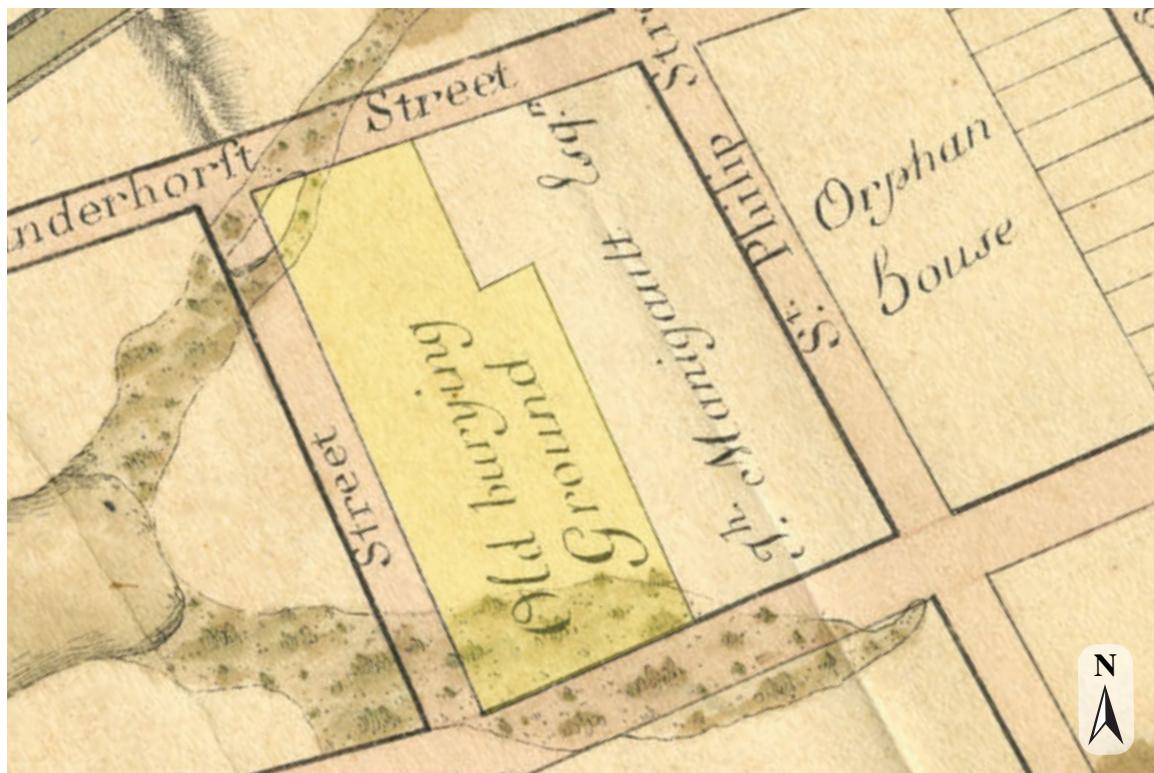


Figure 15: Detail of the 1807 “Plan of a part of Charleston Neck,” identifying the site as the “old burying ground” (South Carolina Historical Society)

89 “Council Chamber,” 1807 August 1, *City Gazette*, Charleston, SC.

90 City of Charleston, SC. *Digest of the Ordinances of the City Council of Charleston, from the Year 1783 to July 1818*. Charleston, SC: A.E. Miller, Printer, 1818. 138-139.

91 S&ME, 9; Butler, Nic. “The Forgotten Dead: Charleston’s Public Cemeteries, 1794-2021.” *Charleston Time Machine*, podcast. Episode 201, 7 May 2021. Transcript available at: <https://www.ccpl.org/charleston-time-machine/forgotten-dead-charlestons-public-cemeteries-1794-2021>.

archaeological excavation for hospital expansion.⁹² Originally planned to encompass an entire city block, the public burial ground was ultimately established on an 11.5-acre parcel. It remained active for over three decades, closing in November 1841, and is estimated to contain the remains of approximately 10,600 to 11,000 individuals.⁹³

As for the Project Area, the City of Charleston subdivided the entire site by 1817 into eleven lots, which largely mirrored the dimensions of the late-eighteenth-century division of Wragg's estate (see Figure 2). At the time, parcels were leased on 25-year terms at a rate of \$5 per year.⁹⁴ As outlined in a rental notice published in the *Charleston Daily Courier*, tenants were permitted to improve the lots: buildings of wood would be demolished upon lease termination, and those built of brick would be appraised and purchased by the city.⁹⁵ One such structure, the brick single house at No. 110 Coming Street, remains standing today as a rare architectural remnant of this period of redevelopment. Notably, the advertisements made no mention of the land's prior use as a public cemetery.

Upon the expiration of all leases in 1842, the City began selling what the *Southern Patriot* referred to as the "former burial ground lots," effectively ending its decades-long ownership of the site.⁹⁶ The parcels were acquired by a diverse range of buyers, including affluent merchants and investment companies who developed the land for rental housing.⁹⁷ By the mid nineteenth century, the block was home to a mix of residents such as enslaved laborers, free people of color from both the working and middle classes, as well as schoolteachers, tailors, and other tradespeople.⁹⁸ Years later, Judge Joseph Travis Walsh (1835-1904), who grew up at the corner of Vanderhorst and Coming streets, recalled his childhood on "the site of the old city Potter's Field" and digging for bones, including one memory of finding "a skull wearing a dragoon's helmet, worn by French soldiers."⁹⁹

Despite redevelopment over time, much of the Project Area appears to have experienced less ground disturbance than other portions of the site. Significant development was historically concentrated along the frontages of Coming, Boundary (now Calhoun), and Vanderhorst streets, where a mix of working-class wooden dwellings and more substantial masonry buildings were constructed, the latter likely involving formal footings that would have disrupted subsurface soils. Known subterranean disturbances within the interior of the burial ground, much of which overlaps with the Project Area, primarily consisted of nineteenth-century residential cisterns, privies, and

92 "Council Chamber," 1807 August 1, *City Gazette*, Charleston, SC.

93 Butler, Nic. "The Forgotten Dead: Charleston's Public Cemeteries, 1794-2021." *Charleston Time Machine*, podcast. Episode 201, 7 May 2021. Transcript available at: <https://www.copl.org/charleston-time-machine/forgotten-dead-charlestons-public-cemeteries-1794-2021>; Edwards, Alexander, ed. *Ordinances of the City Council of Charleston, Passed between the 24th of September 1804, and the 1st Day of September 1807. To Which is Annexed, a Selection of Certain Acts and Resolutions of the Legislature of the State of South-Carolina, Relating to the City of Charleston*. Charleston, SC: W. P. Young, 1807.

94 Charleston County Deed Office, Deed Book V8, Page 278, Charleston, SC; Charleston County Deed Office, Deed Book W8, Page 151, Charleston, SC; Charleston County Deed Office, Deed Book B9, Page 216, Charleston, SC; Charleston County Deed Office, Deed Book C9, Page 54, Charleston, SC; Charleston County Deed Office, Deed Book D9, Page 75, Charleston, SC; "City Lands," 1817 February 7, *Charleston Daily Courier*, Charleston, SC.

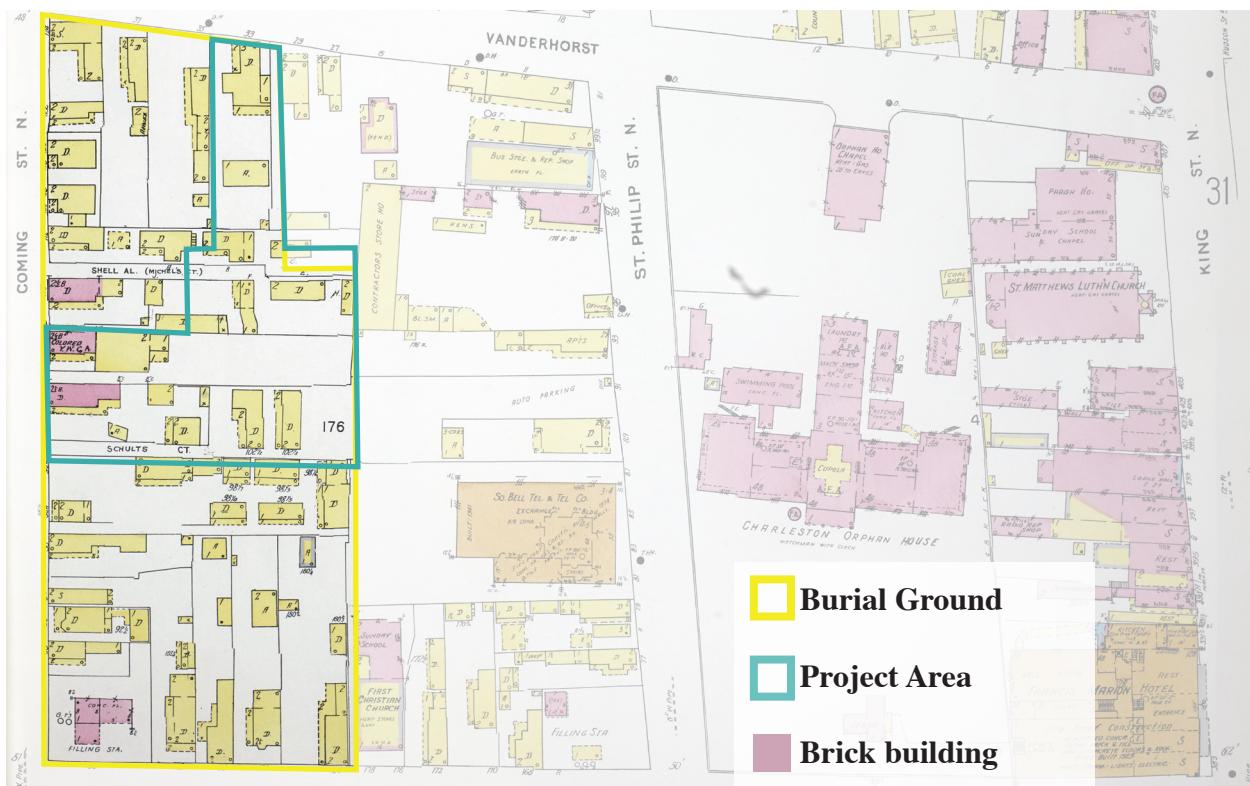
95 "City Lands," 1817 February 7, *Charleston Daily Courier*, Charleston, SC.

96 "Report," 1842 December 14, *Southern Patriot*, Charleston, SC.

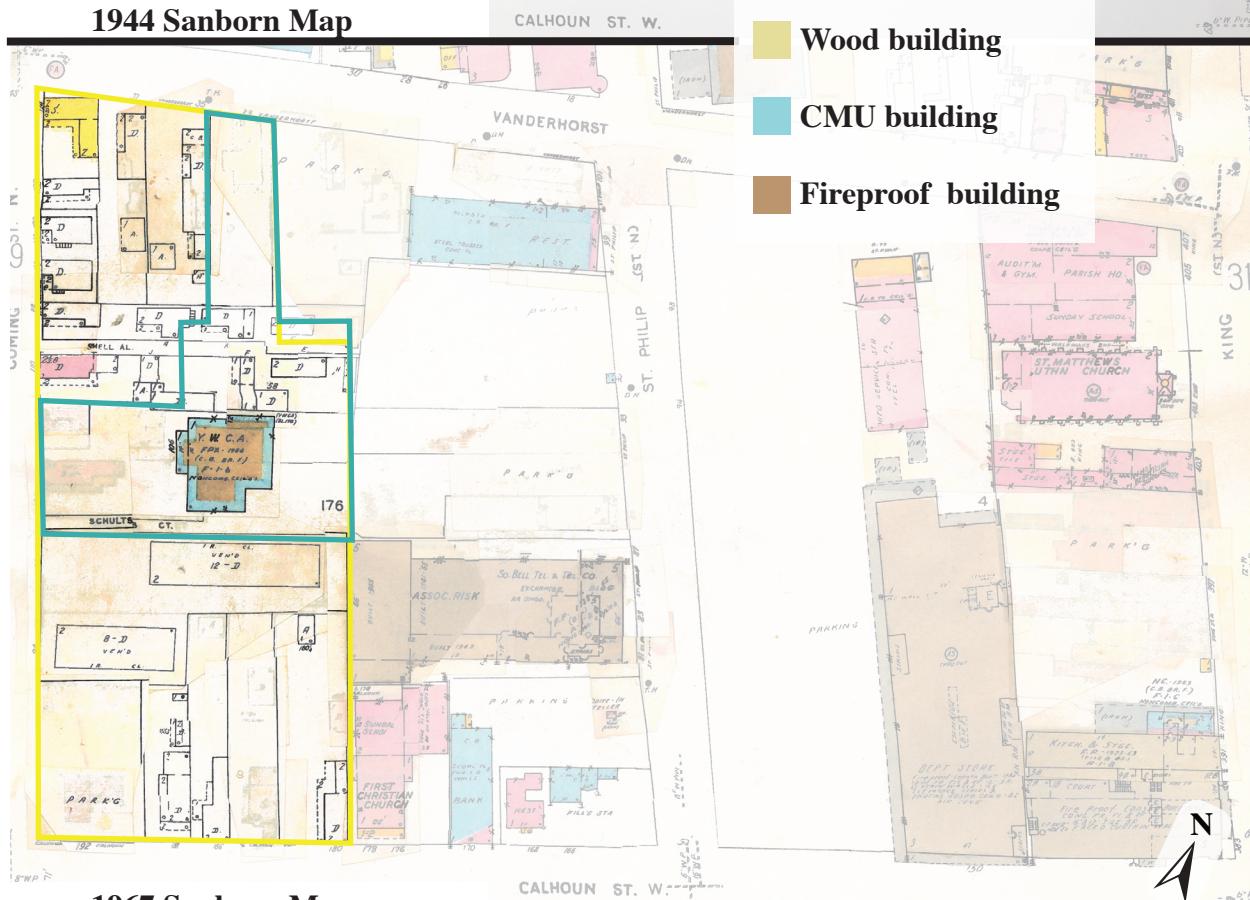
97 Charleston County Deed Office, Deed Book K11, Page 275, Charleston, SC; Charleston County Deed Office, Deed Book Y10, Page 629, Charleston, SC; Charleston County Deed Office, Deed Book Y10, Page 633, Charleston, SC; 1840, 1850 U.S. Federal Census.

98 1840, 1850 U.S. Federal Census.

99 "Autobiography of Joseph Travis Walsh, written in Boston, Mass., December 16, 1897." *The Independent Republic Quarterly*, vol. 12, no. 4. Conway, SC: Horry County Historical Society, 1978. 5.



1944 Sanborn Map



1967 Sanborn Map

Figure 16: Detail of 1944 (top) and 1967 (bottom) Sanborn Fire Insurance maps showing the nature of development within the site and Project Area boundaries (Charleston County Public Library)

shallow foundations associated with a series of modest wooden dwellings that defined the area for most of the nineteenth and twentieth centuries. Additionally, the southern portion of the burial ground was eventually infilled to stabilize low-lying terrain and marshland that continued to define the area well into the nineteenth century.

In the twentieth century, large-scale development projects caused substantial ground disturbance within the southern portion of the site, compromising the historic integrity of that section. By the 1930s, for example, a gas station with underground fuel tanks was constructed at the northeast corner of Calhoun and Coming streets and demolished by the 1960s for surface parking (Figure 16). In the late 1970s, that same site was redeveloped by the Southern Bell Telephone Company into a major telecommunications facility, which included the installation of an extensive “underground cable vault” (Figure 17).¹⁰⁰ Contemporary newspaper reports announcing the construction made no mention of the discovery of human remains during excavation.

Today, the Project Area consists primarily of surface parking and a one-story building constructed c.1966, which likely sits atop a concrete slab. These conditions suggest relatively minimal subsurface impact

compared to the more heavily developed sections of the surrounding parcels. Therefore, the Project Area may retain a higher degree of historic integrity and has the potential to yield a significantly greater amount of archaeological data and human remains associated with the city’s use of the site as a public burial ground from the 1790s through 1807.

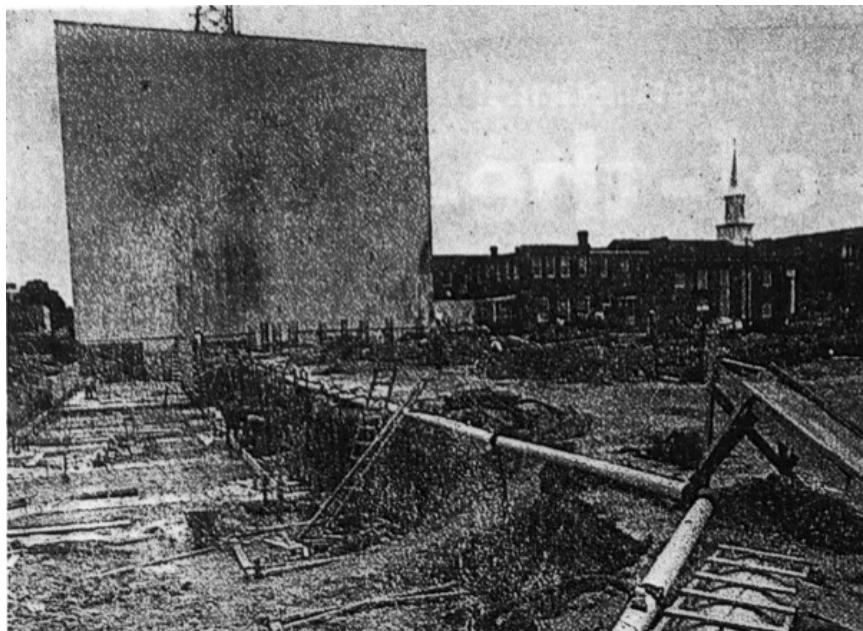


Figure 17: 1975 photograph of the Southern Bell Telephone Co. building under construction and the installation of underground cables within the southern parcel of the burial ground (*Evening Post*, September 22, 1975)

¹⁰⁰ “Oil Concerns Get Property,” 1936 January 15, *Evening Post*, Charleston, SC; “Now Showing: Improvements,” 1975 September 22, *Evening Post*, Charleston, SC

KEY DATES

1793

Charleston's City Council purchased a 3.4-acre parcel on the "Charleston Neck" to establish a new public burial ground.

Approximately 1.14 acres of this parcel, referred to in this report as the Project Area, was conveyed to the College of Charleston in 2025.

1798

City plats first label the site as the "Strangers and Negroes Burying Ground."

1799

A severe Yellow Fever epidemic struck Charleston, disproportionately killing "strangers," such as sailors, visitors, and immigrants.

Yellow Fever outbreaks would continue to plague the city throughout the site's period of use as a burial ground.

1801

Charleston passed an ordinance to standardize burials on the site by requiring specific grave dimensions, establishing segregated plots and appointing a superintendent to oversee operations.

1803

The federal ban on the importation of enslaved Africans was repealed. Charleston resumed participation in the Transatlantic Slave Trade.

1805

A new city ordinance prohibited the disposal of deceased individuals into the city's waterways, explicitly citing cargo ships arriving from Africa as violators. From this point forward, African captives who died while held aboard ships along the wharves or in dockside holding facilities were to receive "decent burials," many likely within the site and Project Area.

Approximately 40,000 enslaved Africans arrived at the Port of Charleston between 1803 and the end of 1807. It is unclear how many perished while housed along the wharves.

1807

The *City Gazette* reported that the site was "so filled with graves as to be no longer fit for interments," and the burial ground was officially closed in less than 15 years, a strong representation of the death toll exacted by poverty, illness, and the final years of the Transatlantic Slave Trade.

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Coming Street YWCA (1964)

No. 106 COMING STREET

CHARLESTON, SC



BVL HISTORIC
PRESERVATION RESEARCH

MAY 2025

BVL HISTORIC PRESERVATION RESEARCH

COMING STREET YWCA (c. 1964)

No. 106 COMING STREET
CHARLESTON, SC

The one-story concrete block and brick building at No. 106 Coming Street was erected in 1964 as the headquarters for the Coming Street branch of Young Women's Christian Association of Charleston, also known as the Coming Street YWCA and later, the YWCA of Greater Charleston. The building remained the Coming Street YWCA's headquarters from 1964 to 2014.¹

CONSTRUCTION & EVOLUTION

Between November of 1963 and June of 1964, the Coming Street branch of the Young Women's Christian Association of Charleston (also known as the Coming Street YWCA) demolished their former headquarters at No. 106 Coming Street and began construction of a modern one-story facility.² Originally, the Coming Street YWCA was founded in 1907 as an auxiliary group of the Colored Young Men's Christian Association of Charleston, located on Cannon Street (also known as the Cannon Street YMCA), to advocate for and support Black women in the Charleston area.³ In 1911, the group acquired a nineteenth-century single house at No. 106 Coming Street to be used as their headquarters under the name "Colored Young Women's Christian Association of Charleston" and established a community center that became vital to the area's Black residents throughout the Jim Crow and Civil Rights eras (Figures 1 and 2).⁴ In 1920, the Coming Street YWCA was subsumed under the national YWCA organization and became an official branch of the YWCA of Charleston, which served as the city's YWCA headquarters and was a White-only institution.⁵

By 1961, however, the facilities of both the Coming Street YWCA and the YWCA of Charleston were in poor condition, and each could not accommodate its growing membership.⁶ In June, plans were introduced to erect new buildings for both entities using national and local funds.⁷ The Coming Street YWCA immediately initiated a "Building Fund Pledge" and hosted several

1 Charleston County Deed Office, Deed Book 0447, Page 352, Charleston, SC;

2 "Board Approves YWCA Branch, Apartment Units," 1963 November 19, *Evening Post*, Charleston, SC.

3 "Origin of the Coming Street 'Y.'" YWCA of Greater Charleston, Inc., Records, 1906 - 2007. Avery Research Center. Charleston, SC.

4 Charleston County Deed Office, Deed Book W25, Page 180, Charleston, SC; "Letter from James Simons to Felicia Goodwin, January 28, 1911." YWCA of Greater Charleston, Inc., Records, 1906-2007. Avery Research Center. Charleston, SC.

5 Charleston County Deed Office, Deed Book D31, Page 5, Charleston, SC.

6 "Planning and Work Bear Fruit," 1963 November 27, *Evening Post*, Charleston, SC.

7 "YWCA Buys Land for Expansion," 1961 June 16, *Evening Post*, Charleston, SC.



