Professional Examination Plan of 106 Coming Street

Project 205 New Construction

Charleston, Charleston County, South Carolina

March 27, 2026| Terracon Project No. EN25P081

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

Prepared by:

Terracon Consultants, Inc.

Charleston, South Carolina

Nationwide

Terracon.com

- Facilities
- Environmental
- Geotechnical
- Materials

March 27, 2026
SCDAH
8301 Parklane Road
Columbia SC, 29223

Attn: Mr. John D. Sylvest
P: (803)-896-6129
E: jsylvest@scdah.sc.gov

Re: Professional Examination Work Plan
Project 205 New Construction
Charleston, SC 29401
Terracon Project No. EN25P081

Dear Mr. Sylvest:

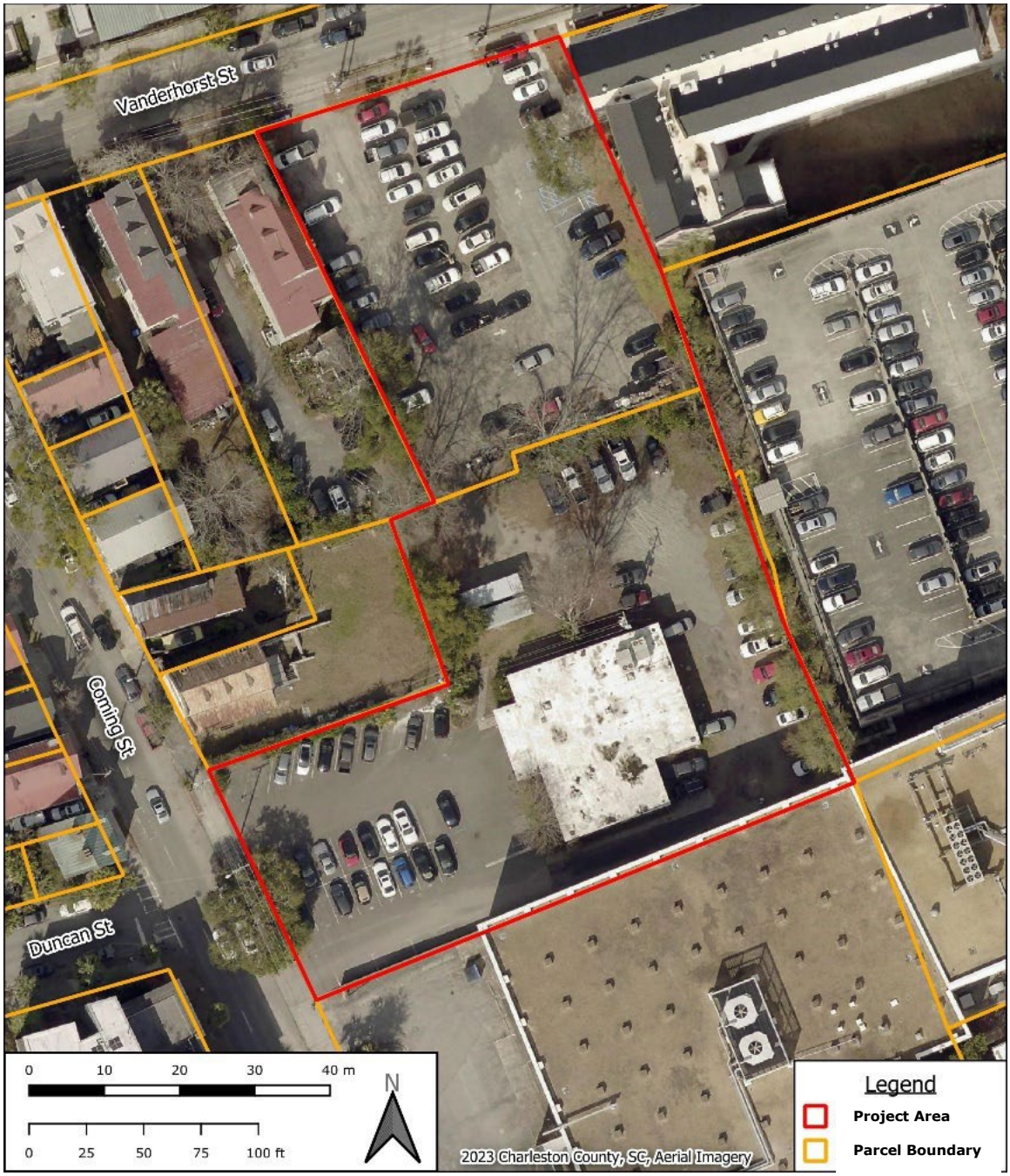
Terracon Consultants, Inc. (Terracon) is pleased to submit this Professional Examination plan to the South Carolina Department of Archives and History for "Project 205 New Construction."

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, and edited to incorporate SCDAH response comments from and email dated February 18, 2026 (Appendix A). The email requested a professional examination or preservation treatment plan be provided for review and approval by SCDAH and DES-BCM related to the irretrievable loss caused by the proposed demolition of 106 Coming Street, Charleston, SC (the former Coming Street YWCA building), a Significant Site under the Coastal Management Program.

Sincerely,
Terracon Consultants, Inc.

Justin Schwebler, MSHP
Project Manager

Patricia Davenport-Jacobs, MHP
Authorized Project Reviewer



Approximate Project Area Outlined in Red

Contents

PROFESSIONAL EXAMINATION PLAN 1
PROJECT INFORMATION 1
Task 1: Written History and Local Historic Context Statement 2
Task 2: Digital Photo Documentation 3
Task 3: Measured Drawings 3
Task 4: Material Salvage/Preservation 4
Task 5: SHPO Statewide Survey Form 4
Task 6: Interpretation/Physical Commemoration Plan 4
Task 7: Dissemination of Professional Examination Findings/ Education Opportunities 5
Conclusion 6
Appendix A: SHPO Correspondence 7
Appendix B: Procedural Summary Matrix and Legend 8

PROFESSIONAL EXAMINATION PLAN

Figure 1: 106 Coming St. Charleston, SC. Former YWCA of Greater Charleston headquarters.

PROJECT INFORMATION

The following professional Examination Plan is submitted by Terracon to the South Carolina Department of Archives and History (SCDAH) on behalf of the College of Charleston to satisfy requirements of the Coastal Zone Consistency (CZC) permit application. The Department of Environmental Services (DES) Bureau of Coastal Management (BCM) permit reference number for this project is **HQE-MAZM-OBJ2E** and SHPO Project Number 25-JS0212.

This professional examination was requested by SCDAH to mitigate impacts caused by an "irretrievable loss of a Significant Site," within the Coastal Management Program, regarding the proposed demolition of 106 Coming Street as part of the permit referenced above. The City of Charleston Board of Architectural Review (BAR) gave unanimous approval for the demolition of 106 Coming Street at the June 11, 2025 meeting. The BAR approval included conditions that the YWCA building's socio-cultural significance be commemorated in a physical manifestation with a highly visible presence in the new construction project. Steps for meeting the conditional approval are outlined in Task 6 of the following report.

Terracon will continue to coordinate with SCDAH, the YWCA of Greater Charleston, the City of Charleston, the College of Charleston, and the Community Engagement Council throughout the Professional Examination to achieve the project goals through the tasks outlined in the SCDAH permit condition recommendations.

Terracon's proposed scope of services for this professional examination are provided in the following sections. All work will be conducted by an Architectural Historian meeting the Secretary of Interior's Professional Qualifications Standards (36 CFR Part 61).

The proposed tasks for this Professional Examination are as follows:

- Task 1: Written History and Local Historic Context Statement
- Task 2: Digital Photo Documentation
- Task 3: Measured Drawings
- Task 4: Material Salvage/Preservation
- Task 5: SHPO Statewide Survey Form
- Task 6: Interpretation and Physical Commemoration Plan
- Task 7: Dissemination of Professional Examination Plan

It is noted that measured drawings (Task 3) must be submitted to and approved by SCDAH prior to any demolition activities. The remaining tasks can be submitted after the demolition of 106 Coming St (former YWCA building). Email updates regarding the tasked components outlined in the plan will be submitted every six (6) months until completion is documented in writing by the SHPO.

