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

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

Date Fri 11/7/2025 2:12 PM

To Schwebler, Justin <justin.schwebler@terracon.com>

Cc RLarsen <RLarsen@scdah.sc.gov>; ejohnson@scdah.sc.gov <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>; chrisc <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>; Jill P. Rothenberg <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 repackaging the contents into one overarching report in such a manner.
- The key sections of the report can be retained as-is.
- The items in Appendix A should be separated into their own appendices labeled A, B, C, etc. Please insert labeled introductory pages prior to each appendix, i.e. “Appendix - Photographic Survey and Reference Maps – Surrounding Context,” “Appendix – Historic Aerial Photographs.” The BVL report should be appended first, followed by the photographs appendices, then eventually by the drawings, then the maps and SHPO comments.
- Append copies of our comments provided to date on the proposed project to the report as an Appendix.
- Append the SHPO Statewide Survey Form and accompanying survey photographs to the report as an Appendix.
- Revise the report to include the statement of National Register eligibility by our office, in introduction and on page 32. Delete or completely revise the bottom two paragraphs on page 32, having the focus of the written history on the YWCA building.
- Page 3, delete the bottom paragraph regarding archaeological investigation plans associated with the overall project.
- Page 10, second paragraph, either add a period after “J” or spell out Julius; bottom, reference that the BVL “recent history” is appended as Appendix --.
- Include more historic documentation from the Avery Research Center’s collection in the report.
- Include more biographical information about the architect/builder.
- Include more biographical information about Christine O. Jackson.
- Include and reference photographs of the removed items cite on page 24 including the bronze memorial plaque, two iron window grates, and parking permit.
- Include photographs of window and door details to the appended exterior photodocumentation.

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

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

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

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

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

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

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

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

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

#### *Geophysical Work Plan, and Archaeological Work Plan:*

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

### Stage 3-Mechanical Excavation:

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

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

### Stage 5-Burial Removal & Documentation:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



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

**Sent:** Wednesday, October 1, 2025 4:25 PM

**To:** Sylvest, John <JSylvest@scdah.sc.gov>

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**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,



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