Figure 1: c. 1941 photo of the former Coming Street YWCA headquarters (Avery Research Center for African American History and Culture)



Figure 2: 1940s photograph of girls at the former Coming Street YWCA headquarters (Avery Research Center for African American History and Culture)

events to raise money for the demolition of the single house they occupied and the construction of a new center.⁸ On the list of those who pledged to serve as financial sponsors were some of the city's leading Black businesses, such as the Fielding Home for Funerals and H.A. DeCosta & Co., as well as locally known Black civil rights activists, such as Dr. Thomas Carr McFall (1908-1969), the first Black councilman of the South Carolina State Hospital Advisory Council to the State Board of Health. Former chairwoman of the Coming Street YWCA Mamie Garvin Fields (1888-1987), J. Michael Graves (1915-1996), and Wilmot J. Fraser (1905-1979), known throughout the Lowcountry as founders of pioneering education programs for the area's segregated children and some of Charleston County School District's first Black educators, were also on the list.⁹

In addition to demolishing the existing headquarters, the Coming Street YWCA purchased an adjacent alleyway and a neighboring single house at No. 102 Coming Street, which they also planned to demolish to expand the lot (Figure 3).¹⁰ By June of 1964, both No. 102 Coming Street and No. 106 Coming Street were razed, and construction began on a modern facility recessed within the newly enlarged property.¹¹ With an estimated cost of \$70,000, the building was funded by member donations collected through the Building Fund Pledge and the United Fund, a national non-profit organization that provided financial assistance for impactful community projects known today as United Way.¹²

Completed by September of 1964, the new 5,155-square-foot headquarters was designed by local architectural firm Cummings & McCrady and it was built by Canady Construction Co. (Figure 4).¹³ The Coming Street YWCA was erected of concrete block with a brick veneer and contained a formal lobby, classrooms, administrative offices, a large multi-purpose room for dances and events, and a catering kitchen (Figures 5-7).¹⁴ The project also provided plans for a swimming pool and an outdoor recreation space.¹⁵ The pool, however, was never completed.

A photograph of the completed building was published in the *Evening Post* on September 12, 1964, and further confirms the building's original design (Figure 8). Pictured is the building's asymmetrical facade with an off-center portico capped with a flat roof and outlined in a concrete trim, iconic features of 1960s architectural trends. The portico shielded the main entry, which contained stone paving, full-height glass doors, and metal storefront windows. The building's 6/6 wooden sash windows were capped with jack arches and fronted with iron grills. Additional photographs in the Coming Street YWCA's collection at the Avery Research Center also depict early interior details (Figures 9-11). The building's interior finishes included a large marbled front desk, painted concrete block walls, multi-colored tile floor, drop ceilings, and profiled window and door casings, most of which survive today. A Sanborn Fire Insurance map recorded the building's footprint in 1967 and confirms that, in addition to its original architectural characteristics, the building's footprint has remained unchanged (Figure 12).

8 "Board Approves YWCA Branch, Apartment Units," 1963 November 19, *Evening Post*, Charleston, SC; "YWCA Branch Sets Womanless Wedding," 1964 April 7, *Evening Post*, Charleston, SC.

9 "Building Fund Pledges," 1962. YWCA of Greater Charleston, Inc., Records, 1906 - 2007. Avery Research Center, Charleston, SC.

10 Charleston County Deed Office, Deed Book C74, Page 272-273, Charleston, SC; Charleston County Deed Office, Deed Book T80, Page 27, Charleston, SC.

11 "YWCA Buys Land for Expansion," 1961 June 16, *Evening Post*, Charleston, SC; "2 Buildings Will Be Remodeled," 1964 June 25, *News & Courier*, Charleston, SC; "Building Permits," 1963 November 14, *Evening Post*, Charleston, SC.

12 Preliminary Plans Drawn for New YWCA Building," 1961 July 20, *Evening Post*, Charleston, SC

13 "2 Buildings Will Be Remodeled," 1964 June 25, *News & Courier*, Charleston, SC; "Official Opening," 1964 September 12, *Evening Post*, Charleston, SC.

14 Jones-Branch, 16; "Origin of the Coming Street 'Y.'" YWCA of Greater Charleston, Inc., Records, 1906 - 2007. Avery Research Center. Charleston, SC; "Campaign Opens Today for New YWCA," 1962 March 23, *News & Courier*, Charleston, SC; "Official Opening," 1964 September 12, *Evening Post*, Charleston, SC.

15 "Dedication of Branch 'Y' Set Sunday," 1964 September 11, *Evening Post*, Charleston, SC.

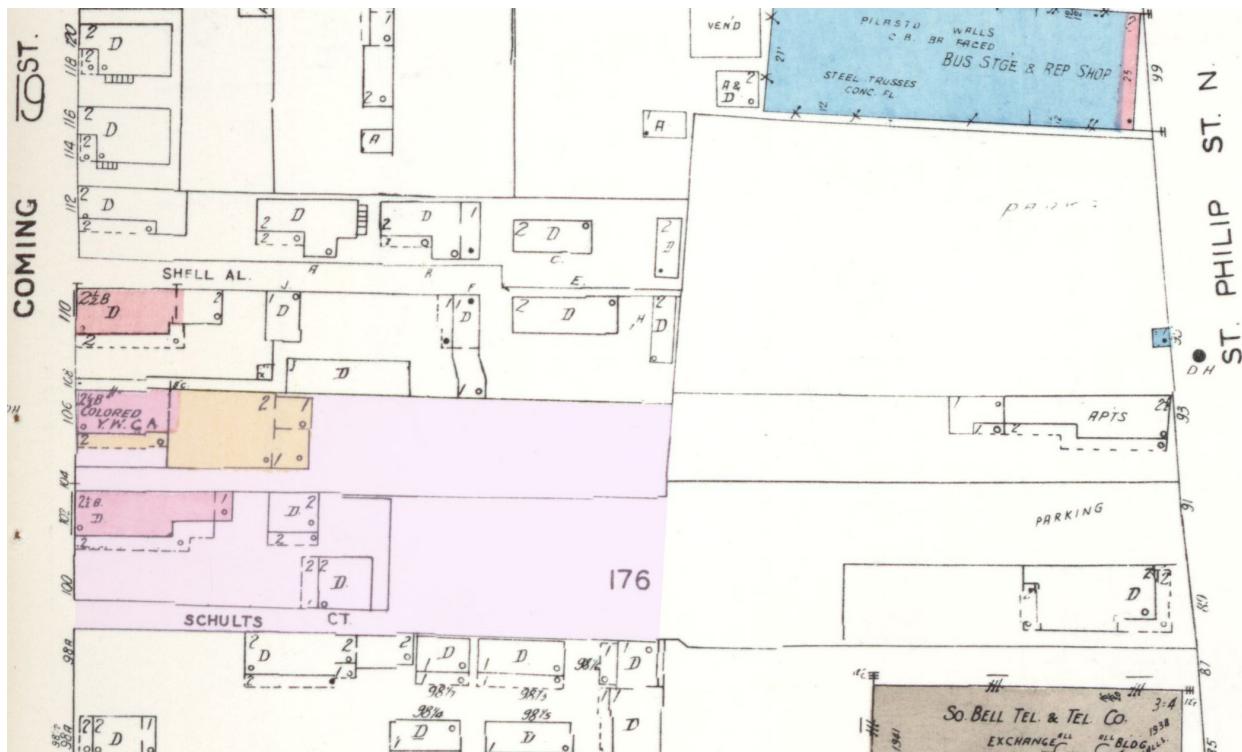


Figure 3: 1955 Sanborn Fire Insurance map; The approximate 1960s enlarged property boundaries are denoted (Charleston County Public Library)

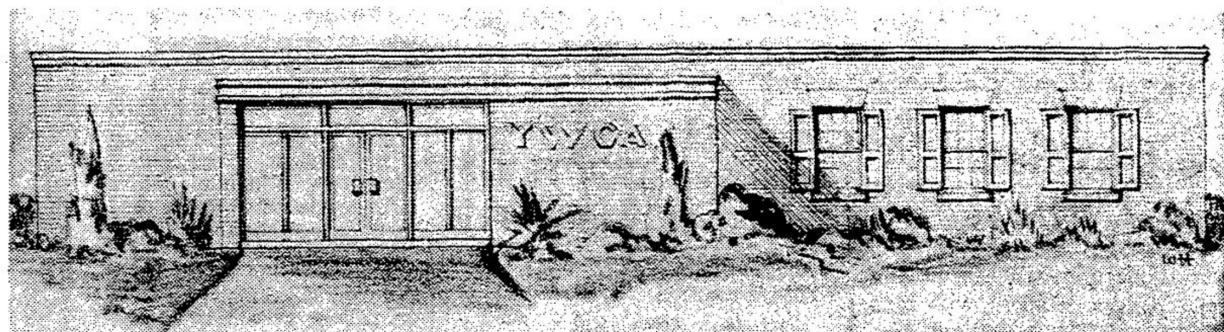


Figure 4: 1963 rendering of the Coming Street YWCA designed by Cummings & McCrady (*Evening Post*, 1963 November 27, Charleston, SC)



Figure 5: 1960s photograph of the new Coming Street YWCA facade (Avery Research Center for African American History and Culture)



Figure 6: c. 1964 photograph of the Coming Street YWCA facade, looking southeast (Avery Research Center for African American History and Culture)

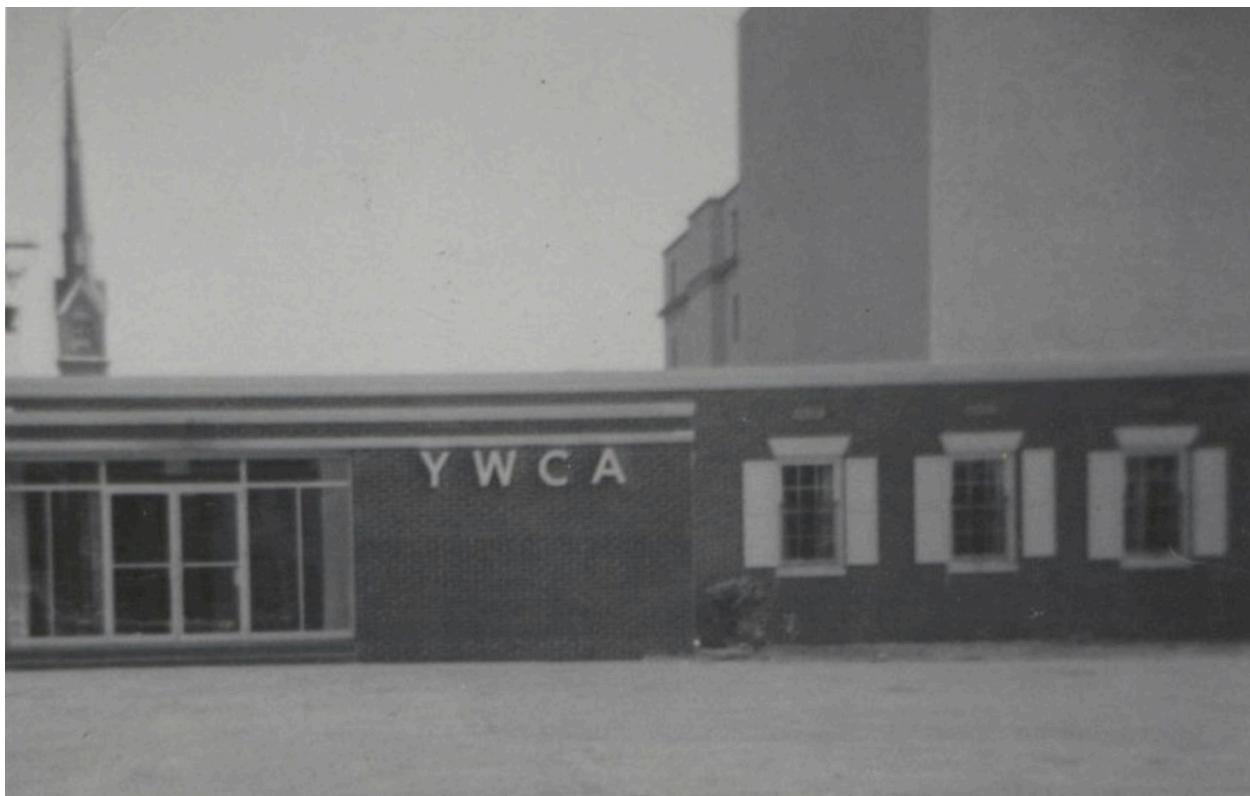


Figure 7: 1960s photograph of the Coming Street YWCA facade (Avery Research Center for African American History and Culture)

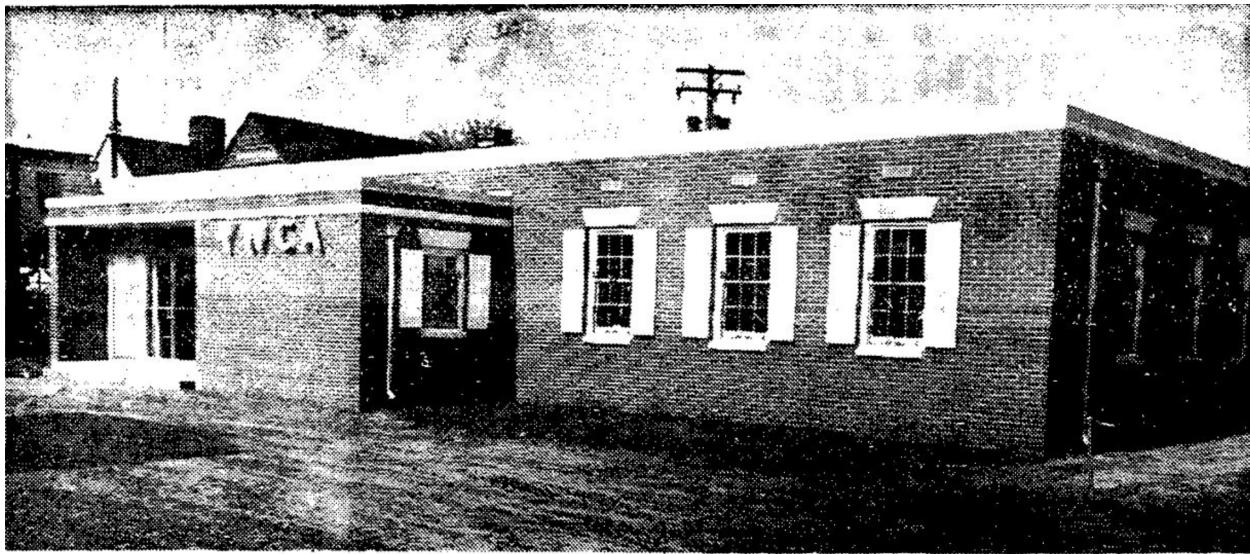


Figure 8: 1964 photograph of the Coming Street YWCA published in Charleston's *Evening Post* shortly after its construction. (*Evening Post*, 1964 September 12, Charleston, SC)



Figure 9: 1970s photograph capturing the "Little Miss YWCA Pageant" in the multi-purpose room within the Coming Street YWCA (Avery Research Center for African American History and Culture)



Figure 10: undated photograph of the reception area within the Coming Street YWCA (Avery Research Center for African American History and Culture)



Figure 11: 1970s photograph of children participating in the day camp held within the Coming Street YWCA (Avery Research Center for African American History and Culture)

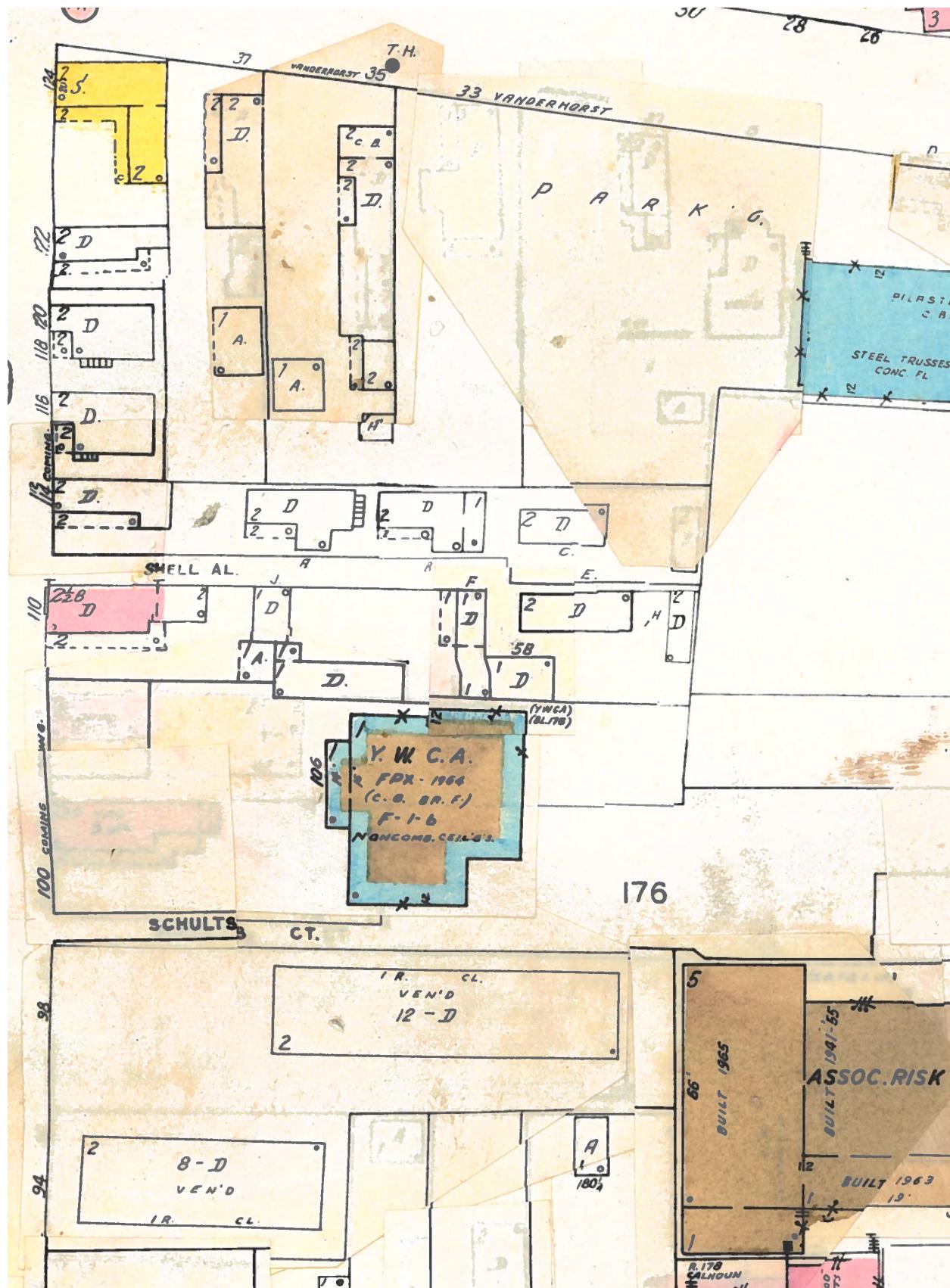


Figure 12: 1967 Sanborn Fire Insurance map (Charleston County Public Library)

The construction of the Coming Street YWCA was part of a larger project to update YWCA facilities in Charleston. At the same time, an additional building for the central branch of the YWCA was constructed at No. 21 George Street. Also designed by Cummings & McCrady, the new George Street facility was similar to the Coming Street YWCA in its general form, yet Colonial Revival in style, featuring a classically-inspired door surround with pilasters, a pediment, and iron railing (Figure 13).¹⁶ This building was demolished in the early 2000s.¹⁷

An aerial of the College of Charleston campus in 1971 captures the Coming Street YWCA and the original green space that was established in the front (west) and rear (east) yards for recreational programming (Figure 14). Both yards, however, were fully paved by 1983 to accommodate additional parking as confirmed by a 1980s photograph of children playing in front of the building on pavement (Figure 15). In 1989, the parking lot was further enlarged to the north when the Coming Street YWCA purchased an empty parcel behind No. 112 Coming Street.¹⁸ A few years later, in 1991, a small rear parcel of No. 110 Coming Street was also conveyed to the Coming Street YWCA, shaping the property into its current form (Figure 16).¹⁹ Despite the loss of the property's green space, an original pierced brick wall that bounded the recreational yard along Coming Street and an iron sign fixture still survive.

Building permits archived in Charleston's Record Management Division and applications found in the city's Board of Architectural Review files confirm that minimal work has been done on the building since its construction. Alterations include the addition of carpet in the hallway and select spaces, as well as the removal of the ceiling in the large multi-purpose room. A mural was added to the walls of one of the building's classrooms and likely dates to 1997 when the Coming Street YWCA initiated a mural project to promote peaceful and positive after-school activities.²⁰

No. 106 Coming Street was sold from the Coming Street YWCA to 106 Coming Street LLC for \$8.25 million in 2014, ending the organization's century-long occupancy on the property.²¹ The current owner, College of Charleston, purchased the property from 106 Coming Street LLC for \$27.9 million in 2025.²²

ORGANIZATION: *The Transition from Coming Street YWCA of Charleston to Coming Street YWCA of Greater Charleston*

After the Civil Rights Act of 1964, the Coming Street YWCA became a leading force in Charleston's Civil Rights movement, and by 1969, it became the city's official YWCA headquarters following the YWCA of Charleston's break from the national organization over integration policies. In June of 1963, the national YWCA organization issued an "Urgent Memo on Civil Rights," urging YWCA branches throughout the country to desegregate all YWCA facilities in support of the proposed

16 "Planning and Work Bear Fruit," 1963 November 27, *Evening Post*, Charleston, SC; "Preliminary Plans Drawn for New YWCA Building," 1961 July 20, *Evening Post*, Charleston, SC; "Campaign Opens Today for New YWCA," 1962 March 23, *News & Courier*, Charleston, SC.

17 Lane, Lois. "Public Pools in Charleston." Lois Lane Properties, July 10, 2015, accessed April 28, 2025.

18 Charleston County Deed Office, Deed Book L182, Page 273, Charleston, SC.

19 Charleston County Deed Office, Deed Book K125, Page 354, Charleston, SC.

20 "School Mural Paints Image of Peace," 1997 October 28, *Post & Courier*, Charleston, SC.