Please refer to the Procedural Summary Matrix and Legend (Appendix B) for further information on how the Professional Examination is staged within the comprehensive project scope.

Task 1: Written History and Local Historic Context Statement

The written history and local historic context statement of 106 Coming Street task will be conducted in three stages: 1) Revise and Repackage Terracon *Architectural Evaluation* and BVL Historic Preservation Research (BVL) report on 106 Coming Street, 2) Submission to SCDAH for review and comments, and 3) Revisions for Final Draft incorporating SCDAH comments.

In reference to the SCDAH email requesting the professional examination from John Sylvest, dated September 5, 2025, and additional comments and recommendation from the November 7, 2025 email, Terracon will work in coordination with BVL in

order to "revise and repackage" the previously submitted *Architectural Evaluation* and BVL report, in order to meet SCDAH requirements for a written history and local historic context as part of the professional examination. SCDAH has offered to provide additional comments on these reports' content as part of the review of the proposed professional examination treatment measures.

Additional research and report drafting will be conducted as needed to satisfy SCDAH recommendations, including the addition of more biographical information about the architect/builder and Chritine O. Jackson, more historic documentation from Avery Research Center, references and photographs to architectural salvage materials, and additional photographs of SCDAH requested architectural details, including exterior window and door details.

Task 2: Digital Photo Documentation

Terracon has compiled a digital photo documentation survey as part of the *Architectural Evaluation*. This digital photo survey and reference map will be appended to the Written History and Local Context Statement above. Additional architectural photos or context photos requested by SCDAH will be incorporated into the survey, including historic aerial imagery, Sanborn maps, and other historic images. The photographic survey and images will be formatted and incorporated into the Professional Examination in accordance with SCDAH recommendations from the November 7, 2025 email.

The photo documentation of 106 Coming Street will use HABS photography guidelines for the capturing of architectural details and elevations, but will not be collected or reported using HABS standard media or formatting.

Task 3: Measured Drawings

Terracon will record 106 Coming St with measured drawings. The field notes will be collected in accordance with Historic American Building Survey (HABS) Guidelines as outlined in the United States Department of the Interior, National Park Service, Heritage Documentation Programs guidelines, *Recording Historic Structures and Sites with HABS Measured Drawings, 2008, updated June 2020*.

Terracon will record a Contextual Site Plan, Floor Plan, Exterior Elevations, typical Window, Door, and Architectural Detail sheets as part of the measured drawing record. Field notes will be retained, scanned, and transmitted digitally to SCDAH as

required. Field Notes will be converted into CAD files. Drawing sheets will be converted digitally into PDFs and submitted electronically in a format requested by SCDAH. CAD drawings will also be printed on one set of 19” x 24” archival bond and accompanied by one set of reduced drawings on 8½” x 11” archival bond to be delivered to the College of Charleston Libraries for inclusion in their archival collections.

Terracon recognizes that the Measured Drawings must be prepared and approved by SCDAH prior to any demolition activities. Once the drawings are submitted electronically to SCDAH, the SCDAH office will have fifteen (15) days to approve or provide comments on the drawings.

Task 4: Material Salvage/Preservation

Terracon will collect architectural elements and/or signage that can be retained and preserved for future interpretation or re-use. These items will be selected through consultation with the YWCA of Greater Charleston Chapter. Materials collected to date including the bronze memorial plaque, two iron window grates, parking permit, and other salvaged architectural material will be photo documented, described, and sent to SCDAH via email as requested in the November 7, 2025 email.

Task 5: SHPO Statewide Survey Form

Terracon will fill out and submit a SCDAH Statewide Survey of Historic Properties form for 106 Coming St. This form and its accompanying survey photographs will be appended to the Task 1 Written History and Local Historic Context Statement report and submitted to SCDAH via electronic copy. The Survey Form and Photographs will be provided in accordance to SCDAH naming conventions cited in the Survey Manual and Electronic Submission Requirements for Planning Surveys and Review & Compliance Surveys, 2021.

Task 6: Interpretation/Physical Commemoration Plan

Terracon will coordinate with the new construction design team (Liollio Architecture) to submit interpretation, and physical commemoration plans of 106 Coming St to SCDAH for review, including text, graphics, or objects under consideration as they

become available, as well as timeframes for the development and implementation of the commemoration plan (see Cemetery and Commemoration Work Plan).

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. The College of Charleston will also engage the Community Engagement Council (CEC) as part of the Commemoration and Memorial plans for both the YWCA and the Potters Field; however, the memorialization of the Potters Field is not included within the scope of the Professional Examination of 106 Coming St. 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.

Task 7: Dissemination of Professional Examination Findings/ Education Opportunities

The Professional Examination findings will be made publicly available through the College of Charleston Libraries (which includes Avery Research Center) in both hard copy and digital formats, and published on the project website: https://coming-street-commons.charleston.edu/.

Terracon is also working with the College of Charleston to develop two dedicated internships for CofC Archaeology, Anthropology, or Historic Preservation students to work on the project, as well as other Cultural Resource Management projects in the Charleston area. This will give students relevant real world work experience related to this project, as well as CRM work as a whole. This provides a greater level of oversight when it comes to working on site, and the students will go through Terracon's rigorous onboarding and safety training prior to any field work. Interns will not be permitted to handle or work on any burials but may be present with supervision during excavation for educational purposes. Interns will be required to report on their experiences working on the project and their internship program through Terracon's internal internship community. Those reports will be shared with the College of Charleston. If College of Charleston interns produce reports documenting the excavations associated with the overall project, these reports will be shared with SCDAH to be added to the state site file record.

Conclusion

Terracon is pleased to submit this Professional Examination Plan for the documentation of 106 Coming St, the former YWCA of Greater Charleston headquarters, to the South Carolina Department of Archives and History.

Appendix A: SHPO Correspondence

SOUTH CAROLINA DEPARTMENT OF
ARCHIVES & HISTORY

July 03, 2025

Terri Russ, RPA
Department Manager - Natural & Cultural Resources
Terracon
3150 Spring Forest Road, Suite 100
Raleigh, NC 27616
Terri.Russ@terracon.com

Re: College of Charleston, Coming Street Commons, 106 Coming Street, Archaeological Monitoring Plan, Revised Draft
Charleston, Charleston County, South Carolina
SHPO Project No. 25-RL0214

Dear Terri Russ:

Thank you for your project correspondence which we received on June 17th, 2025, that you submitted regarding the College of Charleston, Coming Street Commons, 106 Coming Street, Archaeological Monitoring Plan, Draft. We have received a copy of the *Plan for Archaeological Monitoring, Coming Street Commons, College of Charleston, Charleston, Charleston County, South Carolina* as supporting documentation for this undertaking. The State Historic Preservation Office (SHPO) is providing comments Terracon and the College of Charleston through the South Carolina Department of Environmental Services, Bureau of Coastal Management (SCDES-BCM) in accordance with the South Carolina Coastal Zone Management Act of 1976, as amended (South Carolina Code Title 48, Chapter 39), the "Policies and Procedures of the South Carolina Coastal Zone Management Program" and the 1996 Memorandum of Agreement between our Offices concerning implementation of the South Carolina Coastal Management Program. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes including those with state recognition, local governments, or the public.

The SHPO concurs with the archaeological monitoring methodologies proposed in the *Plan for Archaeological Monitoring, Coming Street Commons, College of Charleston, Charleston, Charleston County, South* Carolina. The SHPO concurs with the revised draft, incorporating our requested revisions, and accepts the revised draft as final; we have no additional comments or concerns currently. Please inform our office of when the archaeological monitoring will begin and when the monitor is in the field. Due to the nature of the undertaking, please provide our office weekly updates on the status of the archaeological monitoring.

Should any damage occur to an archaeological site from proposed construction when the archaeological monitor is not present, the recordation of this damage must follow our office's *Guidance for Assessing*

Damage to Archaeological Sites
(https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20(SHPO)/Programs/Programs/Review%20and%20Compliance/Guidance-Assesing-Damage-Archaeological-Sites.pdf).

