
RE: Project 205 New Construction - CZC_DES_BCM Project Review Form and Archaeology Plan

From Sylvest, John <JSylvest@scdah.sc.gov>

Date Fri 9/5/2025 3:22 PM

To Schwebler, Justin <justin.schwebler@terracon.com>; RLarsen <RLarsen@scdah.sc.gov>;
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 2 attachments (720 KB)

CHAR_College of Charleston-Coming Street Commons-106 Coming Street-Archaeological Monitoring Plan-Revised
Draft_25RL0214.pdf; CHAR_College of Charleston-Coming Street Commons-106 Coming Street-Archaeological Monitoring Plan-
Draft_25RL0214.pdf;

Sara,

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

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

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

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

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

The State Historic Preservation Office (SHPO) is providing comments to Terracon Consultants, Inc. and the College of Charleston through the DES-BCM in accordance with the South Carolina Coastal Zone Management Act of 1976, as amended (South Carolina Code Title 48, Chapter 39), the “Policies and Procedures of the South Carolina Coastal Zone Management Program” and the 1996 Memorandum of Agreement between our Offices concerning implementation of the South Carolina Coastal Management Program. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes including those with state recognition, local governments, or the public.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Our office recommends that the *Archaeological Work Plan* incorporate and/or another planning document be developed and provided for review regarding the protection and holistic treatment of human remains. We

recommend stating more clearly that all historic burials are protected under at minimum South Carolina burial laws, citing these laws accordingly:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

remnants must be curated with SCIAA.

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

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

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

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

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

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

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

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

Sincerely,

John D. Sylvest
Supervisor of Survey and Review & Compliance
State Historic Preservation Office (SHPO)
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803.896.6129
<https://scdah.sc.gov/historic-preservation>

From: Schwebler, Justin <Justin.Schwebler@terracon.com>

Sent: Friday, July 11, 2025 3:42 PM

To: Larsen, Robert <RLarsen@scdah.sc.gov>; Sylvest, John <JSylvest@scdah.sc.gov>

Cc: 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; Dorn, Mills <Mills.Dorn@terracon.com>; Russ, Terri A <Terri.Russ@terracon.com>; Boschi, Dave <Dave.Boschi@terracon.com>; Jill.Rothenberg@des.sc.gov
Subject: Project 205 New Construction - CZC_DES_BCM Project Review Form and Archaeology Plan

Good afternoon Robert and John,

Attached is a DES-BCM Project Review Form for the College of Charleston student housing project titled "Project 205 New Construction".

The SHPO Project No. is 25-RL0214.

The DES-BCM Permit application has not been submitted yet, as we wanted to give you additional time to review the cultural resources component of the application before the permit submittal.

Embedded in the project review form is the architectural evaluation and historic research reports for 106 Coming St (former YWCA building), which provides historic background information for the project area. We have also attached an Archaeology Plan for review, regarding the former municipal cemetery located on site.

☐ [Project 205 DES_BCM Permit Application Cultural 1.pdf](#)

☐ [Project 205 New Construction Removal Plan-for SHPO.pdf](#)

Thank you for your time and consideration of this submittal, please do not hesitate to reach out with any questions or comments.

Have a good weekend,

Justin

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