21 Charleston County Deed Office, Deed Book 0447, Page 352, Charleston, SC.

22 Charleston County Deed Office, Deed Book 1291, Page 721, Charleston, SC.

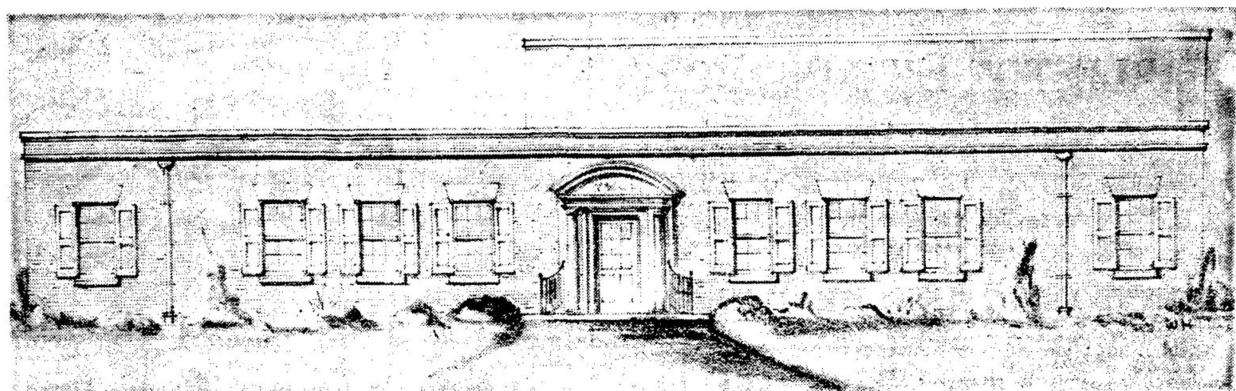


Figure 13: 1963 rendering of the proposed YWCA of Charleston building designed by Cummings & McCrady (*Evening Post*, 1963 November 27, Charleston, SC)



Figure 14: 1971 aerial depicting the southern portion of the Coming Street YWCA property (College of Charleston Special Collections)



Figure 15: 1980s photograph of children playing in the enlarged parking lot in front of the Coming Street YWCA (Avery Research Center for African American History and Culture)

Charleston South Carolina
Office of Register Mesne Conveyance
Plat recorded this 24 day of July 1991 at
4:15 o'clock in Plat Book 148, Page 168, and tracing cloth
copy filed in File 5 Drawer 18, Drawing
No. 18. Original plat (with the print) delivered
to City of Charleston.

8K U204 PG483

MAGNETIC NORTH

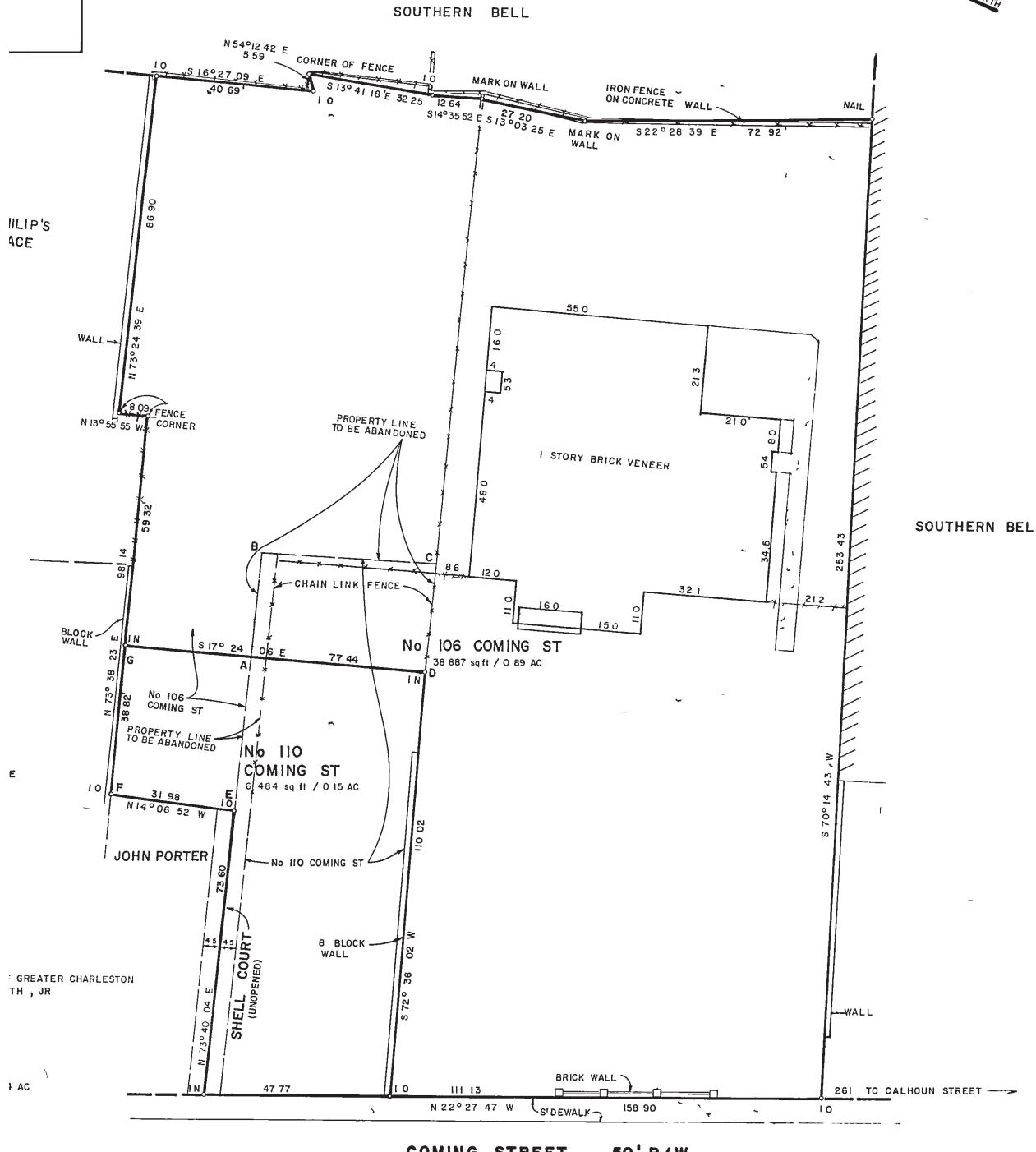


Figure 16: Detail of 1991 plat showing the subdivision of No. 110 and No. 106 Coming Street (Plat CD-168, Charleston County Register of Deeds)

federal civil rights legislation.²³ Two months later, the YWCA of Charleston on George Street wrote a letter to the national YWCA organization rejecting the mandate for integration and demanding autonomy from the Coming Street YWCA.²⁴ The YWCA of Charleston remained segregated after the Civil Rights Act was passed in July 1964, underscoring the need for the modern, dedicated facility for the Coming Street YWCA that was under construction at that time.²⁵

In May of 1966, the YWCA of Charleston published a notice of intent to sever ties with the national YWCA organization, citing their criticism of the new policies on proposed racial integration and formally initiated the required three-year process to disaffiliate.²⁶ In addition to integration, national YWCA initiatives called for inclusiveness and admittance of women from diverse religious backgrounds, which further compelled the YWCA of Charleston to disaffiliate. In March of 1967, for example, the president of the YWCA of Charleston told the *News & Courier* that the new policies “were not in keeping with [their] Christian commitments” and that full racial and religious integration would further weaken their mission.²⁷ The Coming Street YWCA, however, remained open to all women.

Rather than integrate with the Coming Street YWCA, the YWCA of Charleston officially withdrew from the national organization in March of 1969 and changed its name to the Charleston Family ‘Y’ shortly thereafter.²⁸ With the YWCA of Charleston’s disaffiliation, the Coming Street YWCA became the only branch associated with the national YWCA organization and it was tasked with increasing its membership to qualify as a central branch.²⁹ It was also forced to formally acquire the title to No. 106 Coming Street, which remained subsumed under the YWCA of Charleston’s landholdings.

At this time, the Coming Street YWCA was under the new leadership of Christine Osburn Jackson (b. 1928), who would later recall her first years on the job as consumed by the “racial struggle” with the “all-white YWCA of Charleston.”³⁰ Under her stewardship, the Coming Street YWCA immediately initiated an extensive membership campaign, hosting several drives and events between 1967 and 1969 (Figure 17). In a letter to the membership titled “Freedom at last for the Negro Women of Charleston’s Branch YWCA,” national activist and former chairwoman of the Coming Street YWCA Mamie Garvin Fields (1888-1987) urged members to pledge their support for the maintained affiliation with the national YWCA and, in turn, separate itself from the “shackles of noninclusiveness.”³¹ Another prominent activist and leader within the Coming Street YWCA who initiated similar calls to action was Septima Poinsette Clark (1898–1987), who would

23 Jones-Branch, 15.

24 “Charleston YWCA Refuses To Agree To Integration,” 1963 August 16, *News & Courier*, Charleston, SC.

25 Jones-Branch, 15; “YWCA Committee to Name Negro,” 1963 October 2, *Evening Post*, Charleston, SC.

26 “YWCA Here May Cut National Ties,” 1966 May 4, *News & Courier*, Charleston, SC; “YWCA Members to Vite on Ending National Ties,” 1967 March 7, *Evening Post*, Charleston, SC.

27 “YWCA Effort to Cut Ties with national Body Fails,” 1967 March 18, *News & Courier*, Charleston, SC.

28 “New YWCA Group to Buy Building,” 1969 June 10, *Evening Post*, Charleston, SC; “YWCA of Charleston Adopts New Name,” 1972 November 6, *Evening Post*, Charleston, SC.

29 “Letter from Christine O. Jackson to Coming Street Y.W.C.A. Members, September 27, 1967.” YWCA of Greater Charleston, Inc., Records, 1906 - 2007. Avery Research Center. Charleston, SC.

30 “Charleston’s Christine Jackson Reflects on Legacy of MLK, Civil Rights Movement,” 2021 January 17, *Post & Courier*, Charleston, SC.

31 “Freedom at last for the Negro Women of Charleston’s Branch YWCA,” 1967. YWCA of Greater Charleston, Inc., Records, 1906 - 2007. Avery Research Center. Charleston, SC.



Figure 17: late 1960s flyer for a membership drive at the Coming Street YWCA (Avery Research Center for African American History and Culture)

continue to serve on the branch's executive board throughout her lifetime (Figures 18 and 19). In a 2004 tribute before Congress, Representative James Clyburn praised Jackson's "tenacity" and that of her fellow YWCA leaders for steering the all-Black branch to national affiliation during "the turbulent 1960s", crediting them with advancing "its mission of equality and empowerment" amid persistent segregation.³²

By June of 1969, the Coming Street YWCA changed its name to the YWCA of Greater Charleston to further distinguish itself from the former YWCA of Charleston, and by August, formally purchased No. 106 Coming Street under the new organizational name.³³ The following March, the 700-member YWCA of Greater Charleston was awarded a charter as a central branch of the national YWCA organization.³⁴ On March 7, 1970, Jackson told Charleston's *Evening Post* that the branch was officially "open to any woman" and the center formally revised its governing documents to clearly state their dedication in bolstering "the barrier-breaking love of God" by bringing together "women and girls of diverse backgrounds...in the struggle for peace and justice, freedom and dignity for all people."³⁵

EVENTS & USE

Once the doors opened within the new facilities at No. 106 Coming Street in September of 1964, the Coming Street YWCA offered a diverse array of classes for citizens of all ages, such as sewing, dressmaking, general tutoring, self-defense, and adult education, as well as civic services such as marriage, financial and legal counseling (Figures 20-21). A kindergarten and a day camp were also established, allowing children to engage in community service, field trips, dance classes, barbecues, and pageants (Figure 22-23).³⁶

The building also served as a gathering space instrumental for lectures, informative panels, and meetings related to community activism during the Civil Rights movement. In May 1966, for example, the Coming Street YWCA hosted an educational event at their facility regarding the Civil Rights Act and associated laws, where local Black community leaders informed the membership on the legislation and its impact on education, housing, healthcare, employment, and the judicial system.³⁷ In July 1967, amidst the YWCA of Charleston's disaffiliation, Jackson represented the Coming Street YWCA at the Southern Leadership Conference in Charleston and was one of three women to share the stage with Dr. Martin Luther King, Jr., who addressed a crowd of 3,000 on the urgent fight for racial justice.³⁸ It is highly probable that Coretta Scott King, Jackson's first cousin, visited the Coming Street YWCA at this time. Shortly thereafter, the director of the national YWCA's Office of Racial Integration, Dorothy I. Height (1912-2010), spoke at a membership drive at the Coming Street YWCA about the importance of the YWCA in advancing women's rights. Height, known as a primary organizer of the 1963 March on Washington for Jobs and Freedom,

32 Congressman James E. Clyburn Tribute To Christine Osburn Jackson. E1845 108th Cong., 2nd sess., *Congressional Record*, Vol. 150, No. 127. *Extensions of Remarks*. October 8, 2004.

33 "New YWCA Group to Buy Building," 1969 June 10, *Evening Post*, Charleston, SC.

34 Charleston County Deed Office, Deed Book C93, Page 47, Charleston, SC.

35 "Document A: Statement of Purpose," 1971. YWCA of Greater Charleston, Inc., Records, 1906 - 2007. Avery Research Center. Charleston, SC.

36 "YWCA Kindergarten," 1967 November 1. YWCA of Greater Charleston, Inc., Records, 1906 - 2007. Avery Research Center. Charleston, SC.

37 "YWCA Branch Sets Civil Rights Law Discussion," 1966 May 16, *Evening Post*, Charleston, SC.

38 "FLASHBACK: Dr. King visited Charleston in 1962, July 1967," 2018 April 4, *WCSC*, Charleston, SC.



Figure 18: 1965 photograph of Septima Clark (left) at the Coming Street YWCA Christmas Party (Avery Research Center for African American History and Culture)



Figure 19: c. 1980s photograph of Coretta Scott King speaking at a Coming Street YWCA event. Septima Clark is sitting second from the right (Avery Research Center for African American History and Culture)



Figure 20: 1960s photograph of YWCA members attending a sewing class inside the building (Avery Research Center for African American History and Culture)



Figure 21: 1970s photograph of a karate class held within the Coming Street YWCA (Avery Research Center for African American History and Culture)



Figure 22: 1970s photograph of day camp participants in front of the Coming Street YWCA (Avery Research Center for African American History and Culture)



Figure 23: 1970s photograph of children in front yard of the Coming Street YWCA (Avery Research Center for African American History and Culture)

also served as the president of the National Council of Negro Women.³⁹

During the Hospital Strike of 1969, when the Black personnel of Charleston's Medical University of South Carolina demanded better wages and work conditions, the Coming Street YWCA likely served as a meeting place for the protesters. Many first-hand accounts of the strike claim that the classrooms and large meeting room at No. 106 Coming Street were used to organize people and accommodate informational gatherings, playing an integral role in the dissemination of information and mobilization of concerned citizens.⁴⁰ One such group that likely met at the Coming Street YWCA during the strike was the "Charleston Area Community Relations Committee," which was established by a group of citizens dedicated to improving race relations in Charleston. By 1988, a new group was formed to advance the committee's mission and used the Coming Street YWCA as its headquarters.⁴¹ The facility continued to be a meeting place for committees and formal bodies dedicated to ending racism throughout the 1990s and early 2000s.⁴² It is highly probable that Coretta Scott King also visited the Coming Street YWCA during the strike, as she was heavily involved in the movement. Coretta Scott King continued to speak on race relations and civil rights issues at events hosted by the Coming Street YWCA at churches and large banquet halls in Charleston for the next few decades.⁴³

In 1972, the Coming Street YWCA hosted one of the nation's first annual celebrations of Martin Luther King, Jr.'s birthday, organizing a formal ball, lectures, and church services in his honor.⁴⁴ One year later, "Martin Luther King Jr.'s Birthday Observance" was designated as a city-wide holiday.⁴⁵ Although Martin Luther King, Jr. Day did not become a federal holiday until 1986, the Coming Street YWCA became integral to the initiative by urging U.S. Congress to recognize King's January 15th birthday as early as 1973.⁴⁶ By the beginning of the 1990s, the organization also added a parade to the holiday's agenda, a tradition which continues in Charleston today.⁴⁷

After 50 years of programming and events within the c. 1964 building, the Coming Street YWCA formally placed the property on the market in 2014 in search of a larger, more centralized facility to expand its services.⁴⁸ The organization remains active today as the YWCA of Greater Charleston.

39 "Rights Leader to Address YWCA Meeting," 1968 April 20, *Evening Post*, Charleston, SC.

40 "Coretta Scott King to be Guest at Tribute For," 2004 October 7, *Post & Courier*, Charleston, SC.

41 "Racial Panel to Remain Independent," 1988 January 27, *Evening Post*, Charleston, SC.

42 "Make Commitment to Fight Racism," 1992 May 27, *Post & Courier*, Charleston, SC.

43 Taylor, Kerry. "Coretta Scott King Visits Charleston." *The Charleston Hospital Workers Movement, 1968-1969*. Online Exhibit. Charleston, SC: Lowcountry Digital History Initiative, November 2013. Accessed May 2, 2025; "Coretta Scott King to be Guest at Tribute For," 2004 October 7, *Post & Courier*, Charleston, SC.

44 "YWCA Announces MLK Events, Honorees for 53rd Annual Celebration in Charleston," 2024 December 25, *Post & Courier*, Charleston, SC; "Birthday Commemoration Planned," 1972 January 12, *News & Courier*, Charleston, SC.

45 "Events Honor King," 1973 January 13, *News & Courier*, Charleston, SC.

46 "Events Honor King," 1973 January 13, *News & Courier*, Charleston, SC; U.S. Congress. House. *A bill to amend title 5, United States Code, to make the birthday of Martin Luther King, Jr., a legal public holiday*. HR 3706. 98th Congress, 1983-1984. Introduced in House July 29, 1983, Passed in House November 2, 1983.

47 "Charleston's Christine Jackson Reflects on Legacy of MLK, Civil Rights Movement," 2021 January 17, *Post & Courier*, Charleston, SC.

48 "YWCA on move; building up for sale," 2014 September 30, *Post & Courier*, Charleston, SC.

BVL HISTORIC PRESERVATION RESEARCH

COMING STREET YWCA No. 106 COMING STREET CHARLESTON, SC

SIGNIFICANCE EVALUATION

The building at No. 106 Coming Street is significant for its associations as the headquarters for the Coming Street YWCA, a community organization that advocated for racial justice and helped shape public policy in Charleston during and after the Civil Rights movement. The one-story community center collectively embodies the work of Black women from all socioeconomic backgrounds, including teachers, homemakers, mothers, and activists, and their quest for equal opportunity during a time of vast segregation. The Coming Street YWCA not only hosted diverse programs and lectures to combat racial segregation in education, recreation, and business but it also served as a gathering place for meetings related to the Civil Rights Act, the Hospital Strike of 1969, and some of the nation's first Martin Luther King, Jr. commemorations. In addition, a number of Charleston's leading female civil rights activists of the midcentury, including Septima Poinsette Clark (1898–1987), Mamie Garvin Fields (1888-1987), and the Coming Street YWCA's long-standing director, Christine Jackson (b. 1928) all worked directly from the building to secure and protect equal rights during a tumultuous time in American history.

Jackson, serving as executive director of the Coming Street YWCA from 1966 to 2003, emerged as a prominent voice for Black women in Charleston throughout her 37-year tenure (Figure 24).¹ An Alabama native, Jackson was deeply connected to the Civil Rights Movement, both personally and politically. As Coretta Scott King's first cousin, she shared close family ties with the King family, and her parents and husband were jailed alongside Dr. King during his marches across Alabama in the late 1950s and early 1960s.² At her 2003 retirement celebration, Coretta Scott King joined in honoring Jackson, while Representative James Clyburn praised her before Congress, crediting her "strength and steadfastness during [those] difficult times that built the foundation for the YWCA's continuing success" as she "actively registered voters, taught parenting to teenage mothers, provided after-school programs" at the Coming Street YWCA to further the civil rights

1 "At 94, Charleston civil rights leader Christine Jackson still inspiring generations of women," 2023 March 5, *Post & Courier*, Charleston, SC.

2 "Charleston's Christine Jackson Reflects on Legacy of MLK, Civil Rights Movement," 2021 January 17, *Post & Courier*, Charleston, SC; U.S. Congress. *TO REQUEST THAT THE DEPARTMENT OF TRANSPORTATION NAME S-1022 (Washington Street) from L-4349 (Laurens Street) North to the end of state maintenance IN Charleston COUNTY "Christine Jackson Road" AND ERECT APPROPRIATE MARKERS OR SIGNS AT THIS LOCATION CONTAINING THE DESIGNATION.* S 775. 118th Cong., 125th sess. Introduced in House May 9, 2023; "At 94, Charleston civil rights leader Christine Jackson still inspiring generations of women," 2023 March 5, *Post & Courier*, Charleston, SC; "Retired Educator Rev. E L Jackson Dies in Hospital," 1991 July 19, *Evening Post*, Charleston, SC.



Figure 24: 1990 photograph of Christine Jackson standing in front of the Coming Street YWCA sign (*News & Courier*, 1990 February 3, Charleston, SC)

of Black women throughout Charleston County.³ Nearly twenty years later, the *Post & Courier* echoed Clyburn's words, reporting that "generations of African American girls and women sought refuge and strength from the Coming Street YWCA since 1907" as Jackson "helped put [the organization] at the forefront of local efforts to push for voting rights, civil rights, and more equal pay."⁴ On May 12, 2023, the City of Charleston dedicated the intersection of Coming and Duncan streets directly in front of No. 106 Coming Street as "Christine O. Jackson Way" in honor of Jackson's longstanding service to the organization.⁵

As the sole remaining headquarters of the Coming Street YWCA and the best representative example of the organization's legacy, No. 106 Coming Street survives as a testament to the work of one of the first "colored branches" to be recognized in the national YWCA organization. The building serves as an enduring symbol of the success and resilience of the Coming Street YWCA organization during its century-long occupancy of the property.

No. 106 Coming Street appears much as it did when it was dedicated in 1964, despite minor cosmetic updates, such as removing the original "YWCA" letters from the main elevation and repainting the exterior jack arches and windowsills (Figure 25). The building's character-defining features of mid-century architecture remain, including the overall form, design and footprint, brick veneer, metal storefront windows, and wooden window sash. In the interior, the building's painted cinder block walls, window and door casings, tiled floors, and important design elements, such as the marbleized front desk in the lobby and a late-twentieth-century mural, remain intact, representing the occupancy and legacy of the 1964 Coming Street YWCA.

³ Congressman James E. Clyburn Tribute To Christine Osburn Jackson. E1845 108th Cong., 2nd sess., *Congressional Record*, Vol. 150, No. 127. *Extensions of Remarks*. October 8, 2004; "Retired Leader Remains Focused on Y Mission," 2003 October 22, *Post & Courier*, Charleston, SC.

⁴ "Civil rights leader Christine Jackson honored by city of Charleston as a 'towering force,'" 2020 July 31, *Post & Courier*, Charleston, SC.

⁵ "Charleston Honors Living Civil Rights Legend Christine Jackson with New Street Signs," 2023 May 12, *Post & Courier*, Charleston, SC.