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

Please refer to SHPO Project Number 25-RL0214 in any future correspondence regarding this project. If you have any questions, please contact me at 803-896-6181 or at RLarsen@scdah.sc.gov.

Sincerely,

Robert P. Larsen III, MSc., RPA
Archaeologist
State Historic Preservation Office

From: Sylvest, John <JSylvest@scdah.sc.gov>
Sent: Friday, September 5, 2025 3:18 PM
To: Schwebler, Justin <Justin.Schwebler@terracon.com>; Larsen, Robert <RLarsen@scdah.sc.gov>; ejohnson <EJohnson@scdah.sc.gov>; Sara W. Barbagallo <sara.barbagallo@des.sc.gov>
Cc: Benjamin.Thepaut@des.sc.gov <Benjamin.Thepaut@des.sc.gov>; Gary Jensen <garyj@adcengineering.com>; Chris Cook <chrisc@adcengineering.com>; Worrell, Laura Lee <worrellll@cofc.edu>; Schultz, Cristi <schultzca@cofc.edu>; JenniferP@adcengineering.com <JenniferP@adcengineering.com>; Dorn, Mills <Mills.Dorn@terracon.com>; Russ, Terri A <Terri.Russ@terracon.com>; Boschi, Dave <Dave.Boschi@terracon.com>; Jill.Rothenberg@des.sc.gov <Jill.Rothenberg@des.sc.gov>
Subject: RE: Project 205 New Construction - CZC_DES_BCM Project Review Form and Archaeology Plan

Sara,

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

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

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

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

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

The State Historic Preservation Office (SHPO) is providing comments to Terracon Consultants, Inc. and the College of Charleston through the DES-BCM in accordance with the South Carolina Coastal Zone Management Act of 1976,

as amended (South Carolina Code Title 48, Chapter 39), the "Policies and Procedures of the South Carolina Coastal Zone Management Program" and the 1996 Memorandum of Agreement between our Offices concerning implementation of the South Carolina Coastal Management Program. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes including those with state recognition, local governments, or the public.

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

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

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

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

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

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

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

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

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

If the irretrievable loss cannot be avoided, allowing for preservation of the Significant Site, then proposed professional examination treatment plan measures may include but are not limited to:
digital photographic documentation of the building submitted for approval prior to demolition; identification of and/or preparation of measured drawings of the building submitted for approval prior to demolition; completion of a SHPO Statewide Survey Form for the building; a written history of the YWCA Building placing the building within its local historic context; an oral history project; an "history harvest" event related to the history and memorialization of the Coming Street YWCA building; interpretive panels or exhibits; online exhibits; presentations to the public; dissemination of the written history to accepting local repositories, or other creative measures.

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

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

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

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

Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes including those with state recognition, local governments, or the public. Our office is only providing comments on the technical merits of the draft *Archaeological Work Plan*. We note that the presence or absence of any human remains has not been established to date by any known survey, construction, or excavation project or activity. Our comments on the *Archaeological Work Plan* do not denote acceptance or approval of the removal of human remains or of a potential mass burial ground. It is the responsibility of the Owner/Applicant, the College of Charleston, to comply with all applicable cemetery laws and regulations as well as implementation of ethical approaches to the treatment of human remains. Our office recommends consulting the Advisory Council on Historic Preservation's Policy Statement on Burial Sites, Human Remains, and Funerary Objects, see https://www.achp.gov/digital-library-section-106-landing/achp-policy-statement-burial-sites-human-remains-and-funerary.

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

Preservation and Protection of Abandoned and Unmaintained Cemeteries
6-1-35, SC Code of Laws

Destruction or Desecration of Human Remains or Repositories Thereof; Penalties
16-17-600, SC Code of Laws

Removal of Abandoned Cemeteries
27-43-10 thru 27-43-40, SC Code of Laws

Access to Cemeteries on Private Property
27-43-310, SC Code of Laws

The *Archaeological Work Plan* and/or planning documents would benefit from documentation by the Owner/Applicant, the College of Charleston, regarding how state burial laws have been and will be complied with, in terms of required approvals, notification, and removal and/or reburial plans, as well as parties legally required to be consulted in addition to descendant community parties that will be consulted and involved in decision making.

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

--The division of project work into four work stages or phases, while helpful to understanding the timing and progression of work phases for the overall project, would be technically improved by clearer protocols within each stage. For example, we recommend providing clearer protocols for both the identification and recovery of structural remains, human remains, and/or artifacts; for consultation protocols with SHPO, the County Coroner, DES-BCM, the City of Charleston, and Charleston County; and, for treatment of architectural features or other various non-human subsurface features, taking into account National Register eligibility evaluations. Additionally, there are some overlap and discrepancies in the work plan staging. For example, p. 9, third paragraph states that excavation of burials is intended to be undertaken during Stage 4, noting in the preceding sentences that no further excavation at that location will occur during Stages 1,2, 3, instead the location will be recorded on field forms, maps, and on a GIS platform, but the following paragraph states that prior to initiation of Stage 4 of the work plan…..remains will collected and transported to the field office for temporary secure storage. The protocols need to be clearer regarding when discovered remains will be marked, buffered, and covered back up in the field vs collected and/or removed or excavated.

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

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

--Terracon will provide our office a separate GPR methodological plan, detailing the proposed transects, transect spacing and specifications on the exact GPR model utilized. Upon completion of the GPR survey,

Terracon will provide our office GPR amplitude maps of all specific timeslices at all various depths, for independent review and will not proceed with exhumation of burials until the SHPO gives concurrence on all potential anomalies/potential burials.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

John D. Sylvest
Supervisor of Survey and Review & Compliance
State Historic Preservation Office (SHPO)
SC Department of Archives & History
8301 Parklane Road
Columbia, SC 29223
803.896.6129
https://scdah.sc.gov/historic-preservation

Outlook

RE: Project 205 New Construction: Professional Examination, Geophysics, and Archaeology Work Plan

From Sylvest, John <JSylvest@scdah.sc.gov>
Date Fri 11/7/2025 2:12 PM
To Schwebler, Justin <Justin.Schwebler@terracon.com>
Cc Larsen, Robert <RLarsen@scdah.sc.gov>; ejohnson <EJohnson@scdah.sc.gov>; Sara W. Barbagallo <sara.barbagallo@des.sc.gov>; Benjamin F. Thepaut <benjamin.thepaut@des.sc.gov>; Gary Jensen <garyj@adcengineering.com>; Chris Cook <chrisc@adcengineering.com>; Worrell, Laura Lee <worrellll@cofc.edu>; Schultz, Cristi <schultzca@cofc.edu>; Jennifer Papa <jenniferp@adcengineering.com>; Dorn, Mills <Mills.Dorn@terracon.com>; Russ, Terri A <Terri.Russ@terracon.com>; Nelson, Blue <Blue.Nelson@terracon.com>; Boschi, Dave <Dave.Boschi@terracon.com>; Rothenberg Jill P. <jill.rothenberg@des.sc.gov>

Justin, Sara,

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

The State Historic Preservation Office (SHPO) is providing additional comments to Terracon Consultants, Inc. and the College of Charleston through the SCDES-BCM in accordance with the South Carolina Coastal Zone Management Act of 1976, as amended (South Carolina Code Title 48, Chapter 39), the “Policies and Procedures of the South Carolina Coastal Zone Management Program” and the 1996 Memorandum of Agreement between our Offices concerning implementation of the South Carolina Coastal Management Program. Please visit our website at https://scdah.sc.gov/historic-preservation/programs/review-compliance/sc-des-bcm-review-process for more information regarding our review role pursuant to the Coastal Management Program. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes including those with state recognition, local governments, or the public.

Our office is only providing comments on the technical merits of the revised draft document, *Professional Examination, Geophysical Work Plan, and Archaeological Work Plan, Project 205 New Construction, Charleston, Charleston County, South Carolina*.

