



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