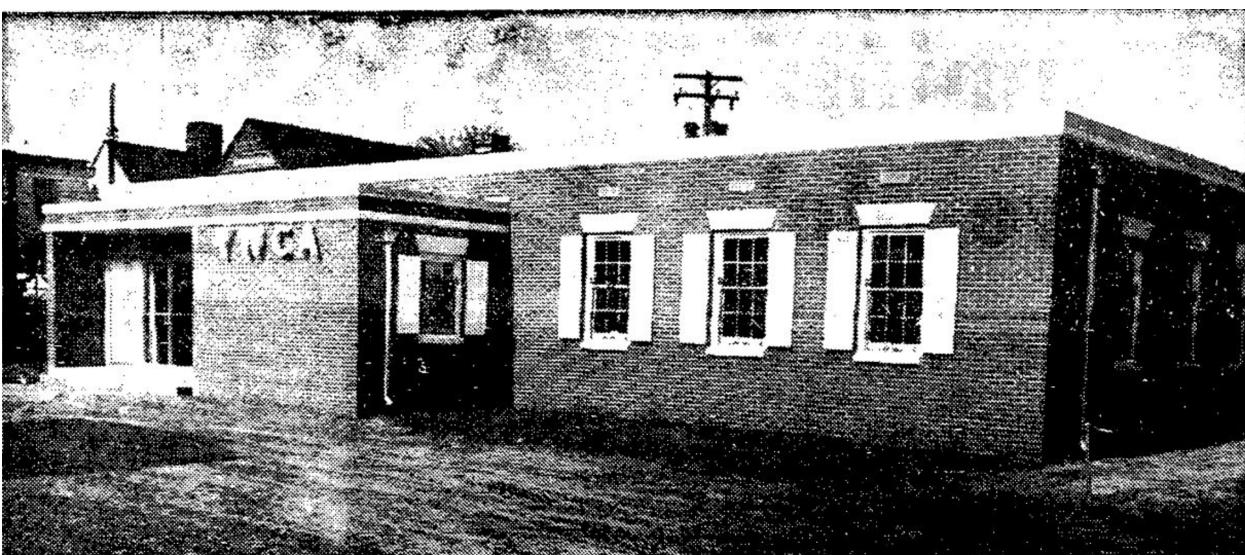


Figure 25: (top) two 1960s photographs of the Coming Street YWCA (Avery Research Center for African American History and Culture and *Evening Post*) ; (bottom) 2025 photograph of the Coming Street YWCA (BVL HPR)

APPENDIX B

Terracon's Architectural Evaluation and Site History

APPENDIX C

S&ME's Historic Research and Geophysical Assessment



Historic Research and Geophysical
Assessment

106 Coming Street and 99 St Philip Street
Charleston, South Carolina
S&ME Project No. 24130280

PREPARED FOR:
Burr & Forman LLP
100 Calhoun Street
Charleston, South Carolina 29401

PREPARED BY:
S&ME, Inc.
7410 Northside Drive, Suite 110
North Charleston, South Carolina 29420

November 12, 2024



November 12, 2024

Burr & Forman LLP
100 Calhoun Street
Charleston, South Carolina 29401

Attention: David Santos

Reference: **Historic Research and Geophysical Assessment**
106 Coming Street and 99 St Philip Street
Charleston, South Carolina
S&ME Project No. 24130280

Dear Mr. Santos:

This report contains the results of S&ME's background research and geophysical assessment of the properties at 106 Coming Street and 99 St. Philip Street in Charleston, South Carolina. This study also included an evaluation of the Coming Street YWCA building's eligibility for the National Register of Historic Places (NRHP).

If you have any questions concerning this report, please contact us by telephone at (843)972-0100 or by email at abrummitt@smeinc.com.

Sincerely,

S&ME, Inc.

Heather Carpinii
Principal Historian / Architectural Historian

Aaron Brummitt, RPA
Principal Archaeologist

With contributions from

Jeffrey Hardy
President/Geophysicist - Hardy Services Group



Table of Contents

1.0	Introduction	1
2.0	Historic Background.....	4
3.0	Geophysical Assessment	25
4.0	Coming Street YWCA (SHPO Site Number 8360).....	31
5.0	Summary, Conclusions, and Recommendations	36
6.0	References Cited.....	37

List of Figures

Figure 1. Location of the Project Area.....	2
Figure 2. Aerial view of the Project Area.....	3
Figure 3. Map of the lands of Mrs. Charlotte Poaug and Mr. Joseph Manigault, north of Manigault (Boundary) Street, 1786 (John McCrady Plats 538).	11
Figure 4. Map of lands west of King Street on the Charleston Neck, 1798 (John McCrady Plats 490).	12
Figure 5. Map of the City Lands North of Boundary Street, 1799 (City Engineer's Plat Book, 1671-1951:12).	13
Figure 6. Map of the City Lands North of Boundary Street, 1799 (John McCrady Plats 538).	14
Figure 7. Portion of the 1802 Ordinance to amend "An Ordinance for the better regulation of the Public City Burial Ground" showing fee schedule (Edwards 1802:243).....	15
Figure 8. Handwritten physicians report to the Commissioners of the Orphan House reporting a death among the residents, April 1806 (Commissioners of the Charleston Orphan House, 1790-1959, Correspondence 1792-1951).	16
Figure 9. Advertisement of city lands for lease, comprised of 11 lots along Boundary, Coming, and Vanderhorst streets (<i>The Charleston Daily Courier</i> 7 February 1817:3).	17
Figure 10. Two plats of the City Lands on the Vanderhorst, Coming, Boundary Street block, 1817 and 1842 (John McCrady Plats 4014).....	18
Figure 11. Advertisement of city lands for sale, bounding on Coming and Vanderhorst streets (<i>The Charleston Mercury</i> 30 December 1842:3).....	19



Figure 12. Plat of City Lots at the southeast corner of Vanderhorst and Coming Streets, 1842 (redrawn 1855) (John McCrady Plats 7853).	20
Figure 13. Portion of the Bridgens and Allen Map (1852), showing former location of the public burial grounds (Bridgens and Allen 1852).	21
Figure 14. Map of the John Michel Estate, east of Coming Street between Vanderhorst and Calhoun Streets, 1874 (John McCrady Plats 4031).	22
Figure 15. Sanborn Fire Insurance map, 1888, showing the Boundary-Coming-Vanderhorst burial ground block (Sanborn Map Company 1888).	23
Figure 16. Sanborn Fire Insurance map, 1902, showing the Boundary-Coming-Vanderhorst burial ground block (Sanborn Map Company 1902).	24
Figure 17. Field conditions at 106 Coming Street.	26
Figure 18. Field conditions at 99 St Philip Street.	26
Figure 19. GPR results at 106 Coming Street.	27
Figure 20. GPR results at 99 St Philip Street.	28
Figure 21. Sample of magnetometer results from 106 Coming Street.	29
Figure 22. Sample of magnetometer results from 99 St Philip Street.	30
Figure 23. Coming Street YWCA, facing east.	32
Figure 24. Coming Street YWCA, facing northeast.	33
Figure 25. Coming Street YWCA, facing northeast.	33
Figure 26. Coming Street YWCA, facing southeast.	34
Figure 27. Coming Street YWCA, original building (Avery Research Center for African American History and Culture, College of Charleston, Charleston, SC).	34
Figure 28. Sanborn Fire Insurance map, 1967, showing the current Coming Street YWCA building (Sanborn Map Company 1967).	35



1.0 Introduction

The parking areas located at 106 Coming Street and 99 St Philip Street (Figures 1 and 2) are under consideration for future development. To assist with the due-diligence research prior to property acquisition or development S&ME, Inc. (S&ME), with assistance from Hardy Services Group conducted background archival research and a geophysical assessment of the properties at 106 Coming Street and 99 St. Philip Street in Charleston, South Carolina. This study also included an evaluation of the Coming Street YWCA building's eligibility for the National Register of Historic Places (NRHP).

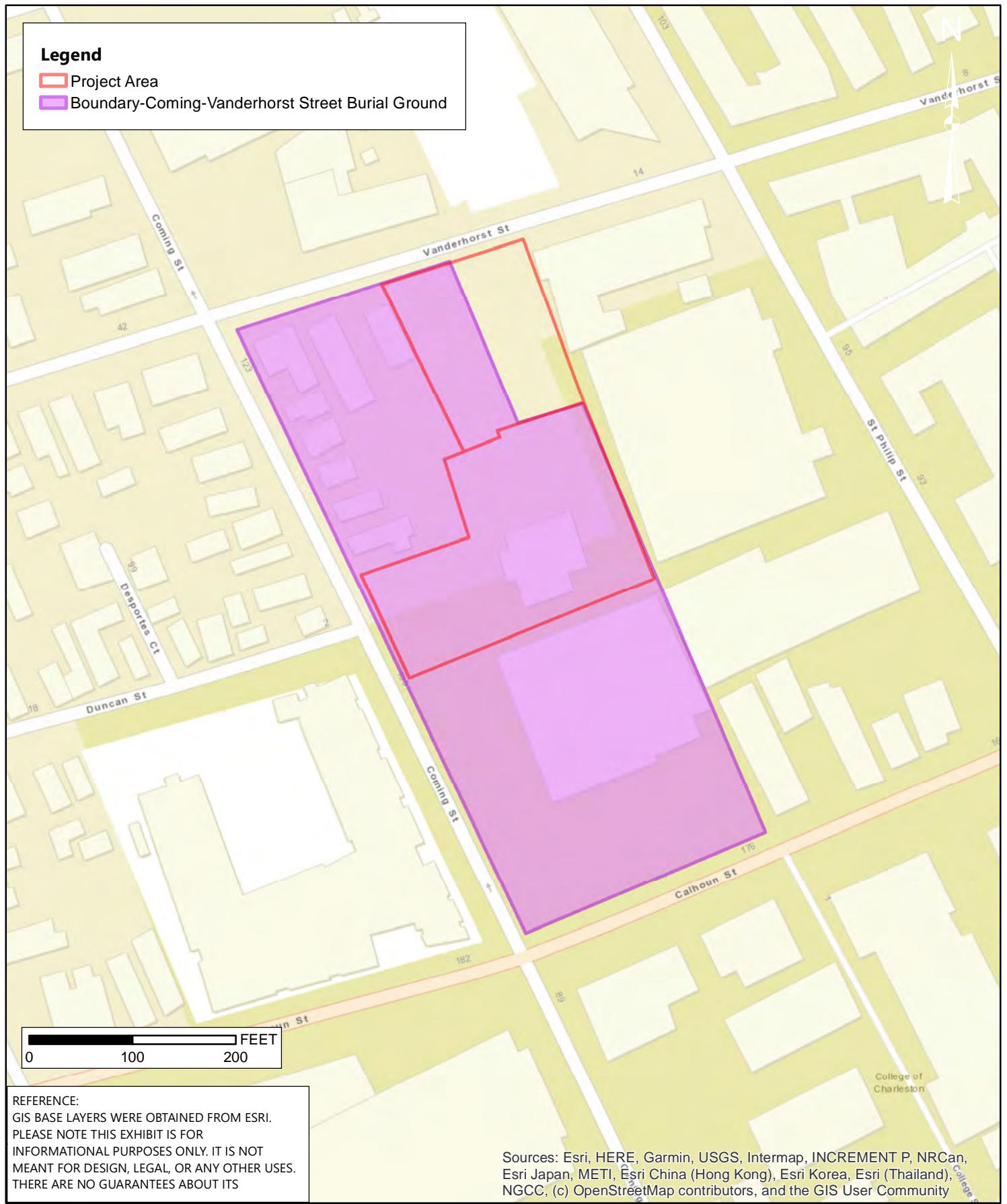
We performed this study in general accordance with S&ME Proposal 24130280, which was authorized on August 7, 2024.

Aaron Brummitt, RPA, S&ME's Principal Archaeologist, served as the project manager and co-author of this report. Heather Carpini, S&ME's Principal Historian, conducted background research and historic architectural evaluation and served as a co-author of this report. Jeffrey Hardy, President of Hardy Services group conducted the geophysical assessment of the Project Area.

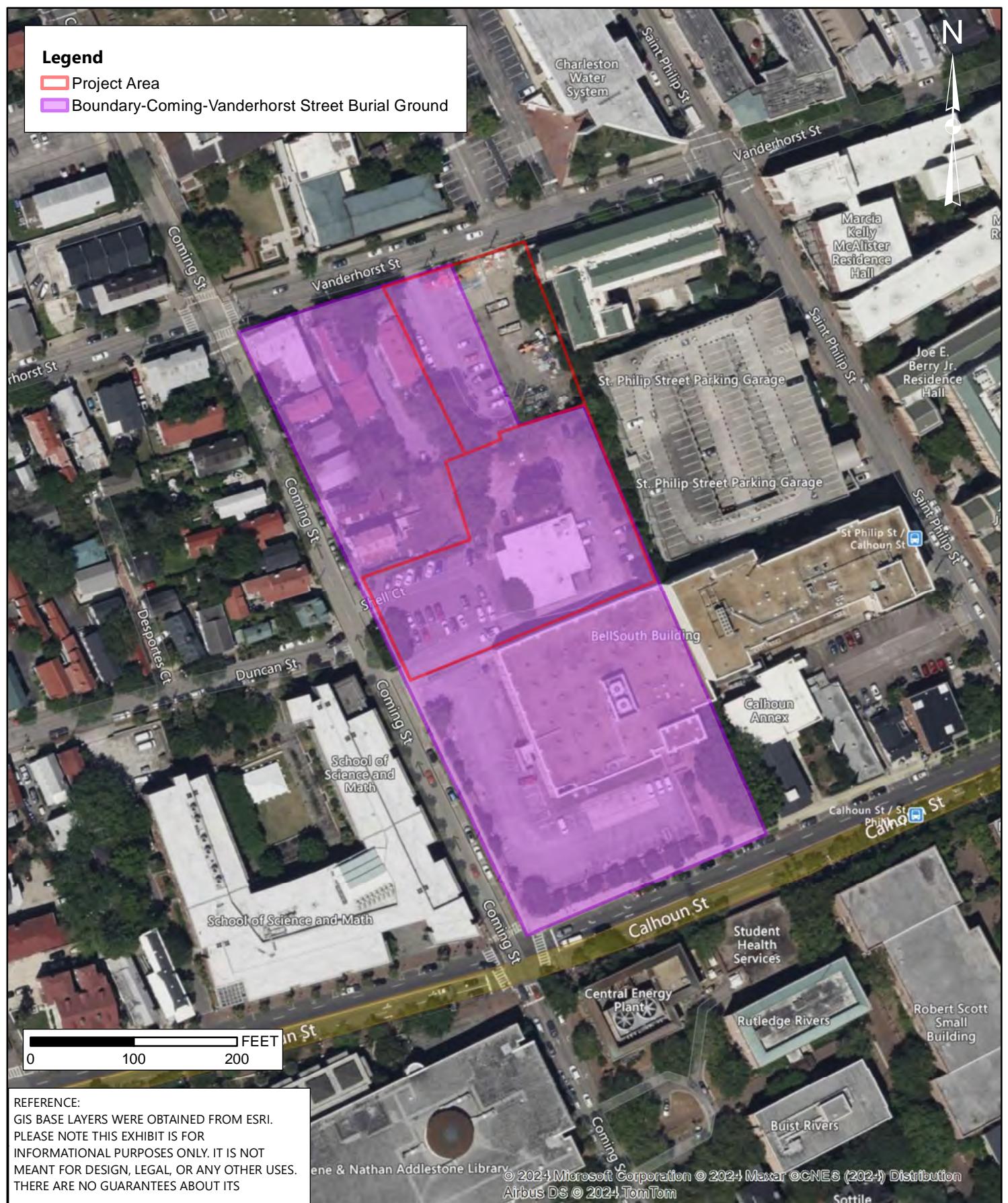
Following this introduction the report presents the history of the Project Area, focused specifically on its use as the City Cemetery, then presents our evaluation of Coming Street YWCA building's eligibility for the NRHP, the methods and results of the geophysical assessment, and concludes with a summary of our findings and a list of references cited.

Legend

- Project Area (Red)
- Boundary-Coming-Vanderhorst Street Burial Ground (Purple)



	SCALE:	1:1,500	Street Map 99 St. Philip Street - 106 Coming Street Charleston, Charleston County, South Carolina	FIGURE NO.
	PROJECT NO:	24130280		1
	DRAWN BY:	HLC		
	DATE:	11/5/2024		



	SCALE:	1:1,500	Aerial Map 99 St. Philip Street - 106 Coming Streett Charleston, Charleston County, South Carolina	FIGURE NO. 2
	PROJECT NO:	24130280		
	DRAWN BY:	HLC		
	DATE:	11/5/2024		



2.0 Historic Background

This chapter presents the historic background of the property. The research was focused on the property's use as the City Cemetery.

2.1 City Cemetery (1794-1807)

The City of Charleston has had multiple public cemeteries¹ during its long history, some of which have served the city for a long period of time and some of which have been short-lived. A general history of public burial grounds in Charleston has been well researched and was presented in a podcast (Butler 2021). Separate from the familiar church graveyards and the family cemeteries on plantations, the municipal public cemetery in the eighteenth and early nineteenth centuries was a final resting place for people who died in Charleston but could not be buried in either of these other types of burial grounds. Generally, these people were either visitors to the city or were poor Charleston residents without family or money to afford burial in a church plot. As a commercial hub and a bustling seaport, the number of "strangers" who were present within Charleston was higher than other South Carolina cities. The diverse population of Charleston during the late 1700s and early 1800s also led to a large number of indigent adults and children, as evidenced by the establishment of the Poor House in 1736 and the Orphan House in 1790. The high percentage of these two populations led to a larger number of deceased individuals with no private burial options, thus the need for a large public cemetery.

In the 1790s, after over a century of using an approximately 14-acre parcel near the northwest corner of the early city boundaries, roughly bounded by Beaufain, Franklin, Logan, and Magazine streets, the City of Charleston recognized the necessity of finding a new location of its public burial grounds (Butler 2021). In 1793, the City Council of Charleston acquired a 3.4-acre parcel, bounding "to the South on Manigault or Boundary Street, to the West on Cummings [sic] Street, to the North on Vanderhorst Street, and to the east on Lands of Joseph Manigault" from John Poaug (Charleston County Register of Deeds 1793 Deed Book F6:519). The land had been part of a 25-acre grant to Samuel Wragg in 1715, which had passed to Charlotte Wragg Poaug and Elizabeth Wragg Manigault upon the deaths of their parents; John Poaug had inherited a large portion of this land upon the death of his mother in 1787 (Charleston County Probate Records 1751 Will Book 6:443; 1769 Will Book 11:667; 1787 Deed Book 22:137).

The land purchased by the city is designated as lots 5, 6, 7, 26, 28, 37, 40, 59, 60, 61, and 62 on a 1786 plat made of these lands (Figure 3). As per land conveyance laws and customs of the time, the deed was executed as a "lease and release", where the City Council agreed to lease the property for a one-year period, in exchange for five shillings and a yearly rent of "one Pepper Corn"; upon taking possession of the property, the City Council paid John Poaug £400 (Charleston County Register of Deeds 1793 Deed Book F6:519). Seven years earlier, the land had been advertised for lease for 20-year terms through an

¹ The terms public or city cemetery, public burial ground, and strangers burial ground are used interchangeably in this narrative, as they were all historically utilized to describe the burial ground.



auction run by John-Walters Gibbs, but at least a portion of the lots did not sell, leaving them available for the City of Charleston to purchase (*Charleston Morning Post* 16 November 1786). In August 1794, the City Council adopted the parcel as its new public burial ground, as "it becomes at this time necessary that a place be appropriated for the burial of strangers, those who may die in the poor house, hospitals, and negroes", and they invested the direction of the cemetery to the Commissioners of the Poor House (*City Gazette & the daily advertiser* [Charleston, SC] 24 August 1794:4).

However, despite the procurement of the land bounded by Boundary, Coming, and Vanderhorst streets for use as a cemetery, in May 1795, the Medical Society of Charleston advised "that a sufficient piece of ground should be procured without the city and enclosed for a public burial ground" for the betterment of health in the city (*City Gazette* [Charleston, SC] 15 May 1795:3). Another plea for a "common burial-ground" for "the interment of Strangers", outside the city, in addition to a request for a place "set apart for the burial of negroes, other people of colour, and slaves", was expressed by a committee of church representatives in November 1798 (*City Gazette & the Charleston daily advertiser* 3 May 1799:3). A report of the City Council reiterated the creation of the new public burial ground on the lands "purchased from Mr. John Poaug...beyond the bounds of the city...lying within Coming, Vanderhorst and Boundary Streets" to be used "for a burying place for Strangers and negroes" and detailed the size of the parcel being "189 feet on Vanderhorst Street, 252 feet on Boundary Street, about 609 feet on Mr. Manigault's lots, and 635 feet on Coming Street," (*City Gazette & the Charleston daily advertiser* 24 August 1799:2; 28 August 1799:4). The burial ground is marked as encompassing the entire block bounded by Boundary, Coming, St. Philip, and Vanderhorst streets on a 1798 plat, but is more accurately depicted as taking up most of the western portion of the block on two plats from 1799 (Figure 4 and 6). Still, during the closing months of 1799, the City may have already been scouting for a new public cemetery location, as the Council noted that "both the last and present councils have already taken order for the purchase of a burial ground, and not doubt the gentlemen appointed to look out for and procure a proper situation, will report as speedily as possible" and another notice stated that a committee of three men had been directed to "enquire into and report whether any and what land near the city can be procured for the interment of dead bodies" (*City Gazette & the Charleston daily advertiser* 3 May 1799:3; 31 October 1799:2).

In October 1800, the City Council's Committee on Contracts advertised for someone to build a fence at the Strangers Burial Ground, "measuring 1748 feet round, of good Pine Inch Boards, free from sap, to be strait edged; the Posts to be cedar, ten feet long, and to be sunk three feet in the ground" (*City Gazette & the Charleston daily advertiser* 14 October 1800:3). By July 1801, in addition to the previously contracted construction of the fence, the Council sought to better regulate the Public City Burial Ground. The Ordinance they passed instituted multiple mechanisms surrounding the cemetery, including creating a Superintendent of the City Burial Ground; during the period between 1803 and 1807, the elected position of the Superintendent of the City Burial Ground/Stranger's Burial Ground was held alternately by John Welch, Jr. (elected October 1805), John Welch (elected October 1803 and October 1806), Nathaniel G. Welsh (elected October 1807) (*City Gazette & the Charleston daily advertiser* 18 October 1803:3; *City Gazette* [Charleston, SC] 24 October 1805:3; 22 October 1806:3; 20 October 1807:3). The Superintendent was given control over the application for and timing of burials within the cemetery, including prohibiting

burials after dark and before sunrise, and setting out a pay scale for each grave dug (Edwards 1802:211–214).