Our comments on the revised draft document do not denote acceptance or approval of the removal of human remains or of a potential mass burial ground. It is the responsibility of the Owner/Applicant, the College of Charleston, to comply with all applicable cemetery laws and regulations as well as implementation of ethical approaches to the treatment of human remains. Our office recommends consulting the Advisory Council on Historic Preservation’s Policy Statement on Burial Sites, Human Remains, and Funerary Objects, see https://www.achp.gov/digital-library-section-106-landing/achp-policy-statement-burial-sites-human-remains-and-funerary.

Professional Examination Plan:

Our office recommended as a permit condition that a professional examination or preservation treatment plan be provided for review and approval by our office and DES-BCM, related to the irretrievable loss caused by the proposed demolition of the Coming Street YWCA building, a Significant Site under the Coastal Management Program.

Based on our review of the revised draft Professional Examination Plan portion of the document, **our office recommends as a revised permit condition that a Professional Examination Plan be developed and implemented in consultation with our office, the YWCA of Greater Charleston Chapter, and the City of Charleston, until approval and completion of said Plan's tasked components is documented in writing by the SHPO. We also recommend providing emailed updates regarding the tasked components outlined under the Professional Examination Plan every six (6) months until completion is documented in writing by the SHPO.**

Our office recommends that the conditioned Professional Examination Plan be developed and provided as a standalone document, not as a part of the Archeological Work Plan. Please provide a revised standalone Professional Examination Plan taking into account our comments below.

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

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

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

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

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

for Project 205 or any other project. We do have a Programmatic Agreement with the College regarding the management of state owned or leased National Register listed properties, but this Programmatic Agreement is not applicable to Project 205 or any federally assisted project or state SCDES-BCM permitted project. Our advisory role to SCDES-BCM could be potentially incorporated, see https://scdah.sc.gov/historic-preservation/programs/review-compliance/sc-des-bcm-review-process for more information.

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

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

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

the measured drawings and field notes electronically; no hard copy will be required. We will accession the written history report, photographs, and drawings electronically into the State Archives. We recommend that the cited archival bond copies be provided to and retained by the College of Charleston Libraries.

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

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

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

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

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

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

Geophysical Work Plan, and Archaeological Work Plan:

The revised *Geophysical Work Plan, and Archaeological Work Plan* (also titled within the document as Cemetery Relocation Work Plan) appears to reflect revisions in response to our prior September 5, 2025 comments and recommendations, but the overall work plan components would benefit from additional organization, detail, thoroughness, and clarity in keeping with our prior comments. The work plan components feel as they deserve more depth, consideration, and careful study, accounting for the sensitive nature of the proposed work affecting the acknowledged Potters Field/Second Official Municipal Cemetery, whose proposed removal has received much public interest and concern.

Our office recommended as a permit condition that a revised *Archaeological Work Plan* be provided to this office and DES-BCM for review and approval prior to any ground

disturbing activities and beginning any work. This condition still applies. Our office's technical comments on the *revised Plan* components are listed below and should be incorporated into another revised draft provided for review:

It appears that, in keeping with our prior review comments and recommendations, that the Owner/Applicant has two options for the development of applicable work planning documents associated with the overall proposed project -- one, develop and provide three separate planning documents:
-one plan for the Professional Examination Plan related to the demolition of the Coming Street YWCA/a Significant Site as discussed above,
-a second plan for the Archaeology Work Plan (including Geophysical work),
-and a third plan for a Cemetery Relocation Work Plan (we would suggest a different title though).
There naturally would be some overlap and repetition between the planning documents, but the one document as currently provided blends the three tenets of the overall project, which reads unclearly. The organization of the Archaeology Work Plan, which only appears as a title in the Submission, has suffered as a result. If one overarching plan is to be retained for the archaeology and cemetery work, i.e. the second option, then it needs much clearer organization, detailed overarching protocols and procedures, and references to such protocols and procedures throughout. We are not promoting a lengthier document for the sake of length, but a planning document (or documents) that reads to either a cultural resource professional or to a member of the public as a plan that has been well thought out, consistent, has realistic and definable metrics, and that reflects the significance and sensitivity of the cultural resources.

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

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

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

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

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

We recommend stopping work and providing reporting to us at the end of Stage 1 (monitoring report) and Stage 2 (GPR report), allowing for consultation with all project stakeholders as well as presenting the findings (absent sensitive locational data) to date to the public prior to proceeding further with additional work stages. We further recommend that an alternative should be provided for in the work plan staging by the Owner/Applicant to reconsider the entire project based on the results of Stage 1 and Stage 2 work, at minimum. Namely, not proceeding with any further removal, excavation, or investigation, or the proposed removal, excavation, or investigation, allowing for the development of alternative plans for the site, in consultation with our office and all stakeholders. Alternative plans should include consideration of avoidance and preservation of the burial ground, carefully capping and greenspacing the site for use as a commemorative community space.

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

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

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

Stage 3-Mechanical Excavation:

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

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

Stage 5-Burial Removal & Documentation:

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

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

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

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

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

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

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

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

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

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

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

No approved plan, regardless of the amount and detail of review, can account for all outcomes or concerns that may arise over the course of a project involving the proposed excavation and removal of potentially hundreds or thousands of graves, associated grave goods, artifacts, and/or cultural features. Our office would anticipate post-plan approval consultation and

additional measures, whether these are expressed through unanticipated discoveries, or through consultation with the public and stakeholders, reflecting desires or outcomes for additional reporting and/or analysis (destructive or nondestructive), conservation, or historical study or commemoration.

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

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

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

Sincerely,

John D. Sylvest
Supervisor of Survey and Review & Compliance
State Historic Preservation Office (SHPO)
SC Department of Archives & History
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Columbia, SC 29223
803.896.6129
https://scdah.sc.gov/historic-preservation

From: Schwebler, Justin <Justin.Schwebler@terracon.com>
Sent: Wednesday, October 1, 2025 4:25 PM
To: Sylvest, John <JSylvest@scdah.sc.gov>
Cc: Larsen, Robert <RLarsen@scdah.sc.gov>; Johnson, Elizabeth <EJohnson@scdah.sc.gov>; Sara W. Barbagallo <sara.barbagallo@des.sc.gov>; Benjamin F. Thepaut <benjamin.thepaut@des.sc.gov>; Gary Jensen <garyj@adcengineering.com>; Chris Cook <chrisc@adcengineering.com>; Worrell, Laura Lee <worrellll@cofc.edu>; Schultz, Cristi <schultzca@cofc.edu>; Jennifer Papa <jenniferp@adcengineering.com>; Dorn, Mills <Mills.Dorn@terracon.com>; Russ, Terri A <Terri.Russ@terracon.com>; Nelson, Blue <Blue.Nelson@terracon.com>; Boschi, Dave <Dave.Boschi@terracon.com>; Rothenberg Jill P. <jill.rothenberg@des.sc.gov>
Subject: Project 205 New Construction: Professional Examination, Geophysics, and Archaeology Work Plan

Good afternoon John, et al.

Attached is the Cultural Resources work plan for "Project 205 New Construction," DES-BCM Reference No. **HQE-MAZM-OBJ2E**. This includes a work plan for the Professional Examination of 106 Coming St, the Geophysical work plan for the site, and the Archaeological work plan. There is also an appendix with relevant supporting documents that were requested.

If you have any questions or recommendations, please do not hesitate to reach out to us.

Thank you for your time and consideration.

Respectfully submitted,

Justin Schwebler

Justin Schwebler, MSHP
Senior Scientist I Environmental & Cultural Resources

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From: Sylvest, John <JSylvest@scdah.sc.gov>
Sent: Wednesday, February 18, 2026 5:15 PM
To: Schwebler, Justin <Justin.Schwebler@terracon.com>; Larsen, Robert <RLarsen@scdah.sc.gov>; ejohnson <EJohnson@scdah.sc.gov>
Cc: Worrell, Laura Lee <worrellll@cofc.edu>; Russ, Terri A <Terri.Russ@terracon.com>; Dorn, Mills <Mills.Dorn@terracon.com>; Sara W. Barbagallo <sara.barbagallo@des.sc.gov>; Benjamin F. Thepaut <benjamin.thepaut@des.sc.gov>
Subject: RE: Project 205 New Construction Work Plan Submittal

Justin, Sara,

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

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

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

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

Our comments on these documents do not denote acceptance or approval of the removal of human remains or of a potential mass burial ground. It is the responsibility of the Owner/Applicant, the College of Charleston, to comply with all applicable cemetery laws and regulations as well as implementation of ethical approaches to the treatment of human remains. Our office recommends consulting the Advisory Council on Historic Preservation's Policy Statement on Burial Sites, Human Remains, and Funerary Objects, see https://www.achp.gov/digital-library-section-106-landing/achp-policy-statement-burial-sites-human-remains-and-funerary.