The 1801 Ordinance additionally divided the 3.4-acre tract into separate “burial yards”, with the northern one acre “appropriated to the interment of free white persons, strangers and foreigners” and the “residue of said burial ground be appropriated for slaves, and people of colour, free negroes, mulattoes, and mustizoes [sic]”, with a partition fence to be built between the two sections (Edwards 1802:212). Each section was ordered to be “divided by right lines into oblong areas of eight feet in breadth; that the graves be opened across the said areas in regular succession, so that each area be filled before any ground be broken in the next; that the graves to be dug shall be at the distance of not more than one foot from the broken ground of one grave, to the broken ground of the next; that regularity and uniformity be preserved, and the ground economised [sic] as much as possible” (Edwards 1802:212). This meant that the parcel was divided into multiple sections, each eight feet wide; bodies would be buried relatively close together, in a line, across each section until it was full, and then the next section would be opened for burials. In terms of grave size, this could be variable, but interments were required to be dug to a depth of six feet. Graves of enslaved individuals that were less than four feet, six inches long cost one dollar, while those greater than four feet, six inches would cost an additional twenty-five cents; presumably, for the sake of cost and land economy, those paying for the burials of enslaved individuals likely took measures to ensure the bodies fit into the smaller-sized graves (Edwards 1802:213). The following year, the City Council amended its fee schedule, as it was deemed “too exorbitant”; the new fee schedule imposed a fee of one dollar for graves of Strangers, mariners, and seamen and seventy-five cents for free persons of color and enslaved individuals (Edwards 1802:242–243) (Figure 7).

By mid-1807, the Boundary-Coming-Vanderhorst street burial ground had been filled with graves and the City Council announced that “after the first day of August next, Burials at the Burial Ground in Boundary-street will be discontinued”; land for a new public cemetery had been purchased in Cannonsborough (*City Gazette* [Charleston, SC] 1 August 1807:3). This announcement summarized an ordinance they had passed in June, which declared that the “city burial-ground, between Boundary, Coming, and Vanderhorst streets, is so filled with graves as to be no longer fit for interments” and designated the new cemetery location, between Thomas, Bee, President, and Doughty streets. The penalty for “any person or persons whosoever, shall make, or cause or suffer to be made, any interment or interments on the first above mentioned burial-ground between Boundary, Coming, and Vanderhorst streets” following August 1, 1808 was to be a \$50 fine for offenders who were white or free Blacks, or one month in the Work House and four “corrections” of not more than 20 lashes each for enslaved offenders, unless the enslaver paid the \$50 fine (Edwards 1807:454). Thus the 13-year active span of the public burying ground on the Boundary-Coming-Vanderhorst street block came to an end.

Although records of burials in the “Strangers Burial Ground” or “Public Burying Ground”, as it was alternately referred to, were spotty between 1794 and 1807, there are some indications of the numbers and makeup of the persons interred in the cemetery.



Between August 1 and December 1, 1799, Dr. David Ramsey of the Medical Society of South Carolina estimated that of the 362 people who were buried within the city's various cemeteries, "239 were Strangers" and were presumably interred in the Public Burying Ground. The same report estimated that 544 people were buried in the city from July to October 1799; assuming the same ratio of Strangers among the dead, there were 359 interments during that period in the burial ground (*City Gazette & the Charleston daily advertiser* 21 March 1800:2). Published statistics from patients at the Charleston Dispensary, the hospital that treated the city's poor, indicate that in July and August of 1805, 234 people died of various diseases, ranging from diarrhea and consumption to "stroke of the sun", nervous fever, and asthma, as well as from accidents, such as drowning (*City Gazette* [Charleston, SC] 2 October 1805:2). Given that those treated at the Dispensary were generally indigent, it is likely that the majority of the people recorded in these death statistics were buried in the public burial ground.

Before 1801, the regulation of the public burial ground was under the control of the Commissioners of the City's Poor House, which was located approximately 0.5-mile south of the cemetery (*City Gazette & the daily advertiser* 25 August 1794:4). Even following the 1801 City Ordinance, the able-bodies residents of the poor house remained involved in the operations of the public burial ground, supplying grave digging services, transportation of corpses, and constructing wood coffins, which were sold for a fee (Records of the Commissioners of the Alms House [Poor House], 1800–1923). The building and sales of coffins, however, appear to have begun between 1802 and 1804. The first instance in the Commissioners minutes of coffins sold for profit was an entry from January 1804, recording three dollars paid to the commissioners "for a coffin sold" (Commissioners of the Alms House [Poor House], 1800–1923, Journals, Records, and Minutes 17 January 1804). Previous to that, at least two account notations indicate that the Poor House was purchasing coffins, at \$150 for a lot of 50, from cabinetmaker Calhoun and Shrewsbury (Commissioners of the Alms House (Poor House), 1800–1923, Journals, Records, and Minutes 25 January 1802; 20 December 1802). The need for these coffins indicates that at least 50 residents of the Poor House had died between January and December 1802, with the majority of these likely being buried in the public burial ground. The Register of the Transient Sick and City Poor, which began recording intakes at the Poor House in 1803, has some records that indicate when and how residents left the house, which includes residents who died while there. Although the earliest death statistics were recorded in 1809, multiple records from previous years have no information on either discharge from the Poor House or death, and it is probable that at least a percentage of these people died while in the Poor House. These include 212 entries from February 1803 through October 1805 that have minimal information on the individual, outside of their name and sometimes where they were born and their age, and which do not have recorded information on when or how they left the Poor House (Commissioners of the Alms House [Poor House], 1800–1923, Register of the Transient Sick and City Poor 1803–1916). These people included both men and women, with recorded ages ranging from 17 through 77, who had come to Charleston from various other states, including Connecticut, Massachusetts, and Maryland, or European countries, including Dutch Flanders, Germany, Ireland, Portugal, and Sweden.

Another City institution that likely interred individuals within the public burying ground was the Charleston Orphan House, which was located one block to the east, between Boundary, King, St. Philip, and Vanderhorst streets (Records of the Commissioners of the Charleston Orphan House, 1790–1959). In a

report from October 22, 1795, the Commissioners reported that since its opening five years earlier, there had been 183 children admitted into the Orphan House, of which six (four boys and two girls) had died; although no years of death were recorded, any of these deaths that had occurred in the preceding year potentially resulted in burials in the public burial ground (Commissioners of the Charleston Orphan House, 1790–1959, Minutes 22 October 1795). In the Orphan House, which was often crowded, the potential for disease spread was great and the causes of death recorded for these six children included measles, smallpox, and bilious fever. The Register of Children, which recorded orphans admitted to the institution, also recorded the reason for their release from the Orphan House. Although most of the children were bound out on work contracts or otherwise discharged, between 1794 and 1807 the Register recorded the deaths of Sarah Hutton, age 14 in March 1803; infant Ann Reynolds, in May 1803; Archibald McNeil, age three in June 1803; infant Clementina Brunston, in June 1803; Thomas Arnold, age 11 in March 1804; John Brown, age two in August 1804; Margaret Scott, age four in March 1805; Ruth McCrackin, age three in June 1805; Alexander Bozeman, age 5 in June 1805; Samuel Shilling, age five in April 1806; and Samuel Guy, age two in August 1806 (Commissioners of the Charleston Orphan House, 1790–1959, Register 1791–1834). Multiple entries, however, have no notation on the child's discharge, meaning that the mortality numbers during this period could possibly be higher. Files of loose correspondence papers include brief physicians reports on the health of the children in the Orphan House to the Commissioners (Figure 8). Although the majority of the reports from this period report general health among the residents of the institution, some reports do correspond to register entries, including notes that Sally (Sarah) Hutton died of a fever on March 17, 1803; Ann Reynolds died of a lung infection on May 15, 1803; Samuel Shilling died of a long illness on April 19, 1806; and Samuel Guy died after a long illness on August 30, 1806. However, an October 1801 report references the death of Maria Finley, "one of the elder girls...after an illness of five days", which was described and assumed to be yellow fever; her death does not correspond to an entry in the register, indicating that there may be other unaccounted for deaths during this period (Commissioners of the Charleston Orphan House, 1790–1959, Correspondence 1792–1951).

Despite the existence of a public burial ground, the disposal of deceased people remained an issue in Charleston, necessitating further regulation. By November 1805, the number of bodies present in the waterways of Charleston was cause for concern, prompting the City Council to pass an ordinance prohibiting the throwing of "dead human body or bodies into any of the rivers, creeks or marshes, within the harbor of the city," with a fine of \$100 for anyone caught doing so (*City Gazette & the Charleston daily advertiser* 29 October 1805:3; *Charleston Courier* 22 November 1805:3). The primary perpetrators of this offense were ships that were transporting enslaved individuals from Africa. The previous January, the officers and surgeon on the ship *Parseverance* swore to the Justice of the Quorum (a local magistrate who oversaw multiple justices of the peace) that "no Negro, whatever, that has died on board said ship, since her arrival here, has been thrown overboard; but that all who have died, since her arrival as aforesaid, have been decently interred in the Public Burying Ground, in the Suburbs of this City" (*City Gazette & the Charleston daily advertiser* 2 February 1805:3). Presumably, following the November ordinance, the bodies of enslaved individuals from these types of ships were among those buried in the public cemetery.



Based on available published numbers, with the summer months having the highest rates of death, due to heat and insect-borne diseases, estimated numbers range between 30 and 75 burials per month in the Public Burying Ground. From August 1794 through July 1807, a period of 13 years (156 months), an estimate of interments in the Boundary-Coming-Vanderhorst cemetery ranges from approximately 4,680 to over 11,000. Historian Nic Butler approximated the number of burials based on an estimated grave size of 32 square feet (eight feet by four feet each) at 4,600 (Butler 2021). A different reading of the language of the 1801 Ordinance, however, could lead to a higher potential number. Assuming that at least half of the burials were less than the four-foot, six-inch cutoff for higher burial costs (for enslaved individuals), and that locating the graves within one foot of each other limited their width, an average grave size may be approximately four feet long by three feet wide (12 square feet); using this size calculation, the 3.4-acre burial ground could hold up to 12,342 burials within its boundary. In truth, the number of burials likely lies somewhere between the two estimates, with the median figure being around 8,500 burials.

After the closing of the Boundary-Coming-Vanderhorst Street burial ground, the land remained under the ownership of the City of Charleston. However, in 1817, within a decade of the ceasing of burials in the lot, the idle lands were up for lease (Figure 9). The former cemetery land, which was divided into 11 lots, were offered for lease on 25-year terms for an initial lease purchase price plus \$5 per year; the leases allowed for the construction of buildings on the parcels, but any wood buildings would be required to be removed at the conclusion of the lease term, while brick buildings would be purchased back from the lessee by the city after the lease expiration (*The Charleston Daily Courier* 7 February 1817:3). The 11 lots generally followed the original parcel lines of the 1786 plat but had been updated with more accurate measurements and renumbered (Figure 3 and Figure 10). In a series of deeds, the City Council of Charleston leased eight of the lots, for an average price of \$312.50 per lot for the rights to the lease (Charleston County Register of Deeds 1817 Deed Book V8:278; W8:151; B9:216; C9:54; D9:75). Upon the expiration of the original leases, in 1842, the City opted to sell some of the former burial ground lots, rather than retain the property or renew the leases (*The Charleston Mercury* 30 December 1842:3). Based on the descriptions of the parcel sizes, these included portions of original lots 1, 3, 4, and 5, which had been divided at some point during the previous quarter century (Figure 11).

Along Vanderhorst Street, lot 1 was divided in half, with a portion sold to Frederick Martins and another portion leased to Ellen Screven Moore for 12 years, with the title eventually conveyed to Lewis Martin subject to that lease (Charleston County Register of Deeds 1842 Deed Book I11:148; Y10:587; 1853 A13:277). Lots 2 and 3 were split between Susan Vardell and William Steadman, guardian; the Vardell lot was described as including a brick dwelling house and outbuildings that were built for Susan Vardell (Charleston County Register of Deeds 1842 Deed Book Y10:629, 633). Along Coming Street, lots 4 and 5 were both sold to John Michel, with lot 5 including a brick house, brick kitchen, and outbuildings (Charleston County Register of Deeds 1842 Deed Book Y10:567, 605). The remaining lots were conveyed to Lewis V. Martin, who already owned wooden buildings on his lot, and Solomon Cohen (Charleston County Register of Deeds 1842 Deed Book Y10:507, 569). The southern lots, along Boundary Street, were again leased out for periods of 25 years. Lot 8 was leased for another 25-year term to the Southwest Railroad Bank, with James Rose as Trustee; the bank had acquired the lease for this property in 1835 from the widow and executrix of the original lessee (Charleston County Register of Deeds 1842 Deed Book



K11:245). Lot 10 was split into two parcels, with the western half leased to Catherine Wright, executrix of Rober Wright, and the eastern half leased to Robert W. Burnham (Charleston County Register of Deeds 1842 Deed Book K11:220, 30).

During the period between 1817 and 1855, while the parcels were under lease agreements and after some were purchased, the lots were built up with one- and two-story houses, along with support buildings. Although only a small number remain along Coming and Vanderhorst streets, these buildings not only lined the main thoroughfares, they also were constructed along alleyways that allowed access to the interior of the block, which created opportunities to build additional residences, which were arranged close together on smaller lots. A plat from 1842 and a map from 1852 show the beginnings of this development (Figure 12 and Figure 13). A plat of the lands belonging to the estate of John A. Michel, one of the 1842 purchasers of two parcels, depicts the further development of this area (Figure 14). Information from the 1861 city census of Charleston indicates that the properties on this block were often owned by people identified in census records as white, but were occupied by a variety of residents, including residents, free Blacks, and enslaved individuals. For instance, along the east side of Coming Street there were 20 parcels identified, with 32 buildings on these lots; of the occupants, seven were identified as being free Blacks and six were identified as enslaved persons (City Council of Charleston 1861:71–72). Sanborn maps from 1888 and 1902 show the concentration of buildings on the parcels, with some being labeled as tenements and shanties, indicating the type of residents who lived in these buildings (Figure 15 and Figure 16).

Despite holding thousands of deceased people beneath the surface, the lands of the former Boundary-Coming-Vanderhorst street burial ground were too valuable to house the growing population of Charleston to remain as undeveloped land. A late-nineteenth century account from Joseph Travis Walsh of his mid-century childhood in Charleston indicates that the status of the land as a cemetery was well known and that the burials remained beneath the houses: "The old Vardell house stood near the corner of Vanderhorst and Coming Streets...the house was built on the site of the old city Potter's Field. I remember one of my childish amusements was to dig for these bones and I was often assisted by an immense African bloodhound called Tiger...I once exhumed with his help a skull with a dragoon's helmet on it" (Horry County Historical Society 1978:5).

Historic Research and Geophysical Assessment

106 Coming Street and 99 St Philip Street

Charleston, South Carolina

S&ME Project No. 24130280



Figure 3. Map of the lands of Mrs. Charlotte Poaug and Mr. Joseph Manigault, north of Manigault (Boundary) Street, 1786 (John McCrady Plats 538).

Historic Research and Geophysical Assessment

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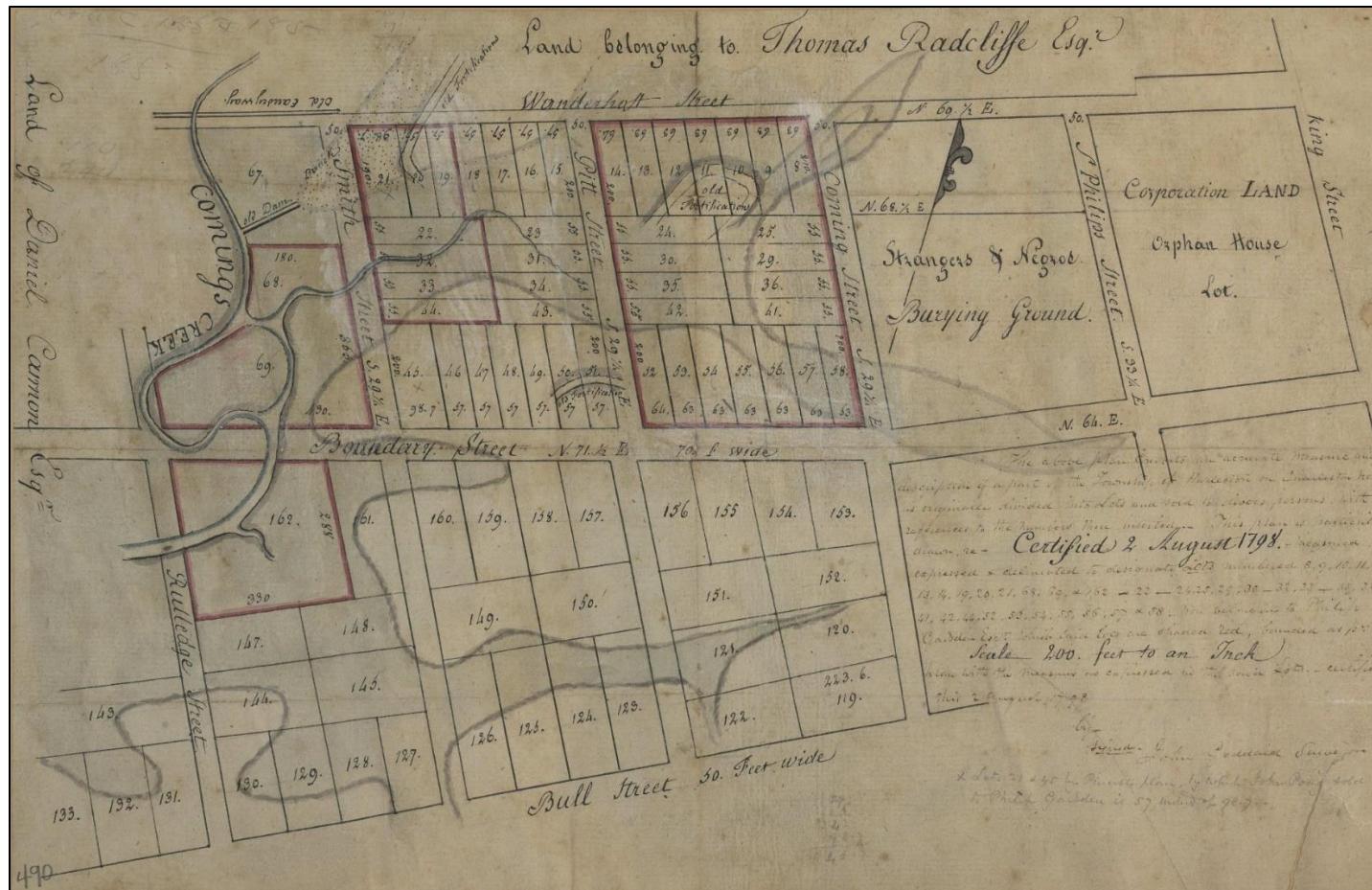


Figure 4. Map of lands west of King Street on the Charleston Neck, 1798 (John McCrady Plats 490).

Historic Research and Geophysical Assessment

106 Coming Street and 99 St Philip Street

Charleston, South Carolina

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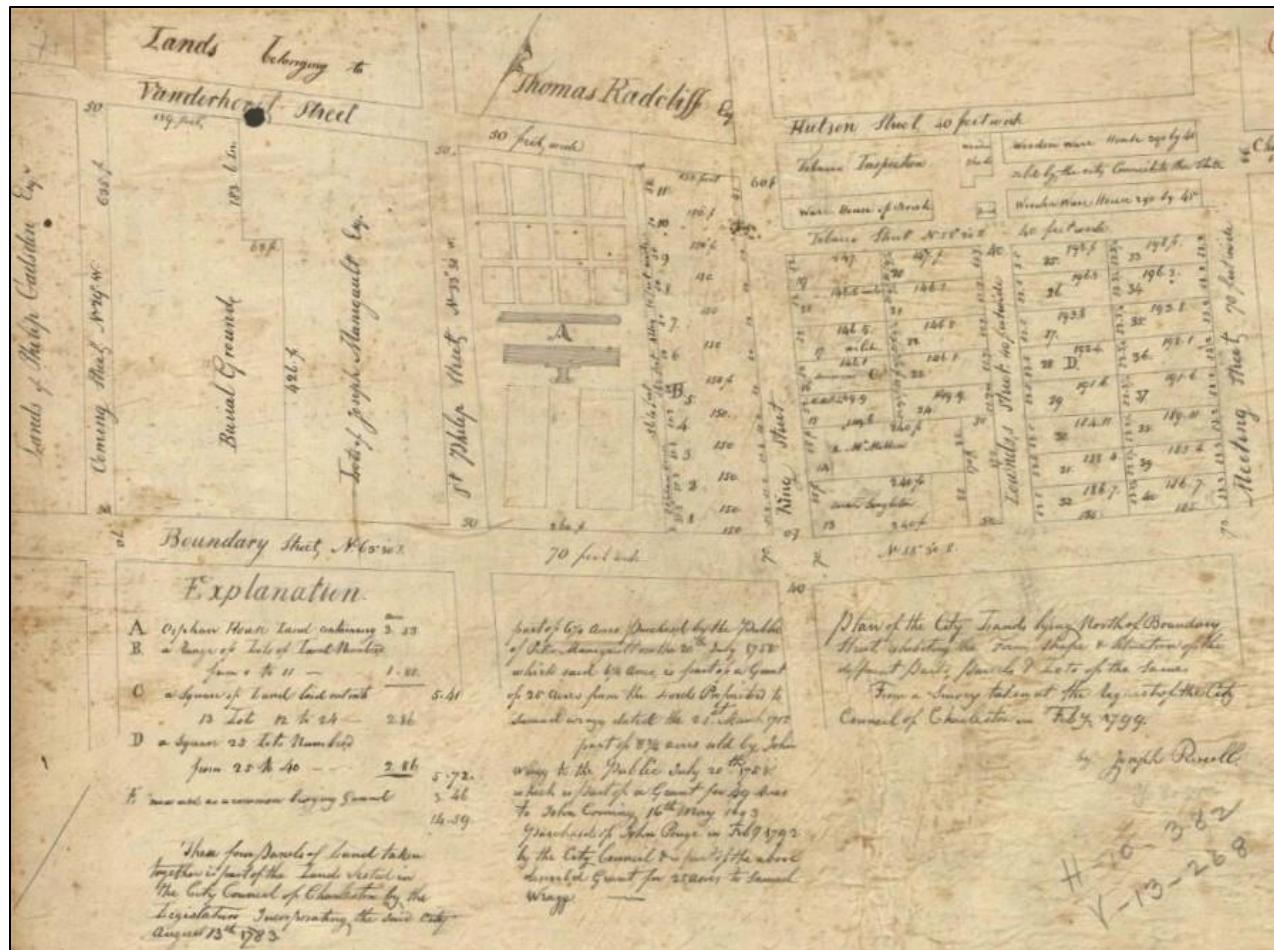


Figure 5. Map of the City Lands North of Boundary Street, 1799 (City Engineer's Plat Book, 1671-1951:12).

Historic Research and Geophysical Assessment

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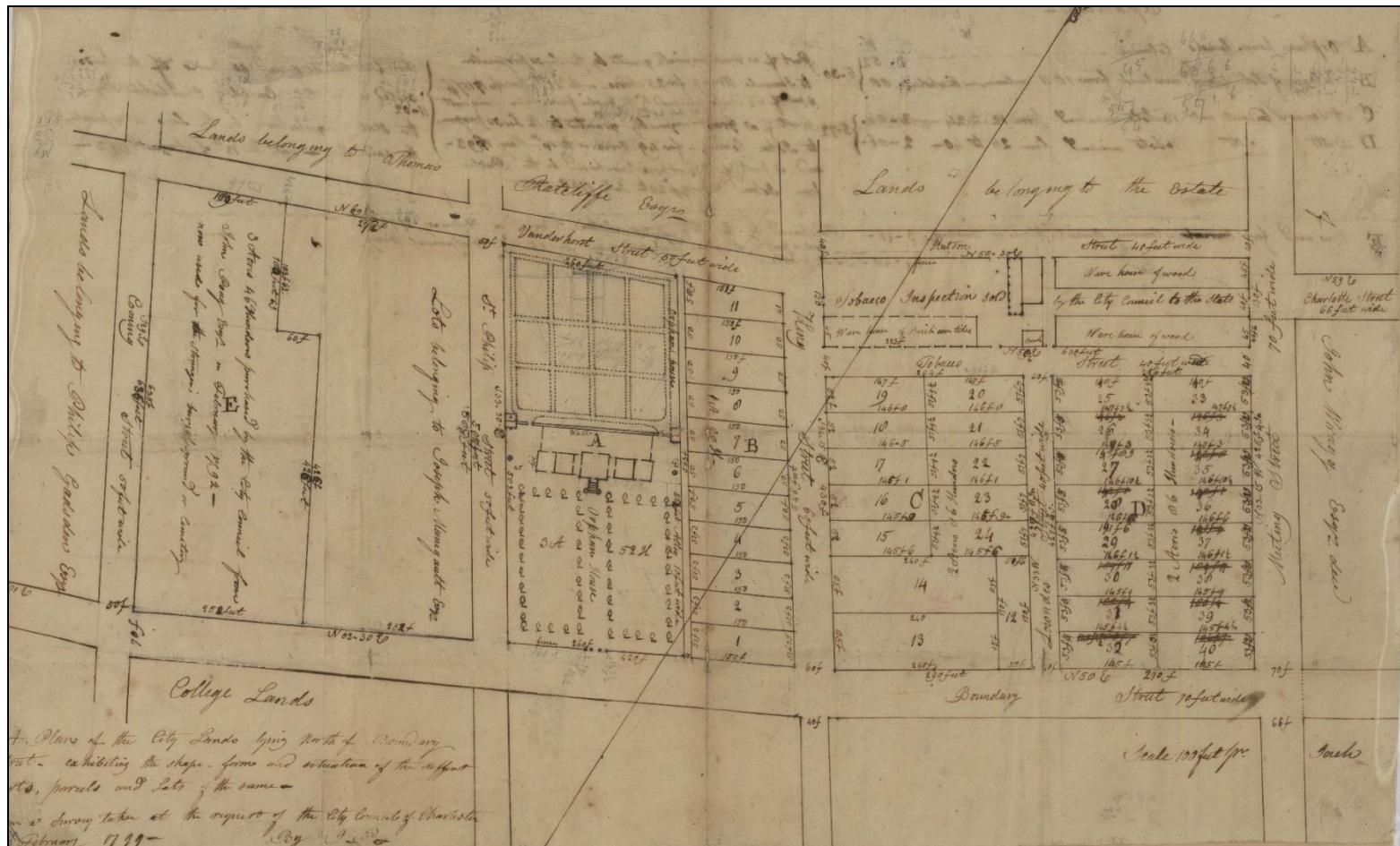


Figure 6. Map of the City Lands North of Boundary Street, 1799 (John McCrady Plats 538).

JOHN WARD, ESQUIRE, INTENDANT.		243
intendant, as a compensation for his services, shall receive the following fees and perquisites (except where the interment be made from the Poor or Orphan-Houses, when no charge therefor shall be allowed) viz.		Compensation allowed super-intendant.
For the digging of the grave of a stranger, mariner, or seaman, and causing the interment,	dolls.	cts.
Digging the grave of a free person of colour, or slave,	0	75
For the opening the grave yard for any person desirous of visiting the same, (except City Officers)	0	6 $\frac{1}{4}$
For opening ditto, and attending to the erection of any form over a grave, if of wood,		25
For ditto, ditto, if of other materials than wood,	1	0
For registering every interment,	0	6 $\frac{1}{4}$
For giving every certificate from his book, when required, (except City Officers)	0	12 $\frac{1}{2}$
For opening the books for the inspection of any person desirous thereof, (except City Officers)	0	6 $\frac{1}{4}$
And be it further ordained by the authority aforesaid, That the said super-intendant shall be annually elected on the third Monday in October, or if To be elected no council should meet on that day, on the first meeting of council annually, thereafter.		
And be it further ordained by the authority aforesaid, That so much of an Ordinance entitled "an Ordinance for the better regulation of the public City Burial-Ground," as is repugnant hereto, be, and the same is hereby repealed.		
Ratified in City Council this eighteenth day of August, one thousand eight-hundred and two, and in the twenty-seventh year of American independence.		
John Ward, Intendant.		

Figure 7. Portion of the 1802 Ordinance to amend "An Ordinance for the better regulation of the Public City Burial Ground" showing fee schedule (Edwards 1802:243).

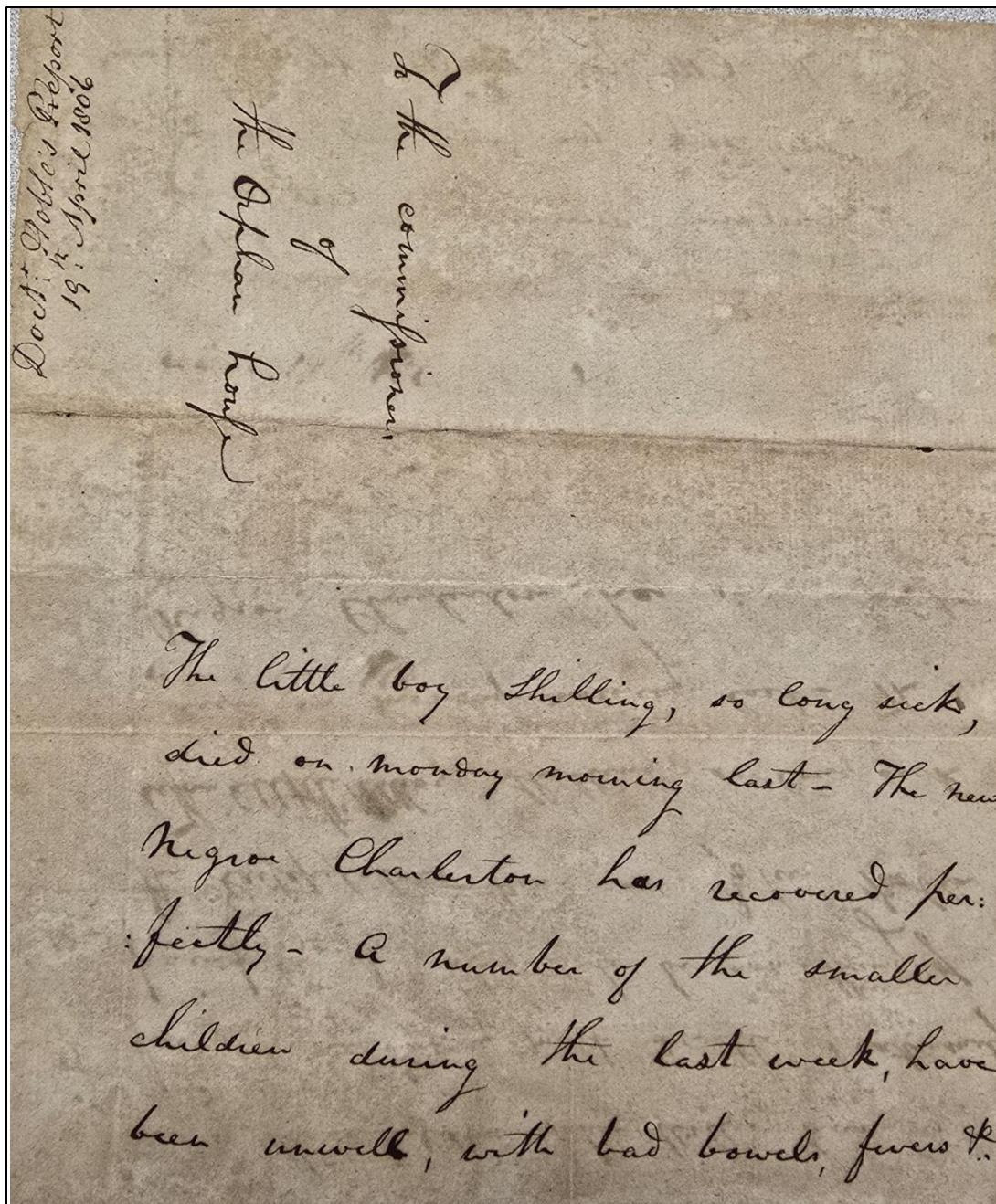


Figure 8. Handwritten physicians report to the Commissioners of the Orphan House reporting a death among the residents, April 1806 (Commissioners of the Charleston Orphan House, 1790–1959, Correspondence 1792–1951).

CITY LANDS.

By J. Simmons Bee.

On the north side of the Exchange, at 11 o'clock, on Thursday, 13th inst. will be sold on a lease of 25 years,

The following City LANDS, subject to the terms expressed below, viz.

Three LOTS on Vanderhorst's street, each of 63 feet front and 183½ feet deep.

Four ditto on Coming-street, each of 63 feet 7 inches front, and 252 feet deep.

Conditions—To pay a ground rent of five dollars per annum. For the purchase money, one-fourth cash; and the balance in bonds, payable in 1, 2, and 3 years, with interest from date and personal security. All buildings erected of brick, of two or more stories, to be valued by appraisers, and paid for by corporation at the expiration of the leases; wooden buildings to revert to the lessees, who are to remove the same within three months after the expiration of the said term of twenty-five years.

ALSO,

Four LOTS on Boundary street, each of 63 feet front and 200 feet deep, for the same term of years, and on the same conditions and reservations; with a right to renew these leases, for a like term of 25 years, on paying double the amount of the first purchase money.

Purchasers to pay for papers.

February 8.

Figure 9. Advertisement of city lands for lease, comprised of 11 lots along Boundary, Coming, and Vanderhorst streets (*The Charleston Daily Courier* 7 February 1817:3).

Historic Research and Geophysical Assessment
 106 Coming Street and 99 St Philip Street
 Charleston, South Carolina
 S&ME Project No. 24130280

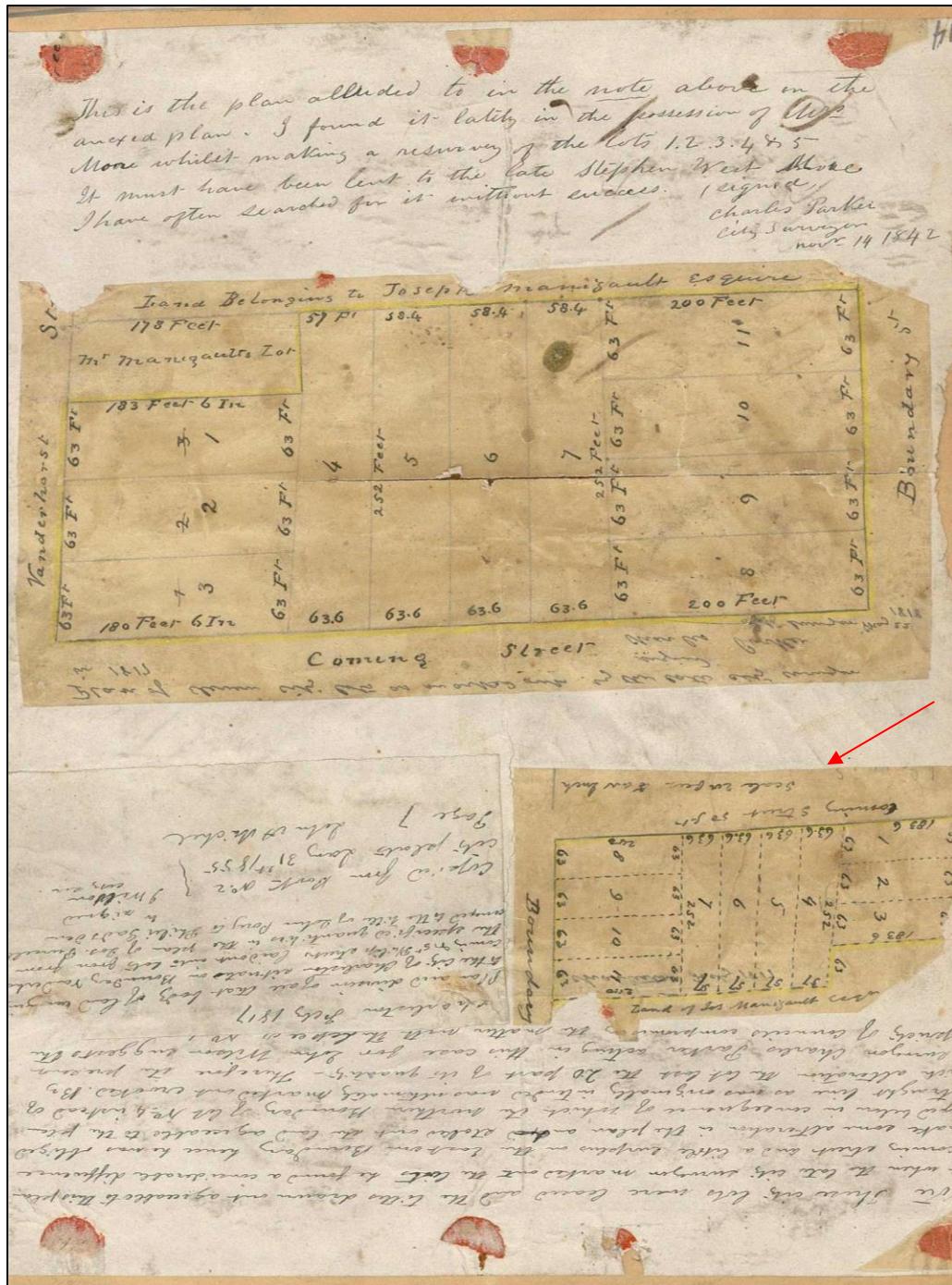


Figure 10. Two plats of the City Lands on the Vanderhorst, Coming, Boundary Street block, 1817 and 1842 (John McCrady Plats 4014).

CITY LANDS.

THREE will be exposed for sale at public outcry, on THURSDAY, the 12th January next at the North of the Exchange, at 12 o'clock, the following CITY LANDS, viz: In Cannonsborough

A Lot at the South East corner of Vandehorst and Coming street, measuring on Vanderhost street 34 feet 4 in. and on Coming street 181 ft.

Three Lots adjoining the above to the South, in Coming street. The first measuring 40 feet 4 in. on Coming street, and 254 feet 2 inches, in depth.

Second Lot 43, 4, on Coming street, by 254 feet in depth.

Third Lot 43, 4, on Coming street, by 254 in depth.

ALSO,

A Lot on Vanderhost street, adjoining second lot from the corner to the eastward, and measuring on Vanderhost street, 52, 6, by 182 on the eastern line and 183 on the western line.

ALSO,

Eight Lots on the North side of Market street, measuring generally from 24 to 26 feet 6 in. on Market street, and about 81 feet deep.

ALSO,

Two Lots in Hampstead, each measuring 100 by 240 feet. These lots are fronting on a public square, opposite to the residence of Thad. Street, Esq.

At the time and place of sale there will be a plat of the lots in Vandehorst and Coming streets, as also those in Market street, exhibited for the convenience of such as may be disposed to purchase.

Conditions—one-third cash; balance in one, two, three and four years, secured by mortgage of the premises.

Dec 30

Figure 11. Advertisement of city lands for sale, bounding on Coming and Vanderhorst streets (*The Charleston Mercury* 30 December 1842:3).



Figure 12. Plat of City Lots at the southeast corner of Vanderhorst and Coming Streets, 1842 (redrawn 1855) (John McCrady Plats 7853).



Historic Research and Geophysical Assessment

106 Coming Street and 99 St Philip Street

Charleston, South Carolina

S&ME Project No. 24130280



Figure 13. Portion of the Bridgens and Allen Map (1852), showing former location of the public burial grounds (Bridgens and Allen 1852).

Historic Research and Geophysical Assessment

106 Coming Street and 99 St Philip Street

Charleston, South Carolina

S&ME Project No. 24130280



Figure 14. Map of the John Michel Estate, east of Coming Street between Vanderhorst and Calhoun Streets, 1874 (John McCrady Plats 4031).

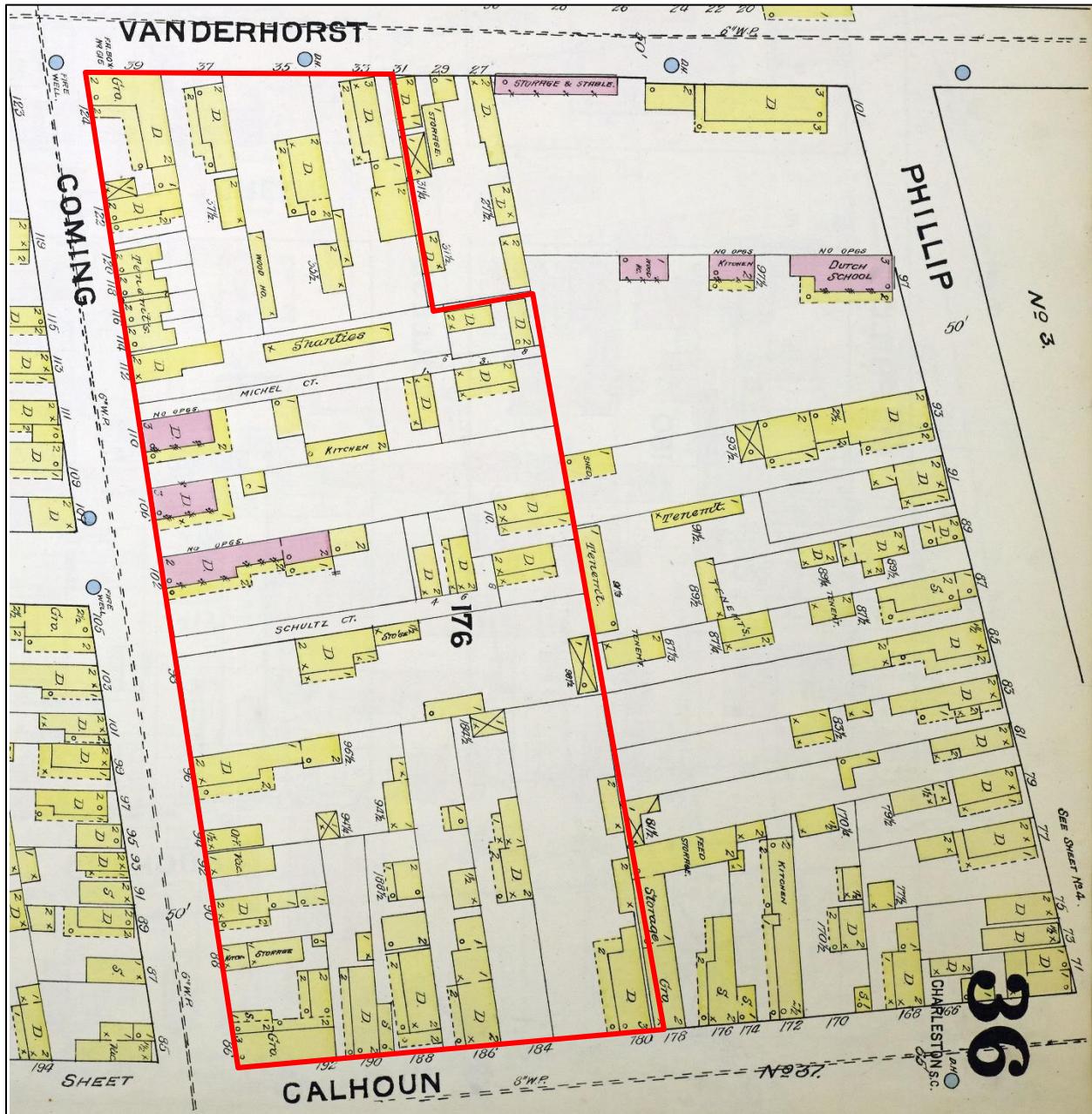


Figure 15. Sanborn Fire Insurance map, 1888, showing the Boundary-Coming-Vanderhorst burial ground block (Sanborn Map Company 1888).



Figure 16. Sanborn Fire Insurance map, 1902, showing the Boundary-Coming-Vanderhorst burial ground block (Sanborn Map Company 1902).



3.0 Geophysical Assessment

Hardy Services Group conducted the fieldwork portion of the Geophysical Assessment on October 18, 2024. Two geophysical methods were utilized to examine the two parking lots. Ground penetrating radar and a Cesium magnetometer were selected for the investigation.

3.1 Methods

Ground Penetrating Radar (GPR)

Hardy Services Group completed the ground penetrating radar evaluation of four accessible areas within the boundaries of the parking lots (Figures 17 and 18). The survey used a Sensors and Software DVL-500N connected to a 500 MHz antenna in a smart cart configuration. The GPR slice profiles were generated by traversing in a grid along an X and Y axis. Lines were spaced two feet apart to be able to cross any foundations, cultural anomalies, or the long axis of unmarked graves.

Magnetic Survey

The magnetometer survey was conducted with a Geometrics 864 cesium magnetometer. The device is a backpack data logger connected to a nine-foot staff carried horizontally with two sensors at end of the support staff. This magnetometer measures a magnetic variant with the two sensors spaced three feet apart. It records magnetic fields that are localized and can be interrelated with features that were formed by human activity. Survey lines were spaced two feet apart to allow one foot of overlap on each transect, and followed the grid used in the GPR survey.