1) SCDES-BCM public meeting and hearing of November 18, 2025 and the College's response to the public comments

2) Community Engagement Council (CEC) meeting minutes received to date: November 12, 2025, December 4, 2025, and January 8, 2026

3) *Archaeological Monitoring Report, College of Charleston, Coming Street Commons, Charleston, South Carolina* (dated and received January 6, 2025)

4) *Historic Research and Geophysical Assessment, 106 Coming Street and 99 St Philip Street, Charleston, South Carolina* (S&ME, Inc., dated November 12, 2024), received November 25, 2025

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

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

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

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

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

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

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

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

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

proposed work plan methodologies, in accordance with applicable state, federal, and cultural resource management standards and guidelines.

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

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

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

The College's response under 2) also included the notion of a "harm avoidance" review and a summary of requested alternatives analysis, i.e. alternative locations for the provision of student housing that the College considered over the last six years or decade. A "Harm Avoidance Assessment" is now appended to the work plans we received on January 9, 2026. We appreciate the requested alternatives analysis identifying other properties that the College has looked at over the past several years to provide student housing. The analysis does raise the question of at what point the Project may become financially infeasible. Has the College accounted for the financial costs of a potential multi-year or multi-decade cemetery removal project, as well as potential commemoration project costs? Could these financial costs and costs to the community potentially outweigh the benefits of the housing project? We are concerned that the proposed work plans may not encompass the potential professional archaeological staffing levels, length of time, and costs that it could take to properly steward such a resource and project to completion.

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

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

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

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

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

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

Additionally, SHPO notes the soil stratigraphical profiles and assessment were recommended to provide anticipatory soil profiles for future excavations, at a minimum, this information should be cited within the Cemetery Work Plan to provide demonstrable evidence of expected soil profiles in areas surrounding the southwest portion of the tract (surrounding soil probe B-13), central portion of the tract (surrounding soil probe B-14) and the northeast portion of the project tract (surrounding soil probe B-15).

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

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

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

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

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

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

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

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

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

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

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

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

--Provided there are no other coordinating party comments on the Plan, then SHPO will accept the plan as revised and resubmitted based on these and the comments provided above and to

date, as final. Additional consultation with the SHPO will be needed if the Plan changes based on coordination with other parties or if the proposed building demolition does not move forward.

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

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

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

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

We also believe the Work Plans should include and account for an Exploratory Stage, Stage 4, that will likely be needed or recommended by our office to investigate the results of the monitoring efforts and/or GPR survey results and review, accounting for potential test unit excavations, soil coring, auguring, probing, soil penetrometer testing, or trench excavation in certain areas, to better define the presence of burials or features, before beginning the currently proposed Stage 3. This Stage 4 should be directly consulted with our office prior to the initiation of any fieldwork associated with this stage. Upon completion of the aforementioned Stage 4, our office recommends a complete stoppage of work and a meeting between the College, SHPO, SCDES-BCM, and Terracon to discuss all subsequent findings from the preceding stages of work and what methodological changes will be required for the Archaeological Work Plan and Cemetery Work Plan and excavation of the entire archaeological site and Potter's Field/Second Official Municipal Cemetery.

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

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

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

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

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

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

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

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

--Pg. 6, In addition to gathering standardized osteometric data, should any disarticulated human remains be noted, i.e. not clearly present in a singular burial context, at a minimum, an initial Minimum Number of Individuals (MNI) analysis, should be calculated. This should be conducted within Stage 4, Archaeological Analysis; while stated in the Cemetery Work Plan, this should likewise be stated in the Archaeological Work Plan, so both documents are methodologically consistent.

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

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

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

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

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

--Pg. 11, fourth paragraph, and pg. 18, bottom paragraph, recommend revise second sentence to: "Terracon will not proceed with exhumation or removal of burials, human remains, or grave

goods until one, the SHPO is given the opportunity to review geophysical data and potential anomalies/potential burials resulting from the proposed Stage 1 and 2 geophysical surveys, two, until a research design and Cemetery Work Plan is reviewed and approved by SHPO incorporating the data from the aforementioned geophysical work, monitoring, and exploratory work to alter proposed excavation methodologies in the Cemetery Work Plan, as necessary, and three, until the City of Charleston approves the removal of the cemetery or burial ground and provides the College, SHPO, and SCDES-BCM a copy of the approval documentation. This statement should also apply to the second sentence under Stage 3 on pg. 19, and in the Cemetery Work Plan on pg. 4.

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

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

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

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

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

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

--Pg. 19, Site Security, “decedents”, spelling.

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

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

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

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

Related, again, has the governing body with jurisdiction over the burying ground provided an opinion regarding the removal of graves or relocation of the burying ground, especially for a public municipal cemetery that they were responsible for establishing? Namely, we understand that the local governing body is aware of the Project, but have they provided a list of requirements to the College for how the College is to petition for the removal of the Potter's Field/Second Official Municipal Cemetery that could be included in the Cemetery Work Plan?

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

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

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

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

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

--Pg. 6, General Grave Excavation and Documentation, Our office concurs with the generalized excavation methodologies of excavating 5-by-5 meter excavation blocks, vertically in 10cm natural strata levels, However, our office concurs the potential scope of these excavations will likely be unique in scope and could require multiple methodological changes as the undertaking unfolds due to the potential uncertainty of comingled / disarticulated remains. For future reference on potential methodological changes, our agency cites the *Pheasant Wood*

Fromelles: Report on Evaluation of WWI Mass Graves & Digging Hallowed Ground: As demonstrated within the archaeological excavations at Fromelles, conducted by the University of Glasgow in 2008 & Tony Pollard, demonstrating successful methodological utilizations of trenching units to identify and excavate mass burials containing high quantities of comingled / disarticulated human remains. Depending on the results of the initial first two or three 5-by-5 meter grid blocks and if any standardizing findings can be calculated, trenching 5-by-1 meter units could be useful.

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

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

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

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

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

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

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

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

SHPO recommended conditions:

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

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

Recommended conditions should include and account for:

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

Stage 1 – Conduct GPR survey prior to any ground disturbance

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

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

Stage 4 – Exploratory stage

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

Stage 6 – Site excavation

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

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

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

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

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

Thank you for the opportunity to comment on this project. Please refer to SHPO Project Number 25-JS0212 in any future correspondence regarding this project. If you have any questions, please contact me at (803) 896-6129 or jsylvest@scdah.sc.gov; for archaeological questions

contact Robert Larsen at (803) 896-6181 or rlarsen@scdah.sc.gov. We are happy to meet and discuss further our comments and recommendations.

Regards,

John D. Sylvest
Supervisor of Survey and Review & Compliance
State Historic Preservation Office (SHPO)
SC Department of Archives & History
8301 Parklane Road
Columbia, SC 29223
803.896.6129
https://scdah.sc.gov/historic-preservation

From: Schwebler, Justin <Justin.Schwebler@terracon.com>
Sent: Friday, January 9, 2026 11:33 AM
To: Sylvest, John <JSylvest@scdah.sc.gov>; Larsen, Robert <RLarsen@scdah.sc.gov>
Cc: Worrell, Laura Lee <worrellll@cofc.edu>; Russ, Terri A <Terri.Russ@terracon.com>; Dorn, Mills <Mills.Dorn@terracon.com>; Sara W. Barbagallo <sara.barbagallo@des.sc.gov>; Benjamin F. Thepaut <benjamin.thepaut@des.sc.gov>
Subject: Project 205 New Construction Work Plan Submittal

Good afternoon Robert and John,

Please see the attached Professional Examination Plan, Archaeology Work Plan, Cemetery Work Plan, and Commemoration Plan for SHPO Project Number 25-JS0212, SCDES-BCM Reference No. HQE-MAZM-OBJ2E. Please reach out if you have comments or questions regarding the attached plans.

Project205 New Construction-ArchaeologyWork Plan_Jan2026.pdf
Project205 New Construction-CemeteryWork Plan_Jan2026.pdf.pdf
Project205 New Construction-Commemoration Plan_Jan2026.pdf
Project205 New Construction-Professional Examination Work Plan_Jan2026.pdf

Regards,

Justin Schwebler

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SOUTH CAROLINA DEPARTMENT OF
ARCHIVES & HISTORY

January 29, 2026

Brian R. Turner, President & CEO
Preservation Society of Charleston
147 King Street
Charleston, SC 29401

Re: Strangers and Negroes Burying Ground/Potter's Field, 180 Calhoun, 106-124 Coming, and 35-37 Vanderhorst streets, Charleston, Charleston County

Dear Mr. Turner:

Thank you for submitting a Preliminary Information Form for the Strangers and Negroes Burying Ground in Charleston, Charleston County and thank you for your patience during our review. While we understand the Preservation Society's interest in establishing the historic significance of the burying ground, we do not currently have sufficient information to determine if the site is individually eligible for listing in the National Register of Historic Places under Criterion D, or if it contributes to the National Register-listed Charleston Historic District or its eligible expansion under that criterion, as explained below. The proposed "Project 205 New Construction" by the College of Charleston, located on part of this property, is currently under State Historic Preservation Office (SHPO) review, as our office is responsible for advising the South Carolina Department of Environmental Service's Bureau of Coastal Management (DES-BCM) about the potential impact of development on historic and archaeological sites in the coastal zone. A determination on whether or not the property is eligible for National Register listing may ultimately be made as part of this review and compliance process.

Guidance from the National Park Service (NPS) does not provide for documentary evidence alone as justification for determining an archaeological site eligible for listing in the National Register. As such, the lack of current archaeological evidence at the burying ground presents a barrier to making a determination of eligibility under Criterion D. National Register Bulletin 36: Guidelines for Evaluating and Registering Archeological Properties identifies three methods by which eligible archaeological sites may be identified: archaeological survey (i.e. test excavation), surface patterning of artifacts and features, or subsurface patterning of artifacts and features using non-destructive techniques, such as ground-penetrating radar (GPR).

Test excavation is proposed and under review for "Project 205" but has not yet occurred; due to later development we currently have no surface evidence related to the burying ground; and no conclusive GPR survey has been conducted to date. Due to post-1807 development on the site, GPR may not be able to provide sufficient datasets to evaluate the integrity of any burials which may be present prior to the hand excavation of test blocks. Lacking this evidence, hand excavated blocks may be the only possible method to determine the integrity of the burying ground.

The importance of the burying ground's history is well established by the documentary record, but the National Register program requires a property to have both a significant association and historic integrity. While there is excellent and extensive evidence of this property's use as a cemetery from the 1790s through 1807, there is also clear documentation of substantial later ground disturbance at the site. Post-1807 development on the former burying ground may have destroyed the site's historic integrity. Though the effect of multiple periods of ground disturbance on the property's historic integrity remains unclear, ground disturbance at the site may have compromised the site's vertical stratigraphy and disarticulated any human

interments present. Understanding the extent of this impact is critical for making a determination on the property's eligibility. In order to remain eligible after ground disturbance, the activity areas or the important information at the site must still be discernable. Otherwise, the site has lost integrity of location and design, two of the most critical aspects of integrity for listing under Criterion D.

The burying ground is located partially within the National Register-listed Charleston Historic District and partially within a proposed expansion to that district determined eligible by the Keeper of the National Register in 1989. The National Register Database compiled by NPS lists Historic – Non-Aboriginal (i.e. Historic Archaeology) as an area of significance for the district. It is our understanding that archaeological sites dating from the period of significance (1700-1941) and retaining historic integrity may be considered contributing to the district or its eligible expansion. However, as described above, we do not currently know if the burying ground retains integrity as an archaeological site, and therefore cannot say whether or not it contributes to the listed Charleston Historic District or the eligible expansion area.

Although we do not have sufficient information to make a determination under Criterion D, we have determined that the burying ground is not eligible under Criterion A. The property cannot be eligible under Criterion A because it no longer represents its important historical associations under that criterion. While some archaeological sites are able to be listed under criteria other than D for information potential, National Register Bulletin 36 describes a site that has been extensively plowed and redeveloped (both on and around the site) as an example of a property that would not have integrity under Criterion A. As with the example in the Bulletin, the loss of grave markers, paving and construction on the site, and development of the surrounding area after 1807 have altered the burying ground such that it no longer conveys its important historical associations under Criterion A.

Several buildings located on the site of the burying ground are located within a National Register-listed or eligible historic district, and one is individually eligible for listing. The buildings at 110, 114, 116, 120, 122, and 124 Coming Street, as well as 37 Vanderhorst Street contribute to the listed Charleston Historic District. 35 Vanderhorst Street is within the eligible expansion area, but was inventoried as non-contributing due to extensive alterations when the eligibility determination was made in 1989. SHPO determined the YWCA at 106 Coming Street individually eligible for listing in September 2025. The YWCA is eligible under Criteria A and B at the local level under the areas of Social History, Ethnic Heritage: Black, Social History: Civil Rights, and Other: Women's History.

We thank you for your interest in the National Register program and regret that we are not able to provide a determination for the burying ground at this time. If you have any questions about our decision, please contact me at (803) 896-6179, or by email at vharness@scdah.sc.gov. For questions regarding SHPO review of the proposed project on the site, please contact John Sylvest at (803) 896-6129 or jsylvest@scdah.sc.gov.

Sincerely,

Virginia E. Harness
Architectural Historian & National Register Co-coordinator
State Historic Preservation Office

Cc: Anna-Catherine Carroll, Director of Advocacy Initiatives, Preservation Society of Charleston