3.2 Results

Ground Penetrating Radar (GPR)

Hardy Services Group conducted a GPR survey in four sections of the Project Area identified as: Coming Street grids A and B, and St. Philip Street grids A and B. Each grid was divided into two feet intervals along the X and Y axis, generally aligned in a northeast/northwest direction. The field crew used sidewalk chalk to mark the asphalt surface to delineate the grid line ending points and for marking anomalous findings. Figure 19 depicts the survey results for 106 Coming Street, Figure 20 depicts the survey results for 99 St. Philip Street. The walk behind GPR collects data created by the reflection of 500mhz down facing pulses. The reflections were collected and stored on Noggins DVI500N. GPZ files were created of all grids and all data was processed with Ekko Project, a specialized software designed to create visualizations of the datasets.

The buried building foundations and other anomalous subsurface features were visible in the locations. These findings are detectable at a depth of up to four feet below the current surface (Figures 19 and 20).



Figure 17. Field conditions at 106 Coming Street.



Figure 18. Field conditions at 99 St Philip Street.

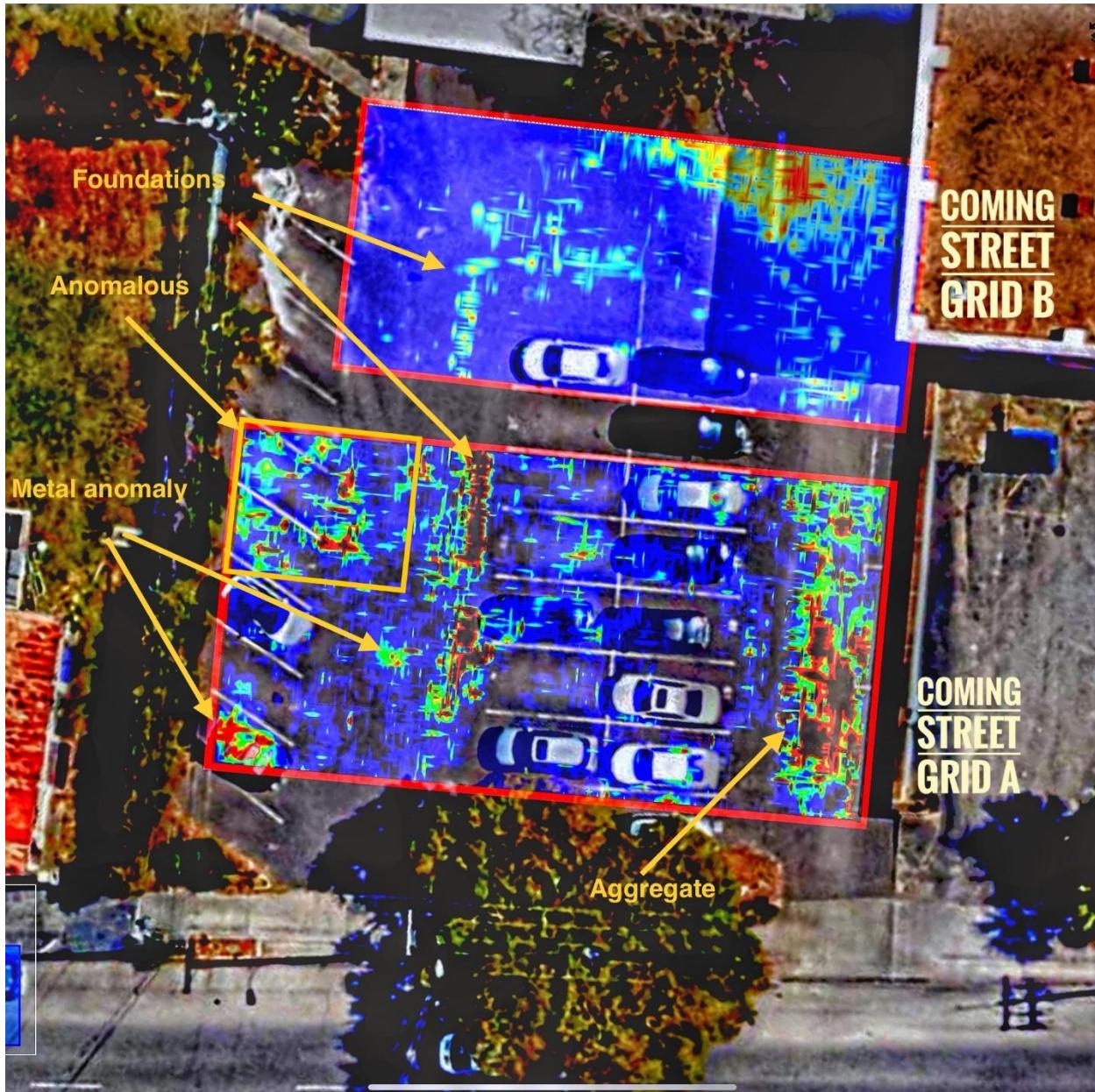


Figure 19. GPR results at 106 Coming Street.



Figure 20. GPR results at 99 St Philip Street.

Magnetometer Survey

Hardy Services Group conducted the survey with the magnetometer in the same locations as the GPR survey. As stated above, two feet spacing intervals were used along both the X and Y axis. The data collected was stored on data logger backpack and then transferred as a DBT file. The grid data was transferred and processed with specialized software Magmap and Magpick. Figure 21 below shows Comings Grid A and Figure 22 depicts St. Philip Grid B. Magnetic fluctuations within the ground are detected, but seem to be largely obscured by nearby vehicles, powerlines, and metal incorporated into the parking lot.

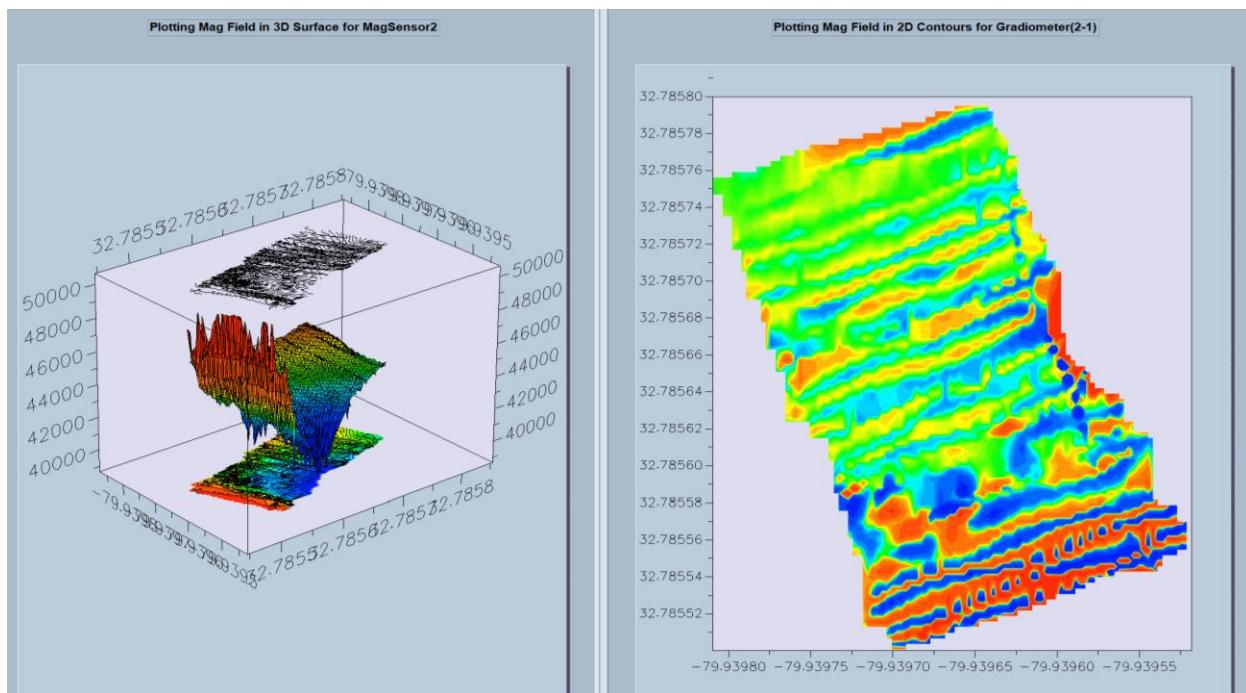


Figure 21. Sample magnetometer results from 106 Coming Street.

3.3 Limitations of the Current study

Due to the site conditions the study could not provide much information past 3-4 ft below the current surface. This limitation was caused by multiple factors. Asphalt and aggregate over an undetermined soil was a hinderance. Multiple subsurface anomalies and objects reduce the ability to scan deeper into the ground. The shallow water table in the region will generally attenuate the scanning signal of the GPR. The Magnetometer readings may help to corroborate the presence of specific anomalies. The detection of subsurface objects such as artifacts, unmarked graves, and structures is dependent solely upon these parameters mentioned above. Finally, the anomalies cannot be identified with complete certainty without subsurface examination and ground truthing being conducted and excavation was beyond the scope of this preliminary study.

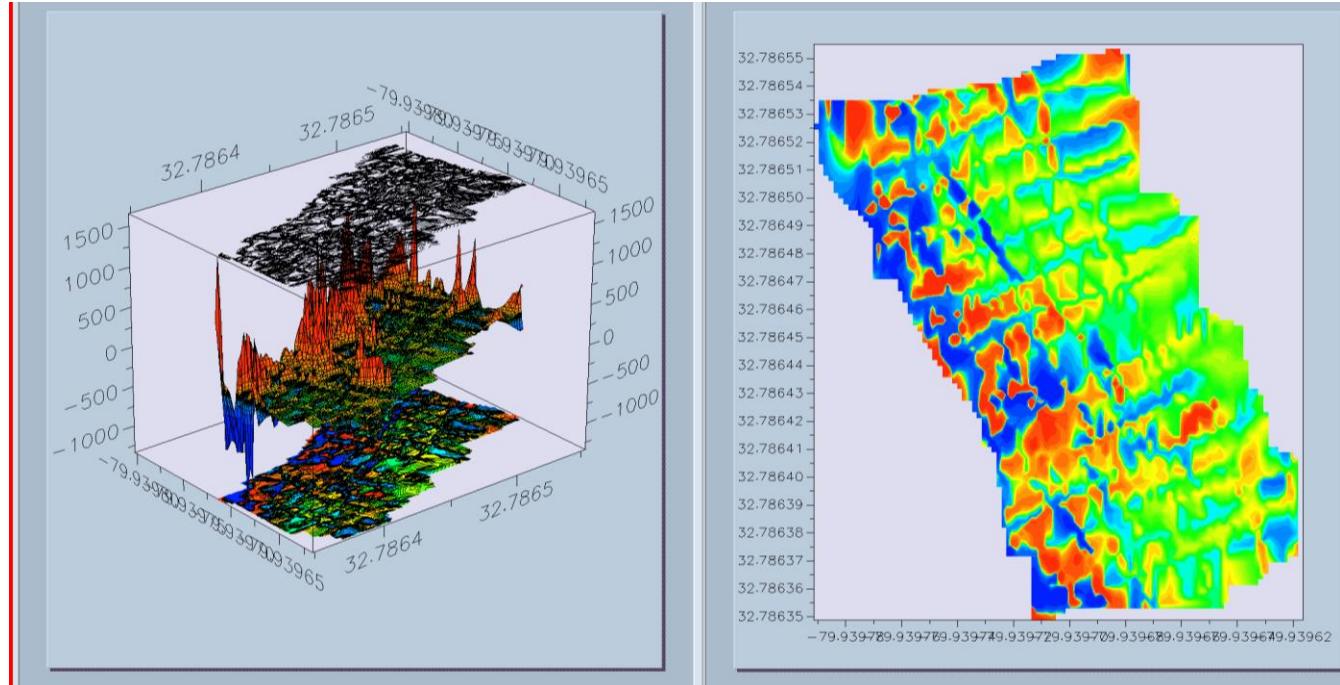


Figure 22. Sample of magnetometer results from 99 St Philip Street.

3.4 Summary and Conclusions

Hardy Services Group conducted a GPR and Magnetometer study of 106 Coming Street and 99 St. Philip Street in Charleston.

The survey grids were arranged to avoid parked vehicles as much as possible given the confines of the Project Area. However, vehicles, streetlights, utilities, and other metal generally prevent the acquisition of meaningful magnetics data. The survey identified multiple anomalies that appear to be building foundations at depths of 1-3 ft in both parking areas.

4.0 Coming Street YWCA (SHPO Site Number 8360)

The Coming Street YWCA² building (SHPO Site Number 8360) is located within the Project Area. The current YWCA building was constructed in 1964. It is a one-story, flat-roofed, brick veneer building, which has a projecting rectangular vestibule on its front elevation (Figure 23–Figure 26). The vestibule exhibits the contemporary midcentury style of the 1960s, with a projecting concrete trim band above the door and a three-panel, metal and glass, entry door and window unit, which is recessed into the façade. To the south of the entry vestibule, along the main section of the building's west elevation, there are three six-over-six, double hung, wood sash windows; the south elevation also has six-over-six, double hung, wood sash windows.

Since the early twentieth century, 106 Coming Street has been the home of the Black branch of the Young Woman's Christian Association (YWCA). The predecessor to the current building was a house that was purchased in 1911 by "The Colored Young Women's Christian Association of Charleston, S.C.", which had been founded in 1907 and incorporated in 1910 (Figure 27); the total price for the property was \$3,200, which they secured with a down payment of \$200. Between 1918 and 1920, the Colored Young Woman's Christian Association of Charleston merged with the white YWCA branch, located on George Street, and was folded under the umbrella of the national YWCA organization, in return for the satisfaction of the remaining \$2,100 balance on their loan ("Facts to Remember About the Coming Street Y.W.C.A." n.d.; "History of the Y.W.C.A.: n.d.). The mission of the Coming Street YWCA was to uplift and support Black women in the community, which it did by offering educational programming, work assistance, and housing for a small number of single, working women ("Coming Street Y.W.C.A, Report for July 1919" 1919a; "Coming Street Y.W.C.A., Report for 1919" 1919b). During the first half of the twentieth century, the Coming Street YWCA had many influential Black women in its various leadership positions, including Septima Clark, and it played a prominent role in the Black community. As the Civil Rights era began, the Coming Street YMCA played a significant role in organizing people and working toward ending segregation, including serving as the location for a radical speech by white ally Elizabeth Waring, the wife of Judge J. Waties Waring, in 1950.

In the early 1960s, the Coming Street YWCA began a Building Campaign, to raise funds for a new structure; a Building Fund Pledge list from 1962 names 57 individuals, companies, and organizations that had either pledged or paid over \$13,000 ("Building Fund Pledges, 1962"). The current building was completed in 1964 and first appears on a 1967 Sanborn map (Figure 28).

The current Coming Street YWCA building is an embodiment of the organization under the leadership of Christine Jackson, who oversaw the activities of the YWCA in the building for most of its existence. After serving as an instructor at the Coming Street YWCA, Christine Jackson took over as the executive director in 1966. Under her leadership, the organization played an instrumental role in the 1969 MUSC Hospital strike, which protested unequal treatment of Black hospital workers; Coretta Scott King, widow of Dr. Martin Luther King and cousin of Christine Jackson, participated in the strike.

² Both YWCA and Y.W.C.A. are used in the narrative. YWCA is used to denote the building and national organization. However, the historical collections of the Coming Street YWCA are catalogued with the Y.W.C.A. abbreviation, which is used in those citations.

The Coming Street YWCA building (SHPO Site Number 8360) is a mid-century edifice that was originally constructed for the Black arm of the Charleston YWCA. The form and style of the building represent the YWCA's function as a social and community organization, as well as the contemporary architectural trends of the 1960s. Although the building is no longer used by the YWCA, it retains its original location, setting, design, materials, workmanship, feeling, and association. The building is significant for its association with the Black branch of the YWCA and as an important location for the YWCA's philanthropic work and organization of resistance activities during the Civil Rights era. It is S&ME's opinion that the Coming Street YWCA is eligible for the NRHP under Criterion A, for its Social History.



Figure 23. Coming Street YWCA, facing east.



Figure 24. Coming Street YWCA, facing northeast.



Figure 25. Coming Street YWCA, facing northeast.



Figure 26. Coming Street YWCA, facing southeast.



Figure 27. Coming Street YWCA, original building (Avery Research Center for African American History and Culture, College of Charleston, Charleston, SC).

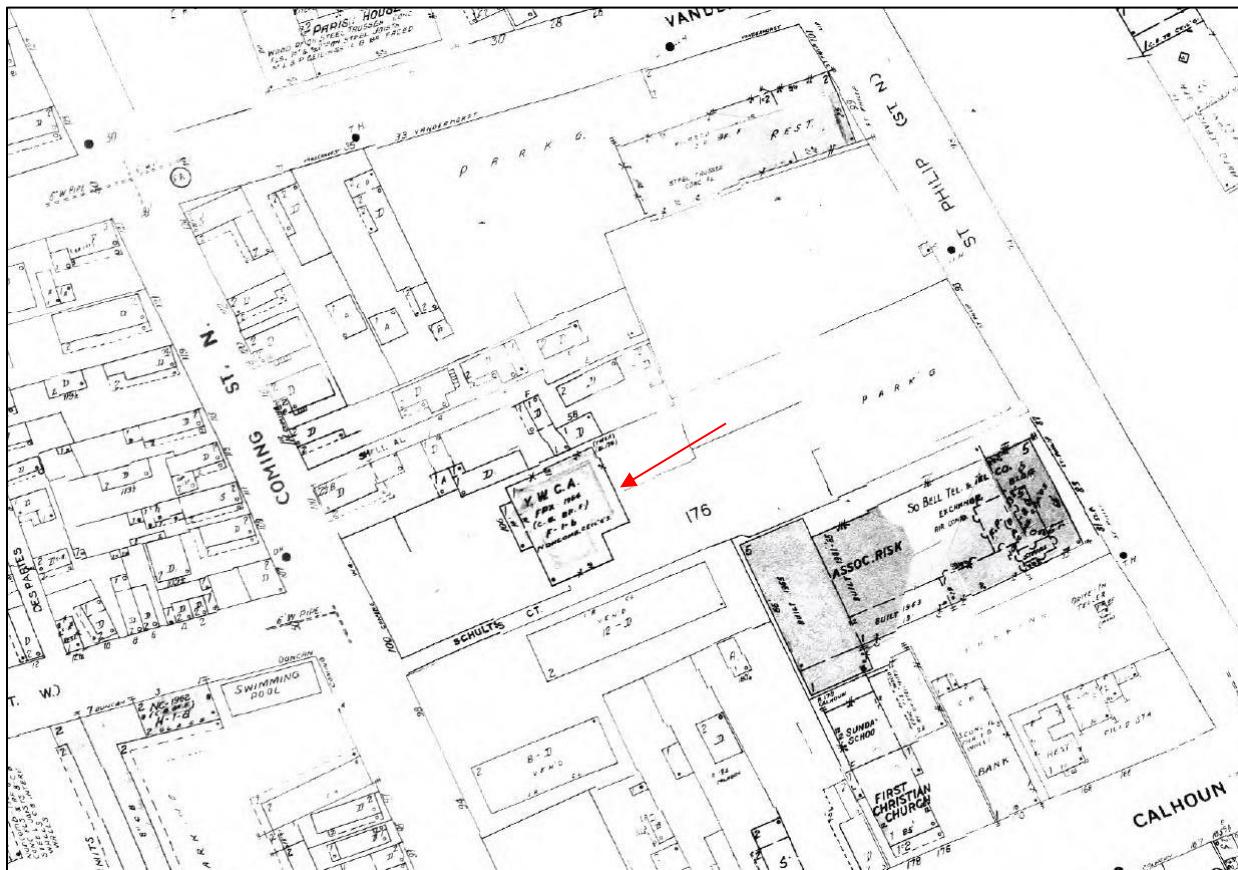


Figure 28. Sanborn Fire Insurance map, 1967, showing the current Coming Street YWCA building (Sanborn Map Company 1967).



5.0 Summary, Conclusions, and Recommendations

S&ME, with assistance from Hardy Services Group conducted background archival research and a geophysical assessment of the properties at 106 Coming Street and 99 St Philip Street in Charleston, South Carolina. This study also included an evaluation of the Coming Street YWCA building's eligibility for the National Register of Historic Places (NRHP).

Background research indicates that the Project Area covers a portion of the property that was once used as the city cemetery. While the archival record from the eighteenth and nineteenth centuries is far from complete, our research found it possible that between 4,600 and 12,000 individuals were interred in the cemetery. While the property was redeveloped after it stopped being used as a cemetery, late nineteenth century accounts indicate that the cemetery was not completely, if at all, destroyed during the redevelopment and some of the graves remained.

Hardy Services Group conducted a GPR and Magnetometer study. The survey identified multiple anomalies that appear to be building foundations at depths of 1-3 ft in both parking areas. These anomalies align with the buildings identified as dwellings on the 1888 Sandborn (Figure 15). The survey grids were arranged to avoid parked vehicles as much as possible given the confines of the Project Area. However, vehicles, streetlights, utilities, and other metal generally prevent the acquisition of meaningful magnetics data. The natural soil conditions and land use history after the property's use as a cemetery have likely created enough variations in soil density that GPR cannot effectively discern small anomalies to the extent that individual graves can be identified.

The Coming Street YWCA building (SHPO Site Number 8360) is a mid-century office building that was originally constructed for the Black arm of the Charleston YWCA. The building is no longer used by the YWCA, but it retains its original location, setting, design, materials, workmanship, feeling, and association. The building is significant for its association with the Black branch of the YWCA and as an important location for the YWCA's philanthropic work and organization of resistance activities during the Civil Rights era. It is S&ME's opinion that the Coming Street YWCA is eligible for the NRHP under Criterion A, for its Social History.

If the proposed development requires federal oversight or permitting, then the lead federal agency will be required to initiate the Section 106 process (per 36 CFR 800(3)) to determine, in consultation with the State Historic Preservation Office (SHPO), whether consultation with other stakeholders is appropriate. SC Code 27-43-10 through 27-43-40 provides a process for the landowner of a property to remove an abandoned cemetery. The process requires communication with the municipal government, 30-days' notice to relatives of the deceased if they are known or publicized via a public notice published in the newspaper if the relatives are not known. A funeral director licensed by the state of South Carolina must oversee the relocation.



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APPENDIX D

College of Charleston Avoidance Assessment



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.



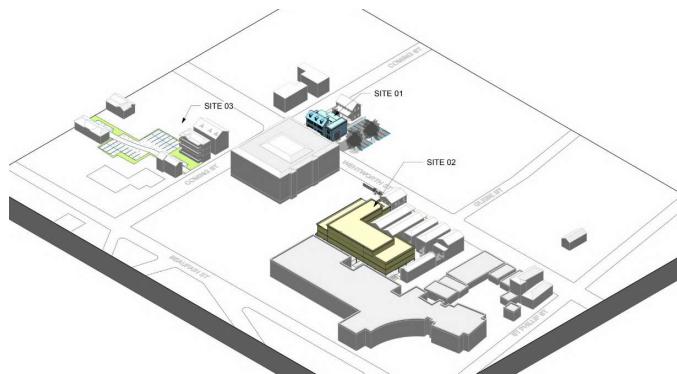
2. New Residence Hall LX (Lightsey Annex)

- 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



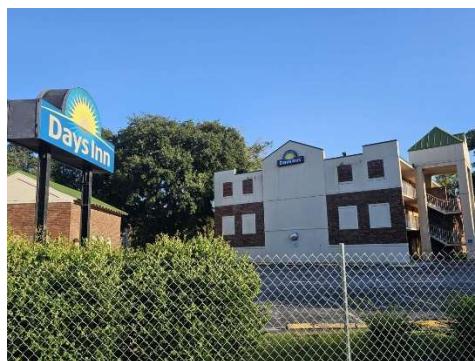
3. Various Alternatives on Foundation Property along Wentworth/Coming

- 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.



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 E

College of Charleston Public Engagement



COLLEGE OF CHARLESTON

Community Engagement Efforts

The College of Charleston understands the high level of public interest in the 106 Coming Street project and welcomes the opportunity to further engage with the community at large. Information continues to be shared widely via the Coming Street Commons website, the College's news website, on social media and with local media outlets. Interested community members can visit the project website to sign up for updates and meeting notifications on the Coming Street Commons Get Involved web page. Links are listed below. Additionally, three in person community engagement opportunities have been held between June 3rd and September 22nd, 2025. As a public university whose mission is education, the College of Charleston will continue to share project information and plans to document, preserve and commemorate the historical significance of the site.

The following pages include an outline of past and future planned community engagement touchstones.

College Information Website

<https://coming-street-commons.charleston.edu/>

Website established June 2025 to inform the community of the project and provide updates, history and notification opportunities.

- Meetings announcements, links to presentations and email sign-up: <https://coming-street-commons.charleston.edu/get-involved/>
- Project FAQs: <https://coming-street-commons.charleston.edu/faqs/>
- Dedicated project email address for comments and questions: coming-commons@charleston.edu

E-Alerts

Community members that sign up via email using the website above, have received the following community engagement summaries utilizing email e-alerts.

- **August 22, 2025:** Community Meeting Thank You
- **July 11, 2025:** Community Meeting Thank You
- **September 19, 2025:** Scheduled Community Meeting Notice
- **September 26, 2025:** Community Meeting Thank You
- **October 3, 2026:** CEC Application Extension Notice
- **December 2, 2025:** CEC 2nd Meeting Announcement



College of Charleston Community Meeting Dates

Direct Link: <https://coming-street-commons.charleston.edu/get-involved/>

- June 3, 2025
- August 4, 2025
 - September 22, 2025 Additional dates to be determined.

The College Today (CofC news site) articles announcing project, meetings, etc.

May 29, 2025:

<https://today.charleston.edu/2025/05/29/coming-street-commons/>

July 21, 2025:

<https://today.charleston.edu/2025/07/21/college-of-charleston-holds-community-meetings-on-student-housing-project/>

September 17, 2025:

<https://today.charleston.edu/2025/09/17/cofc-shares-coming-street-commons-project-updates/>

November 11, 2025:

<https://today.charleston.edu/2025/11/11/coming-st-project-community-engagement-council-to-commence/>

December 2, 2025:

<https://today.charleston.edu/2025/12/02/coming-st-project-community-engagement-council-to-meet/>

CofC Event Calendar

July 23, 2025:

<https://calendar.charleston.edu/event/coming-street-commons-community-meeting-8295>

September 15, 2025:

<https://calendar.charleston.edu/event/coming-street-commons-community-meeting-3151>

September 17, 2025:

<https://calendar.charleston.edu/event/panel-discussion-on-106-coming-street>

November 11, 2025:

<https://calendar.charleston.edu/event/106-coming-street-projects-community-engagement-council-meeting>

December 2, 2025:

<http://calendar.charleston.edu/event/community-engagement-council-to-discuss-106-coming-street-project>

Post and Courier Article

P&C Opinion Article Link:

https://www.postandcourier.com/education-lab/tensions-college-of-charleston-new-dorm-historic-cemetery/article_4bc24899-9be6-4cb6-ba7d-fe0df30715fa.html

CofC President Hsu and City of Charleston Mayor Cogswell Response:

https://www.postandcourier.com/opinion/commentary/burial-ground-charleston-college-dorm/article_56d75e36-387c-4d37-bb80-0bd0bce3d8aa.html

Community Outreach

The College of Charleston, through Terracon Consultants, engaged the Asiko Group to lead community engagement and outreach at the initiation of the project. Through their services, the list below of local agencies, community groups, organizations, preservation groups, congregations, and others on behalf of the College for community were engaged for feedback on an individual basis. Not all entities responded or chose to engage the College.

1	Lightbright, LLC / Humane and Friendly Society Cemetery
2	City of Charleston Human Affairs and Racial Conciliation Commission
3	Charleston Area Justice Ministry (CAJM)
4	Black Lives Matter
5	Heritage Community Development Corporation
6	Emancipation Proclamation Association, Inc.
7	International African American Museum (IAAM)
8	SC Historical Society
9	Anson Street African Burial Ground Project
10	The Preservation Society of Charleston (PSC)
11	Historic Charleston Foundation (HCF)
12	Avery Research Center
13	Anson Street African Burial Ground Project
14	Radcliffeborough Neighborhood Association
15	Gullah Geechee Cultural Heritage Corridor
16	City of Charleston - Mayor's Office of Resilience & Sustainability
17	City of Charleston - Planning, Preservation & Sustainability
18	City of Charleston - Gullah Geechee Heritage Preservation Project
19	International African American Museum (IAAM)
20	Association for the Study of African American Life and History
21	Everyday People
22	YWCA Board of Directors
23	Charleston Housing Authority
24	Joseph Floyd Manor
25	Gadsden Green Homes
26	North Central Apartments

27	Burke High School Alumni
28	Joseph P. Riley Jr. Center for Livable Communities
29	CofC English Dept.
30	CofC History Dept.
31	CofC Archaeology Dept.
32	CofC Classics Dept.
33	CofC Historic Preservation Dept.
34	Clemson Design School/Connection to Burke High School/Charleston native
35	College of Charleston
36	Historic Preservation - Clemson Design Center
37	Society of Africanist Archaeologists
38	Charleston Good
39	Historic Preservation - Clemson Design Center
40	Charleston Museum
41	Mother Emanuel AME Church
42	Morris Brown AME Church
43	Mount Zion AME Church
44	Ebenezer AME Church
45	Greater St. Luke AME Church
46	Francis Brown AME Church
47	Greater Beard Chapel AME Church
48	Nichols Chapel AME Church
49	Mt. Carmel AME Church
50	Greater Middleton Chapel AME Church
51	Greater Trinity AME Church
52	Mt. Carmel United Methodist Church
53	Mt. Moriah Baptist Church
54	Royal Baptist Church

CofC Student Engagement Meetings

September 24, 2025

Panel Discussion on 106 Coming Street for College of Charleston students co-sponsored by the Center for Historical Landscapes and moderated by Classics Professor Jim Newhard (archaeologist and director for the Center for Historical Landscapes).

Community Engagement Council

The College of Charleston established the Community Engagement Council (CEC) in its efforts to partner with a diverse group of community members to help guide the commemoration and reinternment efforts of Coming Street Commons, a planned student residence hall at 106 Coming St. in downtown Charleston. Additional information can be found in a separate document outlining the establishment and ongoing efforts of the Council.



City of Charleston and City Council

The College of Charleston is in direct active contact with the City and Mayoral Staff concerning a future hosted City Council Community Hearing concerning the project.

Date and Location to be determined.

CofC Faculty Engagement Meetings

- February 18, 2025
- April 28, 2025
- September 5, 2025

Ongoing internal information meetings to be scheduled throughout project.

The College's ad hoc committee of faculty experts (in the areas of African American studies, archaeology, historic preservation, history, Southern studies and urban planning) serve in an advisory capacity to the president regarding different aspects of project. The College has also tasked the Committee on Commemoration and Landscapes (comprised of faculty and staff) to begin collecting stories around the property for inclusion in a larger commemoration project.

Tribal Outreach

The College is actively exploring and continuing outreach and engagement with Federal, State, and Local Tribes. More information and outreach can be found in a separate document outlining the ongoing efforts.

In addition, the following NAGPRA and Section 106 governmental agencies have been contacted.

- Nina Schreiner, PhD, RPA
Associate Director
NAGPRA Coordinator
South Carolina Institute for Archaeology and Anthropology
- Melanie O'Brien
Manager, National NAGPRA Program
Acting Deputy Associate Director, Administration and Financial Assistance Programs
Cultural Resources, Partnerships, and Science Directorate, National Park Service
- Ashley Fry
Director, Office of External Engagement (OEE)
Advisory Council on Historic Preservation

APPENDIX F

Community Engagement Council (CEC)

Subject: Selection to the Community Engagement Council (College of Charleston)

Date:

From: Andrew T. Hsu

To:

BCC: Berry, Mark E

Dear XXXXX,

Thank you for your interest to serve on the Community Engagement Council for the College of Charleston's 106 Coming Street Project. The College of Charleston is committed to treating the history of this site with the utmost dignity. Your background, perspective and engagement with the community all contribute to your strength as a council member.

As a member of the Community Engagement Council, you will help guide the College through this project in its solemn responsibility to communicate and interact effectively with the community. The Community Engagement Council will play a central role in advising the College's efforts in honoring and memorializing both the former potter's field and the former YWCA, providing insight and feedback on potential events, interpretative approaches to the footprint of the construction site and commemoration efforts associated with this project. Your perspective will be invaluable as the College and City of Charleston seek to engage with the community in an open, respectful and collaborative manner.

The Council will include representatives from the City of Charleston, members of the College community, local religious leaders, community voices, preservation stakeholders, consultants and advisors from all backgrounds. This broad representation is essential to ensure that our work reflects a wide range of perspectives and honors the legacy of the site with respect and integrity. The Council will meet regularly (monthly), and service will possibly extend from 6 to 12 months. You are invited to an introductory meet and greet (followed by a reception) on **Wednesday, November 12 from 6:00 to 7:30 p.m.** in the College's Randolph Hall (66 George Street).

On behalf of the College of Charleston, thank you for your willingness to serve on the Community Engagement Council. Your voice and leadership will help ensure the work on the 106 Coming Street Project is carried out with care, respect, transparency and a shared commitment to "respecting – the past, place and people."

We look forward to your involvement and meaningful work ahead.

Sincerely,

Andrew

Andrew T. Hsu, Ph.D.

President

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
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
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	
				Daniel Schmidt	Radcliffeborough Neighborhood
				Julie Ann Bowling	Friends of the Tower Hill Cemetery

APPENDIX G

College of Charleston Commitment Declaration



**Andrew T. Hsu, Ph.D.
President**

December 17, 2025

Dear South Carolina State Historic Preservation Office,

On behalf of the College of Charleston, I write to reaffirm our institution's commitment to responsible stewardship, transparency and meaningful community engagement as we move forward with the proposed student housing project at 106 Coming Street in downtown Charleston, a site zoned for high-density residential use by the City of Charleston Council in 2023. We recognize the historical and cultural significance of this location and the importance of ongoing coordination with the South Carolina State Historic Preservation Office. In that spirit, and in keeping with the recommendations of our Community Engagement Council and project partners, the College is committed to the following specific actions and documentation practices, which we respectfully outline below.

- The consultants team will use the College of Charleston Libraries (which includes the Avery Research Center for African American History and Culture) as its primary repository for all findings and documentations related to the project. The CofC Libraries will also hold all future produced internal scholarship (both from faculty and students); these research documents will be shared with SHPO for their records.
- The College's consultants team will provide monthly updates, with benchmark reports/findings (Stages 1 & 2), as well as weekly reports during active archaeology (Stage 3). These updates will include, but are not limited to, all Community Engagement Council meeting minutes, website updates, City of Charleston Council engagements, tribal communications, YWCA Executive Committee communications, Charleston Board of Architectural Review communications and larger community meetings.
- Thus far, the College's project team has worked closely with the YWCA Executive Committee, with individual meetings in spring 2025 (April and May) and inclusion in the three subsequent Community Engagement Meetings, coordinated by the Asiko Group (June, August and September 2025). In the September 2025 meeting, the YWCA leadership had a table, sharing information about their past and current programs. The YWCA leadership will be instrumental in future

commemoration, which includes a College-produced video of their history (for the YWCA website) as well as physical commemoration on the project site.

- In working with recommendations of the Community Engagement Council, the College will continue to sponsor or host larger community engagement gatherings as well as update its project website with appropriate milestones and plans.

Taken together, these commitments reflect the College of Charleston's deep respect for the historical, cultural and community significance of the 106 Coming Street site and our intent to proceed with care, transparency and accountability at every stage of the project. We remain committed to ongoing consultation with SHPO and our community partners, and we welcome continued guidance as this work advances. The College of Charleston views this project not only as an investment in student housing, but also as an opportunity to document, honor and responsibly steward Charleston's shared history.

Sincerely,

A handwritten signature in blue ink that reads "Andrew T. Hsu". The signature is fluid and cursive, with "Andrew" on the top line and "T. Hsu" on the bottom line.

Andrew T. Hsu

APPENDIX H

Site Commemoration Requirements



CITY OF CHARLESTON

BOARD OF ARCHITECTURAL REVIEW – LARGE

MEETING RESULTS

JUNE 11, 2025

The following applications will be considered:

A. MINUTES

1. Review of Minutes from the May 14, 2025 BAR-L Meeting

DECISION: APPROVED

MOTION: Approval of May 14, 2025 Minutes *

MADE BY: Meadors SECOND: Trantham VOTE: FOR: 4 AGAINST: 0

NOTE: * This item was incorrectly identified as the April 9, 2025 minutes, which were previously approved during the May 14, 2025 meeting. The above vote was intended for the May 14, 2025 minutes provided.

B. APPLICATIONS

1. 71 George Street

BAR2025-001929 | TMS #457-04-01-027 | Harleston Village | Council District 8

Not Rated | New Construction | Old and Historic District

Requesting Final Approval of a mock-up panel.

Owner: College of Charleston Board of Trustees

Applicant: Artemiy Zheltov (Little Diversified Architectural Consulting)

DECISION: DEFERRED

MOTION: Deferral including Board and Staff Comments

MADE BY: Meadors SECOND: Trantham VOTE: FOR: 4 AGAINST: 0

STAFF CONTEXT & ANALYSIS:

- It is noted that while there were no hardscape elements represented on the Mockup sample panel, the site was reviewed separately, and the intention is to match existing site pavers and elements.
- The coping shown is not correct and will actually be a pre-formed metal panel system, which is represented here in form but as another material. Staff have reviewed this detail and are comfortable that this intended solution will work satisfactorily.
- Sealant and MEP colors were discussed, with Staff proposing that one generalized brick/mortar blended color may work for the primary brick sealant at control joints, sealant around windows and doors, the color for loose lintels, and any MEP or other

The signage type is approvable (akin to the monument signs in our ordinance), but these specific images are not considered artwork; they are considered advertising and therefore not to be approved. If imagery were changed to include the logo and wayfinding at the top and an art graphic at the bottom, only then would this be supported by staff.

STAFF RECOMMENDATION:

Conceptual Approval with Board and Staff Conditions and Final Review of Revised signage package to Staff

BOARD COMMENTS/DISCUSSION:

- There was a good deal of discussion by various members regarding which designs had been revised and where Staff Comments were no longer applicable.
- There was concern about how well the College and staff are in sync in terms of the overall package.
- This was eventually resolved by Staff striking their “Staff does not Support” comments. These are the last three Staff comments.
- Maybe there is too much signage here. This was addressed by the Applicant in referencing the size and extent of the campus.
- Maybe a refinement of the number of times the branding occurs when reviewed by staff.
- But what is the Board comfortable delegating to staff and what is not?

3. 106 Coming Street

**BAR2025-001918 | TMS #460-16-03-017 | Radcliffeborough | Council District 4
Not Rated | c. 1964 | Old City District**

Requesting Full Demolition of the former YWCA building.

Owner: College of Charleston
Applicant: Liollo Architecture

DECISION: APPROVED

MOTION: Approval with Board and Staff Comments and Staff Condition #1

MADE BY: Ramos SECOND: Trantham VOTE: FOR: 4 AGAINST: 0

STAFF CONTEXT & ANALYSIS:

- The Ordinance (54-240.b) offers criteria for reviewing demolition requests in the Old and Historic District, asking the BAR to consider, among other things:
 - the historic, architectural and aesthetic features of the structure;
 - the nature and character of the surrounding area;
 - the historic or culturally important use of such structure; and
 - the importance to the city
- The structure dates from circa 1964; therefore, it is considered historic. However, the structure is not listed in the current architectural inventory. It is an example of mid-century modern, of which there are scant examples on the peninsula, but this structure is not a meritorious architectural example of the style.

- The building does not fit in with the nearby context.
- The applicant has provided a thorough historic preservation report that demonstrates that the building has cultural significance and is therefore also important to the city for its association with the Young Women's Christian Association (YWCA) and their activities therein.
- Staff believe that anything from the building of architectural or socio-cultural significance, which is salvageable, should be retained for possible reuse on upcoming project(s).
- It is noted that while significant archeological work is expected to take place on this and the larger site, it is beyond the purview of the BAR.

STAFF CONDITIONS:

1. Staff require the socio-cultural significance demonstrated in the BVL Historic Preservation Research Report to be commemorated in a physical manifestation with a highly visible presence in the new construction project.

STAFF RECOMMENDATION:

Staff does not oppose demolition and requests Staff Condition #1 be included in the Board motion.

BOARD COMMENTS:

- The superstructure of the building is in pretty good shape, but this is more about its cultural significance. Included in that significance is the transition from residential to commercial as is evidenced by the fact that a magnificent single-family structure was demolished for this building to exist.
- Cultural significance outweighs the building, but past demolitions complicate the application
- Virtually everyone has expressed that it is the cultural significance rather than the physical building, which is most important here, and that a physical manifestation of a commemoration of what happened on the site has been guaranteed.

4. 573 Meeting Street

BAR2025-001925 | TMS #463-16-04-059 | Westside | Council District 4

Not Rated | New Construction | Historic Corridor District

Requesting Final Approval of a mock-up panel.

Owner: One80 Place

Applicant: LS3P Associates

DECISION: DEFERRED

MOTION: Deferral pending correction of the issues noted with Board And Staff comments

MADE BY: Trantham **SECOND:** Meadors **VOTE:** FOR: 5 AGAINST: 0

STAFF CONTEXT & ANALYSIS:

- Staff support and applaud the vital mission of One80 Place and realize that the materials selected were likely for reasons of economy. These materials have been



Ratification
Number 2023-182

AN ORDINANCE

TO AMEND THE ZONING ORDINANCE OF THE CITY OF CHARLESTON BY CHANGING THE ZONE MAP, WHICH IS A PART THEREOF, SO THAT 99 SAINT PHILIP STREET AND 106 AND 110 COMING STREET (RADCLIFFEBOROUGH - PENINSULA) (APPROXIMATELY 2.0 ACRES) (TMS #460-16-03-001, 460-16-03-127, 460-16-03-143 THROUGH 460-16-03-203, 460-16-03-219, 460-16-03-017, 460-16-03-018) (COUNCIL DISTRICT 8), BE REZONED FROM DIVERSE RESIDENTIAL (DR-2) CLASSIFICATION TO PLANNED UNIT DEVELOPMENT (PUD – COLLEGE SUPPORT DISTRICT) CLASSIFICATION. THE PROPERTY IS OWNED BY 99 ST. PHILIP STREET, LLC; 106 COMING STREET, LLC; AND FRANCIS J. IWANICKI AND CAROLINE VON ASTEN.

BE IT ORDAINED BY THE MAYOR AND COUNCILMEMBERS OF CHARLESTON, IN CITY COUNCIL ASSEMBLED:

Section 1. That the Zoning Ordinance of the City of Charleston be, and the same hereby is amended, by changing the zone map thereof so as to rezone the property described in Section 2 hereof by changing the zoning designation from Diverse Residential (DR-2) classification to Planned Unit Development (PUD) classification.

Section 2. The property to be rezoned is described as follows:

99 Saint Philip Street and 106 and 110 Coming Street (Radcliffeborough - Peninsula) (approximately 2.0 acres) (TMS #460-16-03-001, 460-16-03-127, 460-16-03-143 through 460-16-03-203, 460-16-03-219, 460-16-03-017, 460-16-03-018)

Section 3. This ordinance shall become effective upon ratification.

Ratified in City Council this 10th day of
September in the Year of Our Lord
2023, in the 248th Year of Independence
of the United States of America.

By:


John J. Tecklenburg
Mayor, City of Charleston

Attest:


Jennifer Cook
Clerk of Council

Zoning Criteria:

1. Minimum building setbacks on the front, side and rear shall be the current DR-2 setback requirements.
2. Maximum lot occupancy: 90%
3. Maximum height: Shall follow the existing Old City Height District requirements, unless amended by City Council through a separate rezoning process.
4. Off-street Parking: 120 Parking Spaces existing. All existing spaces will be retained on-site or in an adjacent parking garage with the proposed redevelopment. Additional parking may be provided.
5. Permitted Uses include College Housing, Dormitory, Academic Uses, General Office and General Business
Prohibited Uses include Tattoo Parlors, Casinos, Mechanic's Garage

Open Space:

1. Open Space is not required per Zoning Ordinance for a PUD less than 10 acres.

Buffers:

1. Buffers are not required per Zoning Ordinance for a PUD less than 10 acres.

Tree Summary:

1. Existing protected and grand trees will be governed by City of Charleston Tree protection ordinance.

Cultural Resources:

1. In 1911, the YWCA purchased the lot at 106 Coming Street. From 1966-2003, Christine O. Jackson was the local executive director and we plan to work with her family to permanently recognize Ms. Jackson's legacy of 37 years service.

ADA Standards and Accessibility:

1. Buildings and facilities shall be designed and constructed to be accessible in accordance with relevant requirements of the "2021 International Building Code, Chapter 11", the 2017 ICC A117.1 "Accessible and Usable Buildings and Facilities", the "Accessibility Guidelines for Buildings and Facilities (ADAAG)", and the US Department of Housing and Urban Development "Federal Housing Administration".