Appendix B: Procedural Summary Matrix and Legend

PROJECT 205 - PROCEDURAL SUMMARY MATRIX

Stage		Reference Work Plan & SWPPP	Purpose	Key Activities & Methods	Predecessor	Successor	Stakeholders	Deliverables / Reporting	Work Stop Required for SHPO	Notes & Dependencies
0	YWCA Mitigation Documentation	(1) Professional Examination	Mitigation of YWCA loss to include measured drawings, photography, compiled historic report, and select material salvage.	-Measured Drawings -Photography -Compiled/repackaged historic report -Select Material Salvage -Commemoration (BAR and PUD)	None	-Demolition -Commemoration Work Plan (3)	SCDES-BCM/SHPO YWCA CEC	-Bi-Annual YWCA Update Memorandum -Measured Drawings accepted by SHPO prior to demolition.	**Yes** Measured drawings to be approved prior to demolition. **14 Day Review**	
1	Pre-Disturbance GPR Survey	(2) Archaeology Work Plan (Archaeological Monitoring)	Identify site complexity and features prior to any ground disturbance using GPR.	-Independent (non-Terracon) GPR -Prepare PreDisturbance GPR Report.	None	-Consultation with SHPO/ SCDES-BCM to review results and adjust methods if needed. Submitted as an Amendment to associated Work Plan. -Commemoration Work Plan (3)	SCDES-BCM/SHPO CEC	-Pre-Disturbance GPR Survey Report with GPR results and implications for subsequent stages.	**Yes** Stoppage after Stage 1 for review and methodology adjustments. **30 Day Review**	
2.A	SWPPP Best Management Practices (BMPs) Perimeter Installation	SWPPP & (2) Archaeology Work Plan (Archaeological Monitoring)	Prepare the site for anticipated demolition and excavation. SWPPP Compliance prior to land disturbance (LDP) activities.	-Create site grid in GIS to which all subsequent archaeological and geophysical activities will be georeferenced -Install SWPPP BMPs: perimeter fencing, silt fencing, tree/monitoring well protection, and inlet protections. -Establish site security and signage -Archaeological Monitoring -Applicable Work Plan protocol, Permits, Laws, and SC Codes apply throughout project work.	-Work Plans resubmitted with concurrence from SHPO, based off review comments #3. -LDP Permit -CZC Certification -MS4 -NPDES -Funeral Director Engagement	-Stage 2.B -Commemoration Work Plan (3)	SCDES-BCM/SHPO CEC	-Weekly Archaeological Monitoring Technical Memorandums -Archaeological Monitoring Final Report (to include Stage 2.B) -Raw data generated by the GPR	**No** Notify SHPO if Construction stop work is required for consultation with Coroner (City of Charleston Ordinance Sec. 7.5-4). See work plan concerning 25 meters 'no work' clearance.	-Maintain security and sensitive media protocols. -Ensure SHPO is notified when monitors are in the field and in the event of unanticipated discoveries. -Any human remains or associated grave goods to be documented, covered in place, and protected until further excavation staging (4.a or 4.b). Not to leave site.
2.B	Geophysical Enabling Demolition	SWPPP & (2) Archaeology Work Plan (Archaeological Monitoring)	Clearing of onsite surface geophysics obstructions.	-Continuous archaeological monitoring during all site activities. -Includes site utility termination (at street), asphalt/concrete/gravel overlay removal, YWCA demolition including foundation, tree and utility pole cut to grade only. -Applicable Work Plan protocol, Permits, Laws, and SC Codes apply throughout project work.	-Stage 2.A	-Stage 3 -Commemoration Work Plan (3)	SCDES-BCM/SHPO CEC	-Weekly Archaeological Monitoring Technical Memorandums -Archaeological Monitoring Final Report (with restrictions on imagery of human remains if uncovered).	**Yes** Review of Final Monitoring Report for consultation for Geophysical methodology. Notify SHPO if Construction stop work is required for consultation with Coroner (City of Charleston Ordinance Sec. 7.5-4). **30 Day Review**	-Maintain security and sensitive-media protocols. -Ensure SHPO is notified when monitors are in the field and in the event of unanticipated discoveries. -Any human remains or associated grave goods to be documented, covered in place, and protected until further excavation staging (4.a or 4.b). Not to leave site.
3	Post-Removal Geophysical Survey	SWPPP & (2) Archaeology Work Plan (Archaeological Monitoring)	Re-survey after YWCA demolition and hardscape removal.	-Post-removal Geophysical Survey -GPR, Electromagnetic Induction, and RTK GNSS mapping survey and photogrammetry. -Results may alter Work Plan (2) methodologies as amendments. -Submittal of Research Design	-Stage 2.B	-Consultation for concurrence with SHPO/SCDES-BCM on post-removal Geophysical Survey results and site demolition archaeological monitoring results. -Research Design Approved -Amendments to Work Plan (2) based on Geophysical Report findings -30 Day Public Notice and City of CHS City Council request for removal of cemetery. -Commemoration Work Plan (3)	SCDES-BCM/SHPO CEC	(1)Post-removal Geophysical Survey Report (2)Research Design (3) Archaeology Work Plan Amendments	**Yes** Stoppage after Stage 3 for results review and concurrence on any methodology amendments. Required Research Design Approval. **30 Day Review**	30 Day Public Notice and City of Charleston City Council request for removal of cemetery (SC Code 27-43-10 to 27-43-40) ruling provided to all regulatory agencies for confirmation of compliance required prior to archaeology.
4.A	Archaeology - Ground-Truthing	SWPPP & (2) Archaeology and Cemetery Work Plan	-Ground-truth anomalies identified from post-removal geophysical survey findings in consultation with SHPO and SWPPP BMP remaining features to refine limits of burial areas/features. -Refine limits of burial areas/features.	-Predetermined areas for initial ground-truthing to include (1) no/minor disturbance (higher chance of intact burials), (2) Structure, (3) Utility Pathway, (4) Stacked/mass/comingled burial, (5) Area with no discernable subsurface features, (6) SWPPP remaining BMPs (dewatering basin and construction drives). -Methodology to vary based on feature.	-Stage 3 -Research Design -Funeral Director Engagement	-Continued Funeral Director Engagement -Commemoration Work Plan (3) -Artifact analysis, curation, and reporting (on-going throughout).	SCDES-BCM/SHPO CEC	-Bi-weekly Excavation Updates to SHPO	**No** Amendments to Work Plan methodology and Research Design will be on-going as needed in consultation with SHPO.	Maintain security and sensitive-media protocols.
4.B	Archaeology - Site Excavation	SWPPP & (2) Archaeology and Cemetery Work Plan	-Full archaeological excavation and burial recovery.	-Excavate 5×5 m blocks (~10 cm natural strata), allow method flexibility (e.g., trenching) for commingled/disarticulated contexts, when appropriate in consultation with SHPO through weekly technical memos. -Collect standardized osteometry data and calculate MNI -Document non-burial features and gather representative samples as appropriate. -Artifact analysis, curation, and reporting	-Stage 4.A	-Continued Funeral Director Engagement -Commemoration Work Plan (3) -Artifact analysis, curation, and reporting (on-going throughout).	SCDES-BCM/SHPO CEC	-Bi-weekly Excavation Updates to SHPO -Data Recovery Report Submittal to SHPO following completion of excavation and analysis. -Artifact(s) submission to SCIAA -Commemoration Work Plan (3)	**No** Archaeological Data Recovery Report Submittal requires final SHPO acceptance.	Maintain security and sensitive-media protocols.

Revision 3/19/2026

PROJECT 205 - PROCEDURAL SUMMARY LEGEND

Work Plan Reports/Deliverables/Engagement	Definition
YWCA - Measured Drawings	Architectural measured drawings documenting the YWCA; must be accepted by SHPO prior to demolition.
YWCA - Photography (Mitigation Set)	Photographic documentation of the YWCA used as part of mitigation for loss of the structure.
YWCA - Compiled/Repackaged Historic Report	A consolidated historic report assembled as part of the YWCA mitigation deliverables.
YWCA - Select Material Salvage Plan/Record	Identification and salvage of selected materials for mitigation/commemoration purposes.
Bi-Annual YWCA Update Memorandum	Memorandum of YWCA commemoration planning, engagement, and general updates to be sent to SHPO.
Pre-Disturbance GPR Survey Report	Report documenting ground-penetrating radar methodology and results prior to any ground disturbance.
Research Design	Formal research design submitted/approved post-geophysical work and concurrently with post-removal geophysical survey report to establish historical context, theoretical framework, research questions, and comparative studies (case studies).
Work Plan Amendment(s)	Formal change, modification, or addition made to any Work Plan for the purpose of clarifying, updating, correcting, or improving content. An official part of the original document once adopted and is used to reflect new information, evolving circumstances, or stakeholder input while maintaining the integrity of the underlying framework of the original Work Plans. For notification and ratification for approved Amendments methodology see Archaeological Work Plan or Cemetery and Commemoration Work Plan.
Weekly Archaeological Monitoring Technical Memorandums	Weekly technical memos issued during monitored activities (e.g., SWPPP BMPs, demolition, utility terminations), documenting findings and status with field updates (restrictions on imagery of human remains if encountered).
Archaeological Monitoring Final Report	Final report consolidating weekly monitoring memo results and associated conclusions to inform successor activities and methodologies.
Post-Removal Geophysical Survey Report	Final report produced after demolition/hardscape removal to refine anomaly mapping under cleaner conditions in consultation and concurrence with SHPO.
Bi-Weekly Excavation Updates to SHPO	Updates due every two weeks and must reflect the sequential two-week period just completed sent to SHPO during ground-truthing and excavation phases; used to consult on methodological adjustments and may result in work plan amendments.
Archaeological Data Recovery Report	Report submitted after completion of excavation and analysis; final SHPO acceptance required.
Permits / Laws	**Definition**
SCDES-BCM: Coastal Zone Consistency Certification (CZC)	Review of projects in eight coastal counties to ensure consistency with the South Carolina Coastal Zone Management Program and associated enforceable policies. The review ensures balance of development and conservation of coastal resources such as wetlands, cultural resources, state endangered/threatened species, and shellfish beds. Consultation with State Historic Preservation Office (SHPO) .
SCDES-BOW: National Pollutant Discharge Elimination System (NPDES)	Created by Section 402 of the 1972 Federal Clean Water Act. In 1975, the Bureau of Water received authority from the Environmental Protection Act (EPA) to administer the NPDES Permit Program in SC. The Bureau is responsible for the permitting, compliance, monitoring, and enforcement activities of the program.
Municipal Separate Storm Sewer System (MS4)	A system of conveyances that include, but are not limited to, catch basins, curbs, gutters, ditches, man-made channels, pipes, tunnels, and/or storm drains that discharge into Waters of the State. For these conveyances or system of conveyances to be recognized as an MS4, a state, city, town, village, or other public entity must own them. Designed to reduce the amount of sediment and other pollutants entering state waters from stormwater systems. Entities regulated by MS4 permits must develop a stormwater pollution prevention program and adopt best practices. Issued by the City of Charleston.
City of Charleston: Land Disturbance Permit (LDP)	A required authorization for development projects disturbing 0.5 acres or more, ensuring compliance with Coastal Zone Consistency (CZC) rules, NPDES Construction General Permit requirements, and the City's MS4 stormwater regulations. The LDP verifies that site design, grading, stormwater controls, and construction practices meet all regulatory standards for protecting waterways, natural resources, and downstream properties.
SC Code 27-43-10 to 27-43-40 Removal of Abandoned Cemeteries	Outlines procedures for the removal of abandoned cemeteries, including notice requirements, due care, community involvement, and the responsibilities of landowners and governing bodies.
City of Charleston Ordinance Sec. 7.5-4.	Establishes the City's local rules for the protection of graves and burial sites, including during ground disturbing activities.
S.C. Code of Laws Section 16-17-600	South Carolina's primary criminal statute protecting human remains, graves, cemeteries, burial vaults, and associated markers.
Stakeholders / Feedback Sources / Other	**Definition**
College of Charleston	The institutional owner and project sponsor for Project 205/Coming Street Commons. The College of Charleston is responsible for project planning, coordination with regulatory agencies, consultant oversight, public communication, and implementation of approved Work Plans. As steward of the site, the College facilitates information sharing and engagement with the Community Engagement Council (CEC), Tribal Nations, communities of care, and the broader public, while retaining decision-making responsibility in accordance with regulatory requirements, institutional policies, and applicable laws.

Stakeholders / Feedback Sources / Other	Definition
Terracon Consultants Inc.	The College of Charleston's archaeological and cultural resources consultant for Project 205/Coming Street Commons. Terracon is responsible for conducting archaeological investigations, preparing archaeological work plans and technical reports, coordinating compliance with applicable state standards and guidelines, and supporting consultation with regulatory agencies. Terracon assists the College in documenting site history, subsurface conditions, and cultural resources, including burial features, and in implementing approved methodologies for identification, documentation, and treatment consistent with South Carolina archaeological standards and nationally recognized best practices.
Community Engagement Council (CEC)	Established by the College of Charleston through a public, self-nomination process, the Community Engagement Council (CEC) serves in an advisory capacity to inform the ethical and community-centered dimensions of the project as a key stakeholder group. The CEC's role includes: (1) providing recommendations for SHPO consideration, (2) guiding ethical and culturally informed archaeological practice, (3) advising on culturally and spiritually appropriate care and treatment protocols, and (4) shaping memorialization and interpretive approaches. Information sharing and feedback structure can be found on the Project Information and Feedback Loop. Timeframes and specific dates for benchmarks and findings will vary throughout the project. Updates will be shared monthly in concurrence with CEC meetings as they evolve.
YWCA	As the prior owner and long-time steward of a portion of the proposed project site, the YWCA of Greater Charleston is a key stakeholder with respect to the memorialization and commemoration of the former YWCA building and the culturally significant people, events, and activities associated with the site.
SCDES-BCM/SHPO	State consulting and regulatory authorities concerning Coastal Zone Consistency Certification and Conditions.
Federal Tribes	Sovereign Tribal Nations recognized by the United States that may have historical or cultural connections to the project area. For Project 205, the College of Charleston has reached out to Federal Tribes to share information and invite input regarding culturally appropriate procedures should Indigenous remains or related materials be encountered during project activities.
Public	Members of the general community who have an interest in Project 205 or its outcomes but do not necessarily assert a direct ancestral, cultural, or historical affiliation with the site. The Public may include local residents, advocates, scholars, students, and other interested individuals. Public participation occurs through information sharing, Community Outreach Forums, CEC meetings, the project website, and other opportunities for comment and inquiry, and helps ensure transparency and broad awareness of the project.
Descendant Community	Individuals or groups who identify a genealogical, ancestral, or cultural connection to people buried at or historically associated with the site. For Project 205, no lineal descendants have been formally identified through archival research to date; however, the College acknowledges and welcomes engagement from individuals or communities who self-identify ancestral or historical ties and seeks to ensure their perspectives are respectfully considered. Community participation and engagement occurs through information sharing, Community Outreach Forums, CEC Meetings, the project website, and other opportunities for comment and inquiry, and helps ensure transparency and broad awareness of the project.
Community of Care	Individuals or groups who demonstrate a sustained interest in the respectful treatment, stewardship, and commemoration of the site based on cultural, historical, spiritual, ethical, or community-based connections, rather than documented genealogical descent. For Project 205, Communities of Care may include historians, faith leaders, advocacy organizations, educators, and community members who engage through the Community Engagement Council (CEC), public forums, and other outreach mechanisms to help inform culturally sensitive practices and memorialization.
Coming-street-commons.charleston.edu	Project website established by the College of Charleston as a platform for information sharing, community questions and input, and transparency throughout the project.
Community Outreach Forums	Publicly noticed events hosted by the College of Charleston to share Project 205 updates at key project benchmarks and SHPO-defined work stops. These forums are designed to provide transparent updates on project status, findings, and consultation and engagement through presentations and open discussions by the College, its consultants, and the broader community and feedback sources. Community Outreach Forums also provide space for the Community Engagement Council (CEC) or facilitators to share ongoing discussions and developing recommendations. The forums are intended to gather broader public and descendant-community input, facilitate questions and dialogue, and support the CEC's advisory role without establishing a separate descendant advisory body. The frequency and format of forums may evolve based on project progress and CEC input.
Project Information and Feedback Loop	The structured process through which Project 205 information, documentation, and regulatory reviews are communicated among the College of Charleston, consulting agencies, the Community Engagement Council (CEC), Tribal Nations, and the public. The Information Sharing & Feedback Loop is intended to support transparency, clarity of roles, and timely engagement, while maintaining appropriate sequencing between regulatory review, advisory input, and project decision-making.

Vocabulary	Definition
Coming Street Commons	A College of Charleston capital project proposed for the property at 106 Coming Street and 99 Vanderhorst St in Charleston, South Carolina. Project 205—also referred to as Coming Street Commons—encompasses the planned redevelopment of the former YWCA of Greater Charleston site and the historic Municipal Cemetery. The project includes archaeological investigation, respectful treatment and reinterment of human remains, and memorialization informed by regulatory review and community engagement for the future development of a student residence hall. “Project 205” is the official internal and regulatory project designation used in permitting, work plans, and agency correspondence, while “Coming Street Commons” is commonly used as the public-facing project name in outreach and informational materials.
Procedural Summary Matrix	The procedural matrix developed for Project 205 serves as a concise summary of the project’s complex, phased coordination between archaeological investigation and project development. It outlines the sequencing of work stages, associated tasks, and decision thresholds, while identifying participating stakeholders at each phase. The matrix also documents stop-work triggers, notification and reporting requirements, and pathways for evaluation and response should archaeological materials or human remains be encountered. By presenting these elements in an integrated format, the matrix functions as a practical reference tool to ensure that archaeological stewardship and development activities proceed in a coordinated, transparent, and accountable manner.
Procedural Summary Legend	The procedural legend is intended to supplement the overall project glossary and acronyms by establishing consistent project vocabulary and clarifying the intended meaning and application of key terminology.

Revision 3/